mainly to additional increases in the East, mostly in the North. The main factor in the increase is the relatively steady increase in forest area in many states; stocks follow this area trend. There is an additional increase in soil organic carbon (SOC) beyond that expected from increases in forest area. This additional SOC change is a function of forest type groups. The total effect in SOC net change over the entire interval (1990-2008) suggests there was a slight shift to low specific SOC density forest types in the 1990s relative to earlier and later inventories (see Annex 3.12 of EPA (2010) for SOC associated with forest types).

Table 4-3 Forest Area, Carbon Stocks, and Net Annual Stock Change by Forest Type Group[1]

		Carbon Stocks			Net Annual Stock Change		
	Forest Area	Biomass	Dead Plant Matter	SOC[2]	Biomass	Dead Plant Matter	Per Hectare
Forest Type	*1,000 ha*		*Tg CO_2 eq.*		*Tg CO_2 eq. Yr^{-1}*		*kg CO_2/ha*
East	**176,735**	**43,766**	**12,592**	**45,666**	**(321)**	**(35)**	**(18,820)**
Aspen/Birch	6,963	1,293	453	3,353	10.8	3.4	2,041
Elm/Ash/Cottonwood	8,805	2,116	488	2,963	(0.7)	1.7	113
Loblolly/Shortleaf Pine	22,901	4,757	1,447	4,622	(84.2)	(18.3)	(4,476)
Longleaf/Slash Pine	5,320	842	314	1,907	(9.0)	(1.2)	(1,919)
Maple/Beech/Birch	19,912	6,729	2,855	6,116	(28.8)	0.5	(1,420)
Oak/Gum/Cypress	9,716	3,177	569	3,606	5.3	3.2	867
Oak/Hickory	63,590	18,414	3,613	11,218	(240.8)	(35.1)	(4,339)
Oak/Pine	11,800	2,724	856	2,326	33.3	11.1	3,765
Pinyon/Juniper	3,575	245	190	499	n/a	n/a	n/a
Spruce/Fir	6,129	1,242	956	4,111	2.8	(0.3)	415
White/Red/Jack Pine	4,170	1,376	362	1,440	4.4	4.1	2,033
Woodland Hardwoods	7,441	304	158	1,773	n/a	n/a	n/a
Other Hardwood Type Groups	850	141	34	357	(7.9)	(1.5)	(11,022)
Other Softwood Type Groups	1,902	319	170	349	(6.2)	(3.0)	(4,879)
Nonstocked	3,661	86	128	1,024	n/a	n/a	n/a
West	**99,971**	**28,739**	**16,536**	**16,878**	**(11)**	**(12)**	**(9,784)**
Alder/Maple	1,353	503	162	556	n/a	n/a	n/a
Aspen/Birch	3,506	789	502	724	n/a	n/a	n/a
California Mixed Conifer	3,167	1,817	823	578	n/a	n/a	n/a
Douglas Fir	15,785	7,229	3,490	3,831	n/a	n/a	n/a
Fir/Spruce/Mountain Hemlock	14,756	5,929	3,541	2,560	n/a	n/a	n/a
Hemlock/Sitka Spruce	5,011	3,280	1,547	2,018	n/a	n/a	n/a
Lodgepole Pine	6,467	1,527	865	873	n/a	n/a	n/a
Other Western Softwoods	3,425	488	549	670	n/a	n/a	n/a
Pinyon/Juniper	19,890	1,995	1,616	1,493	(3.7)	(3.1)	(340)
Ponderosa Pine	9,313	2,008	1,128	1,236	n/a	n/a	n/a
Redwood	285	262	112	56	n/a	n/a	n/a
Spruce/Fir	383	39	55	87	n/a	n/a	n/a
Tanoak/Laurel	1,101	594	176	218	n/a	n/a	n/a
Western Larch	697	190	135	95	(3.1)	(1.7)	(6,937)
Western Oak	4,304	1,219	570	504	n/a	n/a	n/a
Western White Pine	112	31	17	19	n/a	n/a	n/a
Woodland Hardwoods	4,583	396	552	470	(4.0)	(7.4)	(2,506.5)
Other Hardwood Type Groups	1,163	315	135	249	n/a	n/a	n/a
Nonstocked	4,669	128	561	641	n/a	n/a	n/a
Total	**276,706**	**72,505**	**29,127**	**62,544**	**(332)**	**(48)**	**(28,603)**

[1]Net change is determined from the two most recent inventories for all forests. Stock change does not include soil carbon changes. Stocks and area are based on the most recent inventory per state. Tg CO2 eq. is teragrams carbon dioxide equivalent. Kg CO_2 is Kilograms carbon dioxide.
[2]SOC (soil organic carbon) does not include effects of past land use history.
Note: "n/a" Indicates not available because large area of comparable forest type groups is not defined for two surveys within the Forest Inventory Analysis database (FIADB v4.0). Totals over these columns should be interpreted accordingly.
Note: Parentheses indicate net sequestration. Other Hardwood Type Groups and Other Softwood Type Groups represent aggregates of minor type groups. However, "Other Western Softwoods" is a specific type group within the FIADB.

The transition from FIA's older periodic inventories to the current annualized inventories does not affect the estimates in an identifiable way. Both types of surveys provide estimates of quantities of forest land and forest characteristics on that land; we have identified and corrected for known differences occurring over time (Smith et al. 2010, EPA 2010).

4.2 Concepts and Conventions

For reporting purposes, carbon estimates in forest ecosystems are allocated to the following pools (Penman et al. 2003):

- Aboveground biomass, which includes all living biomass above the soil including stem, stump, branches, bark, seeds, and foliage. This category includes not only live trees, but live understory.
- Belowground biomass, which includes all living biomass of coarse living roots greater than 2 mm diameter.
- Dead wood, which includes all non-living woody biomass either standing, lying on the ground (but not including litter), or in the soil.
- Litter, which includes the litter, fumic, and humic layers, and all non-living biomass with a diameter less than 7.5 cm at transect intersection, lying on the ground.
- Soil organic carbon (SOC), all organic material, including fine roots, in soil to a depth of 1 meter but excluding the coarse roots of the belowground pools.

The two harvested wood products carbon pools are:

- Harvested wood products in use.
- Harvested wood products in solid waste disposal sites (SWDS).

Continuous, regular annual surveys are not available over the entire time period of interest for each state; therefore, estimates for non-survey years were derived by interpolation between known data points. Survey years vary by state and the list of survey years and data can be found in Table 2 in Smith et al. (2010). Thus, the national estimates in Table 4-2 are a composite of individual state surveys, broken out in more detail in Appendix Table C-1. The same process applies to forest area for each year – annual data are not available throughout the interval so annualized average information between inventory years is presented here (Smith et al. 2010).

4.3 Carbon Stocks and Stock Changes by Forest Type, Region, and Ownership

Total forest ecosystem areas, carbon stocks, and net annual stock change according to forest type group are listed in Table 4-3. Minor type groups in the East and West are pooled, for example, tropical and exotic hardwood groups in both regions. Carbon classifications in this table are for biomass, nonliving plant mass, and soil organic carbon. Biomass includes live trees plus live understory vegetation. Non-living plant mass includes standing dead trees, down dead wood, and the forest floor. Carbon estimates include aboveground and belowground components.

Estimates of stock change according to forest type group were developed by subdividing the state or sub-state classifications according to forest type group (USDA FS 2010) before

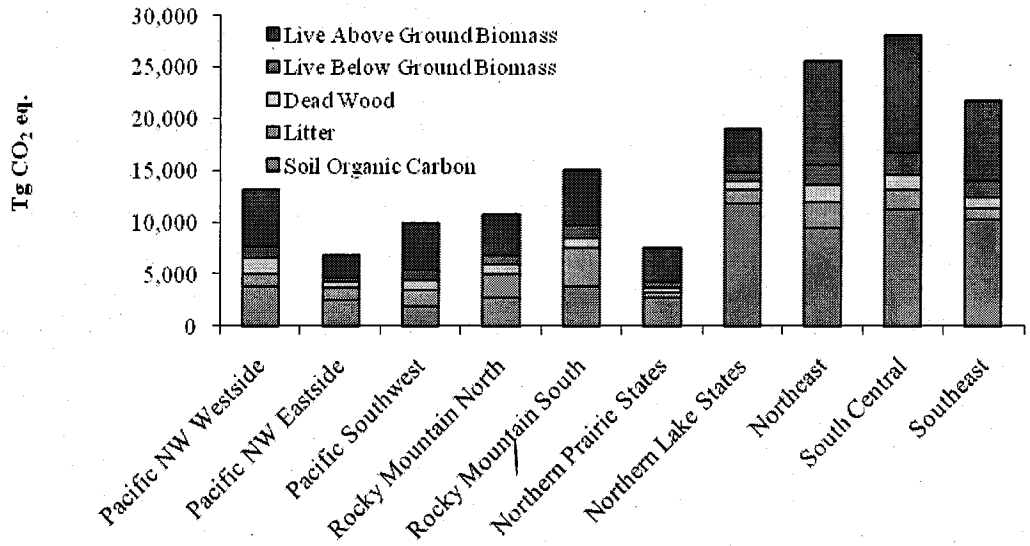
calculating annualized stock or stock change. Note that not all forestland includes at least two surveys in the current inventory format, which limits the estimates of change available in Table 4-3. Thus, change calculated for selected subsets does not necessarily add to totals calculated as more aggregate stocks.

Regional summaries were developed for the regions indicated in Map 4-3; the 10-region classifications are used in Figures 4-1 and 4-2, while the 4-region set is used for additional tables in the appendix. Total forest ecosystem carbon stocks are generally greater in eastern regions than in the West (Figure 4-1a). This is in contrast to regional average values for carbon density, which are greater in the West than in the East (Figure 4-1b). Mass of carbon per unit area is greatest in the Pacific Northwest-Westside and the Northern Lake States due to large pools of biomass and SOC, respectively. The most notable regional features in ecosystem pool carbon density are: greater carbon in biomass in the Pacific Northwest-Westside; greater SOC pools in northern regions; and smaller pools of down dead wood and forest floor in the South. Net annual stock changes are shown in Figure 4-2, which includes estimated changes in harvested wood product pools.

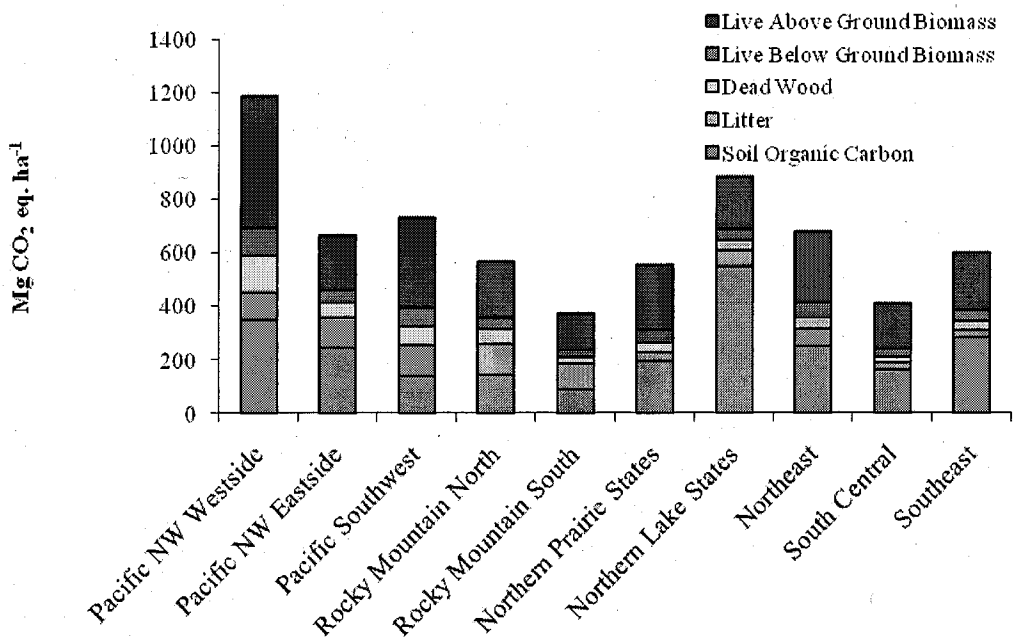
Forestland in the conterminous United States is distributed throughout the 48 States. Carbon density of live trees, both aboveground and belowground, is shown in Map 4-2, which illustrates both the spatial distribution of forest ecosystem carbon and average carbon density over the lower 48 States. Large areas of high live-tree carbon density include the Pacific Coast states and the Appalachian Mountains. This map is based on the most recent inventory data available per state. (State-wide summaries of total forest area and non-soil ecosystem carbon stock are presented in Appendix Table C-1.) This table also includes net change for area, non-soil ecosystem carbon stock, and stock of carbon in harvested wood products for 2008. Carbon stock change in harvested wood is allocated according to total roundwood removals per state reported for nominal year 2006 in the Timber Product Output tables available at USDA FS (2010). Calculated values for net annual change in forest ecosystem carbon reflect estimated carbon densities and forest areas reported in the two most recent surveys per state.

Figure 4-1

a) **Forest Ecosystem Carbon Stocks**



b) **Forest Ecosystem Average Stock Density**[1]



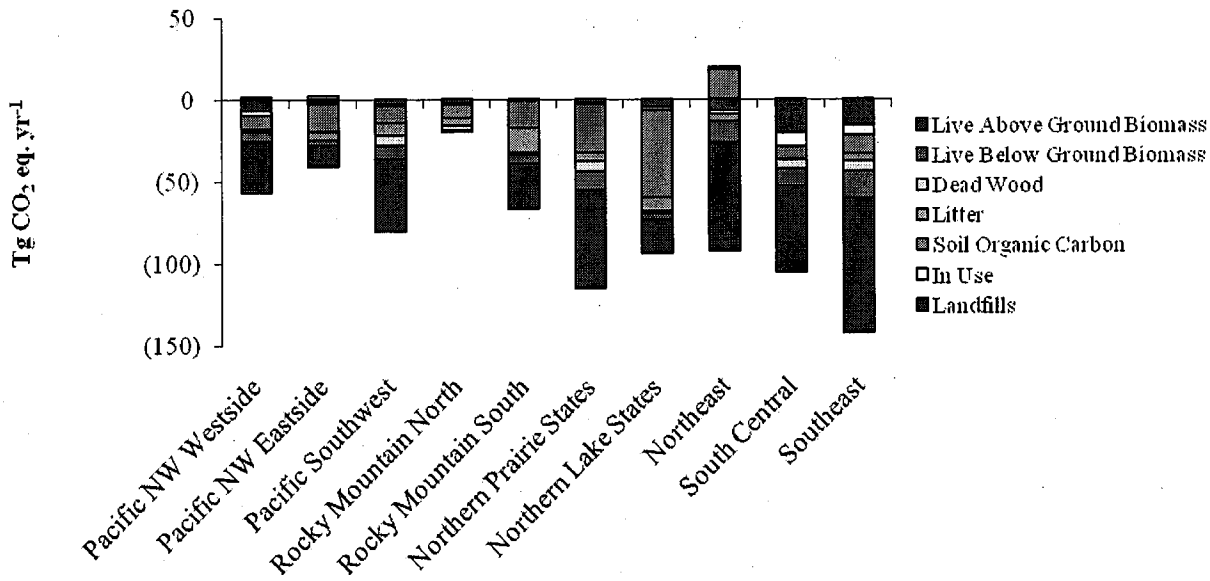
Note: Soil carbon does not include effects of land use history.

[1] Based on plot-level data from the most recent inventory available per state.

Tg CO_2 eq. is teragrams carbon dioxide equivalent; Mg CO_2 eq. ha^{-1} is Megagrams carbon dioxide equivalent per hectare.

Estimates of net annual change calculated as the difference between two successive inventories are sensitive to changes in forestland over the interval as well as changes in average carbon density. Even small differences in carbon density can contribute to large differences if the change is applied to large areas. Whether change in area or density is the controlling factor is dependent on the situation (Smith and Heath 2010). Most estimates of net ecosystem carbon change provided in Tables 4-2 and 4-3, Figure 4-2, and Appendix Table C-1 correspond well to changes in forest area. That is, net gains in forest carbon are most often accompanied by increases in forestland and vice versa. There are exceptions, and most of these involve net gains in forest carbon (negative flux) despite decreases in area. This is the case in Table 4-3 for Eastern Maple Beech Birch forests which are decreasing in overall area (data not shown), yet total carbon stock in biomass is increasing. Similarly, Appendix Table C-1 shows the pattern of

Figure 4-2
Net Annual Forest Carbon Stock Change[1]



[1] Based on interpolation and extrapolation after aggregating plot-level data to state totals.
Parentheses indicate a net sequestration. Soil carbon does not include effects of land use history.
Tg CO_2 eq. is teragrams carbon dioxide equivalent.

carbon stock trend counter to forest area trend in 16 of the lower 48 States listed. The two instances of net carbon loss accompanying area gains involve relatively low rates of area change (0.2% or less).

Additional tabular summaries of forest ecosystem carbon stocks are provided in Appendix Tables C-2 through C-5. The distribution of carbon stocks among forest age classes is shown in Appendix Table C-2 for privately owned and Appendix Table C-3 for publicly owned forests. The tables illustrate that the greater proportion of forest carbon stocks in the East is under private ownership whereas the greater proportion in the West is under public ownership. Distributions according to age are shifted toward older forests on public lands; this is the case for all four regions but is more apparent in the West. Similarly, distribution according to stand size class (Appendix Table C-4) shows a greater proportion in larger size class stands in the West.

Patterns of carbon stocks among forest types and ownerships are presented by forest ecosystem pools (excluding soils) in Appendix Table C-5. Ownership is classified as public or private for timberlands (forests of minimum productivity and available for harvesting). The remaining forestland, both public and private, is either reserved from harvesting or is considered less productive (and thus probably not managed for commercial wood products). The net annual stock change corresponding to Appendix Table C-5 is provided in Appendix Table C-6. Note that Appendix Table C-6 is affected by the same data limitations as discussed above for Table 4-3. For more information about forest inventory variables such as forest classifications of ownership, productivity, forest type, and stand size class, see Smith et al. (2009) and USDA Forest Service (2010).

A large proportion of non-forest trees in the United States is in urban areas – approximately 3% of total tree cover in the conterminous United States, with notable urban expansion projected in the future (Nowak and Walton 2005). Advances in design and deployment of trees in urban environments can provide significant fossil fuel savings for heating and cooling through microclimate management (Dwyer et al. 2000). Development of urban tree waste management and recycling processes and systems would reduce emissions and increase sequestration opportunities. Methods have been developed for estimating carbon sequestration rates for urban trees of the United States (Nowak & Crane 2002). Net flux of carbon into urban trees for 2008 is estimated to be -94 Tg CO2 eq. per year (EPA 2010).

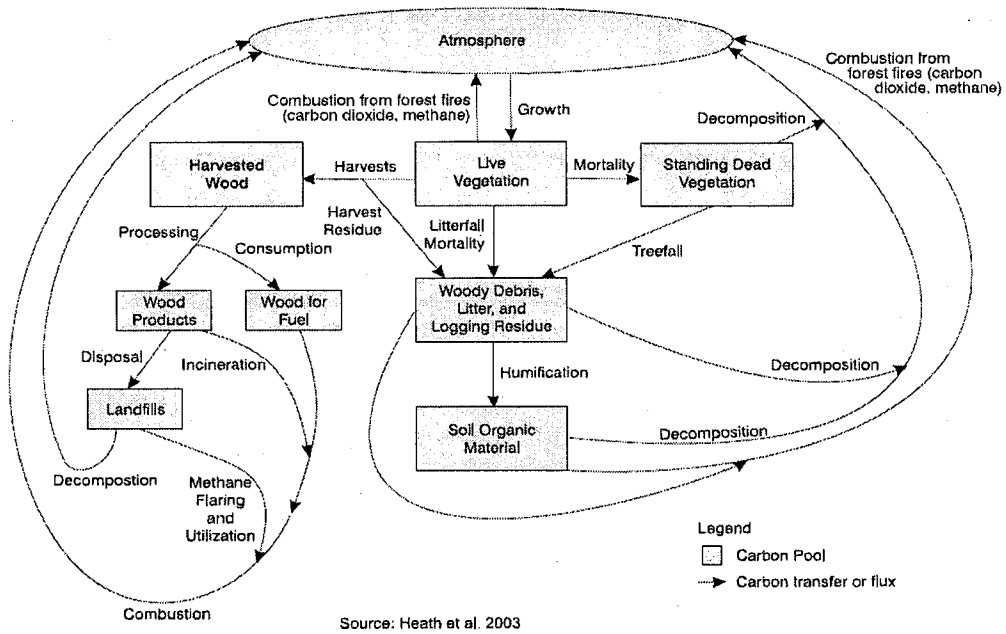
4.4 Mechanisms of Carbon Transfer

Carbon sequestration is a function of the continuous exchange of carbon dioxide between forest ecosystems and the atmosphere, which is illustrated by Figure 4-3. Forest carbon balance also includes some non-CO2 emissions, but the majority of exchange is in terms of CO2, which is the focus of this chapter. Tree growth results in the net accumulation of CO2 in forests (removal from the atmosphere), whereas other processes such as respiration, decomposition, or combustion emit CO2 to the atmosphere. Photosynthesis provides the energy for the conversion of carbon dioxide to organic carbon; this assimilation of CO2 by trees most often exceeds any simultaneous losses through respiration, resulting in net tree growth. Forests convert much of the accumulated carbon to wood, which stores carbon and energy. Processes that control the fate of wood grown in a forest largely determine the subsequent loss of CO2 to the atmosphere. Mortality and disturbance add to the pools of down dead wood and forest floor, which are subject to decay. Carbon can also be removed from forest ecosystems through runoff or leaching through soil. Mechanisms of relatively rapid carbon loss from specific forestlands include disturbances such as fire or the harvest of wood. However, a portion of the carbon in harvested wood is not immediately returned to the atmosphere, rather it is retained in wood products. Once in a product pool, the carbon is emitted as CO2 over time through combustion or decay of the wood product. Net release of carbon from wood products can vary considerably depending on the product, its end use, and the means of disposal (Heath et al. 1996, Smith et al. 2006, Skog 2008).

Forest management affects carbon stocks and stock changes by controlling mechanisms associated with carbon gain and loss (Houghton & Hackler 2000, Johnson & Curtis 2001). Forest management can be defined as activities involving the regeneration, tending, protection, harvest,

and utilization of forest resources to meet goals defined by the forestland owner. Management often focuses on more than one outcome and can vary by forest ecosystem, landowner objectives, and economic possibilities. Example goals, or expected outcomes, of management include productivity and resource conservation. Relatively passive management may include tree harvest and removal, followed by natural regeneration, or riparian area management such as consciously retaining a buffer strip of trees along a watercourse. Intensive management may consist of site preparation, improved stocking, species conversion, planting genetically improved

Figure 4-3. Summary diagram of forest carbon stocks and carbon transfer among stocks



Source: Heath et al. 2003

stock, application of pesticides or fertilizer, and improvement cuttings such as thinning or pre-commercial thinning.

Increased net carbon sequestration is generally associated with forest systems under improved forest management practices, although some practices may reduce carbon storage for a given site-age-type dynamic. Examples of improved management practices include afforestation, increased productivity, reduced conversion to non-forest uses, lengthened rotations in some systems, and increased proportion and retention of carbon in harvested wood products. Afforestation offers significant opportunities to capture and store carbon on lands that are not currently forested (Houghton & Goodale 2004, Woodbury et al. 2006). This is a particularly useful approach to increasing carbon sequestration for marginal agricultural lands. Similarly, reductions in conversion to non-forest land uses contribute to maintaining carbon stocks, particularly through the additional organic carbon storage in forest soils (Lal 2005). Sustainable short-rotation woody crops systems offer the opportunity to rapidly deploy new, faster growing genetic material, sequester carbon in the soil, add to the wood products pool, and provide energy feedstocks as fossil fuel offsets. Improvements in the management of wood products in use and in landfills provide a number of opportunities to reduce emissions and increase sequestration.

Continuing development of wood products can increase their use as substitutes for nonrenewable materials and extend their durability and thus expected lifespan (Perez-Garcia et al. 2005).

Some of the carbon in harvested wood products may remain sequestered for a long time before returning to the atmosphere, depending on the lifespan of the individual products. Emissions can occur from wood burned for energy, or from decay or burning of wood without energy capture (Figure 4-3). This distinction between the two paths for carbon emitted to the atmosphere is useful to assess potential displacement of other fuel sources. Average annual carbon emissions from harvested wood are estimated at 373 Tg CO2 eq. over the period 1990 through 2008 (EPA 2010, see Table A-220 of Annex 3.12). In 2008, it is estimated that 194 Tg CO_2 eq. was emitted by combustion of wood biomass to produce energy (EPA 2010). Net annual carbon sequestration via harvested wood, after accounting for these emissions, is presented in Table 4-2. Information about emissions released when processing or producing harvested wood carbon pools in the U.S. can be found in Heath et al. (2010).

4.5 Methods

Estimates of forest ecosystem carbon as reported here are based on the stock-change method, which uses forest inventory data to produce a series of successive carbon stock estimates for an individual state, for example (Penman et al. 2003, Smith et al. 2010). The FIA data consist of a series of annual partial surveys per state each year with re-measurements at 5- to 10-year intervals, depending on the state (USDA FS 2010). Carbon stocks for each forest classification, ecosystem carbon pool, and inventory are separately calculated and aggregated to total stocks for a specific year for each state. The term "survey" is used here to describe a complete inventory for a state, which is repeated at regular intervals. The inventories for some states are further divided into separate sub-state classifications for consistency in each consecutive series of carbon stocks. Net annual stock change (sometimes referred to as flux) is the difference between successive stocks divided by the interval of time between surveys. Carbon estimates for harvested wood products are based on a separate stock change method and input data that are not directly related to forest inventory data.

The overall goal in reporting these pools is to be as consistent as possible with: (1) the format and estimates provided in the previous USDA forest carbon inventory (Smith & Heath 2008); (2) current forest carbon estimates (EPA 2010, Heath et al. in press); and (3) the carbon estimation methods applied to the available inventory data. As a result, the sequence and identity of figures and tables describing forest carbon are similar to the previous inventory, but the estimates are updated to those in EPA (2010). Classifications, or groupings, of values within tables or figures have changed somewhat due to corresponding changes in forest inventories. Methods are summarized below, with additional details in EPA (2010), Skog (2008), and Smith et al. (2010).

Current forest survey data for the United States are available from the Forest Inventory and Analysis DataBase (FIADB), version 4.0 (USDA FS 2010). Surveys from the FIADB are supplemented with some older surveys from FIA Resources Planning Act Assessment (RPA) databases, which are periodic summaries of state inventories, along with older FIA tree-level data for some states. More complete information about FIA forest inventories is available on the Internet (USDA FS 2010). All FIADB surveys used for carbon stock estimates were obtained from the FIADB Web site on December 4, 2009. See Table 2 of Smith et al. (2010) for a list of the specific surveys used for the estimate provided here.

Carbon estimation factors (described below) are applied to the plot-level inventory data and summed to calculate carbon stocks for each survey of each state. Each survey is associated with an average year for field collection of data. Carbon stocks for each state or sub-state classification are assigned to those average years with net stock change based on the interval (in years) between the stocks. In this way, state-wide annualized estimates of ecosystem stock and change can be calculated and summed to U.S. totals as presented in EPA (2010) and Table 4-2. A similar approach was used to produce the additional estimates disaggregated by categories presented in the figures and tables.

Forest ecosystem carbon is estimated for each inventory plot as six separate pools: live tree, understory vegetation, standing dead tree, down dead wood, forest floor, and soil organic carbon. Live tree and understory are also allocated to aboveground and belowground portions. For each inventory summary in each state, each carbon pool is estimated using available conversion factors, which are generally based on empirical or process-based models (Birdsey & Heath 1995, Birdsey & Heath 2001, Heath et al. 2003, Smith et al. 2004). Coefficients are applied to the survey data at the scale of FIA inventory plots; the results are estimates of carbon density (Mg per hectare). These densities are then converted to CO2 equivalents. Live tree and understory carbon pools are combined as biomass in this inventory. Similarly, standing dead trees and down dead wood are combined as dead wood in this inventory. Definitions of forest floor and SOC correspond to litter and forest soils, respectively.

Tree carbon includes aboveground and belowground (coarse root) carbon mass of live trees. Separate estimates are made for whole-tree and aboveground-only biomass. Thus, the belowground portion is determined as the difference between the two estimates. Tree carbon estimates are based on equations in Jenkins et al. (2003) and are functions of tree species and diameter as well as forest type and region. Tree carbon in the RPA plots, which do not include individual tree data, are estimated from plot-level growing stock volume of live trees and equations based on Smith et al. (2003). Carbon mass of wood is 50% of dry weight (Eggleston et al. 2006). The minimum-sized tree included in the tree carbon pool data is one-inch diameter (2.54 cm) at breast height (1.3 meter). Understory vegetation is defined as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than one-inch diameter, measured at breast height. We estimated that 10% of understory carbon mass is belowground. This general root-to-shoot ratio (0.11) is near the lower range of temperate forest values provided in Penman et al. (2003), and was selected based on two general assumptions: (1) ratios are likely to be lower for light-limited understory vegetation as compared with larger trees, and (2) a greater proportion of all root mass will be less than 2 mm diameter. Understory carbon density estimates are based on Birdsey (1996). Coefficients used for estimating understory or the volume-based standing dead tree carbon are presented in Annex 3.12 of EPA (2010).

Dead wood includes down dead wood and standing dead trees. Down dead wood is defined as pieces of dead wood greater than 7.5 cm diameter, at transect intersection, that are not attached to live or standing dead trees. Down dead wood includes stumps and roots of harvested trees. Ratio estimates of down dead wood to live tree biomass were developed by FORCARB2 simulations and applied at the plot level (Heath et al. in press). The standing dead tree carbon pool includes aboveground and belowground (coarse root) mass. Estimates are based on Smith et al. (2003) and are functions of plot-level growing stock volume of live trees, carbon density of

live trees, forest type, and region. Coefficients used for estimating dead wood carbon are presented in Annex 3.12 of EPA (2010).

Estimates of forest floor and SOC are not based on carbon density of trees, but are functions of plot age, forest type, and region. Forest floor carbon is the pool of organic carbon (litter, duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. Estimates are based on equations of Smith and Heath (2002) applied at the plot level. Forest floor and woody debris remaining after harvests are also included as part of calculations of forest ecosystem carbon pools. Estimates of SOC are based on the national STATSGO spatial database (USDA SCS 1991, USDA NRCS 2006) and the general approach described by Amichev & Galbraith (2004). In their procedure, SOC was calculated for the conterminous United States using the STATSGO database, and data gaps were filled by representative values from similar soils. The SOC estimates are based on region and forest type only. Links to region and forest type groups were developed with the assistance of the USDA Forest Service FIA Geospatial Service Center by overlaying FIA forest inventory plots on the soil carbon map. Historical land use change effects are currently not included in the estimate of the soil carbon pool (Johnson & Curtis 2001, Woodbury et al. 2006). That is, soil carbon for areas which were cleared and plowed at one time, and then reverted to forest, are probably still accruing soil carbon. However, we currently assume that all forests of a given forest type within a region have the same amount of SOC. The regional averages for SOC according to forest type group are included in Annex 3.12 of EPA (2010).

The tabular forest carbon summary values are based on a short sequence of calculations, these are: (1) determine carbon density for individual inventory plots; (2) identify the date (year) associated with each survey based on when data were collected; (3) sum total carbon within each state or sub-state classification for each survey to get carbon stock according to specific classification and year; and (4) linearly interpolate, or extrapolate, to determine annualized stocks and net stock change (Smith et al. 2010). In this way, carbon stocks are calculated separately for each state based on inventories available since 1990 and for the most recent inventory prior to 1990. With this method, stock and flux since the most recent survey are based on extrapolation. Thus, the annualized estimates for 2008 will not exactly match the most recent data per state. In the results presented in this chapter, all estimates of 2008 net stock change (or flux) are based on the difference between the two most recent surveys (extrapolated values). Most values for carbon stock or forest area are based on the most recent data available for each state; the only exception is the set of annualized stocks provided in Table 4-2.

Calculations of carbon in harvested wood products are completely separate from the ecosystem estimates because the datasets and methods are largely unrelated. These estimates focus on carbon in wood removed from the forest; logging residues are part of the ecosystem pools. Carbon in harvested wood that is either in products in use or in products discarded in solid waste disposal sites (SWDS) is based on the methods described in Skog (2008). Estimates were developed for years from 1910 onward based on historical data from the USDA Forest Service (USDA 1964, Ulrich 1989, Howard 2001), and historical data as implemented in the framework underlying the North American Pulp and Paper (NAPAP, Ince 1994), the Timber Assessment Market, and the Aggregate Timberland Assessment System Timber Inventory models (TAMM/ATLAS, Haynes 2003, Mills & Kincaid 1992). From these data on annual wood and paper production, the fate of carbon in harvested wood was tracked for each year from 1910 through 2008; this included the change in carbon stocks in wood products, in SWDS, and carbon

emitted to the atmosphere. The carbon conversion factors and decay rates for harvested carbon removed from the forest are taken from Skog (2008). To account for imports and exports, the production approach is used, meaning that carbon in exported wood is counted as if it remained in the United States, and carbon in imported wood is not counted. The carbon stock changes presented in this chapter represent the net amounts of carbon that continue to be stored in a product pool. Allocation of the national estimates from EPA (2010) to regions or states is based on roundwood removals per state from the FIA Timber Products Output reports for RPA nominal year 2006 (see Other Reporting Tools at USDA FS 2010).

4.6 Major Changes Compared to Previous Inventories

The estimates provided in Table 4-2 reflect a substantial number of incremental changes in methods and data between EPA (2007) and EPA (2010) in terms of net stock change since 1990. The accumulation of newer inventory data for most states, including stocks for coastal (southern and eastern) Alaska and western Texas, affect totals and changes compared to previous inventories. Any modifications or adjustments in a survey are accompanied by corresponding modifications to related older data as necessary to assure consistency over time within each series. Reassessment of the definition of forestland resulted in reduction of grassland area in the U.S. because woodlands previously designated as grassland are now considered forest land, thus increasing the estimation of soil C stock changes in these areas (EPA 2010). However, re-defining forestland also led to the removal of low cover, lower productivity woodlands areas from the surveys (Smith et al. 2009), which were included in the previous USDA (2008) inventory. In addition, a few older western inventories were removed from the stock-change calculations to improve year-to-year consistency between successive stocks. Lastly, the estimation procedures for obtaining carbon stocks from inventory have changed (see Bechtold & Patterson 2005) as well as the approaches to selecting available inventory data. See Smith et al. (2010) for more discussion of how inventory data were used to develop the current 1990-2008 estimates. For comparison of the respective inventory sets, see Tables A-186 and A-207 of EPA (2007) and EPA (2010), respectively. On average, these changes increased carbon stock estimates by approximately 8 percent.

4.7 Uncertainty

Uncertainty about forest inventory data and the carbon conversion factors applied to the inventory contributes to overall uncertainty of the carbon estimates. Contributing components include errors in sampling or measurements as well as unknowns or errors in the largely empirical models used to develop the carbon factors applied at the plot level.

Sampling error is determined separately for each carbon pool according to Bechtold and Patterson (2005). Additional related errors in this use of inventory data are based on resolving a state's forest inventory to carbon stock for a defined forest area at a single point in time. Some small error is possible if surveys conducted over a multi-year period are averaged to a single year before calculating stock change. However, if significant portions of a state's forest inventory were sampled on a completely different schedule as was the case with some of the older inventories, then the error would increase. For this reason, stocks and stock changes were separately determined at sub-state levels, such as national forests, in some Western states (Smith

et al. 2010). The potential for an additional error comes from the use of successive surveys and the need for consistent definition, identification and inclusion of all forestlands within a state. Small errors in carbon stocks are reflected in stock-change calculations; for example, if small areas or ownerships are omitted from one of a pair of successive surveys, then a portion of the resulting state-wide change is due to the apparent change in forestland. Such problems with definition or inclusion of forestlands can have significant effects on calculated net flux.

Uncertainty associated with the estimates of specific carbon stocks varies by carbon pool and forest type. Carbon in trees is relatively well defined, and information on errors in estimates (Jenkins et al. 2003) makes it possible to develop quantitative estimates of uncertainty. Relative errors in the estimates for other ecosystem carbon pools are greater; these carbon conversion factors are generally based on extrapolations of site-specific studies, which may not adequately represent regional averages. Additionally, representative data are not available for all forest types; this also increases uncertainty as substitutions are required. An important source of uncertainty is high variability and general lack of precision possible in assigning estimates of SOC. Soil carbon is a large pool, but it changes relatively slowly. There is limited information available for assessing soil carbon or the cumulative effects of land use change, which can amount to significant stock changes when summed over large forest areas (Woodbury et al. 2006).

A quantitative uncertainty analysis was developed for estimates of total carbon flux. The analysis incorporated the information from preliminary uncertainty analyses and estimates of uncertainty in the carbon conversion factors (Heath & Smith 2000, Smith & Heath 2001, Skog et al. 2004, Skog 2008). Additional details on the analysis are provided in Chapter 7 and Annex 3.12 of EPA (2010). The uncertainty analysis was performed using the IPCC-recommended Tier 2 uncertainty estimation methodology, that is, the Monte Carlo simulation technique. The 2008 95% confidence interval for forest carbon stock changes is -935 to -651 Tg CO2 eq. , with a mean sink of -792 Tg CO2 eq. (Table 4-1). The 95% confidence interval for forest ecosystem sequestration is -846 to -567 Tg CO2 eq., and is -110 to -67 Tg CO2 eq. for harvested wood products.

Chapter 5: Energy Use in Agriculture

5.1 Summary of Greenhouse Gas Emissions from Energy Use in Agriculture

Approximately 0.8 quadrillion btu of direct energy was used in agriculture in 2008, resulting in almost 72 Tg of CO_2 emissions (Table 5-1). The total energy consumption for all sectors in the U.S., including agriculture, was approximately 100.9 quadrillion btu, resulting in 5,572.8 Tg of CO_2 emissions (EPA 2010). Production agriculture's contribution to this total was very small at a little less than 1.3%. Within production agriculture, diesel fuel accounted for about 38% of CO_2 emissions and electricity contributed about another 38% of CO_2 emissions. Gasoline consumption accounted for about 11% of CO_2 emissions, while LP gas and natural gas accounted for about 7% and 5% respectively.

Table 5-1 Energy use and carbon dioxide emissions by fuel source on U.S. farms in 2008

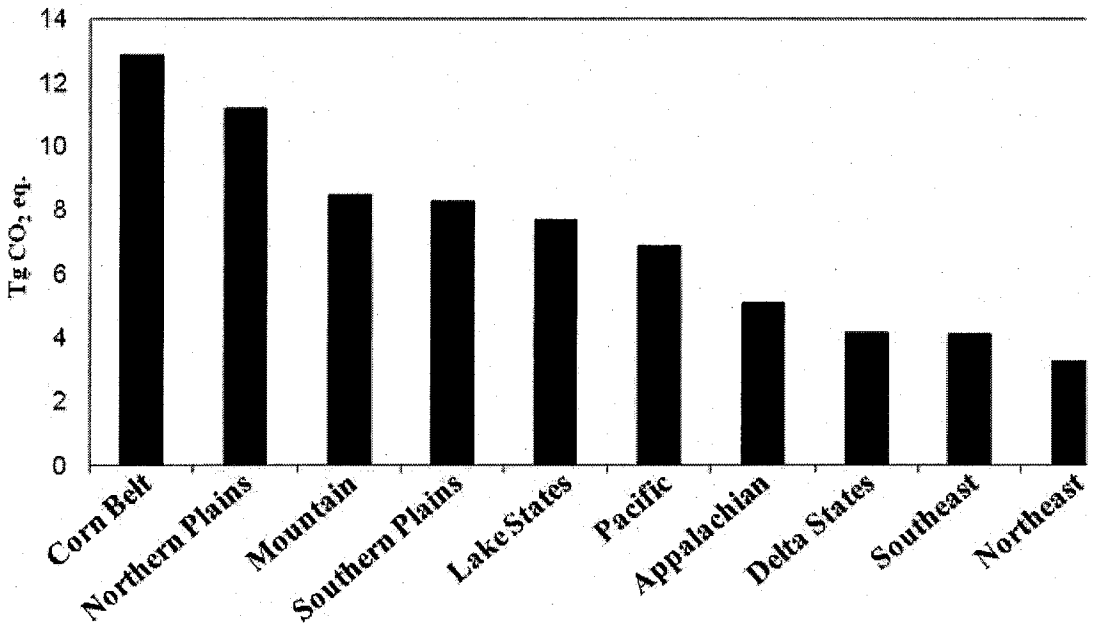
Fuels	Energy consumed	Carbon content	Fraction oxidized	CO_2 emissions
	Qbtu	*Tg C/Qbtu*		*Tg CO_2 eq.*
Diesel	0.377	19.95	1	27.58
Gasoline	0.113	19.33	1	8.02
LP gas	0.080	17.18	1	5.08
Natural gas	0.069	14.47	1	3.64
Electricity	0.156	**	**	27.25
Total	0.795			71.57

Qbtu is quadrillion British thermal units; Tg C/Qbtu is teragrams carbon per quadrillion British thermal units; Tg CO_2 eq. is teragrams carbon dioxide equivalent; LP is liquefied petroleum; CO_2 is carbon dioxide.
** Varies dependent on fuel used to generate electricity and heat rate of the power generating plant.

5.2 Spatial and Temporal Trends in Greenhouse Gas Emissions from Energy Use in Agriculture

The highest emissions in 2008 were in the Corn Belt and Northern Plains (Figure 5-1). Regions are defined in Table 5-2. Intermediate emissions occurred in the Pacific, Mountain, Southern Plains, and Lake States. Relatively small emissions were estimated for the Southeast, Northeast, Delta, and Appalachian states. There is a strong correlation between production and energy use/emissions. Generally, the states with the most agriculture production use the most energy and therefore have the highest CO_2 emissions (Figure 5-1). However, emissions also vary by the types of energy used for farm production in each region. For example, even though the Pacific region was the third highest energy user among the regions, it ranked sixth in CO_2 emissions (Figure 5-1). The Pacific region has the lowest electricity emission factor among the regions because the western part of the United States has the most hydroelectric power.

Figure 5-1
CO_2 emissions from energy use in agriculture, by region, 2008



Tg CO2 eq. is teragrams carbon dioxide equivalent.

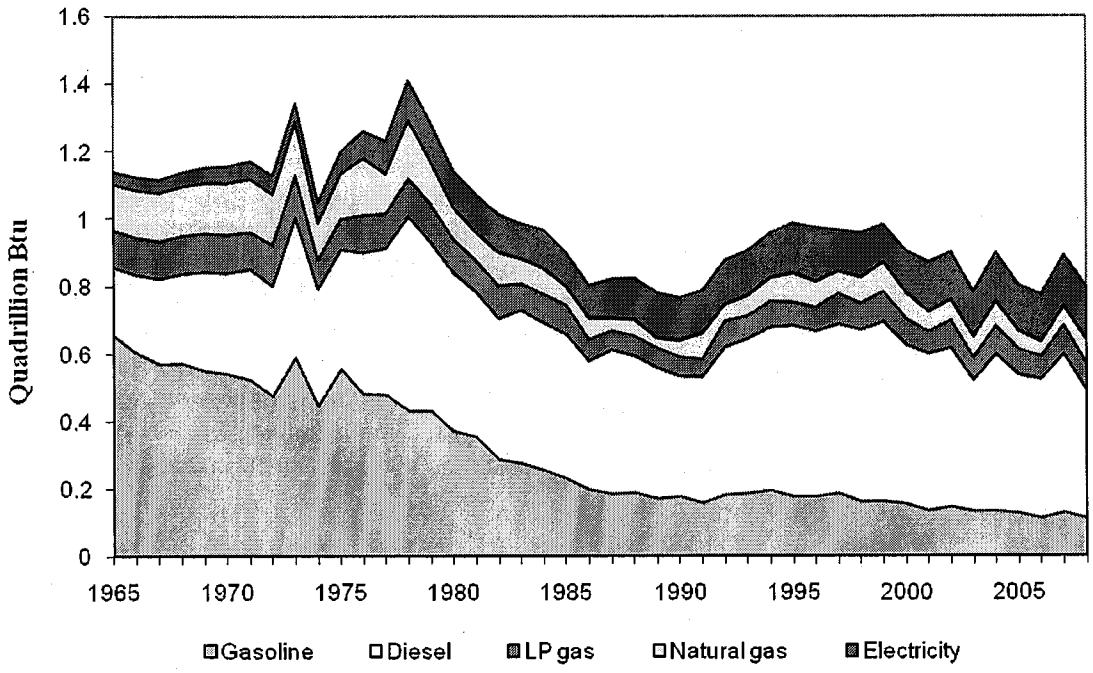
Table 5-2: Definition of Regions Used in Figure 5-1

Region	States of Region	Region	States of Region	Region	States of Region
Corn Belt	Illinois	**Pacific**	California	**Southeast**	Alabama
	Indiana		Oregon		Florida
	Iowa		Washington		Georgia
	Missouri	**Southern Plains**	Oklahoma		South Carolina
	Ohio		Texas	**Northeast**	Connecticut
Mountain	Arizona	**Lake States**	Michigan		Delaware
	Colorado		Minnesota		Maine
	Idaho		Wisconsin		Maryland
	Montana	**Appalachian**	Kentucky		Massachusetts
	Nevada		North Carolina		New Hampshire
	New Mexico		Tennessee		New Jersey
	Utah		Virginia		New York
	Wyoming		West Virginia		Pennsylvania
Northern Plains	Kansas	**Delta States**	Arkansas		Rhode Island
	Nebraska		Louisiana		Vermont
	North Dakota		Mississippi		
	South Dakota				

Agricultural energy use and resulting CO_2 emissions grew throughout the 1960s and 1970s, peaking in the late 1970s (Figure 5-2). High prices, stemming from the oil crisis of the 1970s and early 1980s, drove farmers to be more energy efficient, resulting in a decline in energy use and CO_2 emissions throughout most of the 1980s (Miranowski 2005). This decline is attributed to

switching from gasoline-powered to more fuel-efficient diesel-powered engines, adopting energy-conserving tillage practices, shifting to larger multifunction machines, and adopting energy-saving methods of crop drying and irrigation (Uri & Day 1991; Sandretto & Payne 2006; Lin et al. 1995). Another major change in farm energy consumption began around 1979 when automobile manufacturers began to produce more fuel-efficient vehicles. Laws, such as the Energy Policy and Conservation Act of 1975, increased average fuel economy standards, and both gasoline and diesel powered equipment became increasingly energy efficient throughout the 1980s and 1990s. Declines in farm energy use leveled off in the late 1980s as increases in energy prices subsided (Figure 5-2). Energy use increased throughout most of the 1990s, but since 2000, energy use has gone up and down with no apparent trend. However, energy productivity (i.e., output per unit of energy input) has increased significantly.

Figure 5-2
Energy use in agriculture, by source, 1965-2008



Btu is British Thermal Units, or the amount of energy needed to heat 0.454 kg (1 lb) of water from 3.9 °C (39 °F) to 4.4 °C (40 °F).

5.3 Sources of Greenhouse Gas Emissions from Energy Use on Agricultural Operations

Agricultural operations, including crop and livestock farms, dairies, nurseries, and greenhouses, require a variety of energy sources. Energy use in agriculture varies across agricultural operations by crop or livestock type, size of operation, and geographic location. Energy use also varies over time, depending on weather conditions, changes in energy prices, and changes in total annual crop and livestock production. While energy use in agriculture causes CO_2 emissions, this source is small relative to the total U.S. CO_2 emissions from energy.

Different forms of energy are used for different purposes in U.S. agriculture. Energy used on farms is typically categorized as direct and indirect energy (Miranowski 2005). Direct energy is used on the farm for various operations, whereas indirect energy is the energy used to produce energy-intensive farm inputs, such as commercial fertilizers.

Liquid fuel is the most versatile form of direct energy used on farms. Crop production uses large amounts of diesel fuel, gasoline, and liquefied petroleum (LP) gas for field operations. Most large farms use diesel-fueled vehicles for tilling, planting, cultivating, disking, harvesting, and applying fertilizers and pesticides. Gasoline is used for small trucks and older harvesting equipment. Smaller farms are more likely to use gasoline-powered equipment, but as farms get larger they tend to use more diesel fuel.

Farmers use a significant amount of energy to dry crops, such as grain, tobacco, and peanuts. Several types of energy can be used for crop drying, including LP gas, electricity, diesel fuel, and natural gas. Annual rainfall can have a significant effect on the amount of energy used to dry crops from year to year. For example, above-average rainfall, especially just prior to harvest time, can increase the moisture level of grain. In order to meet quality standards, it may require more energy to dry the grain. Weather can also affect the energy used in livestock facilities and other farm buildings that use various forms of energy for heating, cooling, and air circulation. Natural gas is commonly used to control greenhouse temperatures, and dairies rely heavily on electricity to power milking machines and other equipment.

While many irrigation systems in the U.S. are gravity flow systems that require little or no energy for water distribution, irrigation systems that use pumps to distribute water use energy. Based on the 2008 USDA Farm and Ranch Irrigation Survey, about 49 million acres of U.S. farmland were irrigated with pumps powered by liquid fuels, natural gas and electricity, costing a total of $2.68 billion (USDA NASS 2009). Electricity was the principal power source for these pumps, costing $1.5 billion to irrigate about 30 million acres. Diesel fuel was used to power pumps on about 13 million acres and natural gas was used on about 4.7 million acres (USDA NASS 2009).

Irrigated land (including gravity flow irrigation) went up in 2008 to about 55 million acres compared to the 52.6 million acres reported by the 2003 USDA Farm and Ranch Irrigation Survey. Irrigated farmland has been increasing over time, however, and acreage can vary substantially from year to year, depending on environmental conditions and economic factors (Gollehon & Quinby 2006). Corn for grain or seed, soybeans, and alfalfa required the most water in 2008. The leading states in irrigated land in 2008 are Nebraska with 15% of U.S. total, California with 13% of U.S. total, and Texas with almost 10% of U.S. total.

A significant amount of indirect energy is used off the farm to manufacture farm inputs that are ultimately consumed on the farm. Some farm inputs such as fertilizers and pesticides are produced by energy-intensive industries. For example, commercial nitrogen fertilizer is made primarily from natural gas, and synthetic pesticides are made from a variety of chemicals. Although GHG emissions result from the energy consumption used in manufacturing energy-intensive agricultural inputs, these indirect emissions are not detailed in this inventory. For information on the GHG emissions of manufacturing commercial fertilizers see EPA's 2010 U.S. Greenhouse Gas Inventory Report (EPA 2010).

The amount and type of energy used in agricultural operations affect overall CO_2 emissions, and generally CO_2 levels increase with higher energy use in agriculture (Figure 5-2). Some fuels have higher carbon content than others, resulting in higher CO_2 emissions per btu (British thermal unit) used. However, some fuel/engine applications are more energy efficient than others and require less fuel to perform similar operations. For example, diesel fuel has a higher btu content than gasoline on a volumetric basis, but diesel engines have a higher performance rating compared to gasoline engines. Therefore, even though diesel fuel has higher carbon content per btu compared to gasoline, using diesel engines to perform farm operations may result in lower CO_2 emissions.

5.4 Methods for Estimating Carbon Dioxide Emissions from Energy Use in Agriculture

The CO_2 emission estimates for energy use are constructed from fuel consumption data using standardized methods published in the Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990 – 2008 (EPA 2010). Emission estimates from fuel use in agriculture are not explicitly published in the U.S. Greenhouse Gas Inventory Report, however they are contained in the estimates of fuel consumption and emissions by sectors. The emissions estimates presented in this chapter were prepared separately from the U.S. Greenhouse Gas Inventory Report.

Estimates of CO_2 from agricultural operations are based on energy expense data from the Agricultural Resource Management Survey (ARMS) conducted by the National Agricultural Statistics Service (NASS) of the USDA. The ARMS collects information on farm production expenditures, including expenditures on diesel fuel, gasoline, LP gas, natural gas, and electricity (USDA/NASS, 2009). NASS also collects data on price per gallon paid by farmers for gasoline, diesel, and LP gas (USDA/NASS, 2008). Energy expenditures are divided by fuel prices to approximate gallons of fuel consumed by farmers. Gallons of gasoline, diesel, and LP gas are then converted to btu based on the heating value of each of the fuels. The individual farm data are aggregated by state, and the state data are divided into 10 production regions, allowing fuel consumption to be estimated at the national and regional levels. Farm consumption estimates for electricity and natural gas are also approximated by dividing prices into expenditures. Since electricity and natural gas prices are not collected by NASS, we use data from the Energy Information Administration (EIA) that reports average prices by state (EIA, 2009a; EIA 2009b). NASS regional prices were derived by aggregating the EIA state data into NASS production regions.

Following the method outlined in Annex 2 of the U.S. Greenhouse Gas Inventory, consumption of diesel fuel, gasoline, LP gas and natural gas were converted to CO_2 emissions using the coefficients for carbon content of fuels and fraction of carbon oxidized during combustion (Table 5-2). These carbon content coefficients were derived by EIA and are similar to those published by the Intergovernmental Panel on Climate Change (IPCC). For each fuel type, fuel consumption in units of quadrillion btu was multiplied by the carbon content coefficient to estimate the Tg of carbon contained in the fuel consumed. This value is sometimes referred to as "potential emissions" because it represents the maximum amount of carbon that could be released to the

atmosphere if all carbon were oxidized (EPA 2010). To convert from carbon content to CO_2, it was assumed that the fraction of carbon that is oxidized was 100%.

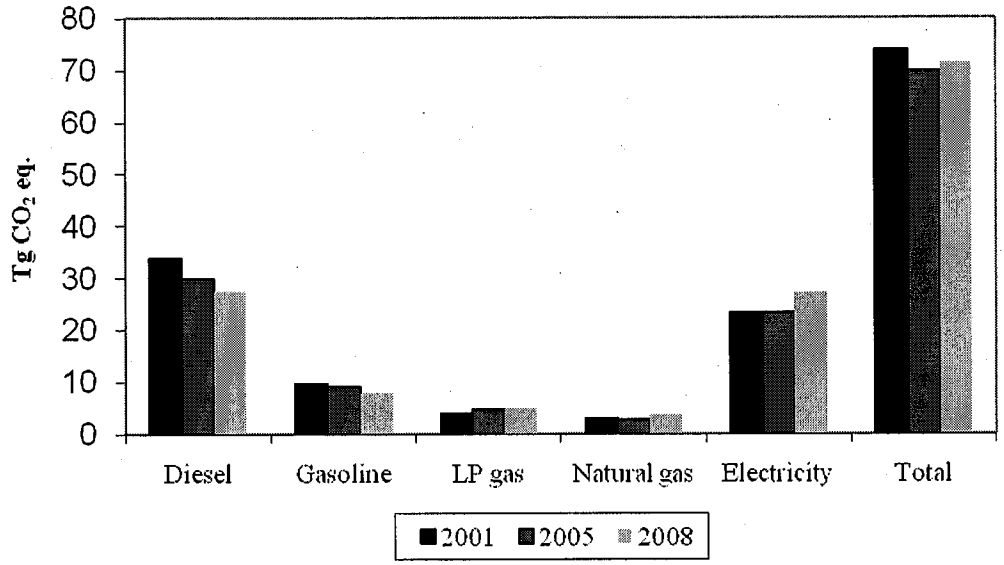
A different approach was used to estimate emissions from electricity, since a number of fuel sources can be used to generate electricity. Also, fuel sources vary significantly by region, for example, some regions of the country rely more on coal for electricity generation, while other regions use more natural gas to generate electricity. Also, the mix of fuel sources used in a region can change overtime. To account for these variables, the CO_2 emission estimates from electricity generation in this chapter are derived from the most current state data available from EIA. In response to a special request from USDA, EIA tabulated state emission factors for the NASS production regions. The regional-level electricity emission factors represent average CO_2 emissions generated by utility and non-utility electric generators for the 1998-2000 time period. These regional emission factors were multiplied by estimated electricity use in each farm production region to calculate CO_2 emissions. As reported above, electricity use is estimated from farm expenditure data collected by NASS. Price estimates for electricity published by EIA are divided into electricity expenditures to derive the kilowatt hours consumed by farmers. The kilowatt hours of electricity used on the farm are converted to btu, based on a standard conversion rate of 3,413 btu per kilowatt hour.

5.5. Major Changes Compared to Previous Inventories

This report is the third edition of the U.S. Agriculture and Forestry Greenhouse Inventory, which estimates GHG emissions for the year 2008. Figure 5-3 compares the 2008 results with the two previous study periods, 2005 and 2001. Annual GHG emissions are expected to vary with changes in crop and livestock production levels. In addition, weather conditions can have a significant influence on energy use in agriculture, thereby affecting GHG emissions from year to year. Total emissions in 2001 are slightly greater than the previous two reports, with most of the difference related to a higher use of diesel fuel (Figure 5-3). The similarity among the 3 years is an indication that changes in GHG emissions generally follow long-term energy trends as shown in Figure 5-3. When a short-term spike in GHG emissions occurs, it probably is related to a major weather event or other factors significantly affecting agricultural production.

Figure 5-3

CO_2 emissions from energy use in agriculture, by fuel source, 2001, 2005, and 2008



CO_2 is carbon dioxide. LP is liquefied petroleum. Tg CO_2 eq. is teragrams carbon dioxide equivalent.

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Appendix A: Livestock Emissions

Appendix A

A-1 Population of Animals by State in 2008
A-2 U.S. Livestock Population, 1990, 1995, 2000-2008
A-3 State-Level Methane Emissions from Enteric Fermentation in 1990, 1995, 2000-2008
A-4 State-Level Methane Emissions from Enteric Fermentation by Livestock Category in 2008
A-5 Cattle Population Categories Used for Estimating Methane Emissions
A-6 Dairy Lactation by Region
A-7 Typical Livestock Weights
A-8 U.S. Feedlot Placement in 2008
A-9 Regional Estimates of Digestible Energy and Methane Conversion Rates for Enteric Fermentation in 2008
A-10 Definition of Regions in the Enteric Fermentation Model
A-11 Methane Emissions from Cattle Enteric Fermentation, 1990, 1995, 2000-2008
A-12 IPCC Emission Factors for Livestock
A-13 Summary of Greenhouse Gas Emissions from Managed Waste by State in 2008
A-14 Methane Emissions from Manure Management by State and Animal in 2008
A-15 Nitrous Oxide Emissions from Manure Management by State and Animal in 2008
A-16 Waste Characteristics Data
A-17 State Volatile Solids Production Rates in 2008
A-18 State-Based Methane Conversion Factors for Liquid Waste Management Systems in 2008
A-19 Additional Nitrous Oxide and Methane Emission Factors
A-20 State-Weighted Methane Conversion Factors for Livestock Waste Emissions in 2008
A-21 Nitrogen in Livestock Waste on Grazed Lands

Appendix Table A-1 Population of Animals by State in 2008

State	Beef Cattle	Dairy Cattle	Swine	Goat	Horse	Sheep	Poultry
				Head			
Alabama	1,288,531	17,984	175,000	50,574	170,731	11,091	209,274,989
Alaska	15,461	799	900	277	5,010	11,091	1,129,194
Arizona	938,433	234,842	165,000	35,374	122,172	155,000	1,129,194
Arkansas	1,822,556	23,978	301,250	32,580	188,414	11,091	241,991,424
California	3,376,306	2,632,471	80,000	103,122	343,973	620,000	45,115,151
Colorado	2,850,938	195,779	750,000	18,561	279,168	420,000	5,016,444
Connecticut	22,921	29,967	3,100	2,586	24,762	8,333	19,283,263
Delaware	11,892	9,191	9,000	1,521	9,001	11,091	45,292,830
Florida	1,663,713	154,889	20,000	39,964	260,451	11,091	24,493,444
Georgia	1,103,618	98,930	230,000	69,498	192,926	11,091	283,713,626
Hawaii	154,364	3,297	13,000	5,364	11,944	11,091	678,444
Idaho	1,443,753	834,036	33,000	11,520	216,945	235,000	1,164,444
Illinois	1,111,217	159,820	4,375,000	17,192	155,495	60,000	6,253,444
Indiana	737,838	242,757	3,600,000	27,801	256,496	52,000	51,345,151
Iowa	4,023,659	324,652	19,525,000	18,898	201,046	225,000	83,990,818
Kansas	7,058,167	184,779	1,800,000	24,763	175,773	90,000	1,129,194
Kentucky	2,270,885	135,858	350,000	68,412	389,629	37,000	62,688,989
Louisiana	891,828	34,975	11,000	14,633	124,575	11,091	18,232,263
Maine	42,550	50,445	4,400	3,162	33,206	8,333	5,316,444
Maryland	125,284	80,924	31,000	9,601	67,647	24,000	57,216,353
Massachusetts	25,058	22,975	10,000	6,022	40,401	8,333	434,444
Michigan	693,922	480,567	1,020,000	21,094	273,584	82,000	27,396,263
Minnesota	1,835,394	732,146	7,525,000	19,768	241,835	145,000	37,610,636
Mississippi	951,906	27,978	375,000	26,738	174,172	11,091	163,385,989
Missouri	4,114,674	169,810	3,112,500	48,654	368,506	82,000	32,169,818
Montana	2,334,925	28,962	175,000	8,613	246,074	270,000	815,444
Nebraska	6,843,288	76,937	3,325,000	11,718	153,615	80,000	13,028,626
Nevada	406,104	36,968	3,500	6,506	42,030	70,000	1,129,194
New Hampshire	16,740	21,479	2,800	3,774	20,662	8,333	663,444
New Jersey	22,817	14,984	8,000	8,312	70,113	11,091	1,942,444
New Mexico	1,152,538	449,621	2,000	19,128	121,702	130,000	1,129,194
New York	531,039	969,909	95,000	33,130	196,216	65,000	21,625,263
North Carolina	816,671	70,927	10,025,000	67,276	167,327	27,000	177,687,788
North Dakota	1,609,165	40,953	151,000	2,523	113,175	93,000	1,129,194
Ohio	1,002,125	383,652	1,897,500	45,061	350,274	125,000	45,704,545
Oklahoma	5,147,362	96,905	2,390,000	82,792	391,394	80,000	48,329,808
Oregon	1,167,345	179,795	20,000	30,628	240,933	220,000	18,824,263
Pennsylvania	874,861	826,131	1,140,000	39,932	295,614	98,000	58,913,878
Rhode Island	3,352	1,698	1,800	468	5,096	8,333	1,129,194
South Carolina	395,427	24,978	240,000	41,192	106,160	11,091	53,460,394
South Dakota	3,378,498	120,889	1,412,500	7,021	181,352	340,000	4,403,667
Tennessee	2,084,215	105,858	205,000	114,664	387,513	30,000	39,377,535
Texas	14,226,582	579,431	1,100,000	1,194,289	970,628	960,000	141,632,535
Utah	700,011	124,874	740,000	9,092	159,976	280,000	5,278,667
Vermont	80,428	197,817	2,600	4,133	29,309	8,333	555,444
Virginia	1,479,084	142,858	350,000	41,275	212,050	81,000	55,693,091
Washington	810,855	347,668	25,000	23,217	197,991	52,000	22,656,263
West Virginia	398,721	15,987	7,000	17,484	83,035	35,000	18,525,485
Wisconsin	1,721,129	1,902,929	385,000	35,179	265,886	90,000	15,713,444
Wyoming	1,240,402	11,984	89,000	5,380	164,011	425,000	318,444
Total	**87,018,553**	**13,658,043**	**67,311,850**	**2,530,466**	**9,499,998**	**5,950,000**	**2,175,119,513**

Source: EPA 2010

Appendix Table A-2 U.S. Livestock Population, 1990, 1995, 2000-2008

	1990	1995	2000	2001	2002	2003	2004	2005	2006	2007	2008
Animal Type						*1 million head*					
Dairy Cattle	**14**	**14**	**13**	**13**	**13**	**13**	**13**	**13**	**13**	**13**	**14**
Dairy Cows	10	9	9	9	9	9	9	9	9	9	9
Dairy Heifers	4	4	4	4	4	4	4	4	4	4	4
Swine	**54**	**59**	**59**	**59**	**60**	**60**	**61**	**61**	**62**	**65**	**67**
Market <60 lbs.	18	20	20	20	20	20	20	20	21	22	22
Market 60-119 lbs.	12	13	13	13	13	13	13	14	14	15	15
Market 120-179 lbs.	9	11	11	11	11	11	11	11	11	12	13
Market >180 lbs.	8	9	9	9	10	10	10	10	10	11	11
Breeding Swine	7	7	6	6	6	6	6	6	6	6	6
Beef cattle	**89**	**97**	**91**	**90**	**89**	**88**	**87**	**87**	**88**	**88**	**87**
Feedlot Steers	6	7	8	8	8	8	8	8	9	9	9
Feedlot Heifers	3	4	5	5	5	5	5	5	5	5	5
Bulls NOF[1]	2	2	2	2	2	2	2	2	2	2	2
Calves NOF	24	25	24	23	23	22	22	22	22	22	22
Heifers NOF	10	12	10	10	10	10	9	10	10	10	9
Steers NOF	10	12	9	9	9	8	8	8	8	8	8
Cows NOF	32	35	34	33	33	33	33	33	33	33	32
Sheep	**11**	**9**	**7**	**7**	**7**	**6**	**6**	**6**	**6**	**6**	**6**
Goats	**3**	**2**	**2**	**2**	**3**	**3**	**3**	**3**	**3**	**3**	**3**
Poultry	**1,537**	**1,827**	**2,033**	**2,060**	**2,098**	**2,085**	**2,131**	**2,150**	**2,154**	**2,167**	**2,175**
Hens >1 yr.	273	299	334	340	340	341	344	348	350	347	340
Pullets	73	81	95	96	95	100	101	97	97	104	99
Chickens	7	8	8	8	8	8	8	8	8	8	8
Broilers	1,066	1,332	1,506	1,525	1,562	1,544	1,589	1,613	1,612	1,619	1,638
Turkeys	118	107	90	91	92	91	88	84	87	89	91
Horses	**5**	**5**	**5**	**6**	**6**	**7**	**8**	**9**	**9**	**9**	**9**

Source: USDA NASS 2009, 2008, 2007, 2006, 2005, 2000, 1995.
Note: Totals may not sum due to independent rounding.
[1](NOF) Not on feed.

Appendix Table A-3 State-Level Methane Emissions from Enteric Fermentation in 1990, 1995, 2000-2008

	1990	1995	2000	2001	2002	2003	2004	2005	2006	2007	2008
State						*Tg CO_2 eq.*					
Alabama	1.98	2.21	1.85	1.72	1.74	1.81	1.73	1.69	1.62	1.63	1.57
Alaska	0.01	0.01	0.01	0.01	0.02	0.02	0.02	0.02	0.02	0.02	0.02
Arizona	1.30	1.35	1.33	1.38	1.41	1.37	1.43	1.54	1.61	1.67	1.71
Arkansas	2.19	2.46	2.26	2.23	2.26	2.33	2.41	2.34	2.19	2.22	2.29
California	6.99	7.27	7.98	8.14	8.37	8.02	8.36	8.62	8.69	9.12	9.10
Colorado	3.48	3.96	4.03	4.03	3.98	3.54	3.12	3.39	3.56	3.74	3.79
Connecticut	0.14	0.13	0.12	0.11	0.11	0.09	0.09	0.09	0.09	0.09	0.09
Delaware	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.03	0.04	0.03
Florida	2.82	3.04	2.70	2.65	2.61	2.56	2.60	2.57	2.53	2.61	2.55
Georgia	1.77	1.96	1.71	1.67	1.64	1.70	1.69	1.66	1.63	1.62	1.55
Hawaii	0.27	0.25	0.24	0.22	0.22	0.23	0.23	0.23	0.24	0.24	0.23
Idaho	2.41	2.80	3.11	3.18	3.26	3.22	3.32	3.46	3.55	3.73	3.80
Illinois	2.17	2.13	1.89	1.81	1.78	1.70	1.67	1.72	1.72	1.71	1.63
Indiana	1.56	1.49	1.23	1.16	1.18	1.14	1.15	1.19	1.20	1.26	1.26
Iowa	5.22	5.16	4.76	4.61	4.56	4.62	4.47	4.59	4.82	5.06	5.11
Kansas	6.26	7.56	7.55	7.70	7.77	7.54	7.71	7.73	7.91	7.82	7.97
Kentucky	3.10	3.41	2.85	2.91	2.96	3.03	3.03	2.99	3.05	3.25	3.14
Louisiana	1.44	1.35	1.26	1.20	1.19	1.19	1.22	1.22	1.17	1.21	1.26
Maine	0.19	0.18	0.17	0.16	0.17	0.15	0.15	0.15	0.15	0.15	0.15
Maryland	0.49	0.49	0.41	0.38	0.39	0.36	0.36	0.36	0.36	0.34	0.32
Massachusetts	0.13	0.12	0.10	0.09	0.09	0.08	0.08	0.08	0.08	0.07	0.07
Michigan	1.68	1.70	1.51	1.48	1.48	1.46	1.52	1.54	1.60	1.69	1.71
Minnesota	3.50	3.54	3.30	3.24	3.16	3.01	3.03	3.02	3.00	3.12	3.12
Mississippi	1.67	1.71	1.41	1.42	1.43	1.39	1.36	1.40	1.26	1.24	1.25
Missouri	5.23	5.78	5.31	5.26	5.30	5.47	5.34	5.37	5.60	5.49	5.32
Montana	3.11	3.88	3.78	3.70	3.61	3.57	3.55	3.48	3.55	3.55	3.80
Nebraska	7.11	7.88	8.43	8.38	8.21	8.10	7.96	8.19	8.45	8.76	8.53
Nevada	0.75	0.78	0.77	0.79	0.77	0.78	0.78	0.77	0.77	0.76	0.74
New Hampshire	0.08	0.08	0.08	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07
New Jersey	0.11	0.10	0.08	0.08	0.07	0.07	0.07	0.07	0.06	0.06	0.06
New Mexico	1.99	2.36	2.54	2.52	2.54	2.48	2.51	2.57	2.71	2.73	2.84
New York	2.79	2.64	2.70	2.59	2.63	2.48	2.54	2.57	2.59	2.70	2.74
North Carolina	1.20	1.43	1.25	1.26	1.25	1.18	1.17	1.16	1.12	1.13	1.08
North Dakota	2.21	2.69	2.52	2.61	2.61	2.51	2.41	2.41	2.40	2.49	2.42
Ohio	2.04	1.96	1.71	1.71	1.72	1.64	1.70	1.81	1.82	1.80	1.83
Oklahoma	5.71	6.37	5.80	5.68	5.82	6.15	5.81	6.02	6.24	6.15	6.17
Oregon	2.06	2.37	2.23	2.09	2.17	2.11	2.24	2.29	2.25	2.11	2.22
Pennsylvania	2.94	2.80	2.75	2.70	2.68	2.49	2.54	2.58	2.56	2.61	2.62
Rhode Island	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
South Carolina	0.72	0.68	0.61	0.59	0.56	0.56	0.57	0.58	0.55	0.54	0.53
South Dakota	4.21	5.07	4.92	5.14	5.07	4.84	4.82	4.92	4.96	4.92	4.85
Tennessee	2.85	3.17	2.68	2.71	2.76	2.88	2.79	2.76	2.83	2.92	2.77
Texas	16.34	19.44	17.66	17.49	17.58	17.85	17.62	17.60	18.16	18.08	17.95
Utah	1.21	1.37	1.38	1.38	1.38	1.32	1.34	1.34	1.28	1.34	1.39
Vermont	0.58	0.55	0.57	0.56	0.56	0.51	0.53	0.52	0.52	0.52	0.52
Virginia	2.17	2.24	2.05	2.11	2.13	2.08	2.03	2.12	2.17	2.12	2.09
Washington	2.16	2.17	2.09	2.02	1.98	1.86	1.93	1.85	1.91	1.98	1.94
West Virginia	0.60	0.65	0.54	0.52	0.54	0.52	0.50	0.53	0.54	0.56	0.54
Wisconsin	6.00	5.34	5.14	5.06	5.01	4.72	4.96	4.99	5.03	5.25	5.29
Wyoming	1.59	2.00	2.09	2.06	2.00	1.78	1.83	1.80	1.91	1.93	1.82
Total	**126.58**	**138.16**	**131.50**	**130.63**	**130.80**	**128.66**	**128.37**	**130.00**	**132.14**	**134.23**	**133.86**

Source: EPA 2010

Note: State-level emissions do not include data for non-cattle or bulls. Tg CO_2 eq. is teragrams carbon dioxide equivalent.

Appendix Table A-4 State-Level Methane Emissions from Enteric Fermentation by Livestock Category in 2008

	Beef cattle	Dairy cattle	*Total*
State		*Tg CO_2 eq.*	
Alabama	1.522	0.047	**1.57**
Alaska	0.019	0.002	**0.02**
Arizona	1.053	0.656	**1.71**
Arkansas	2.233	0.052	**2.29**
California	2.390	6.706	**9.10**
Colorado	3.307	0.463	**3.77**
Connecticut	0.015	0.073	**0.09**
Delaware	0.012	0.022	**0.03**
Florida	2.116	0.436	**2.55**
Georgia	1.270	0.284	**1.55**
Hawaii	0.221	0.006	**0.23**
Idaho	1.740	2.048	**3.79**
Illinois	1.280	0.343	**1.62**
Indiana	0.706	0.549	**1.25**
Iowa	4.374	0.728	**5.10**
Kansas	7.519	0.409	**7.93**
Kentucky	2.817	0.325	**3.14**
Louisiana	1.182	0.077	**1.26**
Maine	0.032	0.121	**0.15**
Maryland	0.118	0.201	**0.32**
Massachusetts	0.021	0.053	**0.07**
Michigan	0.533	1.176	**1.71**
Minnesota	1.554	1.570	**3.12**
Mississippi	1.175	0.072	**1.25**
Missouri	4.990	0.331	**5.32**
Montana	3.735	0.060	**3.79**
Nebraska	8.303	0.176	**8.48**
Nevada	0.649	0.093	**0.74**
New Hampshire	0.014	0.055	**0.07**
New Jersey	0.024	0.035	**0.06**
New Mexico	1.638	1.207	**2.85**
New York	0.344	2.399	**2.74**
North Carolina	0.886	0.196	**1.08**
North Dakota	2.334	0.082	**2.42**
Ohio	0.971	0.855	**1.83**
Oklahoma	5.934	0.232	**6.17**
Oregon	1.797	0.417	**2.21**
Pennsylvania	0.571	2.046	**2.62**
Rhode Island	0.004	0.004	**0.01**
South Carolina	0.456	0.069	**0.53**
South Dakota	4.558	0.280	**4.84**
Tennessee	2.510	0.256	**2.77**
Texas	16.404	1.510	**17.91**
Utah	1.088	0.306	**1.39**
Vermont	0.032	0.492	**0.52**
Virginia	1.701	0.385	**2.09**
Washington	1.020	0.912	**1.93**
West Virginia	0.501	0.037	**0.54**
Wisconsin	1.076	4.208	**5.28**
Wyoming	1.793	0.025	**1.82**
Total	**100.54**	**33.09**	**133.63**

Source: EPA 2010. Tg CO_2 eq. is teragrams carbon dioxide equivalent.

Appendix Table A-5 Cattle Population Categories Used for Estimating Methane Emissions

Dairy Cattle	*Beef Cattle*
Calves	Calves
Heifer Replacements	Heifer Replacements
Cows	Heifer and Steer Stockers
	Animals in Feedlots (Heifers and Steers)
	Cows
	Bulls

Source: EPA 2010

Appendix Table A-6 Dairy Lactation by Region[1]

	California	West	Northern Great Plains	Southcentral	Northeast	Midwest	Southeast
Year				*(kg * year)/cow*			
1990	8,372	66,559	42,812	22,736	77,236	52,303	52,743
1991	8,407	67,689	43,171	22,567	79,184	53,321	53,373
1992	8,492	70,688	44,561	23,321	81,808	54,986	55,075
1993	8,551	70,754	44,780	23,648	81,325	55,167	56,636
1994	9,164	72,957	46,045	24,015	81,694	55,789	57,970
1995	8,878	72,463	46,522	24,001	83,709	57,073	58,719
1996	8,691	73,672	47,248	23,977	84,164	56,593	58,149
1997	8,994	74,496	47,655	23,971	86,676	58,160	59,389
1998	8,823	75,345	49,205	24,167	88,487	59,843	59,252
1999	9,426	75,633	50,450	24,450	89,617	60,676	60,901
2000	9,585	77,056	52,718	25,135	90,412	62,644	62,241
2001	9,482	76,278	52,854	25,002	92,829	61,693	63,078
2002	9,651	78,322	54,951	25,684	94,469	63,499	63,785
2003	9,522	77,600	55,450	26,275	93,256	65,910	62,099
2004	9,589	77,455	55,707	27,711	94,080	66,746	63,946
2005	9,709	78,956	57,794	28,155	95,091	68,757	65,091
2006	9,895	79,414	59,844	27,854	96,716	69,234	65,889
2007	10,179	80,809	60,320	27,459	96,675	69,393	68,011
2008	10,135	80,141	61,700	28,157	98,318	68,914	67,452

Source: USDA 2005d, 2004d, 2003d, 2002d, 2001d, 2000d, 1999a, 1995a.

[1] Beef lactation data developed using methodology described in EPA 2010.

Appendix Table A-7 Typical Livestock Weights

Cattle Type	*lbs.*
Beef Replacement Heifer	
Replacement Weight, 15 Months	715
Replacement Weight, 24 Months	1,078
Mature Weight, 36 Months	1,172
Dairy Replacement Heifer	
Replacement Weight, 15 months	800
Replacement Weight, 24 Months	1,225
Mature Weight, 36 Months	1,350
Stockers– Grazing/Forage Based Only	
Steer Weight Gain/Month to 12 Months	45
Steer Weight Gain/Month to 24 Months	35
Heifer Weight Gain/Month to 12 Months	35
Heifer Weight Gain/Month to 24 Months	30

Source: Feedstuffs (1998), Western Dairyman (1998), Johnson (1999), NRC (1999), EPA 2010.

Appendix Table A-8 U.S. Feedlot Placement in 2008

	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sep	Oct	Nov	Dec	***Total***
Weight Placed	*Number of animals placed, 1,000 head*												
< 600 lbs.	400	330	335	315	340	365	360	365	445	700	565	425	**4,945**
600 - 700 lbs.	467	385	330	278	350	325	315	410	415	615	630	490	**5,010**
700 - 800 lbs.	525	533	561	428	565	383	481	566	541	543	451	407	**5,984**
> 800 lbs.	395	475	510	515	645	445	500	720	880	580	370	325	**6,360**
Total	**1,787**	**1,723**	**1,736**	**1,536**	**1,900**	**1,518**	**1,656**	**2,061**	**2,281**	**2,438**	**2,016**	**1,647**	**22,299**

Source: USDA (2002f, 2001f, 2000f, 1999a, 1995a), EPA 2010.

Note: Totals may not sum due to independent rounding.

Appendix Table A-9 Regional Estimates of Digestible Energy and Methane Conversion Rates for Enteric Fermentation in 2008

Animal Type	Data	California	West	Northern Great Plains	Southcentral	Northeast	Midwest	Southeast
Beef Repl. Heif.	DE [1]	65	59	66	64	65	65	64
	Ym [2]	6.5%	6.5%	6.5%	6.5%	6.5%	6.5%	6.5%
Dairy Repl. Heif.	DE	64	64	64	64	64	64	64
	Ym	5.6%	5.6%	5.3%	6.0%	5.9%	5.3%	6.5%
Steer Stockers	DE	65	59	66	64	65	65	64
	Ym	6.5%	6.5%	6.5%	6.5%	6.5%	6.5%	6.5%
Heifer Stockers	DE	65	59	66	64	65	65	64
	Ym	6.5%	6.5%	6.5%	6.5%	6.5%	6.5%	6.5%
Steer Feedlot	DE	83	83	83	83	83	83	83
	Ym	3.9%	3.9%	3.9%	3.9%	3.9%	3.9%	3.9%
Heifer Feedlot	DE	83	83	83	83	83	83	83
	Ym	3.9%	3.9%	3.9%	3.9%	3.9%	3.9%	3.9%
Beef Cows	DE	63	57	64	62	63	63	62
	Ym	6.5%	6.5%	6.5%	6.5%	6.5%	6.5%	6.5%
Dairy Cows	DE	67	67	67	67	67	67	67
	Ym	5.5%	5.5%	5.2%	5.9%	5.8%	5.2%	6.4%
Steer Step-Up	DE	72	72	72	72	72	72	72
	Ym	5.2%	5.2%	5.2%	5.2%	5.2%	5.2%	5.2%
Heifer Step-Up	DE	72	72	72	72	72	72	72
	Ym	5.2%	5.2%	5.2%	5.2%	5.2%	5.2%	5.2%

Source: EPA 2010

[1] (DE) Digestible energy: in units of percent gross energy (GE) in MJ/Day.

[2] (Y_m) Methane conversion rate is the fraction of gross energy (GE) in feed converted to methane.

Appendix Table A-10 Definition of Regions in the Enteric Fermentation Model

Region & State(s)

California	Northern Great Plains	Northeast	Southeast	West
California	Colorado	Connecticut	Alabama	Alaska
Midwest	Kansas	Delaware	Florida	Arizona
Illinois	Montana	Maine	Georgia	Hawaii
Indiana	Nebraska	Maryland	Kentucky	Idaho
Iowa	North Dakota	Massachusetts	Mississippi	Nevada
Michigan	South Dakota	New Hampshire	North Carolina	New Mexico
Minnesota	Wyoming	New Jersey	South Carolina	Oregon
Missouri	**South Central**	New York	Tennessee	Utah
Ohio	Arkansas	Pennsylvania	Virginia	Washington
Wisconsin	Louisiana	Rhode Island		
	Oklahoma	Vermont		
	Texas	West Virginia		

Source: EPA 2010

Appendix Table A-11 Methane Emissions from Cattle Enteric Fermentation, 1990, 1995, 2000-2008

	1990	1995	2000	2001	2002	2003	2004	2005	2006	2007	2008
Animal Type						*Gg CH_4*					
Dairy	**1,526**	**1,452**	**1,471**	**1,464**	**1,468**	**1,364**	**1,433**	**1,459**	**1,490**	**1,555**	**1,576**
Cows	1,257	1,197	1,222	1,213	1,218	1,136	1,190	1,210	1,232	1,285	1,302
Replacements 7-11 months	58	55	55	55	55	49	54	56	56	60	60
Replacements 12-23 months	211	199	194	196	195	179	189	194	201	211	214
Beef	**4,502**	**5,128**	**4,790**	**4,757**	**4,761**	**4,762**	**4,680**	**4,731**	**4,803**	**4,837**	**4,799**
Bulls	114	126	122	121	119	119	117	117	120	117	117
Cows	2,887	3,223	3,059	3,041	3,022	3,056	3,037	3,056	3,079	3,083	3,065
Replacements 7-11 months	69	85	74	74	75	76	77	80	82	81	79
Replacements 12-23 months	188	241	204	207	207	214	211	217	228	228	220
Steer Stockers	563	661	508	506	516	484	464	472	475	478	473
Heifer Stockers	305	374	322	320	322	304	291	298	298	294	288
Total Feedlot Cattle	375	416	502	488	499	508	482	489	521	556	557
Total	**6,028**	**6,579**	**6,262**	**6,220**	**6,229**	**6,127**	**6,113**	**6,190**	**6,292**	**6,392**	**6,374**

Source: EPA 2010.

Note: Totals may not sum due to independent rounding. Gg CH_4 is gigagrams methane.

Appendix Table A-12 IPCC Emission Factors for Livestock

	Emission Factors
Animal Type	*(kg CH_4/head/year)*
Dairy	128
Other Cattle	53
Calves	0
Swine	1.5
Sheep	8
Goats	5
Horses	18

Source: EPA 2010, IPCC 2006.
IPCC is the Intergovernmental Panel on Climate Change; kg CH_4 is kilograms methane.

Appendix Table A-13 Summary of Greenhouse Gas Emissions from Managed[1] Waste by State in 2008

	CH_4	N_2O	*Total*
State		*Tg CO_2 eq.*	
Alabama	0.40	0.16	**0.55**
Alaska	0.01	0.00	**0.01**
Arizona	1.00	0.29	**1.29**
Arkansas	0.29	0.21	**0.50**
California	7.18	1.51	**8.68**
Colorado	0.76	0.72	**1.48**
Connecticut	0.03	0.02	**0.06**
Delaware	0.03	0.03	**0.06**
Florida	0.54	0.08	**0.62**
Georgia	0.66	0.23	**0.89**
Hawaii	0.02	0.00	**0.03**
Idaho	1.94	0.57	**2.52**
Illinois	1.19	0.30	**1.49**
Indiana	1.04	0.32	**1.35**
Iowa	6.69	1.41	**8.10**
Kansas	0.94	1.48	**2.42**
Kentucky	0.27	0.10	**0.37**
Louisiana	0.11	0.03	**0.14**
Maine	0.04	0.02	**0.06**
Maryland	0.08	0.07	**0.15**
Massachusetts	0.01	0.01	**0.02**
Michigan	0.84	0.38	**1.22**
Minnesota	2.10	0.78	**2.88**
Mississippi	0.45	0.13	**0.58**
Missouri	0.94	0.24	**1.18**
Montana	0.15	0.06	**0.22**
Nebraska	1.03	1.50	**2.53**
Nevada	0.12	0.03	**0.15**
New Hampshire	0.01	0.01	**0.02**
New Jersey	0.02	0.01	**0.03**
New Mexico	1.31	0.28	**1.59**
New York	0.53	0.31	**0.83**
North Carolina	4.45	0.42	**4.87**
North Dakota	0.11	0.07	**0.18**
Ohio	0.76	0.37	**1.13**
Oklahoma	1.41	0.34	**1.75**
Oregon	0.32	0.15	**0.47**
Pennsylvania	0.60	0.35	**0.95**
Rhode Island	0.00	0.00	**0.01**
South Carolina	0.28	0.06	**0.34**
South Dakota	0.53	0.34	**0.88**
Tennessee	0.20	0.07	**0.27**
Texas	2.65	1.95	**4.61**
Utah	0.46	0.12	**0.58**
Vermont	0.10	0.05	**0.15**
Virginia	0.27	0.12	**0.39**
Washington	0.72	0.26	**0.98**
West Virginia	0.04	0.03	**0.07**
Wisconsin	1.32	1.03	**2.35**
Wyoming	0.07	0.07	**0.14**
Total	**45.02**	**17.11**	**62.13**

Source: EPA 2010. Tg CO_2 eq. is teragrams carbon dioxide equivalent. CH_4 is methane. N_2O is nitrous oxide.
[1]Methane totals include emissions from grazed land manure.

Appendix Table A-14 Methane Emissions from Manure Management by State and Animal in 2008

State	Dairy cattle	Beef cattle	Poultry	Swine	Goats	Horses	Sheep	*Total*
				Tg CO_2 eq.				
Alabama	0.0441	0.0148	0.0004	0.0193	0.2546	0.0002	0.0637	**0.3971**
Alaska	0.0003	0.0006	0.0000	0.0004	0.0043	0.0001	0.0001	**0.0058**
Arizona	0.0406	0.8717	0.0003	0.0138	0.0142	0.0025	0.0601	**1.0032**
Arkansas	0.0426	0.0102	0.0003	0.0213	0.1080	0.0002	0.1095	**0.2920**
California	0.0982	6.8946	0.0008	0.0389	0.1061	0.0102	0.0278	**7.1766**
Colorado	0.0767	0.4251	0.0001	0.0211	0.0658	0.0046	0.1637	**0.7571**
Connecticut	0.0004	0.0165	0.0000	0.0019	0.0122	0.0001	0.0003	**0.0314**
Delaware	0.0002	0.0061	0.0000	0.0007	0.0183	0.0001	0.0024	**0.0280**
Florida	0.0599	0.2984	0.0003	0.0295	0.1539	0.0002	0.0024	**0.5445**
Georgia	0.0370	0.1050	0.0005	0.0218	0.4080	0.0002	0.0865	**0.6590**
Hawaii	0.0069	0.0077	0.0000	0.0014	0.0033	0.0002	0.0045	**0.0239**
Idaho	0.0411	1.8665	0.0001	0.0164	0.0127	0.0000	0.0037	**1.9405**
Illinois	0.0274	0.1198	0.0001	0.0117	0.0067	0.0007	1.0216	**1.1880**
Indiana	0.0161	0.1675	0.0001	0.0193	0.0312	0.0006	0.8007	**1.0354**
Iowa	0.1050	0.2629	0.0001	0.0152	0.0465	0.0025	6.2592	**6.6913**
Kansas	0.1856	0.2655	0.0001	0.0133	0.0014	0.0010	0.4693	**0.9362**
Kentucky	0.0541	0.0285	0.0004	0.0294	0.0334	0.0004	0.1279	**0.2740**
Louisiana	0.0331	0.0170	0.0001	0.0141	0.0455	0.0002	0.0021	**0.1121**
Maine	0.0007	0.0232	0.0000	0.0025	0.0088	0.0001	0.0003	**0.0356**
Maryland	0.0026	0.0440	0.0001	0.0051	0.0253	0.0003	0.0068	**0.0842**
Massachusetts	0.0005	0.0087	0.0000	0.0030	0.0008	0.0001	0.0017	**0.0148**
Michigan	0.0142	0.5704	0.0001	0.0206	0.0180	0.0009	0.2134	**0.8376**
Minnesota	0.0378	0.4754	0.0001	0.0182	0.0391	0.0016	1.5277	**2.0999**
Mississippi	0.0339	0.0161	0.0002	0.0197	0.2256	0.0002	0.1533	**0.4490**
Missouri	0.0956	0.0842	0.0003	0.0278	0.0235	0.0009	0.7062	**0.9385**
Montana	0.0649	0.0292	0.0000	0.0186	0.0074	0.0030	0.0318	**0.1548**
Nebraska	0.1921	0.0938	0.0001	0.0116	0.0128	0.0009	0.7177	**1.0290**
Nevada	0.0133	0.1004	0.0000	0.0032	0.0010	0.0008	0.0008	**0.1195**
New Hampshire	0.0003	0.0110	0.0000	0.0016	0.0011	0.0001	0.0003	**0.0144**
New Jersey	0.0005	0.0062	0.0000	0.0053	0.0035	0.0001	0.0015	**0.0172**
New Mexico	0.0360	1.2519	0.0001	0.0092	0.0129	0.0014	0.0001	**1.3115**
New York	0.0089	0.4692	0.0002	0.0148	0.0161	0.0007	0.0169	**0.5269**
North Carolina	0.0177	0.0316	0.0005	0.0189	0.2986	0.0004	4.0787	**4.4465**
North Dakota	0.0420	0.0234	0.0000	0.0085	0.0014	0.0010	0.0305	**0.1068**
Ohio	0.0226	0.2818	0.0002	0.0264	0.0254	0.0014	0.4019	**0.7597**
Oklahoma	0.1211	0.1785	0.0004	0.0295	0.0950	0.0009	0.9873	**1.4128**
Oregon	0.0384	0.2330	0.0002	0.0182	0.0246	0.0024	0.0021	**0.3187**
Pennsylvania	0.0151	0.2724	0.0002	0.0223	0.0316	0.0011	0.2588	**0.6015**
Rhode Island	0.0001	0.0006	0.0000	0.0004	0.0020	0.0001	0.0002	**0.0033**
South Carolina	0.0135	0.0181	0.0003	0.0120	0.1252	0.0002	0.1066	**0.2759**
South Dakota	0.0874	0.1153	0.0000	0.0137	0.0057	0.0037	0.3083	**0.5341**
Tennessee	0.0482	0.0294	0.0006	0.0292	0.0190	0.0003	0.0738	**0.2006**
Texas	0.5353	1.4399	0.0094	0.1098	0.1372	0.0157	0.4053	**2.6527**
Utah	0.0228	0.2497	0.0000	0.0121	0.0587	0.0031	0.1124	**0.4587**
Vermont	0.0010	0.0919	0.0000	0.0022	0.0010	0.0001	0.0001	**0.0963**
Virginia	0.0335	0.0475	0.0002	0.0160	0.0352	0.0009	0.1367	**0.2699**
Washington	0.0250	0.6460	0.0001	0.0149	0.0280	0.0006	0.0034	**0.7180**
West Virginia	0.0096	0.0074	0.0001	0.0063	0.0110	0.0004	0.0010	**0.0357**
Wisconsin	0.0293	1.1895	0.0002	0.0200	0.0101	0.0010	0.0733	**1.3234**
Wyoming	0.0324	0.0113	0.0000	0.0124	0.0007	0.0046	0.0119	**0.0734**
Total	**2.4656**	**19.4292**	**0.0177**	**0.8232**	**2.6325**	**0.0726**	**19.5762**	**45.0170**

Source: EPA 2010. Tg CO_2 eq. is teragrams carbon dioxide equivalent.
Managed manure includes emissions from grazed lands.

Appendix Table A-15 Nitrous Oxide Emissions from Manure Management by State and Animal in 2008

State	Dairy cattle	Beef cattle	Poultry	Swine	*Total*
		Tg CO_2 eq.			
Alabama	0.0032	0.0019	0.1395	0.0039	**0.1484**
Alaska	0.0003	0.0000	0.0018	0.0000	**0.0022**
Arizona	0.0937	0.1811	0.0019	0.0035	**0.2802**
Arkansas	0.0032	0.0015	0.1860	0.0075	**0.1981**
California	1.1314	0.2832	0.0512	0.0018	**1.4676**
Colorado	0.0997	0.5705	0.0062	0.0201	**0.6965**
Connecticut	0.0084	0.0001	0.0141	0.0000	**0.0226**
Delaware	0.0024	0.0001	0.0295	0.0002	**0.0322**
Florida	0.0411	0.0012	0.0219	0.0002	**0.0643**
Georgia	0.0189	0.0019	0.1914	0.0055	**0.2177**
Hawaii	0.0014	0.0003	0.0014	0.0003	**0.0034**
Idaho	0.4286	0.1248	0.0019	0.0005	**0.5559**
Illinois	0.0768	0.0900	0.0068	0.1117	**0.2854**
Indiana	0.1023	0.0553	0.0555	0.0887	**0.3019**
Iowa	0.1492	0.6690	0.0834	0.4775	**1.3791**
Kansas	0.0944	1.3219	0.0018	0.0490	**1.4671**
Kentucky	0.0175	0.0081	0.0426	0.0089	**0.0771**
Louisiana	0.0040	0.0010	0.0134	0.0002	**0.0185**
Maine	0.0059	0.0001	0.0059	0.0000	**0.0120**
Maryland	0.0208	0.0047	0.0377	0.0007	**0.0638**
Massachusetts	0.0059	0.0001	0.0011	0.0002	**0.0073**
Michigan	0.2315	0.0860	0.0221	0.0254	**0.3650**
Minnesota	0.3451	0.1594	0.0694	0.1803	**0.7541**
Mississippi	0.0037	0.0018	0.1085	0.0089	**0.1229**
Missouri	0.0702	0.0337	0.0415	0.0743	**0.2198**
Montana	0.0148	0.0216	0.0015	0.0044	**0.0423**
Nebraska	0.0347	1.3581	0.0131	0.0826	**1.4884**
Nevada	0.0170	0.0036	0.0018	0.0001	**0.0224**
New Hampshire	0.0056	0.0000	0.0013	0.0000	**0.0070**
New Jersey	0.0038	0.0001	0.0026	0.0002	**0.0066**
New Mexico	0.1899	0.0778	0.0019	0.0000	**0.2696**
New York	0.2593	0.0142	0.0165	0.0021	**0.2920**
North Carolina	0.0118	0.0016	0.1548	0.2407	**0.4089**
North Dakota	0.0184	0.0342	0.0018	0.0040	**0.0584**
Ohio	0.1569	0.0951	0.0455	0.0442	**0.3417**
Oklahoma	0.0438	0.0204	0.0335	0.0606	**0.1584**
Oregon	0.0743	0.0416	0.0138	0.0003	**0.1300**
Pennsylvania	0.2021	0.0380	0.0559	0.0283	**0.3243**
Rhode Island	0.0004	0.0000	0.0018	0.0000	**0.0022**
South Carolina	0.0038	0.0006	0.0473	0.0065	**0.0582**
South Dakota	0.0554	0.2032	0.0078	0.0359	**0.3024**
Tennessee	0.0161	0.0023	0.0265	0.0050	**0.0500**
Texas	0.2600	1.4839	0.0992	0.0265	**1.8697**
Utah	0.0612	0.0170	0.0087	0.0192	**0.1062**
Vermont	0.0502	0.0002	0.0012	0.0000	**0.0517**
Virginia	0.0213	0.0152	0.0519	0.0088	**0.0972**
Washington	0.1454	0.0860	0.0176	0.0004	**0.2494**
West Virginia	0.0037	0.0030	0.0155	0.0001	**0.0224**
Wisconsin	0.8598	0.1247	0.0128	0.0087	**1.0060**
Wyoming	0.0054	0.0371	0.0010	0.0027	**0.0462**
Total	**5.475**	**7.278**	**1.772**	**1.650**	**16.1746**

Source: EPA 2010.
Tg CO_2 eq. is teragrams carbon dioxide equivalent.

Appendix Table A-16 Waste Characteristics Data

	Average TAM[1]	Source	Nitrogen, N_{ex}[2]	Source	Max Methane Generation Potential	Source	Volatile Solids (VS)	Source
Livestock	*kg*		*kg/day per 1,000 kg mass*		*B_o (m^3 CH4/kg VS added)*		*kg/day per 1,000 kg mass*	
Dairy Cows	604	Safley 2000	0.44	USDA 1996	0.24	Morris 1976	8.8	Lieberman and Pape, 2005
Dairy Heifers	476	Safley 2000	0.31	USDA 1996	0.17	Bryant et. al. 1976	6.7	Lieberman and Pape, 2005
Feedlot Steers	420	USDA 1996	0.3	USDA 1996	0.33	Hashimoto 1981	3.86	Lieberman and Pape, 2005
Feedlot Heifers	420	USDA 1996	0.3	USDA 1996	0.33	Hashimoto 1981	3.98	Lieberman and Pape, 2005
Bulls NOF[3]	750	Safley 2000	0.31	USDA 1996	0.17	Hashimoto 1981	6.04	USDA 1996
Calves NOF	118	ERG 2003	0.3	USDA 1996	0.17	Hashimoto 1981	6.41	USDA 1996
Heifers NOF	420	USDA 1996	0.31	USDA 1996	0.17	Hashimoto 1981	7.09	Lieberman and Pape, 2005
Steers NOF	318	Safley 2000	0.31	USDA 1996	0.17	Hashimoto 1981	7.93	Lieberman and Pape, 2005
Cows NOF	533	NRC 2000	0.33	USDA 1996	0.17	Hashimoto 1981	6.97	Lieberman and Pape, 2005
Market Swine <60 lbs.	16	Safley 2000	0.6	USDA 1996	0.48	Hashimoto 1984	8.8	USDA 1996
Market Swine 60-119 lbs.	41	Safley 2000	0.42	USDA 1996	0.48	Hashimoto 1984	5.4	USDA 1996
Market Swine 120-179 lbs.	68	Safley 2000	0.42	USDA 1996	0.48	Hashimoto 1984	5.4	USDA 1996
Market Swine >180 lbs.	91	Safley 2000	0.42	USDA 1996	0.48	Hashimoto 1984	5.4	USDA 1996
Breeding Swine	198	Safley 2000	0.24	USDA 1996	0.48	Hashimoto 1984	2.6	USDA 1996
Feedlot Sheep	25	EPA 1992	0.42	ASAE 1999	0.36	EPA 1992	9.2	EPA 1992
Sheep NOF	80	EPA 1992	0.42	ASAE 1999	0.19	EPA 1992	9.2	EPA 1992
Goats	64	ASAE 1999	0.45	ASAE 1999	0.17	EPA 1992	9.5	EPA 1992
Horses	450	ASAE 1999	0.3	ASAE 1999	0.33	EPA 1992	10	EPA 1992
Hens ≥ 1 yr	1.8	ASAE 1999	0.83	USDA 1996	0.39	Hill 1982	10.8	USDA 1996
Pullets	1.8	ASAE 1999	0.62	USDA 1996	0.39	Hill 1982	9.7	USDA 1996
Other Chickens	1.8	ASAE 1999	0.83	USDA 1996	0.39	Hill 1982	10.8	USDA 1996
Broilers	0.9	ASAE 1999	1.1	USDA 1996	0.36	Hill 1984	15	USDA 1996
Turkeys	6.8	ASAE 1999	0.74	USDA 1996	0.36	Hill 1984	9.7	USDA 1996

Source: EPA 2010. B_o is maximum methane producing capacity for domestic waste water. CH_4 is methane.
[1](TAM) Typical animal mass.
[2]Nitrogen excretion source.
[3](NOF) Not on feed.

Appendix Table A-17 State Volatile Solids Production Rates in 2008

State	Dairy Cow	Dairy Heifer	Beef Cow NOF[1]	Beef Heifer NOF	Beef Steer NOF	Beef Heifer OF[1]	Beef Steer OF
				kg/day/1,000 kg mass			
Alabama	8.40	8.35	7.02	7.81	8.22	4.74	4.27
Alaska	7.30	8.35	9.02	10.05	10.81	4.58	4.15
Arizona	10.37	8.35	9.02	10.34	10.81	4.27	3.91
Arkansas	7.59	8.35	7	7.86	8.19	4.35	3.98
California	10.02	8.35	6.85	7.95	8.00	4.33	3.96
Colorado	10.25	8.35	6.46	7.69	7.52	4.34	3.97
Connecticut	9.22	8.35	6.9	7.67	8.07	4.93	4.41
Delaware	8.63	8.35	6.9	7.72	8.07	4.64	4.19
Florida	8.90	8.35	7.02	7.75	8.22	4.58	4.15
Georgia	9.07	8.35	7.02	7.85	8.22	4.63	4.18
Hawaii	7.00	8.35	9.02	10.26	10.81	4.58	4.15
Idaho	10.11	8.35	9.02	10.82	10.81	4.42	4.03
Illinois	9.07	8.35	6.91	8.07	8.07	4.59	4.15
Indiana	9.38	8.35	6.91	7.98	8.07	4.35	3.98
Iowa	9.46	8.35	3.91	8.27	8.07	4.28	3.93
Kansas	9.63	8.35	6.46	7.75	7.52	4.35	3.97
Kentucky	7.89	8.35	7.02	7.91	8.22	4.65	4.20
Louisiana	7.39	8.35	7	7.73	8.19	4.48	4.07
Maine	8.99	8.35	6.9	7.76	8.07	4.47	4.07
Maryland	9.02	8.35	6.9	7.76	8.07	4.45	4.05
Massachusetts	8.63	8.35	6.9	7.74	8.07	4.58	4.15
Michigan	10.05	8.35	6.91	7.99	8.07	4.38	4.00
Minnesota	9.17	8.35	6.91	8.04	8.07	4.24	3.89
Mississippi	8.19	8.35	7.02	7.82	8.22	4.57	4.14
Missouri	8.02	8.35	6.91	7.85	8.07	4.49	4.08
Montana	9.03	8.35	6.46	7.17	7.52	4.69	4.23
Nebraska	9.09	8.35	6.46	7.71	7.52	4.35	3.98
Nevada	9.65	8.35	9.02	10.49	10.81	4.48	4.07
New Hampshire	9.44	8.35	6.9	7.74	8.07	4.30	3.94
New Jersey	8.51	8.35	6.9	7.89	8.07	4.36	3.98
New Mexico	10.34	8.35	9.02	10.56	10.81	4.22	3.88
New York	9.42	8.35	6.9	8.02	8.07	4.05	3.75
North Carolina	9.38	8.35	7.02	7.83	8.22	4.65	4.20
North Dakota	8.40	8.35	6.46	7.43	7.52	4.22	3.88
Ohio	9.01	8.35	6.91	7.93	8.07	4.33	3.96
Oklahoma	8.58	8.35	7	8.08	8.19	4.35	3.98
Oregon	9.40	8.35	9.02	10.54	10.81	4.46	4.06
Pennsylvania	9.26	8.35	6.9	8.00	8.07	4.35	3.98
Rhode Island	8.94	8.35	6.9	7.60	8.07	4.87	4.36
South Carolina	9.05	8.35	7.02	7.81	8.22	4.58	4.15
South Dakota	9.45	8.35	6.46	7.50	7.52	4.39	4.01
Tennessee	8.60	8.35	7.02	7.86	8.22	5.02	4.48
Texas	9.51	8.35	7	8.21	8.19	4.32	3.95
Utah	9.70	8.35	9.02	10.51	10.81	4.22	3.88
Vermont	9.03	8.35	6.9	7.89	8.07	4.52	4.10
Virginia	9.02	8.35	7.02	7.87	8.22	4.35	3.98
Washington	10.36	8.35	9.02	10.77	10.81	4.47	4.07
West Virginia	8.13	8.35	6.9	7.74	8.07	5.25	4.65
Wisconsin	9.34	8.35	6.91	7.87	8.07	4.31	3.95
Wyoming	9.29	8.35	6.46	7.30	7.52	4.61	4.17

Source: EPA 2010.

[1](NOF) Not on feed or (OF) On feed.

Appendix Table A-18 State-Based Methane Conversion Factors[1] for Liquid Waste Management Systems in 2008

State	Liquid/Slurry and Deep Pit	Anaerobic Lagoon
	percent	
Alabama	0.38	0.75
Alaska	0.14	0.46
Arizona	0.43	0.76
Arkansas	0.35	0.74
California	0.36	0.75
Colorado	0.22	0.65
Connecticut	0.24	0.68
Delaware	0.31	0.73
Florida	0.51	0.76
Georgia	0.37	0.75
Hawaii	0.58	0.76
Idaho	0.22	0.65
Illinois	0.28	0.71
Indiana	0.27	0.70
Iowa	0.25	0.68
Kansas	0.30	0.73
Kentucky	0.31	0.73
Louisiana	0.46	0.76
Maine	0.20	0.62
Maryland	0.30	0.72
Massachusetts	0.24	0.67
Michigan	0.24	0.67
Minnesota	0.23	0.67
Mississippi	0.24	0.75
Missouri	0.30	0.72
Montana	0.20	0.61
Nebraska	0.26	0.70
Nevada	0.26	0.71
New Hampshire	0.21	0.64
New Jersey	0.29	0.71
New Mexico	0.28	0.70
New York	0.23	0.65
North Carolina	0.34	0.73
North Dakota	0.21	0.64
Ohio	0.27	0.70
Oklahoma	0.36	0.74
Oregon	0.21	0.64
Pennsylvania	0.26	0.69
Rhode Island	0.26	0.69
South Carolina	0.39	0.75
South Dakota	0.24	0.68
Tennessee	0.33	0.73
Texas	0.43	0.76
Utah	0.22	0.66
Vermont	0.21	0.63
Virginia	0.30	0.72
Washington	0.21	0.64
West Virginia	0.26	0.69
Wisconsin	0.23	0.66
Wyoming	0.20	0.62

Source: EPA 2010, IPCC 2006.

[1](MCF) Methane conversion factors represent weighted average of multiple animal types.

Appendix Table A-19 Additional Methane and Nitrous Oxide Emission Factors

	Methane	Nitrous Oxide
Manure Management System		
Pasture	0.015	0.02
Daily spread	0.005	0
Solid storage	0.04	0.005
Dry lot	0.015	0.02
Poultry with bedding	0.015	0.001
Poultry without bedding	0.015	0.001
Liquid/Slurry	0.25	0.005
Aerobic treatments	0	0.005

Source: IPCC 2006.

Appendix Table A-20 State-Weighted Methane Conversion Factors for Livestock Waste Emissions in 2008[1]

State	Beef Feed Lot Heifer	Beef Feed Lot Steer	Dairy Cow	Dairy Heifer	Swine Market	Swine Breeding	Layer	Broiler	Turkey	Sheep	Goats	Horses
						percent						
Alabama	0.01	2.09	0.69	0.02	2.49	0.54	8.69	3.41	0.03	0.01	0.02	0.92
Alaska	0.00	0.02	0.03	0.00	0.00	0.00	0.18	+	0.03	0.01	0.00	0.02
Arizona	0.75	1.19	41.37	0.14	2.37	0.49	0.65	+	0.03	0.12	0.01	0.66
Arkansas	0.01	2.02	0.47	0.02	2.39	2.83	0.54	3.72	0.89	0.01	0.01	1.01
California	1.39	3.29	325.90	2.41	1.03	0.29	4.32	0.27	0.46	0.48	0.04	1.85
Colorado	1.51	2.14	20.12	0.12	5.15	2.65	3.11	+	0.03	0.22	0.00	1.00
Connecticut	0.00	0.02	0.77	0.02	0.01	0.01	0.28	0.27	0.03	0.00	0.00	0.09
Delaware	0.00	0.01	0.29	0.01	0.07	0.05	0.07	0.78	0.03	0.01	0.00	0.03
Florida	0.01	2.84	14.10	0.12	0.06	0.05	7.10	0.20	0.03	0.01	0.02	1.40
Georgia	0.01	1.75	4.93	0.07	2.99	1.13	14.89	4.52	0.03	0.01	0.03	1.04
Hawaii	0.00	0.33	0.36	0.00	0.14	0.08	0.13	+	0.03	0.01	0.00	0.06
Idaho	0.33	1.63	88.35	0.53	0.12	0.06	0.58	+	0.03	0.12	0.00	0.78
Illinois	0.25	1.05	5.70	0.11	39.37	9.28	0.29	+	0.03	0.03	0.00	0.56
Indiana	0.16	0.61	7.83	0.14	32.66	5.47	0.80	0.27	0.41	0.03	0.01	0.92
Iowa	1.87	3.13	12.32	0.20	269.44	28.62	1.68	0.27	0.26	0.12	0.00	0.72
Kansas	3.79	5.05	12.51	0.13	18.95	3.39	0.04	+	0.03	0.05	0.01	0.63
Kentucky	0.03	2.55	1.26	0.09	4.96	1.13	0.59	0.98	0.03	0.02	0.02	1.40
Louisiana	0.01	1.57	0.78	0.03	0.07	0.03	1.86	0.27	0.03	0.01	0.01	0.67
Maine	0.00	0.03	1.07	0.03	0.01	0.01	0.39	+	0.03	0.00	0.00	0.12
Maryland	0.01	0.11	2.05	0.05	0.25	0.07	0.23	0.95	0.03	0.01	0.00	0.24
Massachusetts	0.00	0.02	0.40	0.02	0.06	0.02	0.01	+	0.03	0.00	0.00	0.15
Michigan	0.24	0.44	26.91	0.25	8.39	1.77	0.56	0.27	0.03	0.04	0.01	0.98
Minnesota	0.44	1.36	22.15	0.49	62.43	10.32	0.35	0.14	1.37	0.08	0.00	0.87
Mississippi	0.01	1.60	0.75	0.02	6.06	1.24	8.02	2.69	0.03	0.01	0.01	0.94
Missouri	0.10	4.46	3.90	0.11	26.17	7.46	0.25	0.27	0.60	0.04	0.01	1.32
Montana	0.06	3.03	1.37	0.02	1.19	0.32	0.33	+	0.03	0.14	0.00	0.88
Nebraska	3.79	5.36	4.43	0.04	27.49	6.69	0.56	0.02	0.03	0.04	0.00	0.55
Nevada	0.01	0.62	4.77	0.02	0.03	0.01	0.02	+	0.03	0.04	0.00	0.15
New Hampshire	0.00	0.01	0.51	0.01	0.01	0.00	0.03	+	0.03	0.00	0.00	0.07
New Jersey	0.00	0.02	0.28	0.01	0.06	0.02	0.14	+	0.03	0.01	0.00	0.25
New Mexico	0.21	1.50	59.40	0.21	0.00	0.00	0.59	+	0.03	0.07	0.00	0.44
New York	0.04	0.38	21.68	0.66	0.62	0.18	0.47	0.27	0.03	0.03	0.01	0.70
North Carolina	0.01	0.84	1.46	0.05	159.74	34.48	10.52	2.55	1.15	0.02	0.03	0.90
North Dakota	0.09	1.91	1.09	0.03	0.85	0.60	0.04	+	0.03	0.05	0.00	0.41
Ohio	0.27	0.81	13.22	0.20	16.11	3.03	0.85	0.18	0.17	0.07	0.01	1.26
Oklahoma	0.49	5.27	8.42	0.08	33.71	13.30	3.74	0.76	0.03	0.04	0.02	1.41
Oregon	0.13	1.70	10.97	0.13	0.07	0.03	0.87	0.27	0.03	0.11	0.01	0.87
Pennsylvania	0.12	0.60	12.43	0.54	10.61	1.72	0.66	0.51	0.33	0.05	0.01	1.06
Rhode Island	+	0.00	0.03	0.00	0.01	0.00	0.07	+	0.03	0.00	0.00	0.02
South Carolina	0.00	0.64	0.84	0.02	4.50	0.57	4.84	0.76	0.36	0.01	0.02	0.57
South Dakota	0.56	3.60	5.43	0.06	11.93	2.75	0.14	+	0.13	0.18	0.00	0.65
Tennessee	0.01	2.29	1.31	0.09	2.98	0.54	0.24	0.64	0.03	0.02	0.03	1.39
Texas	5.95	19.54	68.09	0.48	16.29	3.01	4.45	2.05	0.03	0.75	0.45	5.23
Utah	0.05	1.04	11.82	0.07	4.07	1.28	2.68	+	0.12	0.15	0.00	0.57
Vermont	0.00	0.05	4.27	0.11	0.00	0.00	0.02	+	0.03	0.00	0.00	0.11
Virginia	0.05	1.55	2.17	0.09	5.59	0.92	0.36	0.80	0.52	0.04	0.01	0.76
Washington	0.27	0.92	30.56	0.21	0.12	0.04	1.04	0.27	0.03	0.03	0.01	0.71
West Virginia	0.01	0.45	0.35	0.01	0.03	0.01	0.14	0.27	0.11	0.02	0.00	0.30
Wisconsin	0.34	1.05	55.46	1.18	2.80	0.69	0.29	0.17	0.03	0.05	0.01	0.95
Wyoming	0.10	1.45	0.53	0.01	0.29	0.28	0.01	+	0.03	0.22	0.00	0.59

Source: EPA 2010

[1](MCFs) Methane conversion factors are weighted by the distribution of waste management systems for each animal type within a state.

Appendix Table A-21 Nitrogen in Livestock Waste on Grazed Lands

Year	*Teragrams Nitrogen*
1990	3.9
1991	3.9
1992	4.0
1993	4.0
1994	4.0
1995	4.1
1996	4.0
1997	3.9
1998	3.8
1999	3.8
2000	3.7
2001	3.7
2002	3.7
2003	3.7
2004	3.7
2005	3.8
2006	3.8
2007	3.8
2008	3.7

Source: EPA 2010

Appendix B: Crop Emissions

Appendix B

B-1 Rice Harvested Area, 1990, 1995, 2000-2008
B-2 Total U.S. Production of Crops Managed with Burning, 1990, 1995, 2000-2008
B-3 State Production of Crops Managed with Burning in 2008
B-4 Information Used in Estimating Methane and Nitrous Oxide Emissions from Crop Residue Burning in 2008; (a) Crop Assumptions and Coefficients; (b) Emissions Factors and Global Warming Potentials; (c) Rice Area Burned by State
B-5 Soil Carbon Stocks by Climate Region and U.S. Soil Groupings
B-6 Stock Change Factors for the U.S. and IPCC Default Values for Impacts on Mineral Soils
B-7 Cultivated Histosol (Organic Soils) Area
B-8 Carbon Loss Rates from Organic Soils under Agricultural Management in the U.S.
B-9 State-Level Estimates of Annual Soil Carbon Stock Changes by Major Land Use and Management Type, 2008
B-10 State-Level Estimates of Soil Carbon Changes on Cropland by Major Activity, 2008

Appendix Table B-1 Rice Harvested Area, 1990, 1995, 2000-2008

	1990	1995	2000	2001	2002	2003	2004	2005	2006	2007	2008
State and Crop						*1,000 Hectares*					
Arkansas	**486**	**542**	**571**	**656**	**608**	**589**	**629**	**662**	**567**	**536**	**565**
Primary	486	542	571	656	608	589	629	662	567	536	565
Ratoon	0	0	0	0	0	0	0	1	0	0	0
California	**160**	**188**	**222**	**191**	**214**	**205**	**239**	**213**	**212**	**216**	**209**
Florida	**7**	**15**	**11**	**7**	**8**	**5**	**7**	**5**	**6**	**8**	**7**
Primary	5	10	8	5	5	2	4	5	5	6	5
Ratoon	2	5	3	3	3	2	3	0	1	2	2
Louisiana	**287**	**276**	**329**	**281**	**283**	**294**	**280**	**264**	**279**	**303**	**269**
Primary	221	206	251	214	251	231	216	236	251	249	194
Ratoon	66	69	78	66	32	64	65	28	28	54	75
Mississippi	**101**	**117**	**88**	**102**	**102**	**95**	**95**	**106**	**76**	**76**	**93**
Missouri	**32**	**45**	**68**	**84**	**74**	**69**	**79**	**87**	**87**	**72**	**81**
Texas	**200**	**180**	**130**	**122**	**114**	**101**	**119**	**103**	**84**	**80**	**106**
Primary	143	129	87	87	83	73	88	81	61	59	70
Ratoon	57	51	43	35	31	28	31	22	24	21	37
Total	**1,273**	**1,363**	**1,418**	**1,443**	**1,403**	**1,358**	**1,448**	**1,440**	**1,310**	**1,291**	**1,330**

Appendix Table B-2 Total U.S. Production of Crops Managed with Burning, 1990, 1995, 2000-2008

	1990	1995	2000	2001	2002	2003	2004	2005	2006	2007	2008
Crop						*Million Metric Tons*					
Wheat	74.3	59.4	60.6	53.0	43.7	63.8	58.7	57.3	49.3	55.8	68.0
Rice	7.1	7.9	8.7	9.8	9.6	9.1	10.6	10.2	8.8	9.0	9.3
Sugarcane	25.5	27.9	32.8	31.4	32.3	30.7	26.3	24.1	26.8	27.2	27.8
Corn	201.5	188.0	251.9	241.4	227.8	256.3	299.9	282.3	267.6	331.2	307.4
Barley	9.2	7.8	6.9	5.4	4.9	6.1	6.1	4.6	3.9	4.6	5.2
Soybeans	52.4	59.2	75.1	78.7	75.0	66.8	85.0	83.4	86.8	72.9	80.5
Peanuts	1.6	1.6	1.5	1.9	1.5	1.9	1.9	2.2	1.6	1.7	2.3
Total	**371.7**	**351.8**	**437.5**	**422.0**	**394.8**	**434.6**	**488.6**	**464.1**	**444.8**	**502.3**	**500.6**

Appendix Table B-3 Production of Crops Managed with Burning

	Corn	Soybeans	Barley	Wheat	Peanuts	Rice	Sugarcane
Year		*1,000 bushels*			*1,000 lbs.*	*1,000 cwt*	*1,000 tons*
1990	7,933,894	2,063,480	361,876	2,924,713	3,603,593	156,830	25,525
1991	7,474,639	2,128,399	397,987	2,121,542	4,926,477	160,554	27,444
1992	9,476,538	2,346,768	390,071	2,642,953	4,284,347	180,876	27,545
1993	6,337,623	2,003,236	341,172	2,567,571	3,392,350	157,379	28,188
1994	10,050,350	2,694,457	321,305	2,486,723	4,247,377	199,104	28,057
1995	7,399,926	2,329,519	308,031	2,338,576	3,461,420	175,197	27,922
1996	9,232,401	2,550,250	336,365	2,440,017	3,661,133	172,767	26,729
1997	9,206,676	2,880,755	308,462	2,658,669	3,539,330	184,000	28,766
1998	9,758,520	2,936,751	301,340	2,729,227	3,963,382	185,505	31,486
1999	9,430,452	2,843,264	233,135	2,459,487	3,829,431	207,052	32,023
2000	9,914,883	2,954,747	272,399	2,387,274	3,265,454	191,903	32,762
2001	9,502,419	3,097,107	212,850	2,086,522	4,276,631	215,925	31,377
2002	8,966,635	2,952,965	194,488	1,720,555	3,320,988	211,672	32,253
2003	10,089,051	2,628,882	238,524	2,512,200	4,144,070	200,265	30,715
2004	11,806,886	3,346,750	239,775	2,312,366	4,288,117	232,920	26,320
2005	11,113,894	3,281,984	181,622	2,254,987	4,869,775	223,769	24,137
2006	10,534,690	3,415,921	154,425	1,941,434	3,464,198	194,292	26,820
2007	13,037,654	2,868,291	180,091	2,197,557	3,672,178	199,148	27,187
2008	12,101,033	3,170,490	205,280	2,678,016	5,147,817	204,409	27,842

Appendix Table B-4 Information Used in Estimating Methane and Nitrous Oxide Emissions from Crop Residue Burning in 2008

B-4(a) Crop Assumptions and Coefficients

Assumption/Coefficient	Corn	Peanuts	Soybeans	Barley	Wheat	Rice	Sugarcane
Residue/Crop Ratio	1	1	2.1	1.2	1.3	1.4	0.19
Fraction Residue Burned	0.03	0.03	0.03	0.03	0.03	variable	0.95
Fraction Dry Matter	0.91	0.86	0.87	0.93	0.93	0.91	0.62
Burning Efficiency	0.93	0.93	0.93	0.93	0.93	0.93	0.93
Combustion Efficiency	0.88	0.88	0.88	0.88	0.88	0.88	0.88
Fraction Carbon	0.4478	0.45	0.45	0.4485	0.4428	0.3806	0.4235
Fraction Nitrogen	0.0058	0.0106	0.023	0.0077	0.0062	0.0072	0.004

B-4(b) Emissions Factors and Global Warming Potentials

Greenhouse Gas	Factor & Global Warming Potential
Emissions Factor	
Methane	0.005
Nitrous Oxide	0.007
Global Warming Potential	
Methane	21
Nitrous Oxide	310

B-4(c) Rice Area Burned by State

State	% Burned
Arkansas	20
California	11
Florida[1]	0
Louisiana	5
Mississippi	25
Missouri	3
Texas	0

[1]Crop residue burning is illegal in Florida.

Appendix Table B-5 Soil Carbon Stocks by Climate Region and U.S. Soil Groupings[1]

IPCC	USDA	CTD	CTM	WTD	WTM	STD	STM
Inventory Soil Categories	**Taxonomic Soil Orders**			*Metric Tons C/ha*			
High Clay Activity Mineral Soils	Vertisols, Mollisols, Inceptisols, Aridisols, & High Base Status Alfisols	42	65	37	51	42	57
Low Clay Activity Mineral Soils	Ultisols, Oxisols, Acidic Alfisols, & Many Entisols	45	52	25	40	39	47
Sandy Soils	>70% Sand, <8% Clay	24	40	16	30	33	50
Volcanic Soils	Andisols	124	114	124	124	124	128
Spodic Soils	Spodosols	86	74	86	107	86	86
Aquic Soils	Soils With Aquic Suborder	86	89	48	51	63	48
Organic Soils	Histosols[2]	n/a	n/a	n/a	n/a	n/a	n/a

IPCC is Intergovernmental Panel on Climate Change. C/ha is Carbon per hectare.
[1]U.S. soil groupings are based on the IPCC Soil Inventory categories and the USDA taxonomic soil orders.

[2]Carbon stocks are not needed for organic soils and are thus represented by n/a or "not applicable".
Note: Carbon stocks are for the top 30 cm of the soil profile, and were estimated from pedon data available in the NSSC database (NRCS 1997).
Climate regions: Cold temperate dry (CTD), cold temperate moist (CTM), warm temperate dry (WTD), warm temperate moist (WTM), subtropical temperate dry (STD), and subtropical temperate moist (STM).

Appendix Table B-6 Stock Change Factors for the U.S. and IPCC Default Values for Impacts on Mineral Soils

Factors	IPCC Default	Warm Moist Climate	Warm Dry Climate	Cool Moist Climate	Cool Dry Climate
Land Use Change					
Cultivated[1]	1	1	1	1	1
General Uncultivated[1]	1.4	1.42 ± 0.06	1.37 ± 0.05	1.24 ± 0.06	1.20 ± 0.06
Set Aside	1.25	1.31 ± 0.06	1.26 ± 0.04	1.14 ± 0.06	1.10 ± 0.05
Improved Grassland					
Medium Input	1.1	1.14 ± 0.06	1.14 ± 0.06	1.14 ± 0.06	1.14 ± 0.06
High Input	n/a[2]	1.11 ± 0.04	1.11 ± 0.04	1.11 ± 0.04	1.11 ± 0.04
Wetland Rice Production	1.1	1.1	1.1	1.1	1.1
Tillage					
Conventional Till	1	1	1	1	1
Reduced Till	1.05	1.08 ± 0.03	1.09 ± 0.09	1.08 ± 0.03	1.01 ± 0.03
No-till	1.1	1.13 ± 0.02	1.17 ± 0.08	1.13 ± 0.02	1.05 ± 0.03
Cropland Input					
Low	0.9	0.94 ± 0.01	0.94 ± 0.01	0.94 ± 0.01	0.94 ± 0.01
Medium	1	1	1	1	1
High (without manure)	1.1	1.07 ± 0.02	1.07 ± 0.02	1.07 ± 0.02	1.07 ± 0.02
High (with manure)	1.2	1.38 + 0.06	1.34 ± 0.08	1.38 ± 0.06	1.34 ± 0.08

IPCC is Intergovernmental Panel on Climate Change.
[1]Factors in the IPCC report (2006) were converted to represent changes in soil organic content storage from a cultivated condition rather than a native condition.

[2]n/a indicates "non applicable".

Appendix Table B-7 Cultivated Histosol (Organic Soils) Area

	Temperate	Sub-Tropical
Year	*1,000 ha*	
1990	444	194
1991	444	194
1992	444	194
1993	450	196
1994	450	196
1995	450	196
1996	450	196
1997	450	196
1998	450	196
1999	450	196
2000	450	196
2001	450	196
2002	450	196
2003	450	196
2004	450	196
2005	450	196
2006	450	196
2007	450	196
2008	450	196

Appendix Table B-8 Carbon Loss Rates from Organic Soils Under Agricultural Management in the United States

	Cropland	Grassland[1]
Climate Regions	*Metric Tons C/ha-yr*	
CTD & CTM	11.2 ± 2.5	2.8 ± 0.51
WTD & WTM	14.0 ± 2.5	3.5 ± 0.81
STD & STM	14.0 ± 3.3	3.5 ± 0.81

C/ha-yr is carbon per hectare per year.

[1]There is not enough data available to estimate values for C losses from grasslands. Estimates are 25% of the values for cropland (the IPCC default organic soil C losses on grasslands).

Climate regions: Cold temperate dry (CTD), cold temperate moist (CTM), warm temperate dry (WTD), warm temperate moist (WTM), subtropical temperate dry (STD), and subtropical temperate moist (STM).

Appendix Table B-9 State-Level Estimates of Annual Soil Carbon Stock Changes by Major Land Use and Management Type, 2008

State	Net Change, Cropland [1]	Net Change, Hay	CRP	Ag. Land on Organic Soils	*Total* [2]
			Tg CO_2 eq.		
Alabama	(0.14)	(0.15)	(0.12)	0.00	**(0.42)**
Alaska	ND	ND	ND	ND	**0.00**
Arizona	0.04	(0.01)	0.00	0.00	**0.03**
Arkansas	0.43	(0.10)	(0.06)	0.00	**0.28**
California	(0.14)	0.19	(0.02)	2.27	**2.30**
Colorado	0.33	(0.25)	(0.13)	0.00	**(0.04)**
Connecticut	(0.02)	(0.01)	0.00	0.00	**(0.03)**
Delaware	0.02	0.00	(0.00)	0.00	**0.02**
Florida	0.55	0.10	(0.01)	10.00	**10.64**
Georgia	0.14	(0.10)	(0.02)	0.00	**0.03**
Hawaii	ND	ND	ND	0.29	**0.29**
Idaho	0.29	(0.34)	(0.52)	0.09	**(0.49)**
Illinois	(2.71)	(0.36)	(0.77)	0.50	**(3.34)**
Indiana	(0.53)	(0.30)	(0.18)	2.80	**1.78**
Iowa	(1.39)	(0.57)	(1.48)	0.73	**(2.71)**
Kansas	(0.98)	(0.64)	(1.00)	0.00	**(2.61)**
Kentucky	0.12	(0.47)	(0.12)	0.00	**(0.47)**
Louisiana	(0.57)	(0.08)	(0.09)	0.00	**(0.74)**
Maine	0.03	(0.09)	(0.03)	0.00	**(0.09)**
Maryland	0.03	(0.10)	(0.00)	0.03	**(0.04)**
Massachusetts	(0.00)	(0.02)	0.00	0.03	**0.01**
Michigan	(0.33)	(0.45)	(0.12)	2.29	**1.39**
Minnesota	0.45	(0.73)	(0.81)	5.72	**4.64**
Mississippi	0.10	(0.11)	(0.28)	0.00	**(0.29)**
Missouri	(0.47)	(1.66)	(1.50)	0.00	**(3.63)**
Montana	(1.69)	(1.59)	(2.09)	0.03	**(5.34)**
Nebraska	(0.50)	(0.37)	(0.51)	0.00	**(1.39)**
Nevada	(0.02)	(0.01)	0.00	0.00	**(0.03)**
New Hampshire	0.00	(0.03)	0.00	0.01	**(0.02)**
New Jersey	0.01	(0.09)	0.00	0.01	**(0.07)**
New Mexico	0.12	(0.08)	(0.14)	0.00	**(0.11)**
New York	0.43	(1.03)	(0.06)	0.54	**(0.13)**
North Carolina	(0.04)	(0.12)	(0.03)	2.22	**2.04**
North Dakota	(2.48)	(1.81)	(1.73)	0.00	**(6.03)**
Ohio	(1.05)	(0.75)	(0.26)	0.41	**(1.65)**
Oklahoma	(0.55)	(0.34)	(0.22)	0.00	**(1.10)**
Oregon	0.23	(0.19)	(0.27)	0.06	**(0.16)**
Pennsylvania	0.04	(1.03)	(0.06)	0.00	**(1.04)**
Rhode Island	0.00	0.00	0.00	0.00	**0.00**
South Carolina	0.08	(0.07)	(0.03)	0.04	**0.02**
South Dakota	(1.15)	(1.41)	(0.84)	0.00	**(3.40)**
Tennessee	(0.19)	(0.45)	(0.14)	0.00	**(0.79)**
Texas	(0.10)	0.04	(0.75)	0.00	**(0.80)**
Utah	(0.16)	0.17	(0.09)	0.00	**(0.08)**
Vermont	0.08	(0.15)	0.00	0.00	**(0.06)**
Virginia	0.04	(0.45)	(0.01)	0.02	**(0.40)**
Washington	0.26	(0.50)	(0.67)	0.08	**(0.82)**
West Virginia	(0.03)	(0.27)	0.00	0.00	**(0.30)**
Wisconsin	0.17	(0.45)	(0.57)	2.15	**1.30**
Wyoming	0.06	(0.19)	(0.04)	0.01	**(0.15)**
Total	**(11.16)**	**(17.41)**	**(15.78)**	**30.35**	**(14.00)**

[1] Annual cropping systems on mineral soils (e.g., corn, soybean, cotton, and wheat).

[2] Total does not include change in soil organic carbon storage on federal lands, including those that were previously under private ownership, and does not include carbon storage due to sewage sludge applications.

Tg CO_2 eq. is teragrams carbon dioxide equivalent. ND= No data.

Appendix Table B-10 State-Level Estimates of Mineral Soil Carbon Changes on Cropland[1] by Major Activity, 2008

	Cropland Remaining Cropland		Grassland Converted to Cropland		
	Irrigated	Non-irrigated	Irrigated	Non-irrigated	***Net Total***
State			*Tg CO_2 eq.*		
Alabama	(0.01)	(0.54)	0.00	0.14	**(0.40)**
Alaska	ND	ND	ND	ND	**0.00**
Arizona	0.02	(0.00)	0.00	0.00	**0.02**
Arkansas	0.21	(0.06)	0.06	0.10	**0.30**
California	0.09	(0.10)	0.12	(0.04)	**0.07**
Colorado	0.06	(0.09)	0.00	(0.01)	**(0.04)**
Connecticut	0.00	(0.03)	0.00	0.00	**(0.03)**
Delaware	(0.01)	0.01	0.00	0.00	**0.01**
Florida	(0.01)	(0.00)	0.14	0.51	**0.64**
Georgia	(0.03)	(0.09)	0.00	0.17	**0.06**
Hawaii	ND	ND	ND	ND	**0.00**
Idaho	0.14	(0.73)	0.08	(0.06)	**(0.58)**
Illinois	(0.11)	(3.76)	0.00	0.06	**(3.81)**
Indiana	(0.03)	(1.01)	(0.00)	0.08	**(0.96)**
Iowa	(0.03)	(2.95)	(0.01)	(0.40)	**(3.38)**
Kansas	0.31	(2.79)	(0.01)	(0.09)	**(2.59)**
Kentucky	(0.02)	(0.44)	0.00	0.05	**(0.40)**
Louisiana	(0.23)	(0.55)	0.01	0.05	**(0.72)**
Maine	0.01	(0.11)	0.00	0.00	**(0.10)**
Maryland	(0.01)	(0.07)	0.00	0.02	**(0.05)**
Massachusetts	(0.00)	(0.02)	0.00	0.00	**(0.03)**
Michigan	(0.00)	(0.64)	0.00	(0.09)	**(0.73)**
Minnesota	0.03	(0.84)	(0.01)	(0.13)	**(0.95)**
Mississippi	0.05	(0.57)	0.00	0.23	**(0.29)**
Missouri	(0.02)	(2.81)	0.04	(0.76)	**(3.55)**
Montana	(0.44)	(4.40)	(0.09)	(0.36)	**(5.29)**
Nebraska	0.43	(1.82)	0.08	(0.07)	**(1.39)**
Nevada	(0.03)	(0.01)	0.01	0.00	**(0.03)**
New Hampshire	0.00	(0.02)	0.00	0.00	**(0.02)**
New Jersey	0.01	(0.10)	0.00	0.00	**(0.08)**
New Mexico	(0.04)	(0.06)	0.03	(0.04)	**(0.11)**
New York	(0.01)	(0.70)	0.00	0.04	**(0.66)**
North Carolina	0.01	(0.25)	0.00	0.00	**(0.23)**
North Dakota	(0.08)	(5.76)	(0.00)	(0.17)	**(6.02)**
Ohio	(0.01)	(1.72)	0.00	(0.25)	**(1.98)**
Oklahoma	(0.01)	(1.01)	0.00	0.03	**(0.99)**
Oregon	0.10	(0.29)	0.04	(0.06)	**(0.21)**
Pennsylvania	0.01	(0.88)	0.00	(0.13)	**(1.00)**
Rhode Island	ND	ND	ND	ND	**0.00**
South Carolina	(0.01)	(0.09)	0.00	0.09	**(0.01)**
South Dakota	0.01	(3.08)	(0.01)	(0.29)	**(3.37)**
Tennessee	(0.03)	(0.87)	0.00	0.14	**(0.75)**
Texas	(0.19)	(0.64)	0.03	0.04	**(0.75)**
Utah	(0.06)	(0.07)	0.05	0.00	**(0.07)**
Vermont	0.00	(0.04)	0.00	(0.00)	**(0.05)**
Virginia	0.01	(0.35)	0.00	(0.07)	**(0.41)**
Washington	(0.08)	(0.81)	0.06	(0.07)	**(0.90)**
West Virginia	0.00	(0.21)	0.00	(0.08)	**(0.28)**
Wisconsin	(0.01)	(0.63)	(0.00)	(0.11)	**(0.76)**
Wyoming	(0.03)	(0.06)	0.01	(0.07)	**(0.15)**
Total	**(0.00)**	**(42.03)**	**0.64**	**(1.60)**	**(42.99)**

1 Data from mineral soils used; includes soil C sequestration on CRP lands.
[2]Losses from annual cropping systems due to plow-out of pastures, rangeland, hayland, and perennial/horticultural cropland.
Tg CO_2 eq. is teragrams carbon dioxide equivalent. ND= No data.
Note: Parenthesis indicate a net sequestration.

Appendix C: Forest Carbon Stocks

Appendix C

C-1 Forest Area, Stock, and Stock Change by State
C-2 Carbon Stock Pools on Private Forestland by Region and Age-Class
C-3 Carbon Stock Pools on Public Forestland by Region and Age-Class
C-4 Carbon Stock Pools on Timberlands by Region and Stand Size Class
C-5 Carbon Stocks on all Forestland by Forest Type Group and Ownership
C-6 Net Annual Carbon Stock Change on all Forestland by Forest Type Group and Ownership

Appendix Table C-1 Forest Area, Stock, and Stock Change by State[1]

State	Forest Area	Net Area Change	Non-Soil Stocks	SOC[2]	Non-Soil Change	Harvested Wood Products Change
	1000 ha	*1000 ha yr⁻¹*	*Tg CO_2 eq.*	*Tg CO_2 eq.*	*Tg CO_2 eq. yr^{-1}*	
Alabama	9,184	(28.3)	2,455	1445	(4.4)	(6.4)
Alaska	6,192	n/a	4,510	1970	n/a	(0.4)
Arizona	7,558	(24.7)	1,601	620	7.4	(0.3)
Arkansas	7,396	(27.0)	2,301	1138	(3.5)	(4.2)
California	13,511	54.2	7,989	1908	(66.4)	(3.7)
Colorado	9,244	48.2	3,373	1035	(20.5)	(0.2)
Connecticut	707	(6.7)	333	159	1.6	(0.1)
Delaware	148	(1.1)	65	34	(0.2)	(0.1)
Florida	6,838	26.1	1,727	2580	(22.4)	(3.1)
Georgia	10,046	3.8	2,942	3020	(28.2)	(7.1)
Idaho	8,622	(11.8)	3,854	1294	7.5	(1.5)
Illinois	1,831	13.3	723	356	(4.1)	(0.6)
Indiana	1,920	14.3	826	372	(14.1)	(0.6)
Iowa	1,227	34.8	415	253	(10.8)	(0.2)
Kansas	902	15.6	273	268	(5.6)	(0.1)
Kentucky	4,860	(17.9)	1,745	719	(3.8)	(1.2)
Louisiana	5,722	11.5	1,639	965	0.9	(4.4)
Maine	7,161	(1.4)	2,698	2157	(8.3)	(3.3)
Maryland	987	(8.2)	481	225	(5.2)	(0.4)
Massachusetts	1,236	(3.8)	620	315	(2.6)	(0.3)
Michigan	7,815	1.0	2,930	4176	6.8	(2.2)
Minnesota	6,876	64.1	1,964	4201	(16.2)	(1.9)
Mississippi	7,941	31.8	2,236	1270	(21.5)	(5.5)
Missouri	6,231	73.2	2,217	1098	(40.6)	(1.0)
Montana	10,360	67.5	4,161	1497	(16.2)	(1.3)
Nebraska	504	13.5	157	129	(3.4)	(0.1)
Nevada	4,488	21.0	900	354	(2.6)	(0.1)
New Hampshire	1,914	(4.9)	912	518	(0.4)	(0.2)
New Jersey	843	(2.7)	327	207	(1.5)	(0.2)
New Mexico	6,753	21.9	1,774	574	(14.2)	(0.1)
New York	7,645	20.7	3,418	1977	(23.1)	(1.4)
North Carolina	7,525	25.6	2,655	1878	(25.2)	(5.0)
North Dakota	289	(1.2)	72	81	1.1	(0.0)
Ohio	3,205	2.0	1,253	742	(11.6)	(0.4)
Oklahoma	3,102	37.2	829	465	(15.7)	(0.8)
Oregon	12,176	8.3	7,276	3543	(28.1)	(6.2)
Pennsylvania	6,707	(10.6)	2,867	1546	(13.6)	(1.3)
Rhode Island	148	(1.8)	65	35	(0.4)	(0.0)
South Carolina	5,218	47.5	1,589	1532	(20.8)	(3.5)
South Dakota	757	23.4	191	156	(4.6)	(0.2)
Tennessee	5,659	26.3	2,113	838	(21.2)	(2.0)
Texas[2]	24,363	(0.1)	3,521	4451	(0.1)	(4.0)
Utah	7,374	94.2	1,873	702	(13.1)	(0.1)
Vermont	1,850	(2.3)	881	499	2.5	(0.4)
Virginia	6,364	(9.7)	2,473	1318	(12.4)	(3.1)
Washington	9,061	22.7	6,248	2881	(28.8)	(5.6)
West Virginia	4,857	(0.4)	2,172	1059	(19.6)	(1.0)
Wisconsin	6,757	70.1	2,274	3486	(24.9)	(2.4)
Wyoming	4,633	10.7	1,715	501	(5.8)	(0.1)
Total	**276,706**	**740**	**101,632**	**62,544**	**(558)**	**(88)**

[1] Net change values are model outputs for 2008 (Smith et al. 2010); stocks and area are based on the most recent inventory per state. Parentheses indicate negative values, which are a net decrease of forest area or net increase in carbon sequestration. A value of "n/a indicates not available. Tg CO_2 eq. is teragrams carbon dioxide equivalent.

[2] SOC (soil organic carbon) does not include effects of past land use history.

[3] The central and western portions of these states are represented by a single survey; therefore estimates of change are based only on forests in the eastern forests in the eastern portions of the states.

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Appendix Table C-2 Carbon Stock Pools on Private Forestland by Region and Age-Class[1]

Region	Age Class	SOC[2]	Dead Plant Matter	Biomass	*Total*
	Years		*Tg CO_2 eq.*		
North		**16,399**	**5,159**	**15,523**	**37,080**
	<20	1,420	273	275	**1,967**
	20-40	2,408	528	1,409	**4,346**
	40-60	4,648	1,359	4,332	**10,339**
	60-80	4,892	1,770	5,695	**12,356**
	80-100	2,232	902	2,808	**5,942**
	100-150	740	305	953	**1,998**
	150-200	37	14	32	**83**
	200+	3	1	3	**8**
	Unknown	19	7	17	**42**
South		**18,620**	**4,650**	**19,006**	**42,276**
	<20	5,968	1,093	2,774	**9,835**
	20-40	4,656	1,059	4,116	**9,831**
	40-60	4,080	1,196	5,475	**10,751**
	60-80	2,450	818	4,247	**7,516**
	80-100	814	274	1,403	**2,490**
	100-150	267	85	410	**762**
	150-200	16	5	22	**43**
	Unknown	371	119	558	**1,047**
Pacific Coast		**3,587**	**2,444**	**4,536**	**10,567**
	<20	775	353	217	**1,345**
	20-40	654	360	740	**1,754**
	40-60	660	447	1,042	**2,149**
	60-80	586	435	891	**1,912**
	80-100	383	314	628	**1,325**
	100-150	291	266	533	**1,091**
	150-200	67	71	147	**285**
	200+	88	87	151	**326**
	Unknown	83	111	187	**381**
Rocky Mountain		**1,487**	**1,647**	**1,981**	**5,116**
	<20	322	330	140	**792**
	20-40	79	74	56	**209**
	40-60	127	122	136	**385**
	60-80	236	241	321	**797**
	80-100	267	305	445	**1,016**
	100-150	299	376	587	**1,262**
	150-200	99	129	190	**418**
	200+	58	71	107	**236**
Total		**40,093**	**13,899**	**41,047**	**95,039**

[1] Stocks are based on the most recent inventory per state.

[2] SOC (soil organic carbon) does not include effects of past land use history.

Tg CO_2 eq. is teragrams carbon dioxide equivalent.

Appendix Table C-3 Carbon Stock Pools on Public Forestland by Region and Age-Class[1]

Region	Age class	SOC[2]	Dead Plant Matter	Biomass	*Total*
	Years		*Tg CO_2 eq.*		
North		**7,649**	**1,977**	**5,475**	**15,101**
	<20	762	100	108	**969**
	20-40	951	146	361	**1,459**
	40-60	1,625	344	972	**2,941**
	60-80	2,246	670	1,972	**4,889**
	80-100	1,339	472	1,431	**3,243**
	100-150	649	216	559	**1,424**
	150-200	61	20	49	**130**
	200+	8	4	13	**25**
	Unknown	8	3	10	**21**
South		**2,998**	**807**	**3,762**	**7,567**
	<20	437	64	159	**660**
	20-40	531	102	386	**1,020**
	40-60	695	189	874	**1,758**
	60-80	818	271	1,365	**2,454**
	80-100	356	121	660	**1,138**
	100-150	121	45	252	**418**
	150-200	1	1	4	**6**
	Unknown	38	14	61	**113**
Pacific Coast		**6,714**	**6,084**	**12,958**	**25,757**
	<20	443	255	118	**816**
	20-40	569	302	503	**1,374**
	40-60	516	324	654	**1,494**
	60-80	785	601	1,289	**2,674**
	80-100	744	630	1,365	**2,740**
	100-150	1,171	1,133	2,573	**4,877**
	150-200	722	790	1,778	**3,289**
	200+	1,714	1,987	4,577	**8,278**
	Unknown	52	62	101	**215**
Rocky Mountain		**5,090**	**6,360**	**9,263**	**20,712**
	<20	825	814	314	**1,953**
	20-40	216	205	158	**579**
	40-60	198	197	235	**630**
	60-80	548	595	923	**2,065**
	80-100	832	1,003	1,676	**3,512**
	100-150	1,416	1,975	3,310	**6,701**
	150-200	708	1,060	1,791	**3,558**
	200+	346	511	857	**1,714**
Total		**22,452**	**15,228**	**31,458**	**69,138**

[1] Stocks are based on the most recent inventory per state.

[2] SOC (soil organic carbon) does not include effects of past land use history.

Tg CO_2 eq. is teragrams carbon dioxide equivalent.

Appendix Table C-4 Carbon Stock Pools on Timberlands by Region and Stand Size Class[1]

Region	Stand Size Class	SOC[2]	Dead Plant Matter	Biomass	*Total*
			Tg CO_2 eq.		
North		**22,786**	**6,725**	**19,930**	**49,441**
	Nonstocked	286	40	12	**338**
	Seedling/ Sapling	4,768	843	1,045	**6,656**
	Poletimber	7,523	2,011	5,190	**14,723**
	Sawtimber	10,209	3,831	13,684	**27,723**
South		**17,573**	**4,753**	**20,812**	**43,138**
	Nonstocked	273	29	23	**325**
	Seedling/ Sapling	4,042	727	1,438	**6,207**
	Poletimber	4,606	1,158	4,676	**10,441**
	Sawtimber	8,652	2,838	14,674	**26,165**
Pacific Coast		**7,401**	**5,756**	**12,370**	**25,527**
	Nonstocked	180	113	26	**319**
	Seedling/ Sapling	1,128	539	320	**1,987**
	Poletimber	825	451	809	**2,086**
	Sawtimber	5,267	4,653	11,215	**21,135**
Rocky Mountain		**3,631**	**4,534**	**7,182**	**15,346**
	Nonstocked	181	175	42	**398**
	Seedling/ Sapling	527	483	303	**1,313**
	Poletimber	729	752	1,205	**2,686**
	Sawtimber	2,194	3,123	5,632	**10,949**
Total		**51,391**	**21,767**	**60,294**	**133,452**

[1] Stocks are based on the most recent inventory per state.

[2] SOC (soil organic carbon) does not include effects of past land use history.

Tg CO_2 eq. is teragrams carbon dioxide equivalent.

Appendix Table C-5 Carbon Stocks[1] on all Forestland by Forest Type Group and Ownership Class[2]

	Private	Public	Reserve/Other
Forest Type Group		*Tg CO_2 eq.*	
East	**42,264**	**9,956**	**4,138**
Aspen/Birch	1,026	623	96
Elm/Ash/Cottonwood	2,036	384	184
Loblolly/Shortleaf Pine	5,335	823	46
Longleaf/Slash Pine	860	284	12
Maple/Beech/Birch	6,977	1,910	698
Oak/Gum/Cypress	2,934	654	158
Oak/Hickory	17,239	3,282	1,506
Oak/Pine	2,876	603	100
Pinyon/Juniper	8	3	424
Spruce/Fir	1,338	688	172
White/Red/Jack Pine	1,131	498	109
Woodland Hardwoods	2	0	460
Other Hardwood Type Groups	109	43	24
Other Softwood Type Groups	309	141	39
Nonstocked	84	20	109
West	**8,447**	**21,395**	**15,433**
Alder/Maple	437	198	30
Aspen/Birch	265	797	229
California Mixed Conifer	528	1,566	546
Douglas-fir	2,894	6,557	1,266
Fir/Spruce/Mountain Hemlock	683	4,927	3,860
Hemlock/Sitka Spruce	768	2,491	1,567
Lodgepole Pine	163	1,428	801
Other Western Softwoods	61	313	663
Pinyon/Juniper	1	8	3,602
Ponderosa Pine	1,067	1,825	244
Redwood	240	15	119
Spruce/Fir	13	9	72
Tanoak/Laurel	428	216	126
Western Larch	50	243	31
Western Oak	488	414	887
Western White Pine	2	15	31
Woodland Hardwoods	14	22	911
Other Hardwood Type Groups	214	122	114
Nonstocked	129	227	333
Total	**50,710**	**31,351**	**19,571**

[1] Excluding soils.

[2] SOC (soil organic carbon) Stocks are based on the most recent inventory per state.

Note: Other Hardwood Type Groups and Other Softwood Type Groups represent aggregates of minor type groups. However, "Other Western Softwoods" is a specific type group within the Forest Inventory Analysis DataBase (FIADB).

Note: The Private and Public ownership classes represent timberlands only. The Reserved or Other (lower productivity) forests include both public and private owners.

Tg CO_2 eq. is teragrams carbon dioxide equivalent.

Appendix Table C-6 Net Annual Carbon Stock Change[1] on all Forestland by Forest Type Group and Ownership Class[2]

	Private	Public	Reserve/Other
Forest Type Group		*Tg CO_2 eq. yr^{-1}*	
East			
Aspen/Birch	6.3	6.1	1.2
Elm/Ash/Cottonwood	3.8	(4.9)	1.6
Loblolly/Shortleaf Pine	(87.0)	(17.7)	2.6
Longleaf/Slash Pine	(1.7)	(8.2)	(0.7)
Maple/Beech/Birch	(3.3)	(32.2)	4.3
Oak/Gum/Cypress	32.2	(23.5)	0.4
Oak/Hickory	(209.5)	(83.4)	17.3
Oak/Pine	47.2	(4.2)	1.9
Pinyon/Juniper	n/a	n/a	n/a
Spruce/Fir	8.8	(10.0)	2.0
White/Red/Jack Pine	13.8	(8.0)	2.6
Woodland Hardwoods	n/a	n/a	n/a
Other Hardwood Type Groups	(5.6)	(1.7)	(2.1)
Other Softwood Type Groups	(9.1)	(0.6)	0.7
Nonstocked	n/a	n/a	n/a
West			
Alder/Maple	n/a	n/a	n/a
Aspen/Birch	n/a	n/a	n/a
California Mixed Conifer	n/a	n/a	n/a
Douglas-fir	n/a	n/a	n/a
Fir/Spruce/Mountain Hemlock	n/a	n/a	n/a
Hemlock/Sitka Spruce	n/a	n/a	n/a
Lodgepole Pine	n/a	n/a	n/a
Other Western Softwoods	n/a	n/a	n/a
Pinyon/Juniper	n/a	n/a	(6.9)
Ponderosa Pine	n/a	n/a	n/a
Redwood	n/a	n/a	n/a
Spruce/Fir	n/a	n/a	n/a
Tanoak/Laurel	n/a	n/a	n/a
Western Larch	0.4	(5.6)	0.3
Western Oak	n/a	n/a	n/a
Western White Pine	n/a	n/a	n/a
Woodland Hardwoods	n/a	n/a	(11.5)
Other Hardwood Type Groups	n/a	n/a	n/a
Nonstocked	n/a	n/a	n/a
Total[3]			

[1] Excluding soils.

[2] Net change values are model estimates for 2008 (Smith et al. 2010). Parentheses indicate negative values, which are a net decrease of forest area or net increase in carbon sequestration. A value of "n/a" indicates not available, and totals from columns that include "n/a" should be interpreted accordingly.

[3] Totals would not be the sum of the change of individual forest types because at a more aggregate resolution, more data are available.

Note: Other Hardwood Type Groups and Other Softwood Type Groups represent aggregates of minor type groups. However, "Other Western Softwoods" is a specific type group within the Forest Inventory Analysis DataBase (FIADB).

Note: The Private and Public ownership classes represent timberlands only. The Reserved or Other (lower productivity) forests include both public and private owners.

This report is available on the Web at:
http://www.usda.gov/oce/climate_change/AFGGInventory1990_2008.htm.
Printed copies may be purchased from the National Technical Information Service. Call 1-800-553-NTIS (6847) or 703-605-6000, or visit http://www.ntis.gov.

June, 2011

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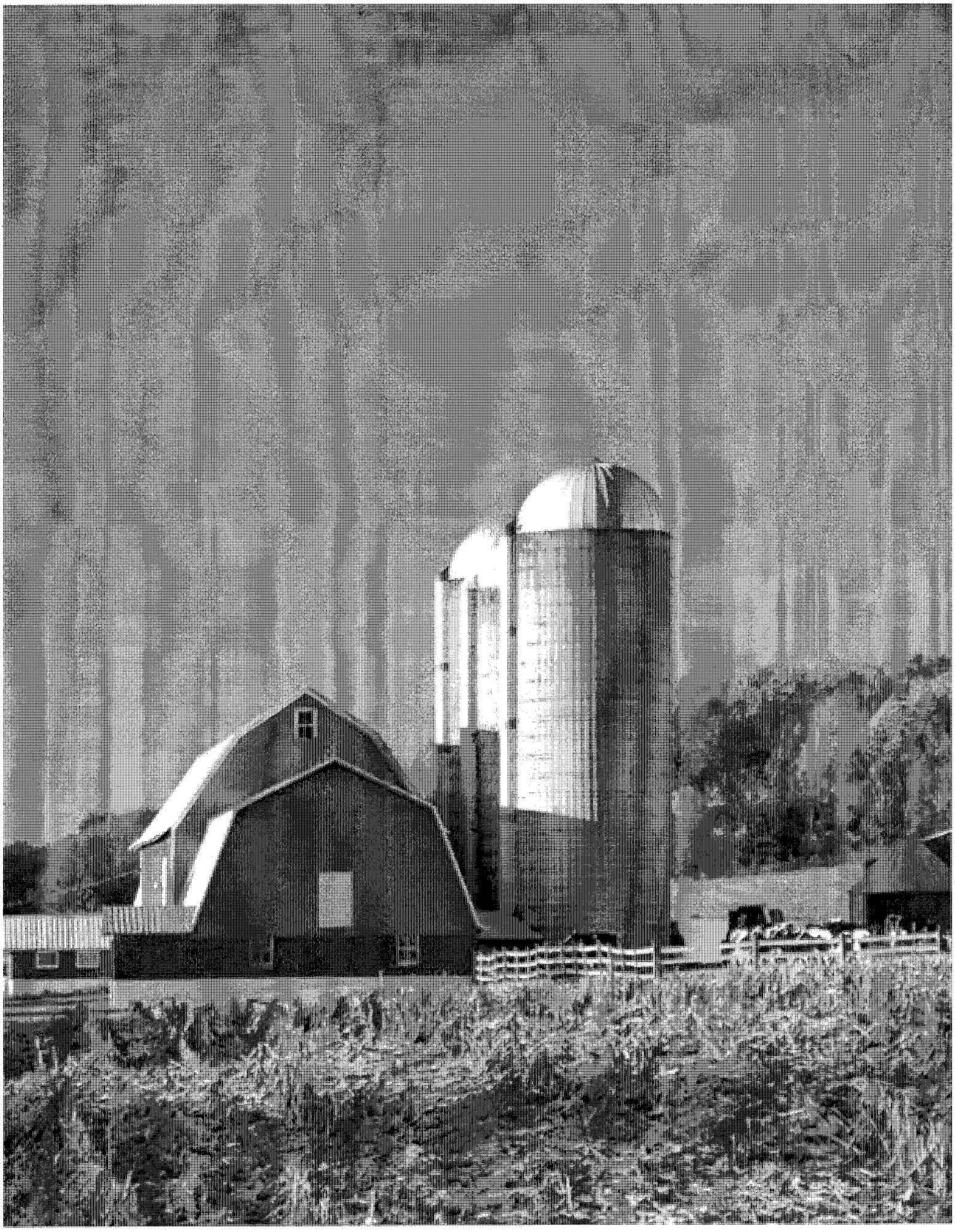

A1.1.52 LATE

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August 24, 2012

File No. 051247-0000

VIA E-MAIL & FEDEX

Department of Environmental Health
ATTN: Eye Gnat Ordinance and Program
5570 Overland Avenue, Suite 102
San Diego, California 92123

Re: Alden Environmental, Inc. Report on Proposed Eye Gnat Ordinance Effect on Biological Resources

Please find enclosed a report by Greg Mason, a senior biologist with Alden Environmental, Inc., regarding the proposed Eye Gnat Ordinance and Program's potentially significant impacts on biological resources in the San Pasqual Valley. This report provides further support for our previous comments on the proposed ordinance—a full environmental impact report must be prepared in order to comply with the California Environmental Quality Act.

We request that the County include this report as part of the administrative record and as part of your deliberations on the proposed ordinance. Be Wise Ranch's voluntary control plan continues to be successful, and it would prefer to devote resources to fighting eye gnats instead of defending against unnecessary regulation. We recognize that the official public comment period has closed, but for purposes of exhausting administrative remedies, comments may be submitted at any time prior to certification of environmental review. (See Pub. Res. Code, section 21177; *Galante Vineyards v. Monterey Peninsula Water Mgmt. Dist.* (1997) 60 Cal.App.4th 1109, 1117–21.)

Best regards,

Taiga Takahashi
of LATHAM & WATKINS LLP

Enclosures

SD\927521.1

LATHAM&WATKINS LLP

cc: **VIA E-MAIL & FEDEX**

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ENVIRONMENTAL, INC
3245 University Ave, #1188 | San Diego, CA 92104 | Phone/Fax: 619.284.3815

August 15, 2012

Mr. Bill Brammer
Be Wise Ranch
20505 San Pascual Road
Escondido, CA 92025

Subject: IS/ND for the County-wide Eye Gnat Program; ER#12-00-001

Dear Mr. Brammer:

This letter presents the results of a biological review of the California Environmental Quality Act (CEQA) Initial Study (IS) and Negative Declaration (ND) prepared by the County of San Diego (County) Department of Environmental Health (DEH) for the proposed County-wide Eye Gnat Program (Program); ER#12-00-001. In order to create the Program the County would adopt an ordinance to amend Title 6 of the San Diego County Code relating to vector control. The proposed Program and Ordinance would implement a progressive strategy for intervention when commercial organic farms cause an eye gnat nuisance by employing a series measures that include the use of conventional pesticides on organic crops or fields. The pesticides that could be required under the Program include Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin.

The IS/ND prepared by the County addressed the potential for these pesticides to have a significant effect on biological resources (Section IV.a) and determined that if the application label instructions were followed the program would have a less than significant effect on sensitive wildlife species. The IS/ND also states the following:

> The pesticides that DEH could order to be used would not be applied to sensitive habitats which support sensitive species. Sensitive species are not expected to be present on organic farming operations. Because the limited use of pesticides, as a last resort, would be applied in accordance with label restrictions, and would avoid habitats which support sensitive species it will not result in impacts to sensitive habitats or species.

Presence of Federal Listed Species

The Be Wise Ranch organic farm in the San Pasqual Valley agricultural preserve is specifically identified in the IS/ND as being one of the areas from which complaints regarding eye gnats have been received and therefore subject to the proposed Program measures. This farm is one of several agricultural operations located within the San Pasqual Valley along the San Dieguito River. The majority of this area is within U.S. Fish & Wildlife Service (USFWS) designated

Critical Habitat (CH) for the Federal listed as endangered arroyo toad (*Anaxyrus californicus*; ART). The USFWS published its ART CH Final Rule on February 9, 2011 (Federal Register 2011). The ART CH designates an area considered to be essential for the survival and recovery of the species, including the farm operations.
The ART has been recorded in numerous locations along the San Dieguito River, adjacent to farming operations. The ART breed and deposit egg masses in shallow, sandy pools that are usually bordered by sand and gravel flood terraces. Outside of the breeding season, the ART is essentially terrestrial and known to use a variety of upland habitats including oak woodlands, open grasslands, coastal sage scrub, and fallow agricultural fields (City 2003). Adults are known to range up to 3,000 feet from breeding pools (Griffin et al. 1999) and have been shown to burrow in adjacent upland habitats, including agricultural fields (Griffin and Case 2001).

The USFWS, California Department of Fish and Game (CDFG), and City acknowledged the potential for the ART to occur within the Be Wise Ranch area in 2005 when they processed a MHPA boundary line adjustment and lease extension (USFWS 2005; attached). The USFWS and CDFG supported extension of the lease provided that the following measures are implemented to avoid impacts to the ART:

- Fencing that allows movement of arroyo toads between the riparian habitat and agricultural lands (e.g. split rail) will be provided at the border of the agricultural activities to ensure that agricultural activities do not encroach into the MHPA;
- no pesticides, herbicides, or chemical fertilizers will be utilized for farming; and,
- tilling will be reduced and will preferably occur during the breeding season of the arroyo toad (March 15 to July 1) when arroyo toads are more mobile and more likely in the adjacent riparian habitats.

These measures were incorporated into the current lease agreement (Section 9.4) for the Be Wise Ranch dated September 19, 2006 (City 2006).

The IS/ND failed to acknowledge the presence of the ART or its CH in the biological resources analysis. Given the presence of the species and its known use of upland areas adjacent to streams and rivers, it is highly possible that the species could be present, at least during a portion (non-breeding season) of the year, in the farm areas along San Dieguito River that are potentially subject to the Program. This is counter to the IS/ND which states that sensitive species are not expected to be present on farming operations.

<u>City of San Diego</u>

The Be Wise Ranch is also located adjacent to the City of San Diego's Multi-Habitat Planning Area (MHPA). The MHPA delineates core biological resource areas and corridors targeted for conservation within the City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan. The City of San Diego, Public Utilities Department owns the land where the Be

Wise Ranch is located and is responsible for managing it as part of the City's MSCP Cornerstone Lands. Conservation and management of land in San Pasqual Valley is guided by the San Diego San Pasqual Valley Plan (City 1995), the Lake Hodges/San Pasqual Valley Open Space Habitat Management Plan (City 2003), and the City of San Diego MSCP Subarea Plan. The analysis in the IS/ND did not acknowledge these planning documents in its review for applicability of/compliance with ordinances/policies (IS/ND Appendix E). These documents provide specific management direction for the San Pasqual Valley area and should have been addressed in the environmental review of the proposed Program.

County CEQA Guidelines for Determining Significance

The County has prepared CEQA guidelines for determining the significance of effects upon biological resources (County 2010; attached). The guidelines provide specific information to be used to determine if an activity would have a significant effect upon special status species (Section 4.1). The information to be evaluated includes:

A The project would impact one or more individuals of a species listed as federally or state endangered or threatened.

D The project may impact arroyo toad aestivation or breeding habitat. Any alteration of suitable habitat within 1 kilometer (3,280 feet) in any direction of occupied breeding habitat (unless very steep slopes or other barriers constrain movement) could only be considered less than significant if a biologically-based determination can be made that the project would not impact the aestivation or breeding behavior of arroyo toads.

A large portion of the San Pasqual Valley (including the Be Wise Ranch and other agricultural operations) is within USFWS designated ART CH. Additionally, the ART is known to be present in the San Dieguito River and may disperse throughout the adjacent farm lands adjacent to the river. Given this, the IS/ND did not adequately address the County guidelines for determination of significance to special status species presented above. Specifically, the IS/ND stated that sensitive species are not anticipated to be present on organic farms but did not provide evidence that a biologically-based determination was made to substantiate that the ART is not present, as specifically called for in the guidelines (4.1.D).

Pesticide Effects

The IS/ND states that the use of the identified pesticides will have no impact upon sensitive species, provided that the product label restrictions are followed. However, the IS/ND acknowledges that some of the proposed pesticides (Malathion, Diflubenzuron and Cyfluthrin) are toxic to aquatic organisms. The Malathion label also notes that it is toxic to the aquatic life stages of amphibians. The label for these pesticides imposes special restrictions, including requirements which prohibit direct application to water or run-off areas; however, the labels do not include application restrictions for irrigated areas. This would allow application to occur

immediately before or after irrigation, which could increase the potential for pesticide transport into the adjacent ART occupied aquatic habitat. The labels for Acephate and Cyromazine (Trigard) include restrictions on use in irrigated areas to help reduce transport. The Cyromazine label goes on to note that a metabolite of Trigard insecticide has been found in ground water, possibly as a result of agricultural use. Use of this product in areas where soils are permeable and water tables are shallow could result in leaching to ground water. Irrigation could increase the risk of contamination. Given that the entire Be Wise Ranch area is within the flood plain of the San Dieguito River, which flows into Lake Hodges it is highly possible that pesticides applied on the Be Wise Ranch may still reach the adjacent aquatic habitat, even if the label restrictions are followed. The IS/ND failed to address this potential impact to the arroyo toad and other sensitive biological resources, even if the label restrictions are followed.

Conclusion

The IS/ND did not adequately address the potential for impacts to sensitive biological resources within the County. The IS/ND is inadequate for the following reasons:

- The IS/ND did not acknowledge the known presence of the listed ART and it's designated Critical Habitat at the Be Wise Ranch.
- The IS/ND did not provide evidence to support a biologically-based determination that impacts to arroyo toad breeding and aestivation behavior would be less than significant, as called for under Section 4.1.d of the County's guidelines (County 2010). A biologically based determination must be completed, given the likely presence of Arroyo Toad due to the adjacent designated critical habitat, known range of the ART, and the wildlife agency requirements to address the likelihood of arroyo toad on the Be Wise Ranch, as indicated in their 2005 letter.
- The IS/ND did not address existing management and planning documents for the San Pasqual Valley area, which encompasses the Be Wise Ranch.
- The IS/ND focused on two areas (Be Wise Ranch and the Bornt farm in Jacumba); however, the proposed County program could be applied throughout the County, across a myriad of sites with numerous biological resource issues not addressed. The IS/ND statement that "Sensitive species are not expected to be present on organic farming operations" is insufficient for a County wide program.
- Implementation of the Program could be in direct conflict with the USFWS and CDFG conditions placed upon the Be Wise Ranch lease and MHPA boundary agreement.
- The IS/ND did not adequately assess the potential impact upon the ART and other sensitive biological resources from the use of the identified pesticides.

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ENVIRONMENTAL, INC
3245 University Ave, #1188 | San Diego, CA 92104 | **Phone/Fax:** 619.284.3815

For the reasons discussed above, the potential for biological impacts resulting from the proposed County Program is not adequately addressed in the IS/ND. At a minimum, appropriate biological studies should be conducted to determine the significance of potential impacts to sensitive biological resources (including the ART). If these studies find that significant impacts could occur then the project description should be changed to avoid impacts and/or a higher level CEQA document (EIR) should be prepared to adequately assess the impacts of the proposed Countywide Program. The CEQA documents would also need to incorporate suitable mitigation to reduce impacts to biological resources to below a level of significance, per the County's guidelines.

Please contact me if you have any questions regarding this letter.

Sincerely

Greg Mason
Senior Biologist

Enclosures: Be Wise Ranch Location Map
USFWS/CDFG Letter
County CEQA Biology Guidelines

References:

City of San Diego. 2003. Habitat Management Plan, Lake Hodges /San Pasqual Valley Open Space. August 8.

City of San Diego. 2006. William Brammer, d/b/a Brammer Farms, Flat Rate Lease. Document N0. RR-301867. September 12.

County of San Diego. 2010. Guidelines for Determining Significance and Report Format Content Requirements, Biological Resources. September 15.

Federal Register 76:27. 2011. Endangered and Threatened Wildlife and Plants; Revised Critical Habitat for the Arroyo Toad, [Docket No. FWS–R8–ES–2009–0069; MO 92210–0–0009–B4]. Department of the Interior, U.S. Fish & Wildlife Service. February 9

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Griffin, P.C. and T.J. Case. 2001. Terrestrial habitat preferences of adult arroyo southwestern toads. Journal of Wildlife Management 65(4):633-644.

USFWS. 2005. MHPA Boundary Line Adjustment for the Brammer Lease. Joint USFWS/CDFG Letter to Ms. Jeanne Krosch, City of San Diego. October 14

Be Wise Ranch Location

U. S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92011
(760) 431-9440
FAX (760) 431-5902 + 9618

CA. Department of Fish and Game
South Coast Regional Office
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201
FAX (858) 467-4299

In Reply Refer to:
FWS-SDG-4601.1

Ms. Jeanne Krosch
Senior Planner, MSCP
202 C Street, MS 5A
San Diego, California 92101-4155

OCT 14 2005

Subject: MHPA Boundary Line Adjustment for the Brammer Lease

Dear Ms. Krosch,

The U.S. Fish and Wildlife Service (Service) and California Department of Fish and Game (Department), collectively referred to as the "Wildlife Agencies," have reviewed the proposal for the extension of the Brammer Lease located in the City of San Diego's (City) Lake Hodges/San Pasqual Valley Cornerstone Lands, which will eventually be used for a mitigation bank. The Brammer lease lands were in active agriculture prior to the adoption of the City's Multiple Species Conservation Program (MSCP) Subarea Plan. However, 9.73 acres of the lease area were included in the City's Multiple Habitat Planning Area (MHPA), the City's preserve lands under their MSCP. The City proposes to extend the Brammer agricultural lease to permit continuation of organic farming within 7.47 acres of the MHPA under the following conditions.

1) The agricultural lease will continue until either:

    a. the formal Lake Hodges/San Pasqual Conservation Bank is set up and the lease area with the MHPA is conserved and farming ceases as part of the bank agreement; or

    b. the property is no longer being leased for organic farming.

2) The MHPA will be increased by the addition of 6.67 acres of lands adjacent to the MHPA.

3) The 2.26 acres of the lease area that is not currently farmed and is in the MHPA will be removed from the lease area.

4) The following conservation measures will be employed to minimize impacts to the federally listed endangered arroyo toad (*Bufo californicus*), which may occur in the adjacent MHPA riparian habitat:

TAKE PRIDE IN AMERICA

a. fencing that allows movement of arroyo toads between the riparian habitat and agricultural lands (e.g., split rail) will be provided at the border of the agricultural activities to ensure that agricultural activities do not encroach into the MHPA;

b. no pesticides, herbicides, or chemical fertilizers will be utilized for farming; and,

c. tilling will be reduced and will preferably occur during the breeding season of the arroyo toad (March 15 to July 1) when arroyo toads are more mobile and more likely in the adjacent riparian habitats.

In summary, the Wildlife Agencies do not object to the City's renewal of the Brammer agricultural lease, provided the above listed conditions are implemented. If you have questions regarding this letter, please contact Carolyn Lieberman of the Service (760) 431-9440 extension 240 or Libby Lucas of the Department at (858) 467-4230.

Sincerely,

for

Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service

David A. Mayer
FOR Michael J. Mulligan
Deputy Regional Manager
California Department of Fish and Game

COUNTY OF SAN DIEGO

GUIDELINES FOR DETERMINING SIGNIFICANCE AND REPORT FORMAT AND CONTENT REQUIREMENTS

BIOLOGICAL RESOURCES

LAND USE AND ENVIRONMENT GROUP

Department of Planning and Land Use
Department of Public Works

Fourth Revision
September 15, 2010

APPROVAL

I hereby certify that these **Guidelines for Determining Significance for Biological Resources, Report Format and Content Requirements for Biological Resources, and Report Format and Content Requirements for Resource Management Plans** are a part of the County of San Diego, Land Use and Environment Group's Guidelines for Determining Significance and Technical Report Format and Content Requirements and were considered by the Director of Planning and Land Use, in coordination with the Director of Public Works on September 15, 2010.

ERIC GIBSON
Director of Planning and Land Use

JOHN SNYDER
Director of Public Works

I hereby certify that these **Guidelines for Determining Significance for Biological Resources, Report Format and Content Requirements for Biological Resources, and Report Format and Content Requirements for Resource Management Plans** are a part of the County of San Diego, Land Use and Environment Group's Guidelines for Determining Significance and Technical Report Format and Content Requirements and have hereby been approved by the Deputy Chief Administrative Officer (DCAO) of the Land Use and Environment Group on the fifteenth day of September, 2010. The Director of Planning and Land Use is authorized to approve revisions to these Guidelines for Determining Significance for Biological Resources and Report Format and Content Requirements for Biological Resources and Resource Management Plans except any revisions to the Guidelines for Determining Significance presented in Section 4.0 must be approved by the Deputy CAO.

Approved, September 15, 2010

CHANDRA WALLAR
Deputy CAO

Fourth Revision
September 15, 2010

Third Revision
June 30, 2009
Second Revision
July 30, 2008
First Revision
December 5, 2007
Approved
September 26, 2006

COUNTY OF SAN DIEGO

GUIDELINES FOR DETERMINING SIGNIFICANCE

BIOLOGICAL RESOURCES

LAND USE AND ENVIRONMENT GROUP

Department of Planning and Land Use
Department of Public Works

Fourth Revision
September 15, 2010

EXPLANATION

These Guidelines for Determining Significance for Biological Resources and information presented herein shall be used by County staff for the review of discretionary projects and environmental documents pursuant to the California Environmental Quality Act (CEQA). These Guidelines present a range of quantitative, qualitative, and performance levels for particular environmental effects. Normally, (in the absence of substantial evidence to the contrary), an affirmative response to any one Guideline will mean the project will result in a significant effect, whereas effects that do not meet any of the Guidelines will normally be determined to be "less than significant." Section 15064(b) of the State CEQA Guidelines states:

> "The determination whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on factual and scientific data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting."

These Guidelines shall assist in providing a consistent, objective and predictable evaluation of significant effects. These Guidelines are not binding on any decision-maker and should not be substituted for the use of independent judgment to determine significance or the evaluation of evidence in the record. The County reserves the right to modify these Guidelines in the event of scientific discovery or alterations in factual data that may alter the common application of a Guideline.

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List of Acronyms

ACOE	U.S. Army Corps of Engineers
BMO	Biological Mitigation Ordinance
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
COI	Certificate of Inclusion
CSS	Coastal Sage Scrub
DPLU	Department of Planning and Land Use
EPA	Environmental Protection Agency
ESA	Endangered Species Act (federal)
HCP	Habitat Conservation Plan
HLP	Habitat Loss Permit
HMP	Habitat Management Plan
MBTA	Migratory Bird Treaty Act
MSCP	Multiple Species Conservation Program
NCCP	Natural Communities Conservation Plan
LLO	Likely Limits of Occurrence
RCA	Resource Conservation Areas
RPO	County of San Diego Resource Protection Ordinance
SAMP	Special Area Management Plan
USFWS	United States Fish and Wildlife Service
USC	United States Code
WCB	Wildlife Conservation Board

INTRODUCTION

This document provides guidance for evaluating adverse environmental effects that a proposed project may have on biological resources. These Guidelines for Determining Significance (Guidelines) should be consulted during the evaluation of any biological resource pursuant to CEQA. Specifically, this document addresses the following questions listed in the California Environmental Quality Act (CEQA) Guidelines, Appendix G, IV. Biological Resources, IX. Land Use and Planning, and XVII. Mandatory Findings of Significance:

IV. Biological Resources – Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means?

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?

IX. Land Use and Planning – Would the project:

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

XVII. Mandatory Findings of Significance

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects.)

1.0 GENERAL PRINCIPLES AND EXISTING CONDITIONS

San Diego County has long been known as a unique environment for biological resources. Both the number and diversity of the habitats and species present in the County far exceed those of most other counties in the United States. Several factors are responsible for this unique environment, including climate, geology, topography, microhabitats, and endemism.

The loss of native habitat to development and agricultural uses over the last several decades has caused many of the region's biological resources to become increasingly rare. Some habitat types now occupy less than 5-10% of their historical range. The majority of habitat loss has occurred along the coast and inland mesas. Hence, most of the habitat types that have experienced the greatest losses and are now considered the most sensitive are found within these areas, such as southern maritime chaparral, vernal pools, coastal bluffs and dunes, maritime succulent scrub and freshwater habitats. Other habitat types, such as coastal sage scrub, grasslands, oak woodlands and various chaparral habitats are becoming more sensitive as residential development extends further into previously rural areas in the north and along the eastern foothills of the County.

The far eastern parts of the County, from the mountain areas to the desert regions, have been left relatively intact thus far and may remain so given that large portions of these areas are publicly owned. However, some habitat types in these areas, such as coniferous forest, Colorado Desert wash scrub, desert dunes, and desert sink scrub, are still considered sensitive for reasons other than historical loss, such as limited distribution, the potential to host sensitive species, or the inability to recover from disturbance.

Today, San Diego supports over 400 sensitive plants and animals. These species range from uncommon to critically endangered. Some of these species require immediate, proactive measures, particularly those that are already listed as threatened or endangered. For others, extirpation or extinction is not quite so imminent, but their

long-term survival may depend upon the precautionary actions taken now, including ensuring that a sufficient amount of native habitat is preserved in a viable manner. Refer to Tables 2 and 3 for lists of County-sensitive plants and wildlife.

Most of the County's conservation policies focus on preservation at the ecosystem and habitat level. The single species approach is only used for particularly sensitive species or those species with unusual life history needs. In all cases, single-species methods are used in conjunction with the habitat or ecosystem-level approach. The County of San Diego has established policies that aim to balance the needs of humans with the need to protect biological resources. The County's policies have been designed to maintain the optimal health and viability of each ecosystem and habitat given the existing and potential environmental conditions and constraints.

2.0 EXISTING REGULATIONS AND STANDARDS

Several Federal, State and local regulations have been established to protect and conserve biological resources. The descriptions below provide a brief overview of the most appropriate regulations and their respective requirements.

2.1 Federal Regulations and Standards

Federal Endangered Species Act[1]
[http://www4.law.cornell.edu/uscode/16/ch35.html]
Enacted in 1973, the Endangered Species Act (ESA) provides for the conservation of threatened and endangered species and their ecosystems. The Act prohibits the "take" of threatened and endangered species except under certain circumstances and only with authorization from the U.S. Fish and Wildlife Service (USFWS) through a permit under Section 4(d), 7 or 10(a) of the Act. Under the Endangered Species Act, "take" is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.

Migratory Bird Treaty Act[2]
[http://www4.law.cornell.edu/uscode/16/ch7schII.html]
Congress passed the Migratory Bird Treaty Act (MBTA) in 1918 to prohibit the kill or transport of native migratory birds, or any part, nest, or egg of any such bird unless allowed by another regulation adopted in accordance with the MBTA. The prohibition applies to birds included in the respective international conventions between the U.S. and Great Britain, the U.S. and Mexico, the U.S. and Japan, and the U.S. and Russia.

[1] U.S.C Title 16, Chapter 35, Sections 1531-1544.
[2] U.S.C Title 16, Chapter 7, Subchapter II, Sections 703-712.

Bald and Golden Eagle Protection Act[3]
[http://www4.law.cornell.edu/uscode/html/uscode16/usc_sup_01_16_10_5A_20_II.html]
When first enacted in 1940, the Act prohibited the take, transport or sale of bald eagles, their eggs or any part of an eagle except where expressly allowed by the Secretary of Interior. The Act was amended in 1962 to extend the prohibitions to the golden eagle.

Federal Water Pollution Control Act (Clean Water Act), 1972[4]
[http://www4.law.cornell.edu/uscode/33/ch26.html]
The Federal Water Pollution Control Act was first passed by Congress in 1948. The Act was later amended and became known as the Clean Water Act. The Act establishes the basic structure for regulating discharges of pollutants into the waters of the United States. It gives the U.S. Environmental Protection Agency (EPA) the authority to implement pollution control programs, including setting wastewater standards for industry and water quality standards for contaminants in surface waters. The Act makes it unlawful for any person to discharge any pollutant from a point source into navigable waters, without a permit under its provisions. Clean Water Act 404 permits are issued by the U.S. Army Corps of Engineers for dredge/fill activities within wetlands or non-wetland waters of the U.S. Clean Water Act 401 certifications are issued by the Regional Water Quality Control Board for activities requiring a federal permit or license which may result in discharge of pollutants into waters of the U.S.

2.2 State Regulations and Standards

California Environmental Quality Act (CEQA)[5]
[http://ceres.ca.gov/ceqa/stat/]
California Environmental Quality Act requires that biological resources be considered when assessing the environmental impacts resulting from proposed actions. CEQA does not specifically define what constitutes an "adverse effect" on a biological resource. Instead, lead agencies are charged with determining what specifically should be considered an impact.

California Fish and Game Code
[http://law.justia.com/california/codes/fgc.html]
The California Fish and Game (CFG) Code regulates the taking or possession of birds, mammals, fish, amphibians and reptiles, as well as natural resources such as wetlands and waters of the state. It includes the California Endangered Species Act (CESA; Sections 2050-2115) and Streambed Alternation Agreement regulations (Section 1600-1616), as well as provisions for legal hunting and fishing, and tribal agreements for activities involving take of native wildlife.

[3] U.S.C Title 16, Chapter 5A, Subchapter II, Sections 668 a-d.
[4] U.S.C Title 33, Ch.26, Sub-Ch.I-VI.
[5] PRC, § 21000 et. seq. and the State CEQA Guidelines, CCR, §15000 et seq.

California Endangered Species Act[6]
[http://law.justia.com/california/codes/2009/fgc/2050-2069.html]
The California Endangered Species Act (CESA) generally parallels the main provisions of the Federal Endangered Species Act (ESA) and is administered by the California Department of Fish and Game (CDFG). The CESA prohibits take of any species that the California Fish and Game Commission determines to be threatened or endangered. CESA allows for take incidental to otherwise lawful development projects upon approval from CDFG. Under the California Fish and Game Code, "take" is defined as to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

California Native Plant Protection Act
[http://law.justia.com/california/codes/fgc/1900-1913.html]
The Native Plant Protection Act (NPPA) of 1977 (Fish and Game Code Section 1900-1913) directed the Department of Fish and Game (CDFG) to carry out the Legislature's intent to "preserve, protect and enhance rare and endangered plants in this State." The NPPA gave the California Fish and Game Commission the power to designate native plants as "endangered" or "rare" and to protect endangered and rare plants from take.

Porter-Cologne Water Quality Control Act[7]
[http://law.justia.com/california/codes/wat/13000-13002.html]
This Act provides for statewide coordination of water quality regulations. The Act established the California State Water Resources Control Board as the statewide authority and nine separate Regional Water Quality Control Boards to oversee water quality on a day-to-day basis at the regional/local level.

Natural Community Conservation Planning (NCCP) Act of 1991[8]
[http://law.justia.com/california/codes/fgc/2800-2835.html]
The NCCP Act is designed to conserve natural communities at the ecosystem scale while accommodating compatible land use. The California Department of Fish and Game is the principal state agency implementing the NCCP Program. NCCP Plans developed in accordance with the Act provide for comprehensive management and conservation of multiple wildlife species and identify and provide for the regional or area-wide protection and perpetuation of natural wildlife diversity while allowing compatible and appropriate development and growth.

California Oak Woodland Conservation Act
[http://law.justia.com/california/codes/fgc/1360-1372.html]
In 2001, the California Legislature passed the California Oak Woodland Conservation Act. This act established the Oak Woodland Conservation Program, administered by the Wildlife Conservation Board (WCB), which was designed to provide $10 million to help local jurisdictions protect and enhance their oak woodland resources. It offers landowners, conservation organizations, and cities and counties an opportunity to obtain funding for projects designed to conserve and restore California's oak

[6] California Fish and Game Code, Division 3, Chapter 1.5, Sections 2050-2115.
[7] California Water Code, Division 7, Sections 13000-14958.
[8] Section 2800 et. seq. of the California Fish and Game Code, as amended January 1, 2003 (Chapter 4, sections 1 and 2 of California statutes 2002.

woodlands. It authorizes the WCB to purchase oak woodland conservation easements and provide grants for land improvements and oak restoration efforts. While the Program is statewide in nature, it is designed to address oak woodland issues on a regional priority basis. The Program provides a mechanism to achieve sustainable ranching and farming operations, along with healthy oak woodlands.

2.3 Local Regulations and Standards

San Diego County General Plan – Open Space Element (Part I), Conservation Element (Part X), and Community and Subregional Plans
[http://www.sdcounty.ca.gov/dplu/generalplan.html]
The Open Space Element and the Conservation Element of the General Plan provide guiding principles for the conservation of biological resources. The Open Space Element outlines the goals and policies pertaining to each type of open space, not all of which are for the preservation of biological resources. The Conservation Element, specifically Chapters 3 and 4 address County policies relating to water, vegetation and wildlife habitat. Appendix K of the Conservation Element outlines the County's Resource Conservation Areas (RCA), which are further described and delineated in each of the Community and Subregional Plans. Each RCA has been designated as such for a purpose specific to that area. When a site is located within a mapped RCA, the project must comply with the relevant policies for that RCA (i.e., avoidance of oaks, etc.).

County of San Diego Zoning Ordinance
[http://www.sdcounty.ca.gov/dplu/zoning/index.html]
Land may also have a zoning designation or Special Area Regulation with certain restrictions pursuant to the Zoning Ordinance. For instance, lands may have a zoning designation of S81 Ecological Resource Area Regulations. The few uses allowed on lands with this designation are subject to strict provisions and limitations. The Zoning Ordinance also applies other Special Area Regulations with specific restrictions and provisions, including designator G (Sensitive Resource), R (Coastal Resource Protection Area) and/or V (Vernal Pool Area).

Multiple Species Conservation Program and Biological Mitigation Ordinance[9]
[http://www.sdcounty.ca.gov/dplu/mscp/bmo.html]
The MSCP is a long-term regional conservation plan designed to establish a connected preserve system that protects the County's sensitive species and habitats. The MSCP covers 582,243 acres over 12 jurisdictions. Each jurisdiction will have their own subarea plan to be implemented separately from one another. The subarea plan for the County's jurisdiction covers 252,132 acres in the southwestern portion of the unincorporated lands. The County Subarea Plan is regulated by the Biological Mitigation Ordinance, which outlines the specific criteria and requirements for projects within the MSCP boundaries. The County Subarea Plan (adopted October 1997), the

[9] County of San Diego, Multiple Species Conservation Program (MSCP), County of San Diego Subarea Plan, 1997 and County of San Diego, Biological Mitigation Ordinance, (Ord. Nos. 8845, 9246) 1998 (new series).

BMO (adopted March 1998), the Final MSCP Plan (dated August 1998) and the Implementing Agreement (signed March 1998) between the County and Wildlife Agencies are the documents used to implement the MSCP.

The MSCP and BMO provide specific criteria for project design, impact allowances and mitigation requirements. The criteria in this document, Guidelines for Determining Significance for Biological Resources, do not replace those required by the MSCP. All projects within the MSCP boundaries must conform to both the MSCP requirements and the County's policies under CEQA.

Resource Protection Ordinance[10]
[http://www.sdcounty.ca.gov/cob/ordinances/ord9842.doc]
The Resource Protection Ordinance (RPO) was adopted in 1989 and amended in 1991 and 2007. RPO restricts to varying degrees impacts to various natural resources including wetlands, wetland buffers, floodplains, steep slopes, sensitive habitat lands and historical sites. Certain permit types are subject to the requirement to prepare Resource Protection Studies under the RPO.

RPO restricts uses in wetlands as defined by the ordinance. Aquaculture, scientific research, wetland restoration projects, limited removal of diseased or invasive plant species, and limited road-, driveway- or trail-crossings may be allowed when specific findings are made for these uses. In addition, the ordinance requires that a wetland buffer be provided to further protect the wetland resources. Improvements necessary to protect the adjacent wetlands and those uses allowed within the actual wetland are the only allowed uses within the buffer. For more explicit information on these requirements refer to RPO.

RPO also limits impacts to sensitive habitat lands. Sensitive habitat lands include unique vegetation communities and/or the habitat that is either necessary to support a viable population of sensitive species, is critical to the proper functioning of a balanced natural ecosystem or which serves as a functioning wildlife corridor. Habitats considered sensitive or significant under CEQA are not necessarily considered RPO sensitive habitat lands. Examples of RPO sensitive habitat lands include, but are not limited to:

- Lands that include populations of sensitive species (such as County Group A plants, Group I wildlife species, state- and federally-listed species).
- Lands that contain unique vegetation communities, such as maritime succulent scrub, southern coastal bluff scrub, coastal and desert dunes, calcicolous scrub, maritime chaparral, valley sacaton grassland, hardpan and claypan vernal pools, montane meadows, mesquite bosque, native grassland, and Torrey pine forest.

Examples of lands that would not be considered RPO sensitive habitat lands include, but are not limited to: Coastal sage scrub, oak woodland, chaparral, and non-native grasslands, provided that these habitats: (a) do not include populations of sensitive

[10] County of San Diego, Resource Protection Ordinance, 2007 (Ord. Nos. 9842, 7968, 7739, 7685 and 7631).

species (such as Group A plants, Group I wildlife species, state- and federally-listed species); (b) are not critical to a balanced ecosystem; or (c) are not part of a functioning wildlife corridor.

Impacts to RPO sensitive habitat lands shall only be allowed when: (a) all feasible measures have been applied to reduce impacts; and (b) mitigation provides an equal or greater benefit to the affected species.

The ordinance includes the provision that when "the extent of environmentally sensitive lands on a particular legal lot is such that no reasonable economic use of such lot would be permitted by these regulations, then an encroachment into such environmentally sensitive lands to the minimum extent necessary to provide for such reasonable use may be allowed".

Habitat Loss Permit Ordinance[11]
[www.co.san-diego.ca.us/dplu/docs/HLP-Ord8365.pdf]
The Habitat Loss Permit (HLP) Ordinance was adopted in March of 1994 in response to both the listing of the California gnatcatcher as a federally threatened species, and the adoption of the Natural Communities Conservation Plan (NCCP) Act by the State of California. Pursuant to the Special 4(d) Rule under the ESA, the County is authorized to issue "take permits" for the California gnatcatcher (in the form of Habitat Loss Permits) in lieu of Section 7 or 10(a) Permits typically required from the US Fish and Wildlife Service. Although issued by the County, the wildlife agencies must concur with the issuance of a HLP for it to become valid as take authorization under the ESA.

The HLP Ordinance states that projects must obtain an HLP prior to the issuance of a grading permit, clearing permit or improvement plan if the project will directly or indirectly impact any of several coastal sage scrub (CSS) habitat types. The Ordinance requires an HLP if CSS or related habitat will be impacted, regardless of whether the site is currently occupied by gnatcatchers. HLPs are not required for projects within the boundaries of the MSCP since take authorization is conveyed to those projects through compliance with the MSCP. HLPs are also not required for projects that have separately obtained Section 7 or 10(a) permits for take of the gnatcatcher. For more explicit information on these requirements refer to the HLP Ordinance.

3.0 TYPICAL ADVERSE EFFECTS

Any action that results in the loss or degradation of a biological resource is considered an adverse effect. The most obvious adverse effect is the direct removal of a resource, such as clearing of habitat or the take of a species. Although not as apparent, indirect impacts can be as harmful as direct impacts. In fact, indirect impacts can adversely affect species or habitat to the extent that it is effectively equivalent to removing the resource.

[11] County of San Diego, An Ordinance Amending the San Diego County Code to Establish a Process for Issuance of the Coastal Sage Scrub Habitat Loss Permits and Declaring the Urgency Thereof to Take Effect Immediately, Ordinance No. 8365. 1994, Title 8, Div 6, Ch. 1. Sections 86.101-86.105, 87.202.2.

Land may also be designated "impact neutral," where the acreage is not considered impacted, but cannot be credited toward mitigation requirements. For example, wetlands and wetland buffers that are avoided to comply with the Resource Protection Ordinance are considered impact neutral. Also see Section 4.2 of the Biological Report Format and Content Requirements regarding other impact neutral situations (large lot subdivisions and fire clearing for existing permitted and occupied structures).

Significant adverse effects may result from one or more direct, indirect and/or cumulative impacts (CEQA Sections 15358 and 15355). The following describes each of these types of impacts relative to biological resources.

3.1 Direct Impacts

Direct impacts are those that are generally obvious, absolute or quantifiable. The removal of habitat by grading or clearing is the most common direct impact. Other examples of direct impacts would include the construction of a substantial barrier in a wildlife corridor (the direct impact being to wildlife movement) or the loss of habitat occupied by a certain species (the direct impact being to that particular species). Direct impacts may occur through the project itself or actions necessary to implement the project (e.g., fire fuel modification and/or clearing, construction staging areas).

3.2 Indirect Impacts

Indirect impacts may be the result of secondary effects from direct impacts or those impacts that over time cause the degradation of a resource by changing its function, health or quality. Unlike direct impacts that are typically one-time effects, indirect impacts often continue in the long term and may actually increase.

Indirect impacts commonly result from a project's "edge effects." Edge effects from development may extend several hundred feet into adjacent open space areas, causing significant changes in species composition, diversity and abundance in those nearby lands. Projects can have a wide variety of indirect impacts depending on the nature of the project, the type of resources present, and the type and degree of edge effects.

Projects can also cause a decline in the availability of a resource, such as water or prey, or change the habitat viability by altering the moisture regime or vegetation present, thereby adversely affecting a biological resource. Projects may cause habitat fragmentation, loss of ecosystem and watershed integrity, and may affect ecosystems and natural systems through changes in the pattern of land use, and population density or growth rate. Indirect impacts have been addressed in multiple species recovery plans, reports, journal articles and conferences. These Guidelines were created based on the best available science and most common standards followed by the wildlife agencies, conservationists and biologists. On a case-by-case basis, other measurable standards may apply.

3.3 Cumulative Impacts

Cumulative impacts are those caused by the additive effect of multiple direct and indirect impacts to a biological resource over time. A project's direct and indirect impacts may not be individually significant, but the additive effect when viewed in connection with the impacts of past, present and probable future projects may cause the significant loss or degradation of a resource. In addition, multiple different impacts to a resource may be cumulative. For instance, a creek may be impacted directly and indirectly from road crossings, buffer encroachment and edge effects, all of which cumulatively cause the overall degradation of the creek.

A project may have significant cumulative effects notwithstanding the project's conformance with a regulatory program or existing mitigation plan such as a Habitat Conservation Plan (HCP) or Natural Communities Conservation Plan (NCCP). For example, species may become listed that were not addressed in the adopted plan, or insufficient information was available at the time of plan adoption.

CEQA requires an appropriate cumulative study area (geographic scope) when determining which projects to include in a cumulative analysis. If the appropriate study area is entirely within the MSCP, a project may rely on the MSCP to determine that the project's impacts are not cumulatively considerable. If, however, a project is located on the periphery of the MSCP, or the project lies both within and outside the MSCP, the cumulative study area must extend beyond the boundaries of the MSCP as necessary to address the appropriate resource(s).

3.4 Permanent and Temporary Impacts

Direct, indirect, and cumulative impacts can be described in more detail relative to whether they are permanent or temporary. Permanent impacts to biological resources would result from a permanent direct loss of those resources as an area is converted to another condition (e.g., developed, ornamental landscaping, agriculture, etc.), or an indirect impact (e.g., edge effects) that will persist and is permanent.

Direct impacts may be considered temporary when an area can be restored to its pre-impact condition thus providing habitat and wildlife functions and values effectively equal to the functions and values that existed before the area was impacted.

4.0 GUIDELINES FOR DETERMINING SIGNIFICANCE

This section provides guidance for evaluating adverse environmental effects a project may have on biological resources. The Significance Guidelines listed in this section are organized into five subject areas based on the State CEQA Guidelines. Some types of impacts may need to be evaluated under more than one subject area.

These Significance Guidelines were established using a variety of resources. Some are the result of extensive literature review covering scientific texts, journal articles, regional

studies and regulatory documents. Others were developed during the creation of the MSCP and are based on modeling and species analyses. Best available science was used in establishing these Significance Guidelines. If no conclusive scientific data was available to support a considered guideline, that guideline was not included. The Significance Guidelines will be modified as necessary when new scientific evidence becomes available. Any person may provide suitable scientific evidence to DPLU for consideration in modifying the Significance Guidelines presented in this section and the information shall be considered and applied, as approved by the County. Additional site-specific Significance Guidelines may be applied where relevant circumstances dictate and as approved by the County. Please note that due to the extensive list of references and multiple sources for each Significance Guideline, all references are listed in Section 6.0 at the end of this document.

It is important to note that quantification standards are provided as a guidance tool only and specific conditions may vary based on specific site conditions and/or circumstances as well as the best available scientific information regarding a species' biology. Values are provided as a tool for assessing the need to consider the potential for a significant adverse effect to occur and the requirement to specifically address the issues raised in this section.

Before a determination of the significance of an impact can be made, the presence, nature and extent of the biological resources must be established per the County's Report Format and Content Requirements for Biological Resources, which describes survey and mapping requirements.

The following significance guidelines should guide the evaluation of whether a significant impact to biological resources will occur as a result of project implementation. A project will generally be considered to have a significant effect if it proposes any of the following, absent specific evidence to the contrary. Conversely, if a project does not propose any of the following, it will generally not be considered to have a significant effect on biological resources, absent specific evidence of such an effect.

4.1 Special Status Species

The project would have a substantial adverse effect, either directly or through habitat modifications, on a candidate, sensitive, or special status species listed in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

The following information should be evaluated to provide evidence to support a determination of impact significance.

A. The project would impact one or more individuals of a species listed as federally

or state endangered or threatened.[12]

B. The project would impact an on-site population of a County List A or B plant species, or a County Group I animal species, or a species listed as a state Species of Special Concern. Impacts to these species are considered significant; however, impacts of less than 5 percent of the individual plants or of the sensitive species' habitat on a project site may be considered less than significant if a biologically-based determination can be made that the project would not have a substantial adverse effect on the local long-term survival of that plant or animal taxon.[13]

C. The project would impact the local long-term survival of a County List C or D plant species or a County Group II animal species.[14]

D. The project may impact arroyo toad aestivation, foraging or breeding habitat. Any alteration of suitable habitat within 1 kilometer (3,280 feet) in any direction of occupied breeding habitat or suitable stream segments (unless very steep slopes or other barriers constrain movement) could only be considered less than significant if a biologically-based determination can be made that the project would not impact the aestivation or breeding behavior of arroyo toads.[15]

E. The project would impact golden eagle habitat. Any alteration of habitat within 4,000 feet of an active golden eagle nest could only be considered less than significant if a biologically-based determination can be made that the project would not have a substantially adverse effect on the long-term survival of the identified pair of golden eagles.[16]

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[12] Significance guideline 4.1.A. Impacts to federally and/or state listed species are always considered significant.

[13] Significance guidelines 4.1.B, 4.1.C. The County has divided sensitive species into groups based on their rarity and known threats. Plant species are divided into Groups A through D on the County Rare Plant List (Table 2). Animals are divided into Groups I and II on the Sensitive Animal List (Table 3). Groups A and B Plants and Group I Animals include those that have a very high level of sensitivity, either because they are listed as threatened or endangered or because they have very specific natural history requirements that must be met. Groups C and D Plants and Group II Animals include those species that are becoming less common, but are not yet so rare that extirpation or extinction is imminent without immediate action. These species tend to be prolific within their suitable habitat types.

[14] The term "local" in significance guidelines C and F is defined by the boundaries of the County's multiple species conservation plans. For species in southern San Diego county, "local" is the area covered by the South County Subarea Plan. For species in northern San Diego county, "local" is the North County Plan area. "Local" for other species is the rest of the County east of the North County Plan and South County Subarea Plan areas. In cases where a species occurs in central San Diego county, an area about the size of the North County Plan or South County Subarea Plan should be considered the "local" area used for analyzing impacts and significance.

[15] Significance guideline 4.1.D. Arroyo toads breed in wetland areas, but require upland habitats for aestivation (similar to hibernation). Studies have shown that arroyo toads will travel up to 1 kilometer (0.62 miles) from wetlands, but there is no definitive study to show the absolute minimum distance that arroyo toads require for all of their life history needs. The USFWS model used to identify and map areas essential to this species determined that areas up to 25m (80 feet) in elevation above the stream channel were most likely to contain the primary constituent upland habitat elements essential to the species. Until such time that a more definitive study is completed, the County will use a width and elevation most often used by the wildlife agencies and amphibian experts.

[16] Significance guideline 4.1.E. Only a limited number of active golden eagle nests remain in San Diego County. This guideline applies a 4,000-foot no-disturbance zone around golden eagle nests. If the project proposes a use that will have little to no long-term effects, such as the construction of a wireless

F. The project would result in the loss of functional foraging habitat for raptors. Impacts to raptor foraging habitat is considered significant; however, impacts of less than 5 percent of the raptor foraging habitat on a project site may be considered less than significant if a biologically-based determination can be made that the project would not have a substantial adverse effect on the local long-term survival of any raptor species.[17]
G. The project would impact the viability of a core wildlife area, defined as a large block of habitat (typically 500 acres or more not limited to project boundaries, though smaller areas with particularly valuable resources may also be considered a core wildlife area) that supports a viable population of a sensitive wildlife species or supports multiple wildlife species. Alteration of any portion of a core habitat could only be considered less than significant if a biologically-based determination can be made that the project would not have a substantially adverse effect on the core area and the species it supports.
H. The project would cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive species over the long term. The following issues should be addressed in determining the significance of indirect impacts: increasing human access; increasing predation or competition from domestic animals, pests or exotic species; altering natural drainage; and increasing noise and/or nighttime lighting to a level above ambient that has been shown to adversely affect sensitive species.[18]
I. The project would impact occupied burrowing owl habitat.[19]

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telecommunications facility or improvements to an existing road, the project may proceed with appropriate mitigation during the non-breeding season without having significant effects. Long-term uses within the 4000-foot zone, including most development and recreational uses, are considered significant impacts to golden eagles even if the initial grading, clearing and construction were completed outside of the breeding season. The analysis completed during the creation of the MSCP found the 4,000-foot no-disturbance to be necessary for the long-term viability of the existing active nests. Given the lack of any contrary scientific evidence, the County will also use the 4,000-foot zone criteria outside of the MSCP.

[17] Some raptor species, such as the black-shouldered kite, can forage over smaller patches of habitat than large raptors. Analysis of impacts to areas less than five acres should be evaluated for loss of foraging habitat for these smaller raptors.

[18] Significance guideline 4.1.H. Some studies such as the Bioacoustics Research Team (1997) concluded that 60dBA, averaged over a time period such as one hour or 24 hours, is a single, simple criterion to use as a starting point for passerine impacts until more specific research is done. Factors that may be considered include, but are not limited to, song and noise frequencies and levels and temporal shifts (time of day, steady vs. intermittent, etc.) for the sensitive species. Best available science will be consulted to determine potential impacts associated with increases in noise and lighting levels for the species present or expected. The following evidence supports the significance of increases in nighttime lighting: (1) plants depend on darkness for the management of their metabolism; (2) deciduous trees lose their leaves during the fall by the production of hormones that are caused by lengthening nights and do not lose their leaves when light pollution simulates summer's long days and short nights; (3) animals depend on darkness in order to hunt, conceal their location, navigate, or reproduce, (4) mammals waste energy trying to stay away from lighted areas (5) some physiological processes only happen in the dark, such as resting, repairing, or charging of systems; (6) birds use dark skies to navigate during bi-annual migrations; and (7) migrating birds can become disoriented when they fly through an artificially brightened area.

[19] The County has prepared a strategy for addressing burrowing owls in the unincorporated county (Attachment A of the Report Format and Content Requirements – Biological Resources). The strategy

J. The project would impact occupied cactus wren habitat, or formerly occupied coastal cactus wren habitat that has been burned by wildfire.[20]
K. The project would impact occupied Hermes copper habitat.[21]
L. The project would impact nesting success of the following sensitive bird species through grading, clearing, fire fuel modification, and/or other noise generating activities such as construction.[22]

Species*	**Breeding Season**
Coastal cactus wren	*February 15 to August 15*
*Coastal California gnatcatcher**	*February 15 to August 31*
Least Bell's vireo	*March 15 to September 15*
Southwestern willow flycatcher	*May 1 to September 1*
Tree-nesting raptors	*January 15 to July 15*
Ground-nesting raptors	*February 1 to July 15*
Golden eagle	*January 1 to July 31*
*Light-footed clapper rail***	*February 15 to September 30*

** The breeding seasons listed in this table do not supersede implementing agreements with the Wildlife Agencies, Habitat Conservation Plans (HCPs), Habitat/Resource Management Plans (HMPs/RMPs), and Special Area Management Plans (SAMPs). For example, inside the MSCP Subarea Plan, the gnatcatcher breeding season is March 1 to August 15.*
*** The light-footed clapper rail is a CDFG fully-protected species and under the Fish and Game Code, CDFG does not allow "take" of fully-protected species.*

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discusses surveying, analyzing impacts, and designing mitigation for burrowing owls. According to the strategy, all remaining non-native grasslands on East Otay Mesa are considered occupied by burrowing owls.

[20] Many cactus patches occupied by the coastal cactus wren were burned during the 2003 and 2007 wildfires in San Diego County. Efforts to restore cactus patches are underway, including salvaging of cactus species from impact sites. Guidelines for salvaging cactus from impacted occupied or potential cactus wren habitat on development sites are provided in Attachment C of the Report Format and Content Requirements - Biological Resources.

[21] Significance guideline 4.1.K. Though not state or federally listed, the Hermes copper meets the definition of endangered under CEQA Sec. 15380 because its "survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors." The County's determination that the Hermes copper meets the definition of endangered under CEQA is based on the loss of Hermes copper populations by development and wildfire, and the review of published and unpublished literature. Interim guidelines for surveying, assessing impacts, and designing mitigation for Hermes copper are provided in Attachment C of the Report Format and Content Requirements – Biological Resources.

[22] Significance guideline 4.1.L. This guideline addresses the potential loss of offspring for particularly sensitive birds. Any direct or indirect impacts that might affect the nesting success of these species would be significant. The dates used are based on the collective information gathered from various studies completed on the birds of San Diego County.

4.2 Riparian Habitat or Sensitive Natural Community

The project would have a substantial adverse effect on riparian habitat or another sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

The following information should be evaluated to provide evidence to support a determination of impact significance.

A. Project-related grading, clearing, construction or other activities would temporarily or permanently remove sensitive native or naturalized habitat (as listed in Table 5, excluding those without a mitigation ratio) on or off the project site. This Guideline would not apply to small remnant pockets of habitat that have a demonstrated limited biological value. No *de minimus* standard is specified under which an impact would not be significant, however; minor impacts to native or naturalized habitat that is providing essentially no biological habitat or wildlife value can be evaluated on a case-by-case basis to determine whether the projected impact may be less than significant. For example, an impact to native or naturalized upland habitat under 0.1 acre in an existing urban setting may be considered less than significant (depending on a number of factors). An evaluation of this type should consider factors including, but not limited to, type of habitat, relative presence of habitat type in project vicinity, its condition and size, presence or potential for sensitive species, relative connectivity with other native habitat, wildlife species and activity in project vicinity, and current degree of urbanization and edge effects in project vicinity, etc. Just because a particular habitat area is isolated, for example, does not necessarily mean that impacts to the area would not be significant (e.g. vernal pools). An area that is disturbed or partially developed may provide a habitat "island" that would serve as a functional refuge area "stepping stone" or "archipelago" for migratory species.
B. Any of the following will occur to or within jurisdictional wetlands and/or riparian habitats as defined by U.S. Army Corps of Engineers (ACOE), CDFG and the County of San Diego: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.
C. The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels.[23]

[23] Significance guideline 4.2.C. Studies have found that groundwater reductions adversely affect native plant species. Two of the referenced studies (Integrated Urban Forestry, 2001 and Committee on Riparian Zone Functioning and Strategies for Management et al., 2002) found that permanent reduction

D. The project would cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive habitats over the long term. The following issues should be addressed in determining the significance of indirect impacts: increasing human access; increasing predation or competition from domestic animals, pests or exotic species; altering natural drainage; and increasing noise and/or nighttime lighting to a level above ambient that has been shown by the best available science to adversely affect the functioning of sensitive habitats.

E. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands. If the project is subject to the Resource Protection Ordinance, buffers of a minimum of 50 feet and a maximum of 200 feet to protect wetlands are required based on the best available science available to the County at the time of adoption of the ordinance.[24] The following examples provide guidance on determining appropriate buffer widths.[25]

- A 50-foot wetland buffer would be appropriate for lower quality RPO wetlands where the wetland has been assessed to have low physical and chemical functions, vegetation is not dominated by hydrophytes, soils are not highly erosive and slopes do not exceed 25%.
- A wetland buffer of 50-100 feet is appropriate for moderate to high quality RPO wetlands which support a predominance of hydrophytic vegetation or wetlands within steep slope areas (greater than 25%) with highly erosive soils. Within the 50-100-foot range, wider buffers are appropriate where wetlands connect upstream and downstream, where the wetlands serve as a local wildlife corridor, or where the adjacent land use(s) would result in substantial edge effects that could not be mitigated.
- Wetland buffers of 100-200 feet are appropriate for RPO wetlands within regional wildlife corridors or wetlands that support significant populations of wetland-associated sensitive species or where stream meander, erosion, or other physical factors indicate a wider buffer is necessary to preserve wildlife habitat.
- Buffering of greater than 200 feet may be necessary when an RPO wetland is within a regional corridor or supports significant populations of wetland-associated sensitive species and lies adjacent to land use(s) which could result in a high degree of edge effects within the buffer. Although the RPO stipulates a maximum of 200 feet for RPO wetland buffers, actions may be subject to other laws and regulations (such as the Endangered Species Act) that require greater wetland buffer widths.

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in groundwater elevation levels of greater than three feet is enough to induce water stress in some riparian trees, particularly willow (*Salix* spp.), cottonwood (*Populus* spp.) and *Baccharis* species.

[24] Significance guideline 4.2.E. Wetland crossings by their nature will not have a wetland buffer.

[25] Significance guidelines 4.2.E, 4.5.C. The Resource Protection Ordinance substantially limits activities that may occur in wetlands and wetland buffers as defined by the Ordinance. The Ordinance requires wetland buffers of an appropriate size to protect the wetlands environmental and functional habitat values. The Ordinance prohibits impacts to sensitive habitat lands, although it allows development within sensitive habitat lands when the project includes mitigation that provides an equal or greater benefit to the affected species.

4.3 Federal Wetlands

The project would have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means.

This Guideline refers only to federally protected wetlands. The significance of impacts shall be determined under Guideline 4.2.B, C, and E.

4.4 Wildlife Movement and Nursery Sites

The project would interfere substantially with the movement of a native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

The following information should be evaluated to provide evidence to support a determination of impact significance.

A. The project would impede wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.
B. The project would substantially interfere with connectivity between blocks of habitat, or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage. For example, if the project proposes roads that cross corridors, fencing that channels wildlife to underpasses located away from interchanges will be required to provide connectivity. Wildlife underpasses shall have dimensions (length, width, height) suitable for passage by the affected species based on a site-specific analysis of wildlife movement.[21] Another example is increased traffic on an existing road that would result in significant road-kill or interference with an existing wildlife corridor/linkage.
C. The project would create artificial wildlife corridors that do not follow natural movement patterns. For example, constraining a corridor for mule deer or mountain lion to an area that is not well-vegetated or that runs along the face of a steep slope instead of through the valley or along the ridgeline.[21]
D. The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels likely to affect the behavior of the animals identified in a site-specific analysis of wildlife movement.[26]

[26] Significance guidelines 4.4.B, 4.4.C, 4.4.D, 4.4.E, 4.4.F. Wildlife movement paths have a critical role in species survival, allowing foraging, juvenile dispersal, genetic flow, migration and colonization. Without these ecological processes, the probability of species extirpation and eventually extinction is significantly greater. Because of their importance, movement paths have received substantial attention in conservation biology literature. Unfortunately, no study has or can conclude the universal minimum standards for maintaining a movement path because of inherent variability in biological resources. Instead, the optimal conditions for individual movement paths is based on site-specific factors, such as the function of the movement path (i.e., as either a regional linkage or a local movement corridor), the needs of the specific species that use the path and the type and quality of habitat present. The criterion

E. The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path. The adequacy of the width shall be based on the biological information for the target species, the quality of the habitat within and adjacent to the corridor, topography and adjacent land uses. Where there is limited topographic relief, the corridor should be well-vegetated and adequately buffered from adjacent development. Corridors for bobcats, deer and other large animals should reach rim-to-rim along drainages.[21]
F. The project does not maintain adequate visual continuity (i.e., long lines-of-site) within wildlife corridors or linkage. For example, development (such as homes or structures) sited along the rim of a corridor could present a visual barrier to wildlife movement. For stepping-stone/archipelago corridors, a project does not maintain visual continuity between habitat patches.[21]

4.5 Local Policies, Ordinances, Adopted Plans

The project would conflict with one or more local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and/or would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.

The following information should be evaluated to provide evidence to support a determination of impact significance.

A. For lands outside of the MSCP, the project would impact coastal sage scrub (CSS) vegetation in excess of the County's 5% habitat loss threshold as defined by the Southern California Coastal Sage Scrub Natural Communities Conservation Planning Process (NCCP) Guidelines.[27]
B. The project would preclude or prevent the preparation of the subregional Natural Communities Conservation Planning Process (NCCP). For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.[22]
C. The project will impact any amount of wetlands or sensitive habitat lands as outlined in the Resource Protection Ordinance (RPO).[20]
D. The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the Natural Communities Conservation Planning Process (NCCP) Guidelines.[22]

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set forth relies on site-specific factors while following the guiding principles that have been established through the numerous studies (best available science) on wildlife movement paths.

[27] Significance guidelines 4.5.A, 4.5.B, 4.5.D, 4.5.G, 4.5.J. Projects must conform to the specific requirements of the Southern California Coastal Sage Scrub Natural Communities Conservation Planning Process (NCCP) Guidelines and the San Diego County Habitat Loss Permit (HLP) Ordinance. These guidelines relate to specific findings required for all projects outside of the MSCP boundaries.

E. The project does not conform to the goals and requirements as outlined in any applicable Habitat Conservation Plan (HCP), Habitat Management Plan (HMP), Special Area Management Plan (SAMP), Watershed Plan, or similar regional planning effort.
F. For lands within the Multiple Species Conservation Program (MSCP), the project would not minimize impacts to Biological Resource Core Areas (BRCAs), as defined in the Biological Mitigation Ordinance (BMO).[28]
G. The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub Natural Communities Conservation Planning Process (NCCP) Guidelines.[22]
H. The project does not maintain existing movement corridors and/or habitat linkages as defined by the Biological Mitigation Ordinance (BMO).[23]
I. The project does not avoid impacts to MSCP narrow endemic species and would impact core populations of narrow endemics.[23]
J. The project would reduce the likelihood of survival and recovery of listed species in the wild.[22]
K. The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (Migratory Bird Treaty Act).[29]
L. The project would result in the take of eagles, eagle eggs or any part of an eagle (Bald and Golden Eagle Protection Act).

4.6 Cumulative Impacts

The project has the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal species.

The project has impacts that are individually limited, but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The whole of the proposed action must be evaluated to determine if there will be significant cumulative impacts. Cumulative issues to consider include the applicability of a regional plan (such as MSCP and NCCP) and a list of past, present and future projects in the area. Cumulative impacts should be evaluated for each of the guidelines used to determine significance. If relying on a project's conformance with a regulatory program or existing mitigation plan such as an HCP or NCCP as evidence that cumulative impacts will be less than significant, additional language should be included

[28] Significance guidelines 4.5.F, 4.5.H, 4.5.I. Projects must conform to the specific requirements of the Multiple Species Conservation Program (MSCP) and the Biological Mitigation Ordinance (BMO). These guidelines relate to specific findings required for all projects within the MSCP boundaries.
[29] Migratory bird breeding season February 15 to August 31.

to substantiate the decision that the project has no cumulatively considerable impacts beyond the existence of the HCP or NCCP. CEQA requires an appropriate cumulative study area (geographic scope) when determining which projects to include in a cumulative analysis. If the appropriate study area is entirely within the MSCP, a project may rely on the MSCP to determine that the project's impacts are not cumulatively considerable. If, however, a project is located on the periphery of the MSCP, or the project lies both within and outside the MSCP, the cumulative study area must extend beyond the boundaries of the MSCP as necessary to address the appropriate resource(s). The HCP or NCCP may not be adequate to substantiate a finding of no cumulatively considerable impacts if there are newly-listed species and/or species present that were not identified as adequately conserved by the HCP or NCCP.

5.0 STANDARD MITIGATION MEASURES AND PROJECT DESIGN CONSIDERATIONS

When it has been established that a significant impact will potentially occur, the project must propose mitigation to lessen or compensate for the impact. As defined by CEQA (Section 15370), mitigation includes either measures to avoid, minimize or rectify impacts or measures that compensate for impacts by adequately replacing or providing substitute resources.

5.1 Typical Mitigation Measures and Conditions

Table 1 provides some applicable mitigation measures.

Table 1
Typical Mitigation Measures and Conditions[1]

Typical Mitigation Applied to Reduce Effects Below Significance
Biological Open Space/Conservation Easement or Fee Title Transfer of Open Space
Limited Building Zone Easement
Off-site Purchase or Preservation of Habitat[2]
Preparation and Implementation of Revegetation Plans
Salvage of Root Stock, Seed or Specimens for Revegetation[3]
Revegetation and/or enhancement of Open Space
Resource Management Plans (RMP) *(formerly known as Habitat Management Plans or HMPs)*
Breeding Season Avoidance
Permanent Signs
Permanent Fencing or Walls
Temporary Fencing
Evidence of Federal or State permits
Restrictions on Lighting, Runoff, Access, and/or Noise
Biological Monitoring

[1] These are described more fully in the County's Report Format and Content Requirements – Biological Resources (Attachment A).
[2] Any land proposed for mitigation must be current on property taxes.
[3] Guidelines for salvaging cactus species are provided in Appendix B of the County's Report Format and Content Requirements – Biological Resources.

Project design is critically important for the protection of biological resources. Unless projects are designed appropriately, resources cannot be protected in a manner that will ensure long-term viability. Therefore, the type and location of projects should always be designed with the needs of biological resources in mind. Detailed discussion regarding project design is included below. Guidance for processing projects within the South County Subarea of the Multiple Species Conservation Program (MSCP) is included in Attachment B.

5.2 On-site Open Space Considerations

The project should first be reviewed to determine whether on-site open space is needed. **On-site open space should only be included in one of the following instances:**

- **A site hosts *high* to *very high* value or irreplaceable biological resources; or**
- **A site hosts *moderate* value biological resources and site-specific factors dictate that on-site mitigation would be biologically-viable; or**
- **A site hosts *low* value habitat but is part of a larger habitat complex that is biologically-viable.**

Project sites that do not meet the examples above shall provide any necessary mitigation off-site. If it is determined that on-site open space should be included, the optimal size, shape and location of open space should be a primary consideration when designing a project.
To determine the value of a site's biological resources, the following attributes should be considered:

- The sensitivity of the vegetation type;
- Extent of on and off-site habitat connectivity;
- General quality of the habitat as determined by the level of disturbance, range in vegetative structure and species diversity;
- Sensitivity of species present;
- Importance of its biological function, such as being part of a wildlife corridor, functioning as a buffer or being integral to a watershed;
- Physical characteristics, such as topography and soils.
- Whether the site has been identified as or adjacent to a pre-approved mitigation area (PAMA) or proposed PAMA.

The following basic principles should be followed when designing a project that includes on-site open space:

- In all cases, projects should be designed to minimize impacts to the more sensitive resources and completely avoid and buffer those that are very rare or unique.

- Although the overall size of an open space area is important, long-term viability of the resources depends on other factors as well. Site conditions and project-specific details should be considered, including:
  - The function and value of the habitat (i.e., as a remnant for stepping-stone / archipelago-dependent behavior, etc.);
  - The type of habitat present and any design requirements (i.e., a vernal pool has a watershed, oak woodlands and wetlands need a buffer to protect their root systems, etc.);
  - Whether wildlife use portions of the site for movement (on any scale);
  - The types of species using the site for nesting, foraging, movement, etc;
  - The nature and scale of the project proposed (for instance, an industrial project will require far different considerations than a subdivision with 20-acre lots);
  - Fire fuel modification and vegetation management requirements for existing and proposed structures and roads.

- Large blocks of habitat are generally better than smaller ones. However, when no alternative exists, there are cases when a small patch of habitat is useful as a stepping-stone through a developed landscape; although, this is only functional for a limited number of avian species.

- The shape of open space in relation to development is often as important as size. The intent of any project design should be to create the maximum amount of interior open space with the lowest amount of interface between development and preserved areas – referred to as maximizing the surface area to perimeter ratio. A shorter perimeter translates to less potential for "edge effects" to degrade the open space.
- The shape, size and location of open space should all be planned to create the maximum amount of habitat connectivity between on and off-site areas. Habitat connectivity allows for more wildlife movement and maximizes the amount of resources available to resident wildlife (for nesting, foraging, etc.).

- To maintain the ecosystem as a functioning unit, the open space should be located such that it encompasses the natural diversity of type, function and structure of habitats. Natural patterns of habitat associations should also be preserved. For instance, wetlands and their adjacent upland habitats should be preserved together as should the grasslands or low-lying shrublands adjacent to oak woodland.

- Linkages and corridors are essential for juvenile dispersal, foraging, migration and genetic exchange, all of which are necessary for maintaining healthy populations. The optimal location and dimensions of each linkage and corridor are dependent upon the types of resources present and the specific needs of species that use the movement path. Natural movement paths within a larger block of undisturbed habitat should be protected, as should the existing constrained, sometimes tenuous connections that provide the last link between two patches of habitat. Projects should never propose to create a constricted corridor or further constrain an existing one.

- Preserve design may include land subject to past disturbances if the land in its current or restored state would serve a biological function.

6.0 REFERENCES

Although specific references are not cited in the text of this document, the following resources were consulted to create these Guidelines.

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[Attachment A]

DEFINITIONS

Bosque – low-lying area, densely forested with deciduous trees, near a river or stream in the desert.

Calcicolous – growing in soil that is rich in lime.

Core Wildlife Area – A large block of habitat that supports a source population of a sensitive wildlife species or multiple wildlife species. Core wildlife areas are typically 500 acres or more (not limited to project boundaries), though smaller areas with particularly valuable resources may also be considered a core wildlife area.

Corridor – A specific route that is used for movement and migration of species. A corridor may be different from a "Linkage" because it represents a smaller or more narrow avenue for movement.

Cumulatively considerable – The incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Impact Neutral – An area not considered impacted, but cannot be credited toward mitigation requirements. For example, wetlands and wetland buffers that are avoided to comply with the Resource Protection Ordinance are impact neutral. Large lot subdivisions may designate impact neutral areas as described in the Biological Report Format and Content Requirements, section 4.2, Analysis of Project Effects. Fire-clearing for existing permitted and occupied structures may also be designated as impact neutral as described in section 4.2 of the Biological Report Format and Content Requirements.

Linkage – An area of land which supports or contributes to the long-term movement of wildlife and genetic exchange by providing live-in habitat that connects to other habitat areas.

Mafic – containing or relating to a group of dark-colored minerals composed chiefly of magnesium and iron and that occur in igneous rocks.

Narrow Endemic Species – As defined in the Biological Mitigation Ordinance, those plant species listed on Attachment E of document No. 0769999 on file with the Clerk of the Board.

Native Wildlife Nursery Sites – Sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas and bat colonies.

Population – An interbreeding group of individuals of the same species. The geographical limits of a population should be delineated as most appropriate for that species depending on its mobility, method of reproduction, and known distribution. Proportions of a population shall generally be determined based on the number of individuals; however, area may be appropriate for some species.

Raptors – Birds of prey such as eagles, hawks, falcons and owls.

Raptor Foraging Habitat – Land that is a minimum of 5 acres (not limited to project boundaries) of fallow or open areas with any evidence of foraging potential (i.e., burrows, raptor nests, etc.).

Sacaton – a coarse perennial grass of the genus *Sporobolus* that grows in alkaline soils.

Sensitive Habitat – Land which supports unique vegetation communities, or the habitats of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the State California Environmental Quality Act (CEQA) Guidelines (14 Cal. Admin. Code Section 15000 et seq.). Sensitive Habitat includes the area which is necessary to support a viable population of any of the above species in perpetuity, or which is critical to the proper functioning of a balanced natural ecosystem or which serves as a functioning wildlife corridor.

Sensitive Plant – Those plants which meet the following criteria as determined by the County and maintained in its list of Sensitive Plant Species:

- Group A = Plants that are rare, threatened or endangered in California and elsewhere; or
- Group B = Plants that are rare, threatened or endangered in California but more common elsewhere; or
- Group C = Plants which may be quite rare, but need more information to determine their true rarity status; or
- Group D = Plants of limited distribution and are uncommon, but not presently rare or endangered.

Sensitive Species –

- Those species that are included on generally accepted and documented lists of plants and animals of endangered, threatened, candidate or of special concern by the Federal Government or State of California;
- MSCP Rare, Narrow Endemic Animal Species, Narrow Endemic Plant Species, and County Sensitive Plant and Animal Species.
- Those species that meet the definition of "Rare or Endangered Species" under Section 15380 of the State CEQA Guidelines.

Take – as defined in the federal Endangered Species Act, "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct."

[Attachment B]

Guidelines for Projects within Multiple Species Conservation Program (MSCP)

SOUTH COUNTY SUBAREA PLAN

The Multiple Species Conservation Program (MSCP) is a comprehensive, long-term habitat conservation plan, which addresses the needs of many species and the preservation of natural vegetation communities in San Diego County. The South County Subarea Plan covers 252,132 acres in the southwestern portion of the unincorporated lands. This attachment outlines the steps necessary for a project to comply with the requirements of the Multiple Species Conservation Program (MSCP).

A. REGULATIONS AND STANDARDS

- Biological Mitigation Ordinance (March 1998). This document is the regulating tool for the County's MSCP. (http://www.sdcounty.ca.gov/mscp/docs/BMO.pdf)

- Subarea Plan (October 1997). This document describes the general concepts and procedures for the three segments within the County's regional MSCP preserve system.

- Implementing Agreement (March 1998). This document is the contract between the wildlife agencies (USFWS and CDFG) and the County.

B. PROCEDURES

1. Determine the MSCP Segment within which the Project Lies (Figure B-1)

The South County Subarea Plan consists of three segments: Lake Hodges, South County and Metro-Lakeside-Jamul.

The Lake Hodges and South County segments are comprised mainly of "hard line" designations that were agreed upon by the landowners, the wildlife agencies and the County during the creation of the MSCP.

Minor and Major Amendment Areas are designations where the parties involved did not agree upon the appropriate designation for some of the properties (further discussion below).

The Metro-Lakeside-Jamul segment has no hard lines with the exception of three properties (2 in Lakeside, 1 in Jamul), but rather has "soft-lines" or areas targeted for preserve assembly. Land within this segment will be evaluated during the review of projects rather than the exact location of development and preserves being pre-determined as in the other two segments.

2. Determine which MSCP Land Designation Applies to the Project Site

Pre-Approved Mitigation Area (PAMA) – These areas are soft-lines (not agreed upon by the landowners, the wildlife agencies and the County) and are only within the Metro-Lakeside-Jamul segment. They signify the general core and linkage areas critical to the success of the regional preserve system. These areas are the focus for preservation of habitat. One of the goals of the MSCP plan is to locate development outside of the Pre-Approved Mitigation Areas as much as possible, and the mitigation ratios are set to encourage mitigation occurring inside PAMA.

Unincorporated Lands in Metro-Lakeside-Jamul Segment – These lands within the Metro-Lakeside-Jamul segment are outside of the identified core and linkage areas (i.e., not in PAMA). However, these lands may support biological resources necessary for the overall success of the MSCP. Therefore, treatment of these lands depends upon what resources may be affected by the project.

Preserve – The ultimate extent of the MSCP preserve area will be comprised of both the hardline areas located in the Lake Hodges and South County Segments as well as open space areas dedicated or acquired within the Pre-Approved Mitigation Area of the Metro-Lakeside-Jamul Segment. No development is allowed within the Preserved Lands except as specified in Section 1.9 of the Subarea Plan or those uses that are allowed through the appropriate amendment process.

Take Authorized – Typically, these areas may be developed without any further biological review because "take" as defined by the Endangered Species Act has already been adequately mitigated in the form of land set aside as "Hard Lined" preserves during the negotiations between the landowners, wildlife agencies and County during preparation of the Subarea Plan.

Minor Amendment – Minor amendment lands are lands that are not currently part of the MSCP Subarea Plan and that contain habitat that could be partially or completely eliminated (with appropriate mitigation) without significantly affecting the overall goals of the County's Subarea Plan. An agreement was not reached between the applicable parties prior to approval of the Subarea Plan. While these lands are included within the MSCP planning boundary, a land designation will not be applied until a Minor Amendment to the plan has been processed. At that time, the land will be designated Preserve, Take Authorized, or a mixture of both, based on the approved project design. Minor Amendments require the approval from the local US Fish and Wildlife Service (USFWS) Field Office Supervisor and the California Department of Fish and Game (CDFG) NCCP Program Manager. In addition to what all projects require within the MSCP, Minor Amendments require concurrence by both the USFWS and CDFG. Written concurrence by the Resource Agencies is required prior to project approval.

Major Amendment – Like Minor Amendment areas, Major Amendment lands are not currently a part of the MSCP Subarea Plan and are lands for which an agreement was

not reached between the applicable parties prior to approval of the Subarea Plan. However, unlike Minor Amendment areas, Major Amendment areas have a high probability of supporting biological resources critical to the success of the MSCP (either by location within core and linkage areas or by the resources identified on the site). Developments proposed within Major Amendment areas require a formal amendment to the Subarea Plan, NEPA compliance, Federal Register Noticing and concurrence of the Regional Offices of the USFWS (Portland) and the CDFG (Sacramento).

3. Determine if Project is Exempt from the Biological Mitigation Ordinance

Section 86.503(a) of the Biological Mitigation Ordinance (BMO) lists the types of the projects that are exempt from the BMO.

Exemption #'s (7) and (11) relate to grading and clearing associated with a single-family residence on a parcel 10 acres and under in size within the Metro-Lakeside-Jamul segment. Projects meeting the criteria for either of these exemptions require a Certificate of Inclusion (COI) to be granted upon project approval. The Certificate of Inclusion conveys Third Party Beneficiary Status and gives the applicant "take authorization" for any incidental impacts that might occur to sensitive species during grading and/or clearing. COIs are issued for up to 2, 5 or 10 acres (depending on the exemption that applies). Please note that a special project plot plan from the applicant or engineer is necessary when the total parcel size is larger than the allowable area to be cleared (either 2 or 5 acres) pursuant to exemption #11. No map is required for exemption #7.

The issuance of the COI satisfies only the MSCP requirements. All other ordinances and regulations must be complied with, including the Resource Protection Ordinance (RPO) and the California Environmental Quality Act (CEQA), if applicable. If the project will affect wetlands, it should be conditioned to obtain state and federal wetland permits when necessary. Note: Projects exempt from CEQA are also exempt from the BMO but do not receive a COI.

4. Project Design Considerations

Project design shall follow the Project Design Considerations, located in section 5.0 of the San Diego County Guidelines for Determining Significance for Biological Resources. A determination is made by the consultant with concurrence of the County whether the project site meets the BMO definition of a Biological Resource Core Area (BRCA). Projects within a Pre-Approved Mitigation Area or BRCA should maximize open space onsite. Projects outside of these areas should provide mitigation at an offsite location within a PAMA or a BRCA. Land that does not qualify as a BRCA would normally only warrant onsite preservation if wetlands or sensitive plants are present. If offsite habitat preservation is proposed, the offsite mitigation site should be a BRCA or within the PAMA and of equal or better functional value than the impact site.

5. MSCP Findings

Projects within the Subarea Plan must demonstrate conformance with the MSCP by completing MSCP Findings. These findings are required by the Subarea Plan and/or the BMO, and are required for all projects within the MSCP. The Findings are made up of the following 5 sections:

- BRCA Status (BMO Section 86.506 (a)(1) a). Required for all projects.
- Project Design Criteria (BMO Section 86.505(a)). Required for potential impacts to critical populations of sensitive species; significant populations of rare, narrow, endemic animal species; narrow endemic plant species; San Diego County sensitive plants; and land determined to be within a BRCA.
- Preserve Design Criteria (BMO Attachment G). Required if the project is adjacent to an MSCP preserve or if the project proposes onsite preservation.
- Design Criteria for Corridors and Linkages (BMO Attachment H). Required if the project site is within a Regional Linkage or supports a local wildlife Corridor.
- Subarea Plan Findings (MSCP Subarea Plan Section 1.2). Required for all projects.

Once the County staff biologist has determined that the biological report and vegetation map are adequate, the County staff biologist will complete the MSCP Findings. If the project is to undergo public review, MSCP Findings are typically attached to the environmental document (i.e., ND or EIR). The MSCP Findings must later be included in the staff report prepared for any required public hearings. The decision maker / hearing body (i.e. Director, Planning Commission, and/or Board of Supervisors) must adopt the Findings along with the CEQA environmental document. MSCP Findings are only adopted once. When relying on previous MSCP Findings, the decision maker / hearing body must "review and rely upon the previously adopted findings."

5. Conveyance of Third Party Beneficiary Status

Third Party Beneficiary Status is the transfer of the authority (from the County to a property owner) to take habitat and species. Third Party Beneficiary Status can be achieved after the project has been approved, the MSCP Findings have been adopted (or COI issued), and all MSCP related mitigation measures have been satisfied. For new development projects, documentation of Third Party Status will take the form of a statement in the project resolution or form of decision. Third Party Beneficiary Status is only conveyed after all mitigation measures have been satisfied. This includes the dedication of all easements, purchase of offsite credits and completion of any other MSCP-related mitigation measures or critical design elements.

Third Party Beneficiary Status may be attained for the project as a whole or for a discrete phase(s) of the project as long as the mitigation for the discrete phase(s) is not functionally dependent upon the mitigation proposed for subsequent phases for MSCP conformance.

Certificates of Participation. Third Party Beneficiary Status may also be conveyed through a Certificate of Participation. These are for projects that have received all discretionary approvals from the County prior to the effective date of the BMO. Projects with remaining discretionary actions are not eligible for this Certificate. A project proponent may apply for a Certificate of Participation.

The County will review such applications to determine if the project conforms to the standards of the County Subarea Plan and the BMO. If the review results in a determination that the project conforms to these standards, the County will issue draft Findings of Conformance for a 45-day review period by the Wildlife Agencies. Unless written objections related to the Findings of Conformance are received from the Wildlife Agencies by the end of the 45-day review period, the County will issue the Certificate of Participation. If the County finds that the proposed project does not meet the standards set forth in the Subarea Plan and the BMO, the project proponent will be informed of the deficiencies and the proper procedures for achieving and assuring conformance to the requirements.

Conclusion of MSCP Regulatory Process. Adoption of the MSCP Findings and the subsequent conveyance of Third Party Beneficiary Status complete the basic MSCP regulatory process. A copy of the MSCP Findings will remain in the environmental file for future reference.

Figure B-1
MSCP Segments

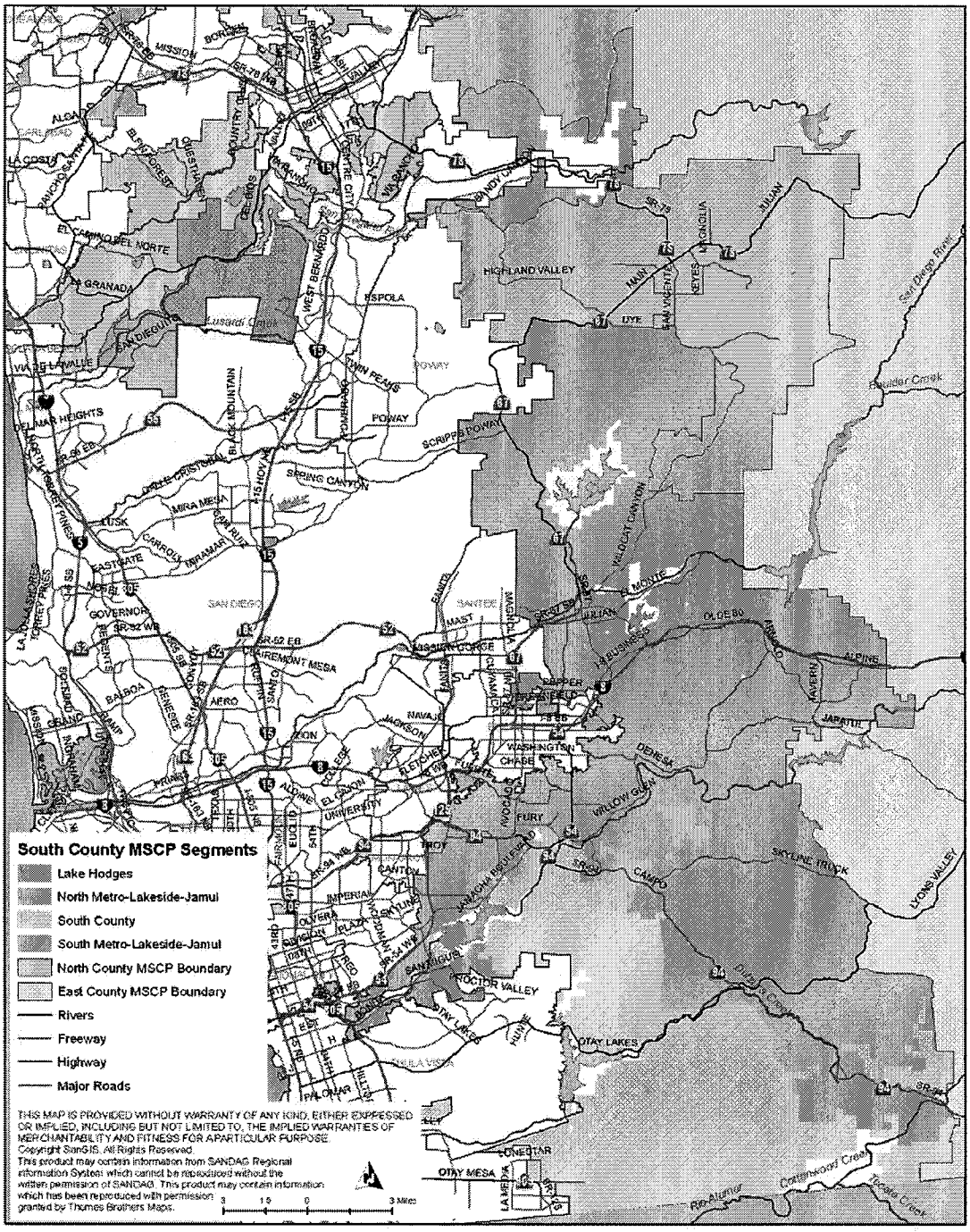

Table 2

County of San Diego Sensitive Plant List

LIST A (Plants rare, threatened or endangered in California and elsewhere)

Abronia villosa var. *aurita*, Foothill sand-verbena -- chaparral and CSS, sandy
Acanthomintha ilicifolia, San Diego thornmint [FT][CE][NE] -- vernal pools, grassy areas, chaparral and CSS, clay and gabbro soils
Ambrosia pumila, San Diego ambrosia [FE][NE] -- chaparral, CSS, grasslands, and valley bottoms, often in disturbed areas
Aphanisma blitoides, Aphanisma -- coastal bluffs, scrub, and dunes
Arctostaphylos glandulosa ssp. *crassifolia*, Del Mar manzanita [FE] -- maritime chaparral, sandy
Arctostaphylos otayensis, Otay manzanita -- mixed chaparral on gabbro and metavolcanic rock
Arctostaphylos rainbowensis, Rainbow manzanita -- chaparral, north county inland areas
Astragalus deanei, Dean's milkvetch -- CSS and riparian along Sweetwater, Otay and Tijuana Rivers and tributaries
Astragalus douglasii var. *perstrictus*, Jacumba milkvetch -- desert transition in southern part of County
Astragalus magdalenae var. *peirsonii*, Pierson's milkvetch [FT][CE] -- desert dunes
Astragalus oocarpus, San Diego Milkvetch -- Lower mountain slopes
Astragalus pachypus var. *jaegeri*, Jaeger's astragalus -- Near Riverside County border, chaparral, cismontane woodlands, CSS, grasslands, sandy or rocky
Astragalus tener var. *titi*, Coastal dunes milkvetch [FE][CE] -- coastal strand
Atriplex coulteri, Coulter's saltbush -- coastal mesas and Ramona grasslands
Atriplex pacifica, South coast saltbush -- coastal sandy areas
Atriplex parishii, Parish brittlescale -- coastal areas and Ramona grasslands
Atriplex serenana var. *davidsonii*, Davidson's saltscale -- coastal areas
Baccharis vanessae, Encinitas baccharis [FT][CE][NE] -- coastal mixed chaparral, cental coast & foothills
Berberis nevinii, Nevin's barberry [FE][CE][MSCP narrow endemic] -- mixed chaparral near Riverside County border, also cismontane woodland, CSS, and riparian scrub, sandy or gravelly
Boechera hirschbergiae (= Arabis h.), Hirshberg's rockcress -- endemic, east of Cuyamaca Lake, on heavy clay overlaid with pebbles
Brodiaea filifolia, Thread-leaved brodiaea [FT][CE][NE] -- clay soils and near vernal pools, North County
Brodiaea orcuttii, Orcutt's brodiaea -- vernal pools and foothill springs
Calochortus dunnii, Dunn's mariposa lily [CA rare][NE] -- montane and foothill, gabbro and metavolcanic soils
Ceanothus cyaneus, Lakeside ceanothus [NE] -- Lakeside, Crest, Alpine chaparral
Centromadia (Hemizonia) pungens ssp. *laevis*, Smooth tarplant -- fall-flowering in coastal valley bottoms
Centromedia (Hemizonia) parryi ssp. *australis*, Southern tarplant -- fall-flowering in coastal and interior valley bottoms including Ramona
Chaenactis carphoclina var. *peirsonii*, Peirson's pincushion flower -- desert slopes near Santa Rosa Mountains
Chaenactis glabriuscula var. *orcuttiana*, Orcutt's pincushion -- coastal bluffs and dunes
Chaenactis parishii, Parish's pincushion flower -- peak tops in the mountains, chaparral, rocky
Chamaesyce platysperma, Flat-seeded spurge -- sandy desert scrub
Chorizanthe orcuttiana, Orcutt's chorizanthe [FE][CE] -- sand soils; Point Loma and Encinitas, older records at Torrey Pines State Park
Chorizanthe polygonoides var. *longispina*, Long-spined spineflower -- clay soils; scattered distribution
Clarkia delicata, Campo clarkia -- central and southern oak woodlands, chaparral
Comarostaphylos diversifolia ssp. *diversifolia*, Summer holly -- coastal and foothill canyons in heavy chaparral
Cordylanthus maritimus ssp. *maritimus*, Salt marsh bird's beak [FE][CE] -- coastal salt marsh
Corethrogyne (Lessingia) filaginifolia var. *linifolia*, San Dieguito sand aster -- north coastal sandy areas

Corethrogyne filaginifolia (=Lessingia f.), San Diego sand aster -- coastal sandy areas
Cryptantha ganderi, Gander's cryptantha -- desert dunes
Cupressus forbesii, Tecate cypress -- Otay, Tecate, and Guatay Mountains
Cupressus stephensonii, Cuyamaca cypress -- west slope of Cuyamaca Peak
Deinandra (Hemizonia) conjugens, Otay tarplant [FT][CE][NE] -- grasslands near Otay and Bonita
Deinandra (Hemizonia) floribunda, Tecate tarplant -- fall-flowering in valleys and arroyos in interior, southern chaparral
Deinandra (Hemizonia) mohavensis, Mojave tarplant [CE] -- drainages in 3,000 ft. elevation chaparral, Chihuahua Valley, Palomar Mtn.
Delphinium hesperium ssp. *cuyamacae*, Cuyamaca larkspur [CA rare] -- montane meadows
Downingia concolor var. *brevior*, Cuyamaca downingia [CE] -- Cuyamaca Lake
Dudleya blochmaniae var. *blochmaniae*, Blochman's dudleya -- MCAS Camp Pendleton clay soils and terraces
Dudleya blochmaniae var. *brevifolia*, Short-leaved dudleya [CE][NE] -- sandstone terraces near Torrey Pines and Del Mar
Dudleya multicaulis, Many-stemmed dudleya -- MCAS Camp Pendleton
Dudleya variegata, Variegated dudleya [NE] -- coastal mesas, CSS and grasslands on foothill slopes among rocks, especially metavolcanics
Dudleya viscida, Sticky dudleya -- North County coastal canyon slopes
Ericameria cuneata var. *macrocephala*, Laguna Mountain goldenbush -- rocky mountain peaks
Eriogonum foliosum, Leafy buckwheat -- sandy montane desert soils
Eryngium aristulatum var. *parishii*, San Diego button-celery [FE][CE] -- vernal pools
Eryngium pendletonensis, Pendleton button-celery -- MCAS Camp Pendleton; coastal bluffs, grasslands and sparse CSS
Fremontodendron mexicanum, Mexican flannelbush [FE][CR] -- metavolcanic canyons on Otay and Jamul Mountains
Galium angustifolium ssp. *borregoense*, Borrego bedstraw [CR] -- Palm Canyon
Galium angustifolium ssp. *jacinticum*, San Jacinto Mountains bedstraw -- montane areas
Grindelia hirsutula var. *hallii*, Hall's gumplant -- montane grassy and meadow areas
Hazardia orcuttii, Orcutt's hazardia [CT] -- CSS in Encinitas
Heuchera brevistaminea, Mt. Laguna alumroot -- rocky mountain cliff slopes
Horkelia cuneata ssp. *puberula*, Mesa horkelia -- chaparral, CSS, cismontane woodland, sandy, gravelly
Horkelia truncata, Ramona horkelia -- gabbro and metavolcanic foothill slopes and peaks
Hulsea californica, San Diego sunflower -- chaparral slopes in montane areas
Isocoma menziesii var. *decumbens*, Decumbent goldenbush -- CSS
Lasthenia glabrata ssp. *coulteri*, Coulter's goldfields -- coastal saltmarsh
Lepechinia ganderi, Gander's pitcher sage [NE] -- metavolcanic soils, Otay and San Miguel Mountains
Lepechinia cardiophylla, Heart-leaved pitcher sage [NE] -- metavolcanic soils near Mt. Woodson
Lepidium flavum var. *felipense*, Borrego pepper-grass -- dry lake bottom, Little Blaire Valley
Lepidium virginicum var. *robinsonii*, Robinson pepper-grass -- CSS and grassy areas
Lessingia glandulifera var. *tomentosa*, Warner Springs lessingia -- valleys near Warner Springs; chaparral, sandy
Lilium parryi, Lemon lily -- moist montane meadows
Limnanthes gracilis ssp. *parishii*, Cuyamaca meadowfoam [CE] -- montane meadows
Linanthus floribundus ssp. *hallii*, Santa Rosa Mtn. linanthus -- Santa Rosa Mountains
Linanthus orcuttii, Orcutt's linanthus -- montane forest openings
Lotus crassifolius var. *otayensis*, Otay Mountain lotus -- top of Otay Mountain
Lotus haydonii, Pygmy lotus -- desert canyons, pinyon juniper, rocky
Lotus nuttallianus, Nuttall's lotus -- south coastal strand and sandy soils
Lupinus excubitus var. *medius*, Mtn. Springs bush lupine -- eastern edge of County near I-8
Malacothamnus aboriginum, Indian Valley bush mallow -- montane chaparral
Mimulus latidens, Vernal pool monkeyflower -- vernal pools
Monardella hypoleuca ssp. *lanata*, Felt-leaved rock mint -- southern foothill peak tops
Monardella macrantha ssp. *hallii*, Hall's monardella -- montane forest

Monardella nana ssp. *leptosiphon*, San Felipe monardella -- montane chaparral and conifer forest, near Riverside border
Monardella stoneana, Jennifer's monardella -- in canyons around Otay and Tecate Mountains
Monardella viminea (= *M. linoides* ssp. *viminea*), Willowy monardella [FE][CE][NE] -- coastal canyons
Muilla clevelandii, San Diego goldenstar -- coastal mesas and clay soils
Navarretia fossalis, Spreading navarretia [FT] -- vernal pools
Navarretia peninsularis, Peninsular navarretia -- moist montane areas near Cuyamaca Lake
Navarretia prostrata, Prostrate navarretia -- vernal pools
Nemacaulis denudata var. *denudata*, Coast woolly-heads -- sandy coastal areas
Nolina cismontana, Chaparral beargrass -- Magee Ridge, Viejas Mtn.
Nolina interrata, Dehesa beargrass [CE][NE] -- chaparral and CSS on gabbro soils in southern foothills
Opuntia parryi var. *serpentina (Clylindropuntia californica)*, Snake cholla [NE] -- south county CSS
Orcuttia californica, California Orcutt grass [FE][CE] -- large vernal pools in California
Packera ganderi (= Senecio g.), Gander's butterweed [CA rare] -- gabbro soils in interior regions
Phacelia stellaris, Brand's phacelia -- sandy soils near the coast
Pinus torreyana ssp. *torreyana*, Torrey pine -- coastal mixed chaparral at Del Mar (only applies to naturally occurring trees)
Poa atropurpurea, San Bernardino bluegrass [FE] -- montane meadows
Pogogyne abramsii, San Diego mesa mint [FE][CE] -- vernal pools
Pogogyne nudiuscula, Otay mesa mint [FE][CE] -- vernal pools in Otay Mesa
Quercus dumosa, Nuttall's scrub oak -- maritime chaparral
Ribes canthariforme, Morena currant -- moist areas in southern interior chaparral
Ribes viburnifolium, Santa Catalina Island currant -- coastal canyons, chaparral, woodlands, Santa Catalina Island, Imperial Beach, and Baja California
Rorippa (Nasturtium) gambelii, Gambel's water cress [FE][CT] -- montane streams, marshes, lake margins, Julian
Rubus glaucifolius var. *ganderi*, Cuyamaca raspberry -- montane forest near Cuyamaca
Satureja chandleri, San Miguel savory -- gabbro and metavolcanic soils in interior foothills, Jamul/Dulzura and Fallbrook areas
Scutellaria bolanderi ssp. *austromontana*, Southern skullcap -- wet chaparral and montane areas
Sibaropsis hammittii, Hammitt's claycress -- gabbro foothills, Viejas Mtn
Streptanthus campestris, Southern jewelflower -- pinyon-juniper areas
Stylocline citroleum, Oil neststraw -- coastal areas, last collected in 1935
Suaeda esteroa, Estuary seablite -- coastal salt marsh
Tetracoccus dioicus, Parry's tetracoccus -- chaparral on gabbro and metavolcanic soils
Thermopsis californica var. *semota*, Velvety false lupine -- montane meadows
Viguiera purissimae, La Purissima viguiera -- found on MCAS Camp Pendleton, near Orange Co.
Xylorhiza orcuttii, Orcutt's woody aster -- gypsum soils in desert canyons

LIST B (Plants rare, threatened or endangered in California but more common elsewhere)

Adolphia californica, San Diego adolphia -- clay soils in CSS, chaparral and grasslands
Agave shawii, Shaw's agave [NE] -- coastal terraces
Ambrosia chenopodiifolia, San Diego bur-sage -- CSS around Otay
Astragalus insularis var. *harwoodii*, Harwood's milkvetch -- desert dunes at eastern base of mountains, sandy or gravely
Ayenia compacta, California ayenia -- desert canyons
Bergerocactus emoryi, Golden-spined cereus -- coastal bluff and near Otay Mountain in maritime succulent scrub
Bursera microphylla, Elephant tree -- desert slopes
Calliandra eriophylla, Fairy duster -- desert canyons, sandy or rocky
Carlowrightia arizonica, Arizona carlowrightia -- desert scrub, sandy, granitic alluvium
Ceanothus verrucosus, Wart-stemmed ceanothus -- coastal mixed chaparral
Chamaesyce arizonica, Arizona spurge -- sandy desert scrub
Colubrina californica, Las Animas colubrina -- high desert scrub

Cordylanthus orcuttianus, Orcutt's bird's-beak -- CSS in South County near Otay, Chula Vista and Imperial Beach
Coreopsis maritima, Sea dahlia -- coastal bluff
Dieteria (Machaeranthera) asteroides var. *lagunensis*, Laguna Mountain aster [CR] -- meadows and openings in forest on Mt. Laguna
Dudleya attenuata ssp. *orcuttii*, Orcutt's dudleya -- Border Field State Park
Ericameria palmeri ssp. *palmeri*, Palmer's goldenbush [NE] -- south coastal and interior arroyos, mesic
Erodium macrophyllum, Large-leaf fillary -- cismontane woodland, grasslands
Eucnide rupestris, Rock nettle -- desert canyons and cliff bottoms
Euphorbia misera, Cliff spurge -- coastal bluff
Ferocactus viridescens, Coast barrel cactus -- coastal mesas and hillsides
Frankenia palmeri, Palmer's frankenia/yerba reuma -- salt marsh near South Bay
Geraea viscida, Sticky geraea -- southern foothill and desert transition, chaparral, often in disturbed areas
Herissantia crispa, Curly herissantia -- eastern desert slopes
Heuchera rubescens var. *versicolor*, San Diego County alumroot -- rocky mountain cliff slopes, conifer forest, chaparral, Hot Springs & Palomar Mts.
Hulsea mexicana, Mexican hulsea -- desert mountain areas near Jacumba
Ipomopsis tenuifolia, Slender-leaved ipomopsis -- desert transition in southeastern part of County
Iva hayesiana, San Diego marsh-elder -- south coastal arroyos and ravines
Lewisia brachycalyx, Southwestern bitterroot -- near Cuyamaca Lake, in conifer forests and meadows/seeps
Linanthus bellus, Desert beauty -- interior and desert transition chaparral in southern edge of County, sandy
Lycium parishii, Parish's desert-thorn -- low desert flats
Malperia tenuis, Brown turbins -- desert pavement
Matelea parvifolia, Climbing spearleaf -- desert washes and canyons
Mentzelia hirsutissima, Hairy stickleaf -- sandy soil, low desert
Nama stenocarpum, Mud nama -- muddy lake edges
Nemacaulis denudata var. *gracilis*, Slender woolly-heads -- sandy desert areas and coastal dunes
Ornithostaphylos oppositifolia, Palo blanco -- hills south of Tijuana River valley
Quercus cedrosensis, Cedros Island oak -- south slope of Otay Mountain
Rhus trilobata var. *simplicifolia*, Single-leaf basketbush -- pinyon juniper, Pinyon and Vallecito Mts.
Rosa minutifolia, Small-leaved rose [CE] -- Otay Mesa, CSS/chaparral
Salvia munzii, Munz's sage -- southern CSS/chaparral near Otay Mountain and Otay Mesa, also Dictionary Hill and Jamul Mts.
Selaginella eremophila, Desert spike-moss -- desert slopes, gravelly/rocky
Senecio aphanactis, Rayless ragwort -- coastal scrub, chaparral, woodlands, alkaline areas
Senna covesii, Cove's cassia -- desert valley edges
Spermolepis echinata, Spermolepis -- Borrego Valley, sandy or rocky areas
Stemodia durantifolia, Blue streamwort -- mesic, sandy areas
Viola aurea, Golden violet -- pinyon-juniper areas, sandy areas

LIST C (Plants which may be rare, but need more information to determine their true rarity status)

Berberis higginsiae, Fremont barberry -- interior chaparral, pinyon-juniper woodland, rocky areas
Camissonia lewisii, Lewis's sun cup -- CSS, grasslands, cismontane woodlands, coastal areas, sandy or clay areas
Ditaxis serrata var. *californica*, California ditaxis -- desert scrub
Githopsis diffusa ssp. *filicaulis*, Mission Canyon bluecup -- CSS in Mission Valley, but also in Silverwood Wildlife Sanctuary
Hordeum intercedens, Vernal barley -- seeps and vernal pools
Myosurus minimus (apus), Little mousetail -- vernal pools
Opuntia wigginsii (Cylindropuntia), Wiggins cholla -- low desert, eastern edge of County, sandy areas

LIST D (Plants of limited distribution and are uncommon, but not presently rare or endangered)

Abronia maritima, Red sand-verbena -- sandy beach areas
Achnatherum diegoense, San Diego needlegrass -- clay soils in native grassy areas, chaparral and CSS, rocky, often mesic areas
Androsace elongata ssp. *acuta*, California androsace -- montane grassy slopes
Artemisia palmeri, Palmer's sage -- arroyo bottoms in chaparral, CSS, and riparian, sandy, mostly south part of County
Asplenium vespertinum, Western spleenwort -- chaparral, woodland, CSS, rocky areas
Astragalus crotalariae, Salton milkvetch -- desert transition
Astragalus lentiginosus var. *borreganus*, Borrego milkvetch -- desert dunes
Azolla mexicana, Mexican mosquito fern -- standing water on ponds
Calandrinia breweri, Brewer's calandrinia -- burned areas
Calandrinia maritima, Seaside calandrinia -- coastal bluff scrub, CSS, grassland, sandy areas
Calochortus catalinae, Catalina mariposa lily -- coastal grasslands, cismontane woodland, CSS, chaparral
Caulanthus simulans, Payson's jewelflower -- sandy, granitic locations in foothills and desert
Chamaebatia australis, Southern mountain misery -- chaparral, gabbro and metavolcanic soils
Chamaesyce revoluta, Thread-stemmed spurge -- Mojave Desert scrub, rocky areas
Chorizanthe leptotheca, Peninsular spineflower -- CSS and chaparral
Convolvulus simulans, Small-flowered morning glory -- coastal clay areas and serpentine seeps, chaparral, CSS, grasslands
Cryptantha costata, Ribbed cryptantha -- desert sandy soils
Cryptantha holoptera, Winged cryptantha -- desert gravels
Cylindropuntia (Opuntia) wolfii, Wolf's cholla -- low desert scrub
Cynanchum utahense, Utah vine milkweed -- desert bajadas
Deinandra (Hemizonia) paniculata, Paniculate tarplant -- grassy areas, coast & foothills, Bonsall to Otay
Delphinium parishii ssp. *subglobosum*, Desert larkspur -- desert transition and rocky locations
Dichondra occidentalis, Western dichondra -- coastal mixed chaparral and North County CSS, grasslands, woodlands
Fritillaria biflora, Chocolate lily -- grasslands, usually on clay soils
Galium johnstonii, Johnston's bedstraw -- Palomar Mtn.
Gilia caruifolia, Caraway-leaved gilia -- east slopes of Palomar Mtn.
Harpagonella palmeri, Palmer's grappling hook -- CSS in South County, chaparral, grassland, clay
Heterotheca sessiliflora ssp. *sanjacintensis*, San Jacinto golden-aster -- North Mtn. Ecoregion, mixed chaparral and mixed conifer
Holocarpha virgata ssp. *elongata*, Graceful tarplant -- coastal mesas and foothills
Horsfordia newberryi, Newberry's velvet-mallow -- Sonoran Desert scrub
Hulsea vestita ssp. *callicarpha*, Beautiful hulsea -- chaparral and coniferous forest
Hymenothrix wrightii, Wright's hymenothrix -- lower mountain woodlands and conifer forests
Juglans californica, California black walnut -- riparian areas near DeLuz
Juncus acutus var. *leopoldii*, Soutwestern spiny rush -- marshes, seeps and riparian areas
Juncus cooperi, Cooper's rush -- desert alkaline areas
Lathyrus splendens, Pride of California -- southern interior chaparral
Lilium humboldtii ssp. *ocellatum*, Ocellated Humboldt lily -- shaded montane canyons
Lycium californicum, California box-thorn -- coastal bluffs and scrub
Lyrocarpa coulteri var. *palmeri*, Palmer's lyrepod -- desert canyons
Microseris douglasii var. *platycarpha*, Small-flowered microseris -- CSS and clay soils
Mimulus aridus, Desert monkey flower -- desert transition
Mimulus clevelandii, Cleveland's monkeyflower -- foothill and mountain peaks
Mimulus palmeri, Palomar monkeyflower -- montane and coastal mixed chaparral
Mirabilis tenuiloba, Slender-lobed four o'clock -- desert canyons
Mucronea californica, California spineflower -- coastal sandy soils (also inland)
Ophioglossum californicum, California adder's tongue fern -- vernal pools, coastal mesas, and coastal mixed chaparral, mesic
Orobanche parishii ssp. *brachyloba*, Short-lobed broomrape -- sandy bluffs

Pectocarya peninsularis, Baja California bur-comb -- rare in Borrego Valley
Penstemon clevelandii var. *connatus*, San Jacinto beardtongue -- rocky desert slopes and mountains
Penstemon thurberi, Thurber's beardtongue -- pinyon juniper areas, chaparral
Pentachaeta aurea, Golden-rayed pentachaeta -- woodlands, lower conifer forests, CSS, grasslands
Perideridia gairdneri ssp. *gairdneri*, Gairdner's yampah -- moist coastal and montane areas
Pilostyles thurberi, Thurber's pilostyles -- Carrizo Badlands Overlook, grows on *Psorothamnus emoryi*
Piperia cooperi, Cooper's rein orchid -- chaparral, woodland, grassland, elev. 15 to 1,585 meters
Piperia leptopetala, Narrow-petaled rein orchid -- woodlands and conifer forests
Polygala cornuta var. *fishiae*, Fish's milkwort -- foothill peaks (chaparral, woodlands, riparian) especially metavolcanic and gabbro
Proboscidea althaeifolia, Desert unicorn-plant -- desert washes, sandy areas
Quercus engelmannii, Engelmann oak -- interior valleys and slopes
Romneya coulteri, Coulter's matilija poppy -- chaparral and CSS, often in burns
Rupertia rigida, Parish psoralea -- montane forest near Cuyamaca
Salvia eremostachya, Desert sage -- northern desert canyons, rocky/gravelly areas
Selaginella asprella, Bluish spike-moss -- montane chaparral, granitic/rocky areas
Selaginella cinerascens, Ashy spike-moss -- undisturbed CSS
Streptanthus bernardinus, Laguna Mtns. Jewelflower -- montane peak tops
Suaeda taxifolia, Woolly seablite -- margins of coastal salt marshes
Viguiera laciniata, San Diego County viguiera -- CSS in southern part of County
Xanthisma (Machaeranthera) junceum, Rush-like bristleweed -- chaparral and CSS in South County

Key to abbreviations

FE – Federally Endangered
FT – Federally Threatened
CE – California Endangered
CR –California Rare
CT – California Threatened
NE – MSCP Narrow Endemic
CSS – Coastal sage scrub

Table 3

County of San Diego Sensitive Animal List

Group 1 Species (alphabetical by scientific name)

Invertebrates

Apodemia virgulti peninsularis, Peninsular metalmark
Branchinecta sandiegoensis, San Diego fairy shrimp (FE, NE)
Coelus globosus, Globose dune beetle
Euphydryas editha quino, Quino checkerspot butterfly (FE, NE)
Euphyes vestris harbisoni, Harbison's dun skipper (NE)
Linderiella occidentalis, California lindellaria
Lycaena hermes, Hermes copper
Callophrys thornei, Thorne's hairstreak butterfly (NE)
Panoquina errans, Wandering salt marsh skipper
Papilio multiculdata, Two-tailed swallowtail
Plebejus saepiolus hilda, Hilda greenish blue
Pseudocopaeodes eunus eunus, Alkali skipper
Pyrgus ruralis lagunae, Laguna Mountain skipper (FE)
Streptocephalus woottoni, Riverside fairy shrimp (FE, NE)

Fish

Eucyclogobius newberryi, Tidewater goby (FE, NE)
Gila orcutti, Arroyo chub
Oncorhynchus mykiss irideus, Rainbow Trout -- Steelhead form (FE)

Reptiles and Amphibians

Batrachoseps aridus, Desert slender salamander (FE, CE)
Bufo microscaphus californicus, Arroyo southwestern toad (FE, NE)
Clemmys marmorata pallida, Southwestern pond turtle (NE)
Coleonyx variegatus abbottii, San Diego banded gecko
Ensatina eschscholtzii klauberi, Large-blotched salamander
Phrynosoma mcallii, Flat-tailed horned lizard
Rana muscosa, Mountain yellow-legged frog (FE)
Rana aurora draytoni, California red-legged frog (FT, NE)
Thamnophis hammondii, Two-striped garter snake
Uma notata notata, Colorado Desert fringe-toed lizard

Mammals

Dipodomys stephensi, Stephens' kangaroo rat (FE, CT)
Ovis canadensis nelsoni, Peninsular bighorn sheep (FE, CT)
Perognathus longimembris pacificus, Pacific pocket mouse (FE)

Birds

Accipiter cooperi, Cooper's hawk
Accipiter striatus, Sharp-shinned hawk
Aechmophorus occidentalis, Western Grebe
Agelaius tricolor, Tricolored blackbird
Aimophila ruficeps canescens, Rufous-crowned sparrow
Ammodramus savannarum, Grasshopper sparrow
Amphispiza belli belli, Bell's sage sparrow
Aquila chrysaetos, Golden eagle
Asio otus, Long-eared owl
Athene cunicularia hypugea, Burrowing owl (NE)
Buteo lineatus, Red-shouldered hawk
Buteo regalis, Ferruginous hawk (Winter)
Buteo swainsoni, Swainson's hawk (Nesting) (CT)
Campylorhynchus brunnicapillus couesi, San Diego cactus wren (NE)
Cathartes aura, Turkey vulture
Charadrius alexandrinus nivosus, Western snowy plover (FT)
Circus cyaneus hudsonius, Northern harrier
Coccyzus americanus occidentalis, Yellow-billed cuckoo (CT, NE)
Elanus caeruleus, White-tailed kite
Empidonax trailii extimus, Southwestern willow flycatcher (FE, SE, NE)
Falco mexicanus, Prairie falcon
Falco peregrinus anatum, American peregrine falcon (CE, NE)
Haliaeetus leucocephalus, Bald eagle (Winter) (CE)
Ictera virens, Yellow-breasted chat
Lanius ludovicianus , Loggerhead shrike
Rallus longirostris levipes, light-footed clapper rail (FE, CE)
Melanerpes lewis, Lewis' woodpecker (Winter)
Pandion haliaetus, Osprey (Rarely breeds)
Passerculus sandwichensis beldingi, Belding's savannah sparrow (CE, NE)
Plegadis chihi, White-faced ibis
Polioptila californica, California gnatcatcher (FT)
Progne subis, Purple Martin
Pyrocephalus rubinus flammeus, Vermilion flycatcher
Rallus longirostris levipes, Light-footed clapper rail (FE, CE, NE)
Riparia riparia, Bank swallow (Formerly bred) (CT)
Rynchops niger, Black skimmer
Sternula antillarum browni, California least tern (FE, CE, NE)
Sterna elegans, Elegant tern
Strix occidentalis occidentalis, California spotted owl (CT)
Toxostoma crissale, Crissal thrasher (Mesquite riparian)
Vermivora luciae, Lucy's warbler
Vireo bellii pusillus, Least Bell's vireo (FE, CE, NE)
Vireo vicinior, Gray vireo (Nesting)

Group 2 Species (alphabetical by scientific name)

Invertebrates

Ariolimax columbianus stramineas, Palomar banana slug
Brennania belkini, Belkin's dune tanabid fly
Cicindela gabbii, Gabb's tidal-flat tiger beetle
Cicindela latesignata latesignata, Western beach tiger beetle
Cicindela sinilis frosti, Senile tiger beetle
Cicindela trifasciata sigmoidea, Mudflat tiger beetle
Cincindela hirticollis gravida, Sandy beach tiger beetle
Cincindela latesignata obliviosa, Oblivious tiger beetle
Danaus plexippus, Monarch butterfly
Helminthoglypta traskii coelata, Peninsular Range shoulderband snail
Megathymus yuccae harbisoni, Coastal giant skipper
Phobetus robinsoni, Robinson's rain beetle
Trigonoscuta blaisdelli, Blaisdell trigonoscuta weevil
Tryonia imitator, Mimic tryonia snail

Fish

Cyprinodon macularius, Desert pupfish (FE, CE)
Gasterosteus aculeatus williamsoni, Unarmored three-spine stickleback (FE, CE)

Reptiles and Amphibians

Anniella pulchra pulchra, Silvery legless lizard
Aspidoscelis hyperythrus beldingi (=*Cnemidophorus hyperythrus*), Belding's orange-throated whiptail
Aspidoscelis tigris stejnegeri (= *Cnemidophorus tigris multiscutatus*), Coastal western whiptail
Charina trivirgata roseofusca, Coastal rosy boa
Coleonyx switaki, Barefoot banded gecko
Crotalus ruber rubber, Northern red diamond rattlesnake
Diadophis punctatus similis, San Diego ringneck snake
Eumeces skiltonianus interparietalis, Coronado skink
Lampropeltis zonata pulchra, San Diego mountain kingsnake
Phrynosoma coronatum blainvillii, San Diego horned lizard
Salvadora hexalepis virgultea, Coast patch-nosed snake
Sauromalus obesus, Chuckwalla
Sceloporus graciosus vandenburgianus, Southern sagebrush lizard
Spea hammondii, Western spadefoot
Taricha torosa torosa, Coast range newt
Thamnophis sirtalis ssp. *novum,* South coast garter snake

Birds

Anas strepera, Gadwall
Anser caerulescens, Snow goose (Winter)
Ardea herodias, Great blue heron
Asio flammeus, Short-eared owl (Winter)
Aythya americana, Redhead
Branta canadensis, Canada goose (Winter)
Bucephala islandica, Barrow's goldeneye (Winter)
Butorides striatus, Green heron
Cerorhinca monocerata, Rhinoceros auklet (Oceanic – Winter)
Charadrius montanus, Mountain plover (Winter)
Chlidonias niger, Black tern (Non-breeder)
Contopus borealis, Olive-sided flycatcher
Cypseloides niger, Black swift (Non-breeder)
Dendrocygne bicolor, Fulvous whistling-duck
Dendroica petechia brewsteri), Yellow warbler
Egretta rufescens, Reddish egret
Endomychura hypoleuca, Xantus murrelet (Oceanic)
Fratercula cirrhata, Tufted puffin (Oceanic)
Eremophila alpestris actis, Horned lark
Falco columbarius, Merlin (Winter)
Gavia immer, Common loon (Winter)
Grus canadensis, Sandhill crane
Ixobrychus exilis hesperis, Least bittern
Junco hyemalis caniceps, Gray-headed junco (Winter-rare)
Larus atricilla, Laughing gull (Non breeding, very rare)
Larus californicus, California gull (Non-breeding)
Laterallus jamaicensis coturniculus, California black rail (extirpated) (CT, NE)
Mycteria americana, Wood stork (Non-breeding, very rare)
Numenius americanus, Long-billed curlew (Non-breeding)
Oceanodroma furcata plumbea, Fork-tailed storm petrel (Ocean)
Oceanodroma homochroa, Ashy storm petrel (Ocean)
Oceanodroma melania, Black storm petrel (Ocean)
Oreortyx pictus eremophila, Mountain quail
Passerculus sandwichensis rostratus, Large-billed savannah sparrow
Pelecanus erythrorhynchos, American white pelican (Winter)
Pelecanus occidentalis californicus, California brown pelican (FE, CE)
Phalacrocorax auritus, Double-crested cormorant (Non-breeding)
Piranga rubra, Summer Tanager
Sialia mexicana, Western bluebird
Toxostoma bendirei, Bendire's thrasher (Non-breeding)
Toxostoma lecontei lecontei, Leconte's thrasher
Tyto alba, Common barn-owl

Mammals *Antrozous pallidus,* Pallid bat *Bassariscus astutus,* Ringtail *Chaetodipus californicus femoralis,* Dulzura Calif. pocket mouse *Chaetodipus fallax fallax,* Northwestern San Diego pocket mouse *Chaetodipus fallax pallidus,* Pallid San Diego pocket mouse *Choeronycteris mexicana,* Mexican long-tongued bat *Corynorhinus townsendii pallescens,* Townsend's big-eared bat *Euderma maculatum,* Spotted bat *Eumops perotis californicus,* Greater western mastiff bat *Felis concolor,* Mountain lion *Lasiurus blossevillii,* Western red bat *Lepus californicus bennettii,* San Diego black-tailed jackrabbit *Macrotus californicus,* California leaf-nosed bat *Myotis ciliolabrum,* Small-footed myotis *Myotis evotis,* Long-eared myotis *Myotis thysanodes,* Fringed myotis *Myotis volans,* Long-legged myotis *Myotis yumanensis,* Yuma myotis *Neotoma lepida intermedia,* San Diego desert woodrat *Nyctinomops macrotis,* Big free-tailed bat *Nyctinomops femorosaccus,* Pocketed free-tailed bat *Odocoileus hemionus,* Southern mule deer *Onychomys torridus Ramona,* Southern grasshopper mouse *Perognathus longimembris brevinasus,* Los Angeles little pocket mouse *Perognathus longimembris internationalis,* Jacumba little pocket mouse *Taxidea taxus,* American badger	

Key to abbreviations

FE – Federally Endangered
FT – Federally Threatened
CE – California Endangered
CT – California Threatened
NE – MSCP Narrow Endemic

Table 4

Vegetation Communities in San Diego County

Introduction

San Diego's vegetation communities owe their diversity to the wide range of soil and climatic conditions found in the County. The County encompasses desert, mountainous and coastal conditions over a wide range of elevation, precipitation and temperature changes. These conditions provide niches for endemic species and a wide range of vegetation communities. San Diego County is home to over 200 plant and animal species that are federally listed as rare, endangered, or threatened. The preservation of this diversity of species and habitats is important for the health of ecosystem functions, and their economic and intrinsic values.

In order to effectively classify the wide variety of vegetation communities, the framework developed by Robert Holland in 1986 has been customized for San Diego County. To supplement the original Holland Code, additions were made by Thomas Oberbauer in 1996 to account for unique habitats found in San Diego and to account for artificial habitat features (i.e., 10000 series). Vegetation communities not present in San Diego County were omitted. Nomenclature and numbering here follows Holland's with a few minor exceptions. A summary of significant changes to Oberbauer's 1996 classification system is located at the end of the list.

While this list is an important planning and regulatory tool, it is recognized that there are inherent limitations to vegetation classification. Nature does not follow a hierarchal and discrete system of species assemblages, but rather exhibits gradations and temporal fluctuations. Despite these limitations, this list provides an efficient framework for environmental analysis, conservation planning, and natural resource management.

Vegetation Communities List

Based on "Preliminary Descriptions of the Terrestrial Natural Communities of California" prepared by Robert F. Holland, Ph.D. for State of California, The Resources Agency, Department of Fish and Game (October 1986)

* Denotes additions to Holland's original categories by Thomas Oberbauer (February 1996)
\# Denotes additions to Holland's original categories in this publication by the County of San Diego (March 2008)

10000 DISTURBED OR DEVELOPED AREAS *
- 11000 Non-Native Vegetation *
  - 11200 Disturbed Wetland *
  - 11300 Disturbed Habitat *
- 12000 Urban/Developed *
- 18000 General Agriculture *
  - 18100 Orchards and Vineyards *
  - 18200 Intensive Agriculture - Dairies, Nurseries, Chicken Ranches *
  - 18300 Extensive Agriculture - Field/Pasture, Row Crops *
    - 18310 Field/Pasture *
    - 18320 Row Crops *

20000 DUNE COMMUNITY
- 21000 Coastal Dunes
  - 21100 Active Coastal Dunes
  - 21200 Foredunes
  - 21230 Southern Foredunes

- 22000 Desert Dunes
  - 22100 Active Desert Dunes
  - 22300 Stabilized and Partially-Stabilized Desert Sand Field
- 23000 Interior Dunes
  - 23200 Relictual Interior Dunes
- 24000 Stabilized Alkaline Dunes*
- 25000 Badlands/Mudhill Forbs*

30000 SCRUB AND CHAPARRAL

- 31000 Coastal Bluff Scrub
  - 31200 Southern Coastal Bluff Scrub
- 32000 Coastal Scrub
  - 32400 Maritime Succulent Scrub
  - 32500 Diegan Coastal Sage Scrub
    - 32510 Diegan Coastal Sage Scrub: Coastal form*
    - 32520 Diegan Coastal Sage Scrub: Inland form*
    - 32530 Diegan Coastal Sage Scrub: Baccharis-dominated #
  - 32700 Riversidian Sage Scrub
    - 32710 Riversidian Upland Sage Scrub
    - 32720 Alluvial Fan Scrub
  - 32800 Flat-topped Buckwheat* (*# formerly part of 37K00*)
- 33000 Sonoran Desert Scrub
  - 33100 Sonoran Creosote Bush Scrub
  - 33200 Sonoran Desert Mixed Scrub
    - 33210 Sonoran Mixed Woody Scrub
    - 33220 Sonoran Mixed Woody and Succulent Scrub
    - 33230 Sonoran Wash Scrub*
  - 33300 Colorado Desert Wash Scrub
  - 33500 Calcicolous Scrub*
  - 33600 Encelia Scrub*
  - 33700 Acacia Scrub* (*# formerly 29000*)
- 34000 Mojavean Desert Scrub
  - 34300 Blackbush Scrub
- 35000 Great Basin Scrub
  - 35200 Sagebrush Scrub
    - 35210 Big Sagebrush Scrub
- 36000 Chenopod Scrub
    - 36110 Desert Saltbush Scrub
    - 36120 Desert Sink Scrub
- 37000 Chaparral
  - 37100 Upper Sonoran Mixed Chaparral
    - 37120 Southern Mixed Chaparral
      - 37121 Granitic Southern Mixed Chaparral
      - 37122 Mafic Southern Mixed Chaparral
    - 37130 Northern Mixed Chaparral*
      - 37131 Granitic Northern Mixed Chaparral*
      - 37132 Mafic Northern Mixed Chaparral*
  - 37200 Chamise Chaparral
    - 37210 Granitic Chamise Chaparral*
    - 37220 Mafic Chamise Chaparral*
  - 37300 Red Shank Chaparral
  - 37400 Semi-Desert Chaparral
  - 37500 Montane Chaparral
    - 37510 Mixed Montane Chaparral
    - 37520 Montane Manzanita Chaparral
    - 37530 Montane Ceanothus Chaparral

37540 Montane Scrub Oak Chaparral
37800 Upper Sonoran Ceanothus Chaparral
37810 Buck Brush Chaparral
37830 *Ceanothus crassifolius* Chaparral
37900 Scrub Oak Chaparral
37A00 Interior Live Oak Chaparral
37B00 Upper Sonoran Manzanita Chaparral
37C00 Maritime Chaparral
37C30 Southern Maritime Chaparral
37G00 Coastal Sage-Chaparral Transition
37K00 Montane Buckwheat Scrub (*# renamed; see also 32800*)
39000 Upper Sonoran Subshrub Scrub

40000 GRASSLANDS, VERNAL POOLS, MEADOWS, AND OTHER HERB COMMUNITIES
42000 Valley and Foothill Grassland
42100 Native Grassland
42110 Valley Needlegrass Grassland
42120 Valley Sacaton Grassland
42130 Saltgrass Grassland #
42200 Non-Native Grassland
42210 Non-Native Grassland: Broadleaf-Dominated #
42211 Non-Native Grassland: Artichoke-Thistle-Dominated #
42300 Wildflower Field
42400 Foothill/Mountain Perennial Grassland*
42470 Transmontane Perennial Grassland *
(*# formerly Transmontane Dropseed Grassland*)
44000 Vernal Pool
44300 Southern Vernal Pool
44320 San Diego Mesa Vernal Pool
44321 San Diego Mesa Hardpan Vernal Pool
44322 San Diego Mesa Claypan Vernal Pool
45000 Meadows and Seeps
45100 Montane Meadow
45110 Wet Montane Meadow
45120 Dry Montane Meadows
45300 Alkali Meadows and Seeps
45320 Alkali Seep
45400 Freshwater Seep
46000 Alkali Playa Community

50000 BOG AND MARSH
52000 Marsh and Swamp
52100 Coastal Salt Marsh
52120 Southern Coastal Salt Marsh
52300 Alkali Marsh
52310 Cismontane Alkali Marsh
52400 Freshwater Marsh
52410 Coastal and Valley Freshwater Marsh
52420 Transmontane Freshwater Marsh
52430 Montane Freshwater Marsh
52440 Emergent Wetland*
52500 Vernal Marsh
52510 Herbaceous wetland #

60000 RIPARIAN AND BOTTOMLAND HABITAT
61000 Riparian Forests

61300 Southern Riparian Forest
61310 Southern Coast Live Oak Riparian Forest
61320 Southern Arroyo Willow Riparian Forest
61330 Southern Cottonwood-Willow Riparian Forest
61500 Montane Riparian Forest
61510 White Alder Riparian Forest
61800 Colorado Riparian Forest
61810 Sonoran Cottonwood-Willow Riparian Forest
61820 Mesquite Bosque
62000 Riparian Woodlands
62200 Desert Dry Wash Woodland
62300 Desert Fan Palm Oasis Woodland
62400 Southern Sycamore-Alder Riparian Woodland
62500 Southern Riparian Woodland #
63000 Riparian Scrubs
63300 Southern Riparian Scrub
63310 Mule Fat Scrub
63320 Southern Willow Scrub
63500 Montane Riparian Scrub
63800 Colorado Riparian Scrub
63810 Tamarisk Scrub
63820 Arrowweed Scrub
64000 Unvegetated Habitat *
64100 Open Water *
64110 Marine *
64111 Subtidal *
64112 Intertidal *
64120 Bay *
64121 Deep Bay *
64122 Intermediate Bay *
64123 Shallow Bay *
64130 Estuarine *
64131 Subtidal *
64132 Intertidal *
64133 Brackishwater *
64140 Freshwater *
64200 Non-Vegetated Channel or Floodway *
64300 Saltpan/Mudflats *
64400 Beach *
65000 Non-Native Riparian #
65100 Arundo-Dominated Riparian #

70000 WOODLAND
71000 Cismontane Woodland
71100 Oak Woodland
71120 Black Oak Woodland
71160 Coast Live Oak Woodland
71161 Open Coast Live Oak Woodland *
71162 Dense Coast Live Oak Woodland *
71180 Engelmann Oak Woodland
71181 Open Engelmann Oak Woodland
71182 Dense Engelmann Oak Woodland
71200 Walnut Woodland
71210 California Walnut Woodland
72000 Piñon and Juniper Woodlands
72300 Peninsular Piñon and Juniper Woodlands

72310 Peninsular Piñon Woodland
72320 Peninsular Juniper Woodland and Scrub
75000 Sonoran Thorn Woodland
75100 Elephant Tree Woodland
77000 Mixed Oak Woodland *
78000 Undifferentiated Open Woodland *
79000 Non-Native Woodland * (*# renamed*)
79100 Eucalyptus Woodland * (*# moved from 11000*)

80000 FOREST
81000 Broadleaved Upland Forest
81100 Mixed Evergreen Forest
81300 Oak Forest
81310 Coast Live Oak Forest
81320 Canyon Live Oak Forest
81340 Black Oak Forest
83000 Closed-Cone Coniferous Forest
83100 Coastal Closed-Cone Coniferous Forest
83140 Torrey Pine Forest
83200 Interior Closed-Cone Coniferous Forest
83230 Southern Interior Cypress Forest
84000 Lower Montane Coniferous Forest
84100 Coast Range, Klamath and Peninsular Coniferous Forest *
84140 Coulter Pine Forest
84150 Bigcone Spruce (Bigcone Douglas-Fir)-Canyon Oak Forest
84200 Sierran Coniferous Forest
84230 Sierran Mixed Coniferous Forest
84500 Mixed Oak/Coniferous/Bigcone/Coulter Forest *

Summary of changes made to Oberbauer's 1996 classification system

Nine new classes were added:

- 23200 Relictual Interior Dunes
- 32530 Diegan Coastal Sage Scrub: Baccharis-dominated
- 42130 Saltgrass Grassland
- 42210 Non-Native Grassland: Broadleaf-Dominated
- 42211 Non-Native Grassland: Artichoke-Thistle-Dominated
- 52510 Herbaceous Wetland
- 62500 Southern Riparian Woodland
- 65000 Non-Native Riparian

65100 Arundo-Dominated Riparian

The following classes were modified:

- 11100 Eucalyptus Woodland was moved to 79100
- 13000-series Unvegetated Habitat was moved to 64000-series
- 29000 Acacia Scrub was moved to 33700
- 37K00 Flat-topped Buckwheat was split:
  32800 Flat-topped Buckwheat and
  37K00 Montane Buckwheat Scrub
- 46100 Badlands/Mudhill Forbs was moved to 25000
- 79000 "Undifferentiated Dense Woodland" was changed to "Non-Native Woodland"

Table 5

Habitat Mitigation Ratios

These ratios apply OUTSIDE of approved MSCP Plans. For lands inside approved MSCP Plans, consult the appropriate plan for required mitigation ratios.

These mitigation ratios apply to impacts that cannot be avoided or minimized in accordance with section 5.0 of this document (Standard Mitigation Measures and Project Design Considerations). On-site and/or off-site lands of long-term biological value may count toward mitigation on an in-kind basis.

Mitigation using an "out of kind" habitat type may be appropriate in cases that meet the following criteria:

1. The biological function and value of the habitat used for mitigation is similar to that which was impacted (i.e., shrublands, riparian scrub, etc.);
2. For non-native grassland habitats that have been created by past legal human activity, it may be appropriate to mitigate with the native habitat type that the land formerly supported. Use observed vegetation species as indicators of the probable pre-disturbance habitat. When no appropriate vegetation indicator species are present, use other evidence to determine the appropriate habitat. Such evidence may include, but not be limited to: aerial photographs, vegetation mapping information, historical biological reports or vegetation maps, and observed habitat on adjacent lands.

Out of kind mitigation will not be accepted if a certain habitat is exceptionally valuable based on a particular function that it serves or species that it hosts. In addition, impacts within the Ramona Grasslands or other large continuous grassland areas should be mitigated with grassland habitats from the same continuous area, if feasible.

Holland Codes	Vegetation Communities	Mitigation Ratio
None	Non-wetland Waters of the U.S.[30]	1:1
11100	Eucalyptus Woodland	None
11200	Disturbed Wetland[1]	3:1
11300	Disturbed Habitat	None
12000	Urban/Developed	None
13100	Open Water (13110-13140)	3:1
13200	Non-Vegetated Channel, Floodway, Lakeshore Fringe	3:1
13300	Saltpan/Mudflats	3:1
13400	Beach	3:1
18100	Orchards and Vineyards	None
18200	Intensive Agriculture - dairies, nurseries, chicken ranches	None

[30] Compensatory mitigation for non-wetland waters may include onsite or offsite improvement or enhancement of water resources.

18310	Extensive Agriculture - field/pasture [2]	0.5:1[2]
18320	Extensive Agriculture - row crops	None
21000	Coastal Dunes (21100-21230)	3:1
22000	Desert Dunes (22100-22300)	2:1
24000	Stabilized Alkaline Dunes	3:1
29000	Acacia Scrub	3:1
31000	Coastal Bluff Scrub	3:1
32400	Maritime Succulent Scrub	3:1
32500	Diegan Coastal Sage Scrub (32510-32520)[3]	See Note[3]
32700	Riversidean Sage Scrub (32710-32720)	2:1
32800	Flat-topped Buckwheat[3]	See Note[3]
33100	Sonoran Creosote Bush Scrub	1:1
33200	Sonoran Desert Mixed Scrub (33210-33230)	1:1
33300	Colorado Desert Wash Scrub	3:1
33500	Calcicolous Scrub	1:1
33600	Encelia Scrub	2:1
34000	Mojavean Desert Scrub (34300)	1:1
35000	Great Basin Scrub (35200-35210)	2:1
36110	Desert Saltbush Scrub	2:1
36120	Desert Sink Scrub	3:1
37121	Granitic Southern Mixed Chaparral	0.5:1
37122	Mafic Southern Mixed Chaparral	3:1
37131	Granitic Northern Mixed Chaparral	0.5:1
37132	Mafic Northern Mixed Chaparral	3:1
37210	Granitic Chamise Chaparral	0.5:1
37220	Mafic Chamise Chaparral	3:1
37300	Red Shank Chaparral	1:1
37400	Semi-desert Chaparral	1:1
37500	Montane Chaparral (37510-37540)	1:1
37800	Upper Sonoran Ceanothus Chaparral (37810-37830)	1:1
37900	Scrub Oak Chaparral	1:1
37A00	Interior Live Oak Chaparral	2:1
37B00	Upper Sonoran Manzanita Chaparral	1:1
37C00	Southern Maritime Chaparral (37C30)	3:1
37G00	Coastal Sage-Chaparral Scrub[3]	See Note[3]
39000	Upper Sonoran Subshrub Scrub	1:1
42100	Native Grassland (42110-42120)	3:1
42200	Non-native Grassland [2]	0.5:1 or 1:1[2]
42300	Wildflower Field	3:1
42400	Foothill/Mountain Perennial Grassland (42470)	3:1

44000	Vernal Pool (44300-44322)	5:1
45000	Meadow and Seep (45100-45400)	3:1
46000	Alkali Playa Community (46100)	3:1
52000	Marsh and Swamp (52100-52440)	3:1
61300	Riparian Forests (61300-61820)	3:1
62000	Riparian Woodlands (62200-62400)	3:1
63000	Riparian Scrubs (63300-63820)	3:1
70000	Woodland (71000-79000)	3:1[4]
80000	Forest (81000-85100)	3:1

1 Wetland mitigation shall include a minimum 1:1 creation component, while restoration/enhancement of existing wetlands may be used to make up the remaining requirements for a total 3:1 ratio.

2 The mitigation ratio shall be 1:1 if the site is in East Otay Mesa, occupied by burrowing owl, or the land is considered part of the Ramona grasslands.

3 Mitigation ratios for coastal sage scrub habitat types are subject to NCCP Process Guidelines and are typically 1:1, 2:1 or 3:1 depending on habitat value for long-term conservation. Habitat value is defined in the NCCP Conservation Guidelines.

4 For oak woodlands, a reduced mitigation ratio of 2:1 may be applied if the woodland will only be subject to fire fuel modification without removing or otherwise affecting mature oak trees or oak tree recruitment. In these cases, the oak woodland must be preserved in dedicated biological open space and fire fuel modification activities must allow maintenance of existing oak trees and oak tree recruitment.

Sources for Mitigation Ratios:

These standard ratios factor in the importance of preserving areas necessary to ensure the continued survival of species. Mitigation ratios are standardized and not dependent upon the quality of habitat. Rather, the mitigation ratios recognize the regional importance of the habitat, its overall rarity, and the number, variety and sensitivity of species it supports. Mitigation for habitat loss is required to compensate for direct impacts as well as cumulative loss of habitat. Cumulative impacts are often more significant than direct impacts, particularly on smaller projects. While individual projects may actually have very little loss of habitat (direct impacts), the cumulative habitat losses from several projects may result in a dramatic loss of habitat in that area.

Regional preserve plans such as the MSCP include region-wide analyses to determine the location and amount of habitat that may be lost while still ensuring the long-term viability and survival of sensitive biological resources. Outside of the adopted MSCP, no region-wide analysis has been completed. Therefore, outside of adopted plans, ratios are generally higher to help prevent potentially significant, irreparable harm to biological resources. As future regional NCCP/Subarea Plans are adopted, lands within the boundaries of those plans can rely upon mitigation ratios developed for those plans.

[Attachment C]

SUMMARY OF REVISIONS

Guidelines for Determining Significance and Report Format and Content Requirements for Biological Resources were originally approved on September 26, 2006. The following is a summary of revisions made since original document approval.

Fourth Revision, September 15, 2010

Revisions to the Guidelines for Determining Significance

- Addition of three species-specific guidelines (for burrowing owl, coastal cactus wren and Hermes copper butterfly) to Section 4.1.
- "Local" has replaced "regional" in the following guideline: The project would impact the local long-term survival of a County List C or D plant species or a County Group II animal species. The change is based on CEQA case law that determined that "regional" in terms of determining significance is too broad.
- The same change has been made to the guideline for assessing the impacts to raptor foraging habitat; "regional" has been changed to "local": ...that the project would not have a substantial adverse effect on the local long-term survival of any raptor species.
- Various editorial changes.

Revisions to Report Format and Content Requirements

- Addition of four attachments:
    - Strategy for Mitigating Impacts to Burrowing Owls in the Unincorporated County
    - Guidelines for Hermes Copper
    - Guidelines for Salvaging Cactus
    - SanBIOS GIS Data Standard User Manual, Version 1
- Instructions that surveys for burrowing owls must follow the Strategy to Mitigate Impacts to Burrowing Owls in the Unincorporated County and surveys for the Hermes copper must follow the County's Hermes Copper Interim Guidelines
- Clarification about where the significance of impacts should be discussed in the biological technical report.
- Addition of three species-specific guidelines (for burrowing owl, coastal cactus wren and Hermes copper butterfly)
- Footnotes regarding the three species-specific guidelines.
- Clarification about preparing conceptual resource management plans (RMPs) and indicating that a template for preparing an RMP is attached.
- Instructions that isolated pockets of habitat should not be proposed as mitigation.
- Information regarding SanBIOS and instructions that SanBIOS must be used to submit biological resources data to the County.
- Various editorial changes.

Third Revision, June 30, 2009

Revisions to the Guidelines for Determining Significance

- Added the California Oak Woodland Conservation Act to Section 2.2: State Regulation and Standards.
- Corrected Section 2.3: Local Regulations and Standards to reflect the 2007 change in the RPO.
- Added mitigation ratio of 1:1 for Non-wetland Waters of the U.S. in Table 5.
- Changed Guideline 4.1B to indicate impacts to State and Federal Endangered Species and County Group A or B plant species and Group 1 animal species are significant when they impact the **local** long-term survival of the species rather than the regional long-term survival, and that impacts to less than 5 percent of the population **on the project** site may be potentially less than significant.
- Changed Guideline 4.1C to determine significance by impacts to the **local** long-term survival of County Group C or D plant species or Group 2 animal species.
- "Foraging habitat" and "suitable stream segments" were added to Guideline 4.1D.
- Clarified Guideline 4.1H to state that it addresses **indirect** sensitive species impacts and the very high standard of "proven to affect" was removed. The "best available science" will be used in analyzing noise and lighting impacts in Guideline 1H.
- Added foraging habitat to Guideline 4.1 D and added "or suitable stream segments" after "occupied breeding habitat."
- Added information regarding the effects of night lighting on plants and wildlife to the footnote for Guideline 4.1.H
- Revised Guideline 4.1I to reflect the County's typical practice of requiring avoidance of clearing, grading and grubbing during the breeding season.
- Clarified Guideline 4.2D to state that it addresses **indirect** sensitive habitat impacts.
- Changed the standard for Guideline 4.4A from the very high standard of "prevent wildlife access" to a reasonable standard of "impede wildlife access."
- Changed Guideline 4.4D to lower the very high standard of "proven to affect."

Revisions to Format and Content Requirements

- A method for impact analysis and guidance on mitigation requirements for sensitive annual plants in order to anticipate variations from year to year was added.
- The Report Format and Content Requirements for Resource Management Plans (Attachment D) were replaced with the Report Format and Content Requirements for **Conceptual** Resource Management Plans. The Report Format and Content Requirements for Resource Management Plans will become a stand alone document and no changes are currently proposed.
- Clarified that the Conceptual Revegetation Plan need not be prepared by a consultant on the County's Approved Revegetation Plan Preparer list, and that neither a cost estimate nor detailed irrigation and landscape architect drawings are required.
- Explained when species-based mitigation is required and when habitat-based mitigation is adequate, and added guidance on use of mitigation ratios for species-based mitigation.

- Clarified how to determine impacts in the oak-root zone and added an exemption for utility line trenching.
- Added construction monitoring by a qualified biologist and transplantation for some cactus species to the Typical Mitigation Measures Attachment.
- Added that for Guideline number 4.1.H, the 60 dB(A) be measured over a time period such as one hour or 24 hours.
- Added a figure to clarify mitigation requirements for oak root zone impacts.
- Updates to the sensitive species lists.
- Various editorial changes.

Second Revision, July 30, 2008

- Oak root protection zones - Added new procedure to overlap fire fuel management zones and oak root protection zones within an open space easement.
- Added guidance for selection of offsite mitigation locations.
- Added guidance about mitigation for impacts to previously preserved land (i.e., open space encroachments, vacations).
- Added additional language to address circumstances where the MSCP would not adequately address cumulative biological impacts.
- Added allowance for 2:1 mitigation ratio for oak woodlands if existing trees are maintained and oak regeneration is assured.
- Revised vegetation codes.
- Added guidance to clarify RPO sensitive habitat lands definition.
- Various editorial changes.

First Revision, December 5, 2007

- Incorporated 2007 changes to Resource Protection Ordinance.
- Added that areas subject to fire-clearing for existing permitted and occupied structures are considered "impact neutral."
- Added Guidelines for projects within the Multiple Species Conservation Program (MSCP).
- Amended mitigation ratios for coastal sage scrub habitats to reflect NCCP requirements.
- Added guidance about surveying for focused sensitive species during unsuitable environmental conditions.
- Added Report Format and Content Requirements for Resource Management Plans (RMPs).
- Various editorial changes.

ALDEN
ENVIRONMENTAL, INC

Greg Mason
Principal/Senior Biologist

Summary of Qualifications

Mr. Mason is the Principal and Senior Biologist at Alden Environmental, Inc. He has over 18 years experience working in the environmental field and has participated in hundreds of projects in San Diego County. His experience includes oversight of large- and small-scale mitigation compliance programs including habitat restoration, sensitive species surveys, vegetation mapping, wetland delineations, construction monitoring, impact analysis, report preparation, project permitting, and project management. He has worked extensively with both public and private clients, in coordination with federal, state and local regulatory staff, in the implementation of mitigation and monitoring programs in the field. He regularly assists clients in obtaining aquatic resources permits including U.S. ACOE Section 404 permits, RWQCB Section 401 Certifications, and CDFG 1600 Streambed Alteration Agreements. Through his permitting work he also facilitates the Section 7 consultation process with the USFWS and negotiates conservation measures. Mr. Mason is permitted by the USFWS to conduct presence/absence surveys for quino checkerspot butterfly; San Diego, Riverside, vernal pool, Conservancy, and longhorn fairy shrimps; and vernal pool tadpole shrimp throughout the range of each species, and is also authorized to conduct dry season fairy shrimp analysis, identification, and culturing.

Professional Experience

Jr. Environmental Planner	HELIX Environmental Planning, Inc., La Mesa, CA	1992 - 1993
Peace Corps Volunteer	U.S. Peace Corps, Paraguay	1993 - 1996
Environmental Planner	HELIX Environmental Planning, Inc., La Mesa, CA	1996 - 1998
Biologist	HELIX Environmental Planning, Inc., La Mesa, CA	1998 - 2001
Biology Group Manager	HELIX Environmental Planning, Inc., La Mesa, CA	2001 - 2004
Division Manager, Biological Services	HELIX Environmental Planning, Inc., La Mesa, CA	2004 - 2008
Vice President, Biological Services	HELIX Environmental Planning, Inc., La Mesa, CA	2008 - 2011

Education

Bachelor of Science, Natural Resources Planning & Interpretation, Humboldt State University, 1992

Registrations/Certifications/Licenses

- USFWS Threatened/ Endangered Wildlife Species Permit (quino checkerspot butterfly; San Diego, Riverside, vernal pool, Conservancy, and longhorn fairy shrimps; and vernal pool tadpole shrimp)
- USFWS authorized for dry season fairy shrimp analysis, identification, and culturing
- CDFG Scientific Collecting Permit SC-007619
- County of San Diego, Approved Biological Consultant and Approved Revegetation Planner
- Engineering Contractor's License No. 796474

Professional Affiliations

- California Native Plant Society
- Returned Peace Corps Volunteer Association
- Society of American Military Engineers

Select Project Experience

Hawano (2010 -2012). Project Manager and Biologist for this 80-acre project located within the Minor Amendment Area of the County's MSCP Subarea Plan. Managed the biological survey effort and preparation of the biological technical report and biological section of the EIR. Current tasks include processing the Minor Amendment concurrence with the USFWS and CDFG and a consultation with the USFWS for effects to San Diego fairy shrimp critical habitat.

Federal Express Facility (2012-2012). Project Manager and Biologist for this 80-acre proposed Federal Express transportation facility located in the East Otay Mesa Specific Plan Area of the County of San Diego. Tasks included a biological reconnaissance, preparation of County environmental project application materials, and identification of environmental mitigation measures to be required. Because of the disturbed nature of the site and the precedence set in the EIR for the Specific Plan, the County agreed that biological and cultural mitigation measures would not be required.

Murrieta Parcel (2012 -2012). Project Manager and Biologist for this 20-acre residential lot split in the City of Murrieta. Tasks included vegetation mapping, a burrowing owl habitat assessment, preparation of an MSHCP compliance report, and a HANS application.

Sierra Training Area Restoration (2011-2012). Project Biologist for this 100-acre habitat restoration effort located at the Sierra Training Area on USMC Camp Pendleton. The project consists of restoring approximately 100 acres of disturbed agricultural land to a mosaic of native habitats to help buffer adjacent sensitive resources from USMC training activities. Tasks include a site assessment, preparation of a habitat restoration plan, oversight of initial weed removal, and biological monitoring of the installation and maintenance effort.

City of San Diego Land Management Plan (2011). Project manager and biologist for the preparation of a Land Management Plan for the City of San Diego's Public Utilities Department. The intent of the plan is to provide management goals and objectives for approximately 40,000 acres of lands managed by the City. Tasks included goal establishment, vegetation mapping, GIS modeling, facilitation of stakeholder workshops, cultural resource assessments, facilities investigations, identification of future restoration sites, and preparation of the overall plan.

City of San Diego Engineering and Capital Projects Department As-Needed CEQA Services (2010-2011). Biology project manager for this as-needed CEQA services contract with the City of San Diego Engineering and Capital Projects Department. Responsible for management of numerous biology task orders performed at the request of the City. Work conducted included vegetation mapping, sensitive species identification, preparation of biological technical reports, and construction monitoring for City infrastructure projects.

Candlelight Project (2006 – 2012). Project manager and biologist for this private development project located in the Otay Mesa community of the City of San Diego. Conducted biological surveys, prepared biological technical report and vernal pool habitat restoration plan, provided text for the biological resources section of the project EIR pursued regulatory agency permits, and negotiated mitigation measures. Biological issues include the presence of vernal pools, fairy shrimp, non-native grassland, burrowing owls, and jurisdictional features.

City of San Diego Montgomery Field Airport Vernal Pool Mitigation Program (2007 - 2011). Project manager for this approximately 3-acre vernal pool habitat restoration project located on the Montgomery Field municipal airport. Vernal pool restoration was conducted as required in the USFWS Biological Opinion for a previous expansion of the runway. Conducted initial field survey work and prepared the habitat restoration plan. Installation occurred in January 2008.

Otay Mesa Cross Border Facility (2009 – 2012). Biology project manager for this cross border facility project that would create a pedestrian bridge connecting a new commuter terminal on the U.S. side of the border with the Rodriguez International Airport on the Mexican side. Field tasks included conducting vegetation mapping, burrowing owl surveys, and a jurisdictional delineation. Prepared biological text in support of the project's EIR and negotiated mitigation solutions with the City of San Diego Public Utilities Department and regulatory agencies for impacts to sensitive habitat and burrowing owls.

MCAS Miramar QCB Surveys (2011). Project manager and biologist for this quino checkerspot butterfly survey of the eastern half (Camp Elliott) of MCAS Miramar. Responsibilities included identifying suitable habitat and developing a method of ranking suitability, conducting surveys, and preparing the final survey report.

Palomar Station (2010 - 2011). Project manager for this commercial/residential development project in San Marcos, CA. Project includes updating the jurisdictional delineation, identification of possible vernal pools, regulatory agency permit applications, and a Section 7 consultation with the USFWS for San Diego fairy shrimp critical habitat.

CEC As-needed Contract to Provide Biological Resources Support for Solar Power Projects in California (2009 - 2011). Principal-in-Charge of HELIX's as-needed contract with Aspen Environmental Group to provide impact analyses for proposed solar energy projects under review by the California Energy Commission. Provided project oversight to ensure HELIX biologists collected the necessary data on large project sites with challenging access and tight timeframes. Provided QA/QC of HELIX's technical analyses and ensured that the necessary resources were assigned to each solar project site. To date, HELIX has assessed 6 solar project sites (proposed projects) and their corresponding on-site and off-site alternative sites located in Kern, San Bernardino, Riverside, and Imperial counties. HELIX biologists were responsible for conducting a biological reconnaissance of each proposed project site study area and each alternative site study area, including habitat assessments for sensitive species (e.g., burrowing owl and desert tortoise).

Ocotillo Wind Energy Project (2009 - 2011). Principal-in-Charge of this proposed wind farm project proposed on approximately 15,000 acres in western Imperial County. Provided necessary project oversight to help ensure that proposed biology protocols were adequate to meet resource agency expectations. Attended meetings with the project proponent, resource agencies, and County of Imperial to discuss and defend the proposed biology survey protocols. Ensured that the necessary resources were assigned to this extensive wind energy project. Surveys on the site include vegetation mapping; jurisdictional delineations; avian point counts and migration counts; bat studies; habitat assessments for listed and highly sensitive species; and focused surveys for rare plants, burrowing owls, flat-tailed horned lizards, and barefoot banded geckos.

Fort Rosecrans National Cemetery Annex (2009 - 2011). Project manager for this cemetery project located on MCAS Miramar. Project included resource agency permitting, IPMP plan, NRMP, vernal pool restoration plan, wetland habitat restoration plan, construction monitoring, and biological monitoring of the project's vernal pool restoration effort.

Vista Del Mar Elementary School (2009 - 2011). Project manager for this elementary school project in the San Ysidro school district. Project included vernal pool mapping, fairy shrimp surveys, resource agency permitting, USFWS Section 7 consultation, and preparation of a vernal pool restoration plan and a habitat management plan.

SR 11 and East Otay Mesa Port-of-Entry (2008 - 2011). Biology Project Manager for this project that would construct State Route (SR)-11 to connect the SR-905/SR-125 interchange with the future East Otay Mesa port-of-entry (POE), as proposed in the East Otay Mesa Specific Plan, and provide a POE site for development. Responsibilities include oversight of vegetation mapping, jurisdictional delineation, general wildlife surveys, burrowing owl surveys, coastal California gnatcatcher surveys, fairy shrimp surveys, and rare plant surveys, and preparing a biological technical report for the project in a 1,002-acre study area. Responsible for quality control of all biology work conducted and coordination with Client and HELIX planning staff in support of CEQA document.

San Ysidro Rail Yard Improvement Project (2008 - 2011). Principal Biologist for preparation of supporting technical studies for the expansion of the existing freight railroad yard in San Ysidro. The project would construct 2 new track extensions and revisions to track alignment for additional rail car storage, a new truck access road, and drainage improvements.

San Vicente Pipeline Monitoring (2007 - 2011) Project Manager for this environmental pipeline project component of the San Diego County Water Authority's Emergency Storage Project (ESP). Responsible for overseeing all aspects of environmental compliance monitoring including SWPPP/erosion control, sensitive species surveys, habitat assessment, cultural monitoring, paleontology monitoring, noise assessments, and general construction monitoring.

SDG&E Sunrise Powerlink Transmission Project (2007 - 2009). Responsible for providing staff and ensuring that fieldwork and associated reporting was conducted for the Sunrise Powerlink project. Work included extensive field survey efforts, impact analysis, mapping and report writing for various alternative alignments located in San Diego and Imperial counties.

Corrections Corporation of America/Otay Mesa Facility (2005 - 2011). Biology Project Manager for this 40-acre correctional facility project on Otay Mesa. Responsible for oversight of jurisdictional delineation, burrowing owl surveys, vegetation mapping, rare plant survey, fairy shrimp survey, and biological technical report. Processed aquatic resources permits and helped negotiate the purchase of an on-mesa mitigation site for burrowing owl non-native grassland. Also prepared a Habitat Management Plan for the preserve and facilitated the preparation of a PAR for the long-term management budget.

Otay Business Park (2005 - 2012). Project Manager and Biologist for this 160-acre industrial development project located adjacent to the US/Mexico border in the County of San Diego. Conducted biological surveys, provided input to CEQA document, pursued regulatory agency permits, prepared biological technical report and vernal pool habitat restoration plan, provided text for the biological resources section of the project Environmental Impact Report, and pursued MSCP concurrence from CDFG and USFWS. Biological issues include the presence of non-native grassland, burrowing owls, fairy shrimp, quino checkerspot butterfly, jurisdictional features, critical habitat, and several County List A/B plant species. Successfully negotiated the USFWS Section 7 consultation for quino checkerspot butterfly, fairy shrimp, and critical habitat and obtained a Biological Opinion for the project.

Wetland Training Institute (2006, 2007, 2010, and 2012). Co-created and taught two-day vernal pool restoration and flora workshop. The course is designed to teach students how to identify vernal pool habitat and flora in the field. Field visits were conducted in vernal pool habitat restoration sites to provide information on habitat restoration successes and failures.

City of San Diego Vernal Pool Inventory (2002 - 2003). Project manager and lead biologist for the floristic inventory of vernal pools on land owned by the City of San Diego. Work included visiting vernal pool complexes in the City to identify plant species occurring within vernal pool habitat. Animal species identified during the visits also were recorded. Collected data was provided to the City in support of their Vernal Pool Inventory.

A1.153 CATE

Thomas L. Escher
Deputy Agriculture Commissioner Retired
County of San Diego, Dept. of Agriculture / Weights and Measures
2615 Sunset Hills
Escondido, CA 92025
E-mail: tandmescher@cox.net

September 10, 2012

Rebecca Lafreniere, Chief Community Health Division
County of San Diego
Dept of Environmental Health
5570 Overland Ave, S102
San Diego, CA 92123
Phone (858) 694-3595
E-mail: Rebecca.lafrenier@sdcounty.ca.gov

Rodney Lorang, Senior Deputy
County of San Diego
Office of County Council
1600 Pacific Highway
San Diego, CA 92101-2469
Phone (858) 694-3204
E-mail: Rodney.lorang@sdcounty.ca.gov

Dear Rebecca and Rodney,

Before commenting on your respective letters dated June 6, 2012 to Bornt and Sons Inc., lessee of approximately 400 acres of the Jacumba Valley Ranch in Jacumba for organic farming and June 5, 2012 to Jacumba Valley Ranch LLC, c/o Karl Turecek, representative of the owner of Jacumba Valley Ranch, LLC, I am listing some items for clarification purposes. Of great concern was that 300 acres of land was made unsuitable for organic farming for 3 years by applying Sevin XLR at Jacumba Valley Ranch on July 12, 2012.

1. Title 7, Code of Federal Regulations Part 205.202 establishes the land requirements for Organic production. Specifically, any field or farm from which harvested crops are intended to be sold, labeled, or represented as "organic" must: (b) have had no prohibited substances, as listed in 205.105, applied to it for a period of three years immediately preceding harvest of the crop.
2. Sevin XLR is a (synthetic) conventional pesticide, not an organic pesticide, making it a prohibited substance.
3. San Diego County Agriculture Weights and Measures issued a restricted materials permit number 37-11-134775N on July 9, 2012 for application of Sevin XLR for "soil pests on uncultivated ag". Soil pests and uncultivated ag are not on the Sevin XLR label. There was no crop and very few weeds, if any, on the non-irrigated dry 300 acres at the time of application as the grower had recently informed the county that he was going to cease farming due to lack of sufficient water.
4. Because of the application of Sevin XLR, the 300 acres north of Old Hwy 80 cannot be farmed organically for three years, even if organic non-irrigated crops such as grain are grown.

label cannot be followed, making adherence to the Bornt Farms 2012 Eye Gnat Nuisance Plan practically impossible.

15. It is very difficult to determine what an eye gnat "nuisance level" is, as it is based on opinion only. Some opinions are that eye gnat levels should be close to zero so there is no inconvenience whatsoever. Others believe it doesn't make any difference how many eye gnats there are because they can be reduced by traps in the area, eliminated from small areas, such as outside dining tables, by installing fans that require eye gnats to seek shelter in foliage. Since eye gnats are regularly found in San Diego County, how many would have to be present to declare a "nuisance level". It is apparent that the number of complaints have been used predominantly to decide what constitutes a "nuisance level". Also, there has been very little if any verification or follow up of complaints.

16. The 2009/2010 San Diego County Grand Jury in a letter filed May 13, 2010 recommended that the Chief Administrative Officer of San Diego County direct that:

    10-20: The Director of Environmental Health include and designate the eye gnat a priority in the efforts of the Community Health Division's Vector Control Program.

    10-21: The Director of Environmental Health assure that the Vector Control Program specifically require facilities that may generate an eye gnat infestation include the vector abatement protocols as an element in the use permit process, if one is required, and for any other location, regardless of the need for a permit.

    10-22: The Director of Environmental Health direct the Vector Control Program to require the owners of such facilities to notify the residents impacted by any eye gnat infestation as well as any corrective actions to be taken.

    10-23: The Director of Agriculture/Weights and Measures require that all existing, newly established or proposed, and closed or discontinued agricultural developments, control and correct any source of vector harborage or breeding impacting the community at large.

17. On Nov. 9, 2011, at the request of Supervisor Dianne Jacob and Supervisor Pam Slater-Price, the Board of Supervisors directed the Chief Administrative Officer to work with the Farm Bureau and other interested parties and return with recommendations outlining a "tougher strategy" to lessen the adverse community impact of eye gnats caused by local organic farming operations and develop options for consideration by the Board of Supervisors.

Rebecca, in your June 6, 2012 Department of Environmental Health letter to Bornt and Sons Inc. you said, referring to the Bornt Farms 2012 Eye Gnat Nuisance Prevention Plan, that "the plan is intended to prevent public nuisance conditions, against which the county would have both judicial enforcement and administrative abatement authority." It seems that there should be definite criteria to define what constitutes an eye gnat public nuisance condition in order to have meaningful judicial enforcement and administrative abatement authority.

Also, you stated "the county is even more concerned with the reservoir of eye gnat eggs and larvae that have built up in the soils on this farm during your operations. Those eggs and larvae will remain in the soil when you cease operations. If your trap lines and flight barriers are removed and if buffer crop maintenance and treatment are halted, other measures must be implemented to control eye gnats. If no new measures are put in place, we anticipate nuisance level eye gnat impacts in the community for a period of at least several weeks or months". Review items 7, 8, and 9 above.

Your letter correctly stated the 2012 Bornt Farms Eye Gnat Prevention Plan was "based on anticipated calendar year 2012 farming activity", which did not include an early cessation of farming. Bornt Farms 2011 plan did not include an early cessation of farming measure either. Apparently you (Dept. of Environmental Health) must have considered an exit plan was not necessary as you had two or more years to include one. Why was it so important to promptly add an exit plan to Bornt Farms after farming operations had ceased?

"A double row of collar traps 10 feet apart and parallel with the community border should be employed. They should be 10 feet from the black erosion cloth barrier, and the second row that parallels the first should be staggered. In addition to the trap line, trapping should occur at the rate of 1 trap per 1000 sq ft in long term vegetable production where appropriate or possible."

Mr. Bethke, Horticultural and Farm and Home Advisor, University of California Co-Operative Extension, specifies trapping year round and weekly monitoring and maintenance.

Bill Brammer, owner of Be Wise Ranch has installed 2000 traps about 10 to 30 ft apart, depending on how many eye gnats are being trapped, and a 3 foot high black shade cloth barrier around the perimeter of the ranch. He submitted a "voluntary" 2012 Eye Gnat Nuisance Prevention Plan including those two measures on June 1, 2012 and the county has not approved it even though his plan has worked very well.

Mr. Brammer has donated collar traps to anyone in the neighborhood who would like to contribute to reducing eye gnat populations in the area. Many residents in the area have also joined the "community effort" by making their own simple inexpensive eye gnat traps out of a 2 liter plastic bottle like the Borrego Water District has installed and maintained for decades.

In summary:

Because of neighborhood eye gnat complaints adjacent and near 400 acres leased by Bornt organic farm on Jacumba Valley Ranch in Jacumba and the 200 acre Be Wise Ranch organic farm in south Escondido on the City of San Diego's Agricultural Preserve, the Grand Jury in a letter filed May 13, 2010 recommended that the San Diego County Chief Administrative Officer direct the Director of Environmental Health and the Director Of Agriculture/Weights and Measures to basically solve the problem.

The San Diego County Board of Supervisors recommended at their Nov 9, 2011 meeting that the Chief Administration Officer include a "tougher strategy."

On Feb 2, 2012 the Director of Environmental Health presented a Proposed Eye Gnat Ordinance to the public that included measures for Eye Gnat Nuisance Prevention Plans. Feb. 29, 2012 was the scheduled date for possible adoption of the ordinance. Many environmental and other comments were submitted that caused rescheduling that has not occurred to date.

The 2011 and 2012 Bornt Farms Eye Gnat Nuisance Prevention Plan included abatement measures based upon continuing on farm University Of California Co-Operative Extension research. Trapping, spraying, cultural methods, barriers and buffer crops specifically for eye gnats have been included in the plan and monitored weekly by the Department of Environmental Health for compliance. Trapping is highly effective for reducing eye gnats and has been the preferred method for decades. Spraying, cultural methods, barriers and buffer crops basically have only reduced eye gnat populations "in part".

In May 2012 Bornt Farms announced that farming would cease due to lack of sufficient water. The Department of Environmental Health added an exit plan to the Bornt Farms 2012 Eye Gnat Nuisance Plan "that offered continuance of some of the items until the end of the year or provide an alternate plan." The accepted plan was one application of Sevin XLR to dry, bare, uncultivated cropland that would kill very few, if any, eye gnats but would make the land unavailable for organic farming for three years.

In the June 6, 2012 letter to Bornt Farms, the Department of Environmental Health said "You should anticipate County nuisance abatement enforcement action if you cease farming in Jacumba without putting adequate eye gnat abatement measures in place and a public nuisance results."

In the June 5, 2012 letter to Jacumba Valley Ranch, the property owner of the land leased by Bornt Farms, the County of San Diego Office of County Counsel said "the owner of property on which a public nuisance is

Signature and/or comments from other interested and concerned parties

Robert S. Harrow

Thomas O. Frank

Rene C. Mu[illegible]

Homer Daniel

Sandra L. Paolilla

Charles M. Schneider

[illegible]

Joan Rico

Patrick J. Burke USDA, SCS, retired

Edward Bennett

[illegible]

A1. 154

From: 4ajunger@cox.net
Sent: Friday, June 15, 2012 9:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Heidi Junger
4489 Texas St
San Diego, CA 92116-2977

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

I am also concerned that the spraying of pesticides will impact the plants and animals in the San Pasqual Valley. Your document looks a lot at County policies, but the impacts to Be Wise and the Valley are in the City of San Diego. The San Pasqual Valley is a City open space park and agricultural preserve, and supports endangered and threatened species like the Arroyo Toad, the Least Bell's Vireo, and California Gnatcatcher. The use of organic farming methods is in harmony with the protection of these species, because it uses natural methods to grow crops and control pests. Spraying pesticides would change the nature of farming in this area, and allow pesticides to enter the food chain of the animals in the area. Your environmental document gives no analysis to these impacts.

Finally, I am concerned that the pesticides required by this ordinance could run off into the San Dieguito River and enter the Lake Hodges drinking water reservoir and end up in my water supply. Agricultural pesticides in drinking water are a serious health concern that has not been addressed by your study. Organic farming lowers the risk of pesticides entering the water system, while the ordinance you propose raises that risk.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Heidi Junger

A1.155

From: atomsky@yahoo.com
Sent: Friday, June 15, 2012 9:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

andy tomsky
po box 683
san marcos, CA 92079-0683

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

andy tomsky

A1.156

From: pat@orangeportstudios.com
Sent: Friday, June 15, 2012 9:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

patricia Ybarra
1796 Fire Mountain Drive
Oceanside, CA 92054-5611

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

patricia Ybarra

A1.157

From: vegesoul@sbcglobal.net
Sent: Friday, June 15, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Pamela Broeder
230 Lolita Street
Encinitas, CA 92024-3236

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Pamela Broeder

A1.156

From: jhoppel@yahoo.com
Sent: Friday, June 15, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Joe Hoppel
521 Orange ave
chula vista, CA 91911-4035

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Joe Hoppel

A1.159

From: j_cunnyngham@yahoo.com
Sent: Friday, June 15, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jeannie Cunnyngham
3845 Elijah court #634
San Diego, CA 92130-6009

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jeannie Cunnyngham

A1.160

From: sarahwendeline@yahoo.com
Sent: Friday, June 15, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Sarah Wyckoff
1815 Mission Cliff Drive
San Diego, CA 92116-1235

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Sarah Wyckoff

A1.161

From: peterkuhnxx@gmail.com
Sent: Friday, June 15, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

peter kuhn
3611 vista de la bahia
san diego, CA 92117-5746

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

peter kuhn

A1.162

From: str8ash@gmail.com
Sent: Friday, June 15, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Peter Ash
po box 235281
encinitas, CA 92023-5281

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Peter Ash

A1.163

From: clifalan@yahoo.com
Sent: Friday, June 15, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Clif Henrichsen
3191 Camino Portofino
Fallbrook, CA 92028-9607

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Clif Henrichsen
9492332221

A1.164

From: jbraden@coronad0.ca.us
Sent: Friday, June 15, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Julie Braden
P.O. Box 182053
Coronado, CA 92178-2053

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Julie Braden
619-522-2403

A1.165

From: xx@home.com
Sent: Friday, June 15, 2012 9:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

X X
Fallon
SD, CA 92130-1870

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

X X

A1.166

From: carolee@opalfinearts.com
Sent: Friday, June 15, 2012 9:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

CAROL LEE WILLIAMS
2801 Preece ST
San Diego, CA 92111-5417

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

CAROL LEE WILLIAMS
619 422 4542

A1.167

From: magilltoo@earthlink.net
Sent: Friday, June 15, 2012 9:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

nancy smith
11376 Red Cedar Way
San Diego, CA 92131-1928

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

nancy smith
8585491156

A1.168

From: rabia77@cox.net
Sent: Friday, June 15, 2012 9:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Rabia Barkins
711 Passiflora Ave
Encintas, CA 92024-2340

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

I am opposing this declaration because it is based on emotional reactivity, rather than an environmental impact report. As you know, the impact of using pesticides can cause other long-term negative impacts, that are unknown at this time, on the environment and local area residential areas.

Sincerely,

Rabia Barkins

A1.169

From: cheriekitterman@gmail.com
Sent: Friday, June 15, 2012 9:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Cherie Kitterman
1013 Merritt Drive
El Cajon, CA 92020-6714

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Cherie Kitterman
619-456-2820

A1.170

From: carolinahn@yahoo.com
Sent: Friday, June 15, 2012 9:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Carolina Valder
2744 Felicita Rd.
Escondido, CA 92029-5730

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Carolina R. Valder

A1.171

From: jjjbbbnnn@yahoo.com
Sent: Friday, June 15, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jabian Nimmo
po box 4735
Oceanside, CA 92052-4735

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Jabian

A1.172

From: psothman@gmail.com
Sent: Friday, June 15, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Pam Sothman
934 Sandpiper Pl
La Jolla, CA 92037-7729

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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A1.173

From: kleinmutt@yahoo.com
Sent: Friday, June 15, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jill Kleinman
4042 Mount Blackburn Ave.
San Diego, CA 92111-3818

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

I am also concerned that the spraying of pesticides will impact the plants and animals in the San Pasqual Valley. Your document looks a lot at County policies, but the impacts to Be Wise and the Valley are in the City of San Diego. The San Pasqual Valley is a City open space park and agricultural preserve, and supports endangered and threatened species like the Arroyo Toad, the Least Bell's Vireo, and California Gnatcatcher. The use of organic farming methods is in harmony with the protection of these species, because it uses natural methods to grow crops and control pests. Spraying pesticides would change the nature of farming in this area, and allow pesticides to enter the food chain of the animals in the area. Your environmental document gives no analysis to these impacts.

Finally, I am concerned that the pesticides required by this ordinance could run off into the San Dieguito River and enter the Lake Hodges drinking water reservoir and end up in my water supply. Agricultural pesticides in drinking water are a serious health concern that has not been addressed by your study. Organic farming lowers the risk of pesticides entering the water system, while the ordinance you propose raises that risk.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Jill Kleinman

A1.174

From: trishguidi@yahoo.com
Sent: Friday, June 15, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Patrizia Guidi
1822 Sparks COurt
San Diego, CA 92110-1363

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Patrizia Guidi
619-244-6575

A1.175

From: dkcinsd@yahoo.com
Sent: Friday, June 15, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Diana Casillas
548 E. Barham Dr., Apt 201
San Marcos, CA 92078-4466

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Diana K. Casillas

A1.176

From: asanta32@yahoo.com
Sent: Friday, June 15, 2012 9:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Alicia Santacroce
233 Autumn Rose Lane
Fallbrook,, CA 92028-5508

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Alicia Santacroce
7604510001

A1.177

From: joe@cuviello.com
Sent: Friday, June 15, 2012 9:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Joe Cuviello
529 Turfwood Lane
Solana Beach, CA 92075-2405

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Joe Cuviello

A1, 178

From: cindy.lyle@att.net
Sent: Friday, June 15, 2012 9:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Cindy Lyle
4344 Copeland Ave.
San Diego, CA 92105-1208

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Cindy Lyle
6194882518

A1.179

From: rejuvenationmd@gmail.com
Sent: Friday, June 15, 2012 9:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Melinda Dixon
3729 Balboa Terr #B
San Diego, CA 92117-5440

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Melinda Dixon
6197213150

A1,180

From: gregguerrero@yahoo.com
Sent: Friday, June 15, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Greg Guerrero
4615 Torrey Circle S201
San Diego, CA 92130-6664

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Greg Guerrero
8589257096

A1,181

From: shirleyrast@gmail.com
Sent: Friday, June 15, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Shirley Rast
3542 Bayside Walk
San Diego, CA 92109-7452

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

We should have the right to keep organic farms. We do not want to consume pesticides in our foods. Please help us keep Bee Wise without toxic sprays. If you were to research effects of pesticides, you may not want to consume them for yourself and your family.

Sincerely,

Shirley Rast
6197238515

A1.182

From: jasonteichman@yahoo.com
Sent: Friday, June 15, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jason Teichman
9158 Rebecca Ave
San Diego, CA 92123-3548

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I strongly oppose San Diego County's proposed Eye Gnat Ordinance and Program. A relative small number of residents that are annoyed by the gnats have influence public policy that puts the environment at risk and undermines local organic industry.

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Jason Teichman
858-775-8587

A1.183

From: swisschef1@roadrunner.com
Sent: Friday, June 15, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Carl Wirz
6693 Corte Maria
Carlsbad, CA 92009-5917

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Carl Wirz
000-000-0000

A1.184

From: ssum@vcn.bc.ca
Sent: Friday, June 15, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Steve Summers
8349 Laurelridge Road
San Diego, CA 92120-1731

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Finally, I am concerned that the pesticides required by this ordinance could run off into the San Dieguito River and enter the Lake Hodges drinking water reservoir and end up in my water supply. Agricultural pesticides in drinking water are a serious health concern that has not been addressed by your study. Organic farming lowers the risk of pesticides entering the water system, while the ordinance you propose raises that risk.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Steve Summers

A1.105

From: holisticgardener@hotmail.com
Sent: Friday, June 15, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Connie Crusha
1077 Vista Madera Lane
El Cajon, CA 92019-3579

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

I am an organic gardening instructor and have a large organic garden for my own personal use. I am well acquainted with both sides of this issue.

It has not been long since it was decided that malathion should be sprayed in El Cajon to get rid of fruit flies. The concomitant damage from a surge in population of other insect pests went on for two or three years. My point is that if you spray for the eye gnats you will probably create a much more dangerous situation.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

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Sincerely,

Connie Crusha

A1.186

From: william.van.vechten@gmail.com
Sent: Friday, June 15, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Please Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

William Van Vechten
307 Elm St
Santa Cruz, CA 95060-4316

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

William Van Vechten
831-334-6876

A1.187

From: katharine@cruzio.com
Sent: Friday, June 15, 2012 9:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Katharine Herndon
134 Dakota Ave. #110
Santa Cruz, CA 95060-6608

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

My children and grandchildren live in San Diego, and I want them and their environment to be safe from pesticides. I am a retired California public school nurse. Please stop corporate toxic trespass on our food and world.

Sincerely,

Katharine Herndon

A1.188

From: daddis@theoldglobe.org
Sent: Friday, June 15, 2012 9:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Diane Addis
PO Box 33477
San Diego, CA 92163-3477

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Diane Addis

A1.189

From: sdsuguy2403@yahoo.com
Sent: Friday, June 15, 2012 9:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Shane Bond
3761 Mississippi Street #5
San Diego, CA 92104-3380

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Shane Bond

A1.190

From: marcdesmas@gmail.com
Sent: Friday, June 15, 2012 9:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

MARC DESMAS
207 Elkwood Ave. #2
IMPERIAL BEACH, CA 91932-2467

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

MARC DESMAS

A1.191

From: laura@bierfamily.org
Sent: Friday, June 15, 2012 9:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Laura Bier
2712 La Costa Ave
Carlsbad, CA 92009-7326

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Laura Bier

A1.192

From: ama_bay@hotmail.com
Sent: Friday, June 15, 2012 9:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Chris Shalom
53 west 12th
santa cruz, CA 95060

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Chris Shalom

A1.193

From: lwilson.lac@gmail.com
Sent: Friday, June 15, 2012 9:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lori Wilson
4423 Mt. Lindsey Ave
San Diego, CA 92117-3939

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Lori Wilson

A1.194

From: amyluw@gmail.com
Sent: Friday, June 15, 2012 9:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Amy Weas
4861 69th PL
San Diego, CA 92115-3016

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Amy Weas

A1.195

From: kay-kay@mindspring.com
Sent: Friday, June 15, 2012 9:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Karin Rose
5232 Marigot Pl
San Diego, CA 92124-2120

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Karin Rose

A1.196

From: lrp59-list@yahoo.com
Sent: Friday, June 15, 2012 9:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lance Robert
889 Date St #226
San Diego, CA 92101-8639

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

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Sincerely,

Lance Robert
619-881-7842

A1.197

From: cc@waits.net
Sent: Friday, June 15, 2012 9:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Cathy Waits
5623 Glenstone Way
San Diego, CA 92121-4328

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

Please! Consider what is written below. This issue is very important to me and to my family! I am appalled that I have to send this letter to begin with.

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Cathy Waits

A1.198

From: carlperkins@cox.net
Sent: Friday, June 15, 2012 9:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Carl Perkins
644 Hutchison Street
Vista, CA 92084-1410

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Carl Perkins

A1.199

From: ksmitaz@yahoo.com
Sent: Friday, June 15, 2012 9:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jennifer Hall
3419 Macaulay St
San Diego, CA 92106-1719

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Jennifer Hall
619-422-0059

A1,200

From: everydaynamaste@gmail.com
Sent: Friday, June 15, 2012 9:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Danielle Roark
1003 smith grade
Santa cruz, CA 95060-9703

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Danielle Roark
8314253596

A1.201

From: tysdam@gmail.com
Sent: Friday, June 15, 2012 9:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Tys Dammeyer
14615 Otay Lakes Rd
Jamul, CA 91935-7005

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Tys Dammeyer

A1, 202

From: artersa@att.net
Sent: Friday, June 15, 2012 9:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Susan Mayer
2328 Amity Street
San Diego, CA 92109-1514

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Mrs. Susan Mayer

A1.903

From: emaildpres@gmail.com
Sent: Friday, June 15, 2012 9:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Michelle Hartley
4922 Loma Laguna Dr
Carlsbad, CA 92008-3807

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Michelle Hartley

A1.204

From: goldstarfish@att.net
Sent: Friday, June 15, 2012 9:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Diane Shields
1636 Olympus Loop Dr.
Vista, CA 92081-5440

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Diane Shields

A1, 205

From: rbutler2@roadrunner.com
Sent: Friday, June 15, 2012 9:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Robert Butler
P.O. Box 234201
Encinitas, CA 92023-4201

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Robert Butler

A1.206

From: acoustic.artist@gmail.com
Sent: Friday, June 15, 2012 10:01 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Don Fera
3486 Audrey Ln
San Diego, CA 92115-6509

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Don Fera

A1,207

From: swtyndall@gmail.com
Sent: Friday, June 15, 2012 10:01 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Steven Tyndall
7243 camino degrazia
san diego, CA 92111-7846

June 15, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Steven Tyndall

A1.208

From: nsagheb@san.rr.com
Sent: Friday, June 15, 2012 10:01 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Nina Sagheb-Schulman
4644 Fargo Ave.
san Diego, CA 92117-2406

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Nina Sagheb-Schulman

A1.209

From: arries@mac.com
Sent: Friday, June 15, 2012 10:01 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Tedd Kawakami
4788A W Mountain View Drive
San Diego, CA 92116-1615

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Tedd Kawakami

A1,210

From: adlib_pv@sbcglobal.net
Sent: Friday, June 15, 2012 10:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Judith Dupree
P.O.Box 365
Pine Valley, CA 91962-0365

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

Mr. Miller and Board of Supervisors,

Please weigh the impact of the proposed Eye Gnat Ordinance & Program diligently and with informed vision. It is a deadly solution to a problem that needs to be addressed in more benign and effective ways. I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Judith DUpree
619-473-8683

A1, 211

From: wayjack1@earthlink.net
Sent: Friday, June 15, 2012 10:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Tamara Johnson
4442 Campus Avenue
San Diego, CA 92116-3904

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Tamara Johnson
(619) 2971984

A1.212

From: kmwinkman@hotmail.com
Sent: Friday, June 15, 2012 10:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

mica wink
5421 Avenida Encinas - N
carlsbad, CA 92008-4410

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

mica wink

A1.213

From: scottcarr@juno.com
Sent: Friday, June 15, 2012 10:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Scott Carr
3709 Buena Creek Rd.
Vista, CA 92084-7427

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Scott Carr

A1.214

From: jsennett@pacbell.net
Sent: Friday, June 15, 2012 10:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Julie Daily
9939 Azuaga Street Unit H205
San Diego, CA 92129-6023

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Julie Daily
6192334500

A1.245

From: flash@scripps.edu
Sent: Friday, June 15, 2012 10:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

kay cole
1362 darby street
spring valley, CA 91977-3716

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

kay cole
858-784-2510

A1.216

From: mandersen29@hotmail.com
Sent: Friday, June 15, 2012 10:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Misty Andersen
979 n. vulcan ave
encinitas, CA 92024-1718

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Misty Andersen

A1,217

From: synergee@cox.net
Sent: Friday, June 15, 2012 10:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

John Hochman
4475 Dale Ave., 113
La Mesa, CA 91941-6232

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

John Hochman
619-303-5270

A1.218

From: laespino@cox.net
Sent: Friday, June 15, 2012 10:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Linda Espino
2506 Horton Avenue
San Diego, CA 92101-1350

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

DO NOT POISON ME! Do not poison my food sources. Do not allow these poisons/toxins to be sprayed on organic farms. Do Not allow these poisons to be sprayed in/on animals, people, soil and our water. Do not let one individual have total power to destroy the organic farms of their businesses, and destroy the jobs of the workers. I do not want poisons sprayed on me, my animals nor my food and water.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Linda Espino

A1.219

From: mjbailey29@sbcglobal.net
Sent: Friday, June 15, 2012 10:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

M J Bailey
4220 Eastridge Drive
La Mesa, CA 91941-7830

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

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Sincerely,

M J Bailey

A1,220

From: jennifertrue@gmail.com
Sent: Friday, June 15, 2012 10:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jennifer Tavernier
P.O. Box 22448
San Diego, CA 92192-2448

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Jennifer Tavernier

A1.221

From: ariana1382@hotmail.com
Sent: Friday, June 15, 2012 10:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ariana Faustini
9525 Genesee Ave APT 218
San Diego, CA 92121-2025

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Ariana Faustini

A1.222

From: dflam7@cox.net
Sent: Friday, June 15, 2012 10:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Deborah Flam
3633 Fairway Drive
La Mesa, CA 91941-8048

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Deborah Flam
619 5896787

A1.223

From: dea@gordonq.com
Sent: Friday, June 15, 2012 10:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Adam Latham
PO Box 33477
San Diego, CA 92163-3477

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Adam Latham

A1.224

From: beverlytuazon@hotmail.com
Sent: Friday, June 15, 2012 10:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Beverly Tuazon
4165 Alabama St #6
San Diego, CA 92104-7006

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Beverly Tuazon

A1,225

From: ruhann@cox.net
Sent: Friday, June 15, 2012 10:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ruth Yacko
1435 Hamilton Lane
Escondido, CA 92029-4316

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Ruth Yacko
760-735-3338

A1.296

From: sollinger@temple.edu
Sent: Friday, June 15, 2012 10:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Samantha Ollinger
3672 45th St
San Diego, CA 92105-3535

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Samantha Ollinger

A1.227

From: twbrit@cox.net
Sent: Friday, June 15, 2012 10:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Tim Brittain
1157 Ocelot Ave.
Chula Vista, CA 91911-3806

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

This is an outrage. I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Tim Brittain

A1.228

From: krmmckurt@yahoo.com
Sent: Friday, June 15, 2012 10:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Kurt McLean
1312 Seacoast Drive
Imperial Beach, CA 91932-3188

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Kurt McLean

Please use this link to SEE ME and view more information about me
http://www.capwiz.com/grassrootsnetroots/picturepages.tt?id=418159

A1.229

From: cheryl@metrocateringsandiego.com
Sent: Friday, June 15, 2012 10:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Cheryl Raiken
6625 Top Gun Street #101
San Diego, CA 92121-4148

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Cheryl Raiken

A1.280

From: jimbellelsi@cox.net
Sent: Friday, June 15, 2012 10:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jim Bell
4862 Voltaire St.
San Diego, CA 92107-2108

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

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Finally, I am concerned that the pesticides required by this ordinance could run off into the San Dieguito River and enter the Lake Hodges drinking water reservoir and end up in my water supply. Agricultural pesticides in drinking water are a serious health concern that has not been addressed by your study. Organic farming lowers the risk of pesticides entering the water system, while the ordinance you propose raises that risk.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Jim Bell
619-758-9020

A1.231

From: mirandapaulaj@gmail.com
Sent: Friday, June 15, 2012 10:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Paula Miranda
4351 Poplar Street
San Diego, CA 92105-4617

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Paula
6196308160

Please use this link to SEE ME and view more information about me
http://capwiz.com/grassrootsnetroots/picturepages.tt?id=418161

A1.232

From: marceloch@aol.com
Sent: Friday, June 15, 2012 10:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Marcelo Dos Santos
1645 Corsica St
San Diego, CA 92111-6903

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Marcelo Dos Santos

A1.233

From: nadia550@sbcglobal.net
Sent: Friday, June 15, 2012 10:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Nadine Scott
550 Hoover St.
Oceanside, CA 92054-4557

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I request a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance. You cannot consider pesticides of any kind an adequate mitigation on any land that is practicing and/or certified organic. Further it gives too much power to the director to make unilateral decisions that can deprive farmers of their livelihoods. Organic food is in high demand because people want a choice about their food products for consumption!

The proposed ordinance is likely to result in the spraying of pesticides on the organic crops on organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland. It also severely impacts their livelihoods!!!!

I am also concerned that the spraying of pesticides will impact the plants and animals in the San Pasqual Valley. The San Pasqual Valley is a City open space park and agricultural preserve, and supports endangered and threatened species like the Arroyo Toad, the Least Bell's Vireo, and California Gnatcatcher. The use of organic farming methods is in harmony with the protection of these species, because it uses natural methods to grow crops and control pests. Spraying pesticides would change the nature of farming in this area, and allow pesticides to enter the food chain of the animals in the area. Your environmental document gives no analysis to these impacts.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance. Wise pest management programs should be utilized that DO NOT

use pesticides and take away someone's livelihood! An analysis of impacts to wildlife and flora must be done before this ordinance proceeds any further- the valley area is home to hundreds of threatened and endangered species as well as sensitive receptors including humans, children and food and forage crops.

Sincerely,

Nadine L. Scott, Attorney

A1.234

From: barbara@diederichs.me
Sent: Friday, June 15, 2012 10:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Barbara Diederichs
12956 Christman Lane
Poway, CA 92064-5832

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Barbara Diederichs

A1.235

From: ranchoviz@yahoo.com
Sent: Friday, June 15, 2012 10:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Maveh Vissers
10430 Loma Rancho Dr
Spring Valley, CA 91978-1027

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Maveh and Joe Vissers

A1,236

From: kdodson@cox.net
Sent: Friday, June 15, 2012 10:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

K Dodson
704 Hardell Ln
Vista, CA 92084-6625

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

K Dodson

A1.237

From: mcomstock@foundation.sdsu.edu
Sent: Friday, June 15, 2012 10:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Tamatha Comstock
8514 Carlton Oaks Drive
Santee, CA 92071-2211

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Tamatha Comstock

A1.238

From: nancy.touchofearth@gmail.com
Sent: Friday, June 15, 2012 10:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

nancy brillault
1811 Belle Grove rd
Encinitas, CA 92024-4208

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

nancy brillault

A1.239

From: ahvyna@gmail.com
Sent: Friday, June 15, 2012 10:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Susan Weir
4212 Bernadine Place
San Diego, CA 92115-6012

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Susan Weir
619-886-6896

A1,240

From: sluth33@yahoo.com
Sent: Friday, June 15, 2012 10:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

sarah luth
1045 meade ave.
san diego, CA 92116-1038

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

sarah luth
619 296-2895

A1.241

From: inharmonyherbs@yahoo.com
Sent: Friday, June 15, 2012 10:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jodi Shagg
1862 1/2 Bacon Street
San Diego, CA 92107-3014

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Jodi Shagg
6192238051

A1.242

From: backcountryduffy@gmail.com
Sent: Friday, June 15, 2012 10:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

sharon duffy
35240 peralta dr
warner springs, CA 92086-9718

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

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Finally, I am concerned that the pesticides required by this ordinance could run off into the San Dieguito River and enter the Lake Hodges drinking water reservoir and end up in my water supply. Agricultural pesticides in drinking water are a serious health concern that has not been addressed by your study. Organic farming lowers the risk of pesticides entering the water system, while the ordinance you propose raises that risk.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

sharon duffy

A1.243

From: faithfilly1@sbcglobal.net
Sent: Friday, June 15, 2012 10:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

La Nelle Kidd
5144 Sunnyside Drive
Bonita, CA 91902-2131

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

FYI, I suffer from two autoimmune diseases for which pesticides adversely affect my health. After switching to all organic foods, my health improved dramatically and will hopefully enable my ability to work. It is currently difficult and expensive to obtain enough organic foods year round, this bill will cripple the availability of needed organic foods and drive the costs even higher. Please consider the negative impact pesticides have on those with sensitive health issues and that of our children. The quality of our food impacts the health of all and drives up health care costs! I am certain that there must be an environmentally friendly and organic alternative to control the gnat problem.

Sincerely,

La Nelle Kidd
6194798981

A1.244

From: diane@visionmetrics.com
Sent: Friday, June 15, 2012 10:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Diane Foote
12545 McFeron Road
Poway, CA 92064-3631

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

Mr. Miller and Members of the San Diego County Board of Supervisors.

I am a Be-wise CSA customer that has been following the Eye Gnat issue.

It seems to me to be a choice between having organic farms in San Diego county or not. The proposed ordinance could effectively shut down larger organic farms in the county.

Personally, that means that my access to locally grown healthy food would be diminished. I can only grow so much in my own backyard and there are many others who do not have the time and space to grow any. Are the homeowners that complain about the eye gnats more important that any other person in the county?

Taking a larger view, the market for organic produce is not going to go away, so it will be satisfied by non-locally grown items that will be more expensive for our residents and take more resources to deliver. Not the smartest direction to take. San Diego has a unique climate which allows our area to be a great agricultural resource - why not take advantage of that? It is part of our county's strengths.

Be-wise and other organic farms are taking scientifically recommended steps to combat this problem - it may take some time - not much in nature is instantaneous. Why not give it some time before jumping in with a sledgehammer approach?

I hope that you will take my comments under consideration.

Thank you, Diane Foote

I now return you to the boiler plate letter...

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Diane Foote
858-312-2904

A1.245

From: kristin.m.kennedy@lpl.com
Sent: Friday, June 15, 2012 10:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Kristin Herndon
1416 Wilbur Ave
San Diego, CA 92109-2137

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Kristin Herndon

A1.246

From: lindajhenning@yahoo.com
Sent: Friday, June 15, 2012 11:01 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Linda Henning
3525 Del Mar Heights Rd.
San Diego, CA 92130-2122

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Linda Henning

A1.247

From: gm@grandmedicine.com
Sent: Friday, June 15, 2012 11:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Leonard Mehlmauer Mehlmauer, ND
222 Dovary Road
Chula Vista, CA 91910-5008

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Leonard Mehlmauer Mehlmauer, ND

A1.243

From: lindseylupo@gmail.com
Sent: Friday, June 15, 2012 11:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lindsey Lupo
2928 Zircon Pl
Carlsbad, CA 92009-4414

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Lindsey Lupo

A1.249

From: chuck@chucklowery.net
Sent: Friday, June 15, 2012 11:06 AM
To: LUEG, DEH-Eyegnat
Subject: Take care of local business first

Chuck Lowery
812 Alberta Ave
Oceanside, CA 92054-4102

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

As a business person and former president of an organic bakery with national distribution, I ask that you oppose the neg dec and request a full EIR on the proposed eye gnat ordinance.

I request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Chuck Lowery

A1.250

From: andersonbarnett@gmail.com
Sent: Friday, June 15, 2012 11:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ruth Anderson
4663 Biona Dr.
San Diego, CA 92116-4822

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Ruth Anderson

A1.251

From: jonahsroots@yahoo.com
Sent: Friday, June 15, 2012 11:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jonah Arter
4412 Pescadero Ave
San Diego, CA 92107-3629

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Jonah Arter

A1,252

From: mrpat4u@cox.net
Sent: Friday, June 15, 2012 11:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Patrick Cameron
12970 Hwy 8 Bus #81
El Cajon, CA 92021-1839

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Patrick Cameron

A1.263

From: steve@waits.net
Sent: Friday, June 15, 2012 11:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Stephen Waits
5623 Glenstone Way
San Diego, CA 92121-4328

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

I am also concerned that the spraying of pesticides will impact the plants and animals in the San Pasqual Valley. Your document looks a lot at County policies, but the impacts to Be Wise and the Valley are in the City of San Diego. The San Pasqual Valley is a City open space park and agricultural preserve, and supports endangered and threatened species like the Arroyo Toad, the Least Bell's Vireo, and California Gnatcatcher. The use of organic farming methods is in harmony with the protection of these species, because it uses natural methods to grow crops and control pests. Spraying pesticides would change the nature of farming in this area, and allow pesticides to enter the food chain of the animals in the area. Your environmental document gives no analysis to these impacts.

Finally, I am concerned that the pesticides required by this ordinance could run off into the San Dieguito River and enter the Lake Hodges drinking water reservoir and end up in my water supply. Agricultural pesticides in drinking water are a serious health concern that has not been addressed by your study. Organic farming lowers the risk of pesticides entering the water system, while the ordinance you propose raises that risk.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Stephen Waits
8584557887

A1.254

From: joyel13@cox.net
Sent: Friday, June 15, 2012 11:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

joyce watkins
4636 Tivoli st
san diego, CA 92107

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

joyce watkins
(619) 523-8462

A1.255

From: thelet@aol.com
Sent: Friday, June 15, 2012 11:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Robert Vanian
4435 Del Monte Avenue
San Diego, CA 92107-3607

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Robert Vanian

A1.256

From: ellen@ellenherroon.com
Sent: Friday, June 15, 2012 11:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ellen Herroon
4332 Adams Avenue
San Diego, CA 92116-2521

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

I am deeply concerned about loosing San Diego's organic farms and their produce. My family relies on local organic foods, especially for my medically fragile son.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Ellen Herroon

A1.757

From: bmeaselle@san.rr.com
Sent: Friday, June 15, 2012 11:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Barbara Measelle
10454 Brooktree Ter.
San Diego, CA 92131-1333

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

PROTECT ORGANIC FARMS. DON"T RUIN THEM. More and more people as myself are buying organic because they do not have pesticides. WHO IS SUPPORTING THIS BILL TO PUT SUSTAINABLE, ORGANIC FARMS OUT OF BUSINESS?

WE DON'T NEED MORE CHEMICALS IN OUR FOOD SUPPLY!

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Barbara Measelle

A1.258

From: riveryaker2000@yahoo.com
Sent: Friday, June 15, 2012 11:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Scott Johnson
8407 El Paso Street
La Mesa, CA 91942-2706

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Scott K Johnson
619-741-0088

A1.259

From: rachelzhere@yahoo.com
Sent: Friday, June 15, 2012 11:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Rachel Carey
4149 6th Avenue
San Diego, CA 92103-1437

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Rachel Carey

A1.260

From: sarah@lifton.biz
Sent: Friday, June 15, 2012 11:46 AM
To: LUEG, DEH-Eyegnat
Subject: Please Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Sarah Lifton
14048 Boquita Drive
Del Mar, CA 92014-2945

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

As a San Diego County resident, a regular consumer of organic produce and a strong supporter of local farms, I am writing to request in the strongest possible terms that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch, whose products I regularly buy, and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego, and we should be advocating for more not fewer sources of local organic produce.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Sarah Lifton

A1.261

From: chris@bamcom.net
Sent: Friday, June 15, 2012 11:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Chris Weiscopf
4515 Inverness Dr
Oceanside, CA 92057-5054

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Chris Weiscopf

A1262

From: cclear2@earthlink.net
Sent: Friday, June 15, 2012 11:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Crystal M Clearwater
10273 Black Mtn Rd M8
San Diego, CA 92126-3851

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

Any danger to organic produce is a danger to my health.

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Crystal M Clearwater

A1.263

From: pizzaz_of_eternia@yahoo.com
Sent: Friday, June 15, 2012 11:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Eric Myers
3704 robinson pl
San Diego, CA 92103-4509

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Eric Myers

A1.264

From: heartlight9@earthlink.net
Sent: Friday, June 15, 2012 11:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Arline Fernandez
1261 Rainbow Valley Blvd
Rainbow, CA 92028-9773

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Arline Fernandez
7607234522

A1.265

From: smdelrosario@earthlink.net
Sent: Friday, June 15, 2012 11:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

S. del Rosario
850 Beech Street
San Diego, CA 92101-2891

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

S. del Rosario

A1.266

From: bandrow@gmail.com
Sent: Friday, June 15, 2012 12:01 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Anita Bandrowski
7860 Camino Glorita
San Diego, CA 92122-1804

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

Dear Environmental Health Staff and Supervisors,

Please consider deeply your stance on the Eye Gnat remediation efforts. As a scientist and a mother, I deeply appreciate the clean water, organic (pesticide free) food and healthy environment in San Diego.

I have taken a similar step in my old home as you are considering. We lived on a river in Florida prior to moving to San Diego and I noticed that there was a black snake in my yard quite often. It bothered me and I asked my husband to kill it without thinking through this action. However, after reading more about the black snake it turns out that this harmless creature does keep the water moccasin snake away from its territory. By killing the black snake, who made his home in my yard, I opened up my property to one of the world's deadliest snakes.

Your action of destroying organic farming in San Diego county may be an analogous tale of killing the black snake opening up our community to a set of unanticipated vulnerabilities. Please complete the full environmental survey before you take this step because you may be doing yourself and your community a terrible disservice by remaining ignorant of important impacts.

Sincerely,

Anita Bandrowski

A1.207

From: sargor7@gmail.com
Sent: Friday, June 15, 2012 12:01 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Sarah Gordon
420 South Pacific Street
Oceanside, CA 92054-2923

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Sarah Gordon

A1.26B

From: jongor7@gmail.com
Sent: Friday, June 15, 2012 12:06 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jonathan Gordon
420 South Pacific Street
Oceanside, CA 92054-2923

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jonathan Gordon

A1.209

From: burnrubbernancy@hotmail.com
Sent: Friday, June 15, 2012 12:06 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Nancy Price
3637 Tierra De Dios
Escondido, CA 92025-7857

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Nancy Price

A1.270

From: lnicholson@ebtherapy.com
Sent: Friday, June 15, 2012 12:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lisa Nicholson
5253 Diane Ave.
SAN DIEGO, CA 92117-1321

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Lisa Nicholson
6197724002

A1.271

From: hollaceann@cox.net
Sent: Friday, June 15, 2012 12:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Hollace Jones
705 W Upas St
San Diego, CA 92103-3840

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance. These impacts include your health and the health of your family and ours.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Hollace Jones
619-295-6895

A1.272

From: ahoyhoy@cox.net
Sent: Friday, June 15, 2012 12:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

dave harvey
1655 eolus avenue
encinitas, CA 92024-1517

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

dave harvey

A1.293

From: kelissajean@gmail.com
Sent: Friday, June 15, 2012 12:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Melissa Kelley
519 N Nevada Street Unit C
Oceanside, CA 92054-2480

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Melissa Kelley

A1.274

From: lorna.buratto@sbcglobal.net
Sent: Friday, June 15, 2012 12:16 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lorna Buratto
1933 Dove Lane
Carlsbad, CA 92009-4081

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

It's about time we stopped poisoning the environment and I don't understand why anyone would ignore all the warnings unless they have not studied the evidence or they just don't give a damn.

Sincerely,

Lorna Buratto

A1.275

From: jochenklinke@gmail.com
Sent: Friday, June 15, 2012 12:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jochen Klinke
18510 Thomas Paine Ln
Ramona, CA 92065-7300

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Jochen Klinke
(760) 730-2034

A1.276

From: flkdancer@yahoo.com
Sent: Friday, June 15, 2012 12:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

vicki maheu
8718 macawa ave
san diego, CA 92123-2921

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

vicki maheu

A1.277

From: Erin [erin@bsidephotography.com]
Sent: Friday, June 15, 2012 12:29 PM
To: LUEG, DEH-Eyegnat
Subject: Eye Gnat Ordinance and Program :: Full environmental impact report is needed

To whom it may concern:

I am a concerned citizen adamantly opposed to the proposed eye gnat ordinance and program.

If the DEH primary focus is on organisms that transmit diseases to humans, why are they attempting to have eye gnats considered to be a vector when clearly they are not. According to eye gnat expert James Bethke, Floriculture and Nursery Farm Advisor at the University of California Cooperative Extension San Diego, "the cases I have seen in our study area can be explained by other sources of infection and cannot be directly correlated with eye gnats."[1] And optometrists who have treated this condition agree. San Diego optometrist Brian Chou says, "Eye gnats seem to be more a nuisance than a vector of serious eye disease."[1]

The vague and ambiguous language within the proposed amendment leaves too much room for problems in the future and would give too much unrestricted power to the DEH. The lack of planning, research to alternative measures and scientific studies along with the rush to amendment appears that the DEH may have other hidden objectives to amending the San Diego County Code.

What has spawned this recent interest in the eye gnat population? Where did these proposed measures come from? I am not seeing enough justification, data, research, evidence to strip away the rights of our farmers and our rights as citizens of this community to fresh, organic food; clean drinking water; and a toxic free environment.

This proposed amendment gives too much power to one individual. The director will have the authority to enforce extreme measures upon any farm he deems including restricting farmable acreage with the use of barrier crops, contaminating soil with the use of pesticides, and effectively killing organic farming.

If eye gnats breed in warm climates in rich, organic soil, it seems to reason that someone is targeting organic farms where the soil is the richest and where eye gnats are probably more prevalent than in traditional farms where the soil is dead and depleted of nutrients. The answer to a problem is not a radical, extreme and unthought out solution. Please give the farmers and researchers time to find the right answer to this problem. Do not strip away our rights as a community and potential poison my home and my food.

I beg for rational thinking before we get carried away. Please do a full Environmental Impact Report before moving forward with the proposed amendment.

Sincerely,
Erin Grummel
1240 Sundown Glen
Escondido, CA 92026

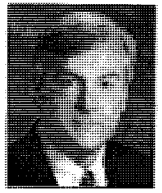
[1] Can Eye Gnats Cause Infection? Joseph P. Shovlin, D..O. http://www.revoptom.com/content/d/cornea/c/20372/

Can Eye Gnats Cause Infection?

These little bugs can cause big-time irritation in Southern states.

Edited by Joseph P. Shovlin, O.D.

4/15/2010



Q. Several patients have complained of a red eye response when gnats get in their eyes. Is this a possible vector for infection or just an inflammatory response to the gnat?

A: Most likely, the insect in question is not your run-of-the-mill bothersome bug, but more precisely, the eye gnat.

"An eye gnat is like a tiny house fly that has spongy mouthparts and laps up its food source, which is mucus," says eye gnat expert James Bethke, Floriculture and Nursery Farm Advisor at the University of California Cooperative Extension San Diego.

Eye gnats (*Hippelates spp.*) are actually small flies—about 1/16 to 1/8 inch in length—with clear wings. Their bodies range from shiny black to dull gray, with yellow, orange, or dark brown and orange legs. Eye gnats are prevalent in the South, and they have been reported to cause problems along the Border States from California to Florida and as far north as North Carolina.[1] In the Southwest, eye gnats are primarily restricted to the arid desert regions of California and Arizona.

Although eye gnats are non-biting insects, the adult females are strongly attracted to moisture around the eyes and nose of humans and animals. In mid-summer, large numbers of eye gnats persistently hover around the face, causing considerable annoyance.[1] They swarm around the head and dart at the eyes, mouth, nose or wounds of humans and other animals. If brushed off, they quickly return.

Female eye gnats get protein for egg production from exposed mucous or sebaceous secretions, pus and blood of humans or animals. They do not pierce the skin of the host to obtain this material; rather, they scrape at the skin with large, curved spurs on their hind legs to produce a pool of mucous material for soaking up with their spongy mouthparts.[1]

Although they are primarily an annoyance, eye gnats can spread disease organisms that cause acute bacterial conjunctivitis (pink eye), anaplasmosis, and bovine mastitis.[1]

Part of Mr. Bethke's recent study, the Jacumba Eye Gnat Research Project, looked into whether eye gnats can indeed cause infection. "The cases I have seen in our study area can be explained by other sources of infection and cannot be directly correlated with eye gnats," Mr. Bethke says.

Optometrists who have treated this condition agree.

"I have always treated this as an inflammatory condition," says Alabama optometrist Ernie Bowling. "I don't recall seeing any infections from this, as most patients have irrigated their eyes before they ever make it to the office. "

Adds San Diego optometrist Brian Chou, "Eye gnats seem to be more a nuisance than a vector of serious eye disease." Still, studies have implicated eye gnats as a potential vector for bacterial conjunctivitis, he adds.[2,3]

In late summer of 1981, a widespread outbreak of acute bacterial conjunctivitis occurred in southeast Georgia, affecting primarily grade-school children.[3] This outbreak was similar to previously described seasonal conjunctivitis in the South.[3] As suggested in earlier studies, the eye gnat may serve as a mechanical vehicle in the transmission of the suspected causative agent, a possible Haemophilus species.[3] The 1981 Georgia outbreak illustrated that "gnat sore eyes" are not obsolete and apparently can occur unpredictably during warm months in the Southern states. Physicians and other health care workers should be aware of the unique clinical and epidemiologic features of this acute seasonal conjunctivitis, the study concluded.

Q: How should I treat "gnat sore eyes"?

A: In cases of bacterial conjunctivitis, the clinician can prescribe topical antibiotics to reduce its contagiousness and facilitate resolution, and if significant inflammation is also present, an antibiotic-corticosteroid combination is appropriate, Dr. Chou says.

"Fortunately, most eye irritation following exposure to eye gnats is mild, self-limiting, and resolves without special intervention," Dr. Chou says. "In these more common situations, reassurance and frequent artificial tears can suffice."

For Dr. Bowling, treatment depends on the presentation. Typically, Dr. Bowling treats the affected eye with Lotemax (loteprednol etabonate, Bausch + Lomb) q.i.d. He also recommends an over-the-counter antihistamine like Benadryl (diphenhydramine, Johnson & Johnson) if the edema is severe, in addition to cold compresses. "Fortunately, the presentation resolves rather quickly," Dr. Bowling says.

1. Pest Notes; County of San Diego; Department of Agriculture, Weights and Measures. August 2004.
2. Payne WJ Jr, Cole JR Jr, Snoddy EL, Seibold HR. The eye gnat Hippelates pusio as a vector of bacterial conjunctivitis using rabbits as an animal model. J Med Entomol. 1977 Jan 31;13(4-5):599-603.
3. Buehler JW, Holloway JT, Goodman RA, Sikes RK. Gnat sore eyes: seasonal, acute conjunctivitis in a southern state. South Med J. 1983 May;76 (5):587-9.

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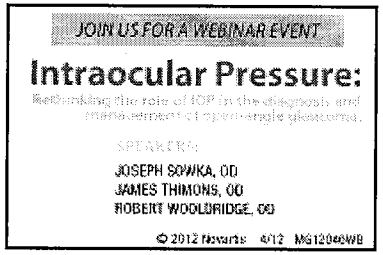

Thursday, June 12, 2012

Webinar Event: Intraocular Pressure: Rethinking the role of IOP in the diagnosis and management of open-angle glaucoma.
Time: 9:00 p.m. ET
Faculty: Robert Wooldridge, O.D.

Click here to register

JOIN US FOR A WEBINAR EVENT

Wednesday, June 20,

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A1.278

From: candace.m.miller@gmail.com
Sent: Friday, June 15, 2012 12:31 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Candace Miller
1045 Pepper Tree Ln
Fallbrook, CA 92028-4247

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Candace Miller

A1.279

From: soleil.develle@gmail.com
Sent: Friday, June 15, 2012 12:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Soleil Develle
2987 Sumac Road
Fallbrook, CA 92028-8704

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Soleil Develle

A1.280

From: b_margay@yahoo.com
Sent: Friday, June 15, 2012 12:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Bonnie Margay Burke
PO Box 601493
San Diego, CA 92160-1493

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Bonnie Margay Burke

A1.201

From: mary@virgomoon.com
Sent: Friday, June 15, 2012 12:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Mary Hicklin
11770 Hi Ridge Rd
Lakeside, CA 92040-1010

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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This is an extremely important issue for me. I depend upon Bee Wise products. It is unconscionable to put them out of business, especially based upon an inadequate finding. I visit that area and am also concerned about adverse health effects for myself from inhaling the pesticides. Please reconsider!!

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Thank you.

Sincerely,

Mary Hicklin

A1-282

From: rocks2stocks@yahoo.com
Sent: Friday, June 15, 2012 12:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

William Snider
4613 Isleta Ave
San Diego, CA 92117-2548

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

William Snider

A1.283

From: jnekracht@cox.net
Sent: Friday, June 15, 2012 12:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Elaine Kracht
3831 Basilone st. #2
San Diego, CA 92110-5407

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Elaine Kracht
619 7589315

A1.204

From: rebs619@gmail.com
Sent: Friday, June 15, 2012 12:41 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Rob Rabello
3654 Orange Ave
San Diego, CA 92104-2354

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Robert M. Rabello

A1.285

From: lauraturner55@yahoo.com
Sent: Friday, June 15, 2012 12:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Laura Turner
3214 Loma Riviera Dr.
San Diego, CA 92110-5510

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Laura Turner

A1.286

From: pagesorganics@sbcglobal.net
Sent: Friday, June 15, 2012 12:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Thomas Page
1914 Pamo Road
Ramona, CA 92065-7612

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

Yes, you really need to think this through guys....I have an organic family farm in Ramona and been farming this way for 15 years without any issues with eye gnats or neighbors. We grow veggies for all the neighbors and beyond.....very much appreciated.

If we ever lost our certified status we would be out of business...that simple!!

Farmers are very resourceful when it comes to problems like this and you need to let them handle it without the health departments help.

Sincerely,

Thomas Page

A1.287

From: bbbjhill@roadrunner.com
Sent: Friday, June 15, 2012 12:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Beverly Hill
943 La Buena Vida
Fallbrook, CA 92028-4528

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Beverly Hill

A1.288

From: p_nutt@cox.net
Sent: Friday, June 15, 2012 12:51 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Pauline Nutt
414 Norfolk Drive
Cardiff by the Sea, CA 92007-2017

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Pauline Nutt

A1.289

From: hanyalamp@yahoo.com
Sent: Friday, June 15, 2012 12:51 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Hanya Lamp
4009 1/2 Illinois St.
San Diego, CA 92104-2658

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Hanya Lamp

A1.290

From: maris__@hotmail.com
Sent: Friday, June 15, 2012 12:56 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Maris Brancheau
Po box 82062
San Diego, CA 92138-2062

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Maris Brancheau
760-2129928

A1.291

From: imb888@gmail.com
Sent: Friday, June 15, 2012 1:01 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Irma Brandt
2015 harmony way
Vista, CA 92081-7020

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Irma Brandt
760-550-0570

A1,292

From: dscokwn@aol.com
Sent: Friday, June 15, 2012 1:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lisa Davison
8641 Via Mallorca Unit B
La Jolla, CA 92037-9003

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Lisa Davison

A1.293

From: greenworldis@fastmail.fm
Sent: Friday, June 15, 2012 1:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Linda Flournoy
1738 Oxford Ave
Cardiff, CA 92007-1633

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing, with great concern for my health and that of my family and friends and all inhabitants of our local lands and waters, to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland. This alarms me and may impact my ability to live in San Diego.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

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Finally, and most importantly, I am *very* sensitive to pretty much ALL chemicals used to poison/control other life forms - have been since I was a young teen. I have bad reactions to conventionally (chemically) farmed foods and MUST eat Organic to survive, let alone be a productive member of society. In case it matters to you, I am a civil engineer and planner whose expertise is Sustainability, with a Master's and most of a PhD from Cambridge University in the subject, and I am on a number of regional committees, so this impacts more than me personally. It was environmental toxins that made me have to quit the PhD in my last year, and it has taken me years to recover to 90%. If you become responsible for poisoning our local produce supply, you will significantly impact many of us. More and more people, especially children, are being impacted by toxins added to the environment. When we were kids the risk of cancers in the USA was about 1 in 150; today it is 1 in 3 for women and 1 in 2 for men. Please do what you can to not exacerbate the situation for our region.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance. They exist and new means are also being discovered in response to the need to stop poisoning our planet and local regions. Thank you for reconsidering this MOST important issue.

I reiterate the discussion about why this is a bad idea here:
TOP FIVE REASONS THE ORDINANCE SHOULD BE REJECTED

If passed in its current form, this ordinance would:
1. Force Organic Farms to Spray Chemical Pesticides
The ordinance could force an organic farm to spray chemical pesticides if it faced an unspecified number of complaints from neighbors. Not only would this strip the farm of its organic certification but it could affect the health of surrounding populations and its customers.

2. Give a Single Person Complete Control
If a farm does not or cannot comply with the ordinance requirements - even with no actual scientific remedies - the Director of Vector Control has full power to seek relief from applicable, validated and practicable control measures. This can be achieved by ordering a fallow period, changing a farmer's crop selection or by ordering the implementation of a "barrier" crop.

3. Reduce Farmable Acreage
By possibly mandating the use of "barrier" crops, the ordinance would reduce the amount of land available for organic farming and have a negative financial impact on farmers.

4. Shut Organic Farms Down During Peak Growing Season

Another method of this ordinance to control eye gnat populations would be to require organic farms to shut down for weeks during the summer, the peak growing season. This fallow period could effectively close most organic farms in San Diego.

5. Target Organic Farms Without a Scientific Basis
The targeting and mandatory inclusion of farmers in the program depends solely on neighbor complaints and the decisions of a single director responding to these complaints. The director has the authority to override input from scientific or agricultural agencies knowledgeable about organic farming.

The Solution
As a solution, organic farmers are participating in legitimate, scientific research to mitigate the problem and are assembling the necessary traps to implement proven measures to control eye gnat populations that don't include any of the above restrictions. Major organic produce suppliers such as Whole Foods, People's Organic Co-op and Jimbo's are siding with organic farms against this ordinance. We are asking that the Board of Supervisors give organic farms the time they need to implement these voluntary, community-wide measures and reject the ordinance in its current, punitive form.

Again, thank you for reconsidering the poisoning of our lands, waters and children.

Sincerely,

Linda Flournoy

A1.294

From: laeljackson@msn.com
Sent: Friday, June 15, 2012 1:16 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lael Jackson
Box 424
Del Mar, CA 92014-0424

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Lael Jackson

A1.295

From: pjwascher@yahoo.com
Sent: Friday, June 15, 2012 1:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Patricia Wascher
11088 Fury Lane
La Mesa, CA 91941-7308

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Patricia Wascher
858-382-5683

A1.296

From: chilel4fun@hotmail.com
Sent: Friday, June 15, 2012 1:31 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ruth Kuroda
2121 Glasgow Ave
Cardiff by the Sea, CA 92007-1806

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Ruth Kuroda

A1.297

From: 6ygavi6@gmail.com
Sent: Friday, June 15, 2012 1:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Yvette Gavillan
9228 Ronda Ave.
San Diego, CA 92123-3515

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Yvette Gavillan

A1.298

From: cjpoquoc@sbcglobal.net
Sent: Friday, June 15, 2012 1:51 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Claudia Poquoc
3446 Tie St.
San Diego, CA 92105-3918

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Claudia Poquoc

A1.299

From: miriahleclerc@hotmail.com
Sent: Friday, June 15, 2012 1:51 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Miriah Scheibe
147 Jupiter St
Encinitas, CA 92024-1450

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Miriah Scheibe

A1.300

From: buh_nana@yahoo.com
Sent: Friday, June 15, 2012 2:06 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

G Liu
7655 Via Cristal Unit 2
San Diego, CA 92129-4679

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

G Liu

A1.30 F

From: phil.aument@gmail.com
Sent: Friday, June 15, 2012 2:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Philip Aument, Jr
811 9TH ST APT C
Coronado, CA 92118-2568

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Philip Aument, Jr

A1.302

From: dawngifford@gmail.com
Sent: Friday, June 15, 2012 2:16 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Dawn Gifford
4560 North Ave Apt 4
San Diego, CA 92116-2614

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Dawn Gifford
6192970157

A1,303

From: quantumcipher@gmail.com
Sent: Friday, June 15, 2012 2:17 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Alan Haggard
1828 Gateway Dr.
San Diego, CA 92105-5104

June 15, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Alan Haggard
619-263-0104

A1.304

From: rosemariealfaro@mac.com
Sent: Friday, June 15, 2012 2:27 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

rosemarie Alfaro
362 mainsail rd
oceanside, CA 92054-4609

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

rosemarie Alfaro
415-265-0020

A1.305

From: xoxc333@gmail.com
Sent: Friday, June 15, 2012 2:31 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Courtney Williams
2042 Chatsworth Blvd.
San Diego, CA 92107-2716

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Courtney Williams
2142057832

A1.306

From: biancadlara@hotmail.com
Sent: Friday, June 15, 2012 2:32 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Bianca Lara
710 Eucalyptus Street
Oceanside, CA 92054-5108

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Bianca Lara
760-722-8487

San Diego, CA 92116-2614 dawngifford@gmail.com

Alan Haggard
1828 Gateway Dr.
San Diego, CA 92105-5104 quantumcipher@gmail.com

rosemarie Alfaro
362 mainsail rd
oceanside, CA 92054-4609 rosemariealfaro@mac.com

Courtney Williams
2042 Chatsworth Blvd.
San Diego, CA 92107-2716 xoxc333@gmail.com

Bianca Lara
710 Eucalyptus Street
Oceanside, CA 92054-5108 biancadlara@hotmail.com

?
Nadine Spier
1042 N El Camino Real B184
Encinitas, CA 92024-1322 lovetoweave@cox.net

A1.307

From: janiezeee@aol.com
Sent: Friday, June 15, 2012 3:16 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jane Zeimantz
P.O. Box 4594
Oceanside, CA 92052-4594

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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The use of organic farming methods is in harmony with the protection of these species, because it uses natural methods to grow crops and control pests. There are many alternative methods to combatting pests, including, but not limited to, the use of spraying natural cedar oil, biodegradable soap applications, release of ladybugs, co-growing of bug-resistant

plants, and strengthening of crops themselves to naturally resist predators, but these only touch the surface of what organic farmers use. Spraying pesticides would change the nature of farming in this area, and allow pesticides to enter the food chain of the animals in the area. Your environmental document gives no analysis to these impacts.

Finally, I am concerned that the pesticides required by this ordinance could run off into the San Dieguito River and enter the Lake Hodges drinking water reservoir and end up in my water supply. Agricultural pesticides in drinking water are a serious health concern that has not been addressed by your study. Organic farming lowers the risk of pesticides entering the water system, while the ordinance you propose raises that risk.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Jane Zeimantz

A1.308

From: kip92116@yahoo.com
Sent: Friday, June 15, 2012 3:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ken Martin
2848 Nye St.
San Diego, CA 92111-5406

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Ken Martin
6198401065

A1.309

From: jhendersonbrown@san.rr.com
Sent: Friday, June 15, 2012 3:26 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Joan Brown
1421 Soledad Ave
La Jolla, CA 92037-3814

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Joan Brown

A1.310

From: caseydiaz@sbcglobal.net
Sent: Friday, June 15, 2012 3:31 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Julie Diaz
10181 Caminito Jovial
San Diego, CA 92126-4101

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Julie Diaz

Please use this link to SEE ME and view more information about me
http://capwiz.com/grassrootsnetroots/picturepages.tt?id=418182

A1.311

From: davidz424@yahoo.com
Sent: Friday, June 15, 2012 3:41 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

David Zavala
9034 Kenwood Dr. #4
Spring Valley, CA 91977-2210

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

I, like many others, are committed to improving our diet and health by eating organic foods. This is not just a phase but comprises a movement that has even resulted in an organic garden being used every day at the White House. To force organic farmers to spray pesticides is the same thing as taking their livelihood away as well as denying millions of health-conscious citizens to a healthy lifestyle. Please oppose the San Diego Eye Gnat Ordinance and Program.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

David Zavala

A1.312

From: drvhpy@aol.com
Sent: Friday, June 15, 2012 3:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Joni Hoffman
12121 obispo rd
san diego, CA 92128-2627

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Joni Hoffman

A1.313

From: barbara-blair@att.net
Sent: Friday, June 15, 2012 3:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Barbara Blair
2325 Paseo De Laura #119
Oceanside, CA 92056-3733

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Barbara Blair

A1.314

From: hbrazier@aol.com
Sent: Friday, June 15, 2012 3:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Helene Brazier
8258 Via Urner Way
Bonsall, CA 92003-4809

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Helene Brazier

A1.315

From: asiota@san.rr.com
Sent: Friday, June 15, 2012 4:06 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Alfred Siota
4335 Lister St
San Diego, CA 92110-3330

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Alfred Siota
6192764721

A1.316

From: duft@sbcglobal.net
Sent: Friday, June 15, 2012 4:06 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Kimberly Duft
PO Box 1133
Rancho Santa Fe, CA 92067-1133

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Kimberly Duft

A1.317

From: jhshulman1@cox.net
Sent: Friday, June 15, 2012 4:31 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Joseph Shulman
6249 Romo Street
San Diego, CA 92115-6932

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Joseph Shulman
619-286-7754

A1.318

From: drewsearing@hotmail.com
Sent: Friday, June 15, 2012 4:51 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Robert Searing
3794 Third Ave
San Diego, CA 92103-4112

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Robert Searing

A1.319

From: brophjm@yahoo.com
Sent: Friday, June 15, 2012 5:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

John Brophy
653 cantara Lane
Vista, CA 92081-6357

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

John Brophy

A1.320

From: w.j.remsen@gmail.com
Sent: Friday, June 15, 2012 5:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Julie Remsen
2451 Romney Road
San Diego, CA 92109-1559

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Julie Remsen

A1.321

From: mseltzer@san.rr.com
Sent: Friday, June 15, 2012 5:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Maxine Seltzer
14195 Mango Drive
Del Mar, CA 92014-2924

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

m

A1.pr

From: jmanfre1@san.rr.com
Sent: Friday, June 15, 2012 5:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Joseph Manfredi
1381 Caminito Batea
La Jolla, CA 92037-7177

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Joseph Manfredi

A1.323

From: cbuell5@gmail.com
Sent: Friday, June 15, 2012 5:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Carol Buell
3515 Bear Dr
San Diego, CA 92103-3902

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Carol Buell
6195010307

A1.324

From: dr.cfarlow@cox.net
Sent: Friday, June 15, 2012 5:51 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Christine Farlow
832 Lochwood Pl
Escondido, CA 92026-1488

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Dr. Christine H. Farlow

A1.395

From: judycullins@ccox.net
Sent: Friday, June 15, 2012 5:56 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Judy Cullons
7000 M elody Lane
La Mesa, CA 91942-1427

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Judy Cullons

A1.326

From: tilda1217@yahoo.com
Sent: Friday, June 15, 2012 6:01 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Elaine Alfaro
752 Glen Canyon Rd.
Santa Cruz, CA 95060-1631

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Elaine Alfaro
831-454-8118

A1,327

From: tracyry@gmail.com
Sent: Friday, June 15, 2012 6:01 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ryan Tracy
620 Marsolan Ave
Solana Beach, CA 92075-1931

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Ryan Tracy
7604200380

A1.328

From: saexodus@cox.net
Sent: Friday, June 15, 2012 6:16 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Bruce Sims
211 N.Citrus, #104
ESCONDIDO, CA 92027-3443

June 15, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Bruce Sims

A1.329

From: bbphilley@hotmail.com
Sent: Friday, June 15, 2012 6:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Robert Philley
2108 Larkspur Drive
Alpine, CA 91901-1308

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Robert Philley
619-445-8729

A1.330

From: rwinkfive@gmail.com
Sent: Friday, June 15, 2012 6:51 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Richard winkler
1719 Beryl
San Diego, CA 92109-2214

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Richard winkler
858 652 0663

A1.331

From: jbpreato@san.rr.com
Sent: Friday, June 15, 2012 6:56 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

JB Preato
5007 McGill Way
San Diego, CA 92130-2711

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

JB Preato

A1.332

From: ninalouisenoble@yahoo.com
Sent: Friday, June 15, 2012 6:56 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Nina Noble
150 Hummingbird Hill
Encinitas, CA 92024-4202

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Nina Noble

A1.333

From: vip_joshi@hotmail.com
Sent: Friday, June 15, 2012 6:56 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Vipul Joshi
2045 39th st.
San diego, CA 92105-5639

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Vipul Joshi

A1.3 34

From: matt_story@hotmail.com
Sent: Friday, June 15, 2012 7:06 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Matthew Story
86 E. Naples St.
Chula Vista, CA 91911-2253

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Matthew Story

A1,335

From: bussera@gmail.com
Sent: Friday, June 15, 2012 7:16 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

amy busser
2193 bacon st
san diego, CA 92107-2127

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

amy busser
330-221-2252

A1.336

From: dinatalk@gmail.com
Sent: Friday, June 15, 2012 7:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Dina Robinson
P.O.Box 2688
La Jolla, CA 92038-2688

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Dina Robinson
858/459-6826

A1.387

From: jmanfre1@san.rr.com
Sent: Friday, June 15, 2012 7:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Joseph Manfredi
1381 Caminito Batea
La Jolla, CA 92037-7177

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Joseph Manfredi

A1.33B

From: jasons.email.contact@gmail.com
Sent: Friday, June 15, 2012 7:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jason Kenyon
2647 Gateway Rd ste 105
Carlsbad, CA 92009-1757

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Jason Kenyon

A1.339

From: maryannsowards@msn.com
Sent: Friday, June 15, 2012 8:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Mary Ann Sowards
12616 Cijon Street
San Diego, CA 92129-3023

June 15, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Mary Ann Sowards

A1.240

From: scottrga@gmail.com
Sent: Friday, June 15, 2012 9:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Scott Anderson
3624 Felton Street
San Diego, CA 92104-3811

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Scott Anderson

A1.341

From: tahoesongbird@yahoo.com
Sent: Friday, June 15, 2012 9:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Tamra Miller
3050 Rue d"Orleans, #329
San Diego, CA 92110-5920

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Tamra Miller
619 795 6361

A1.342

From: fishgottaswim2@sbcglobal.net
Sent: Friday, June 15, 2012 9:56 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Sandra Carp
2010 W. San Marcos Blvd. Unit 54
San Marcos, CA 92078-3908

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Sandra Carp

A1.343

From: csoragha@hotmail.com
Sent: Friday, June 15, 2012 10:06 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

c soragha
saratiga ave
san diego, CA 92107

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

c soragha

A1.344

From: dr.partovi@gmail.com
Sent: Friday, June 15, 2012 10:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ryan Partovi
4671 Hamilton St., #1
San Diego, CA 92116-3063

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Dr. Ryan D. Partovi
817-361-8381

Please use this link to SEE ME and view more information about me
http://capwiz.com/grassrootsnetroots/picturepages.tt?id=418195

A1.345

From: ladylightln@yahoo.com
Sent: Friday, June 15, 2012 10:56 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lenore Nieters
9303 Darcy Ct
SANTEE, CA 92071-2973

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Lenore Nieters

A1.340

From: jimbellelsi@cox.net
Sent: Friday, June 15, 2012 11:06 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jim Bell
4862 Voltaire St.
San Diego, CA 92107-2108

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jim Bell
619-758-9020

A1.347

From: lnbrost@gmail.com
Sent: Friday, June 15, 2012 11:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Laure Brost
240 coast Bl #1E
la jolla, CA 92037-4692

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Laure Brost
8584545127

A1.348

From: dlks@roadrunner.com
Sent: Friday, June 15, 2012 11:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

diana schmidt
3644 lakeridge road
fallbrook, CA 92028-9104

June 16, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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diana schmidt

A1.349

From: csoragha@hotmail.com
Sent: Friday, June 15, 2012 11:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

c soragha
saratiga ave
san diego, CA 92107

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Department of Environmental Health
5570 Overland Avenue, Suite 102
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c soragha

A1.350

From: video911@cox.net
Sent: Friday, June 15, 2012 11:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ruth Weisz
1491 E. Lexington Ave # A
El Cajon, CA 92019-1987

June 16, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Ruth Weisz

A1,351

From: camiz@sbcglobal.net
Sent: Saturday, June 16, 2012 12:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Cam Martinez
4211 Iowa St. #3
San Diego, CA 92104-1338

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Cam Martinez

A1.352

From: dianaatchley@yahoo.com
Sent: Saturday, June 16, 2012 2:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Diana Atchley
209 Weeks Ave
Santa Cruz, CA 95060-4248

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Diana Atchley

A1.353

From: toadc@hotmail.com
Sent: Saturday, June 16, 2012 3:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

ToddCohe Cohe
3232 Governor Drive
san diego, CA 92122-2931

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

ToddCohen
6198004497

A1.354

From: angihoy@hotmail.com
Sent: Saturday, June 16, 2012 6:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

ANgela Hoy
1666 Marbella Drive
Vista, CA 92081-5465

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

ANgela Hoy

A1.355

From: bnlhor@yahoo.com
Sent: Saturday, June 16, 2012 7:01 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jennifer Floyd
4845 Redondo Drive
La Mesa, CA 91941-5756

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jennifer Floyd

A1.356

From: stevierayhall@yahoo.com
Sent: Saturday, June 16, 2012 7:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Steven Hall
16005 Caminito Tomas
San Diego, CA 92128-3353

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Steven Hall

A1.357

From: amazing_amber@hotmail.com
Sent: Saturday, June 16, 2012 7:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Amber Jimenez
11360 Poblado Rd.
San Diego, CA 92127-1351

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Amber Jimenez

A1.356

From: dellasdad2@yahoo.com
Sent: Saturday, June 16, 2012 7:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

John Hartley
4477 Mentone St. #203
San Diego, CA 92107-1079

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

John Hartley

A1.359

From: pdnhed@gmail.com
Sent: Saturday, June 16, 2012 7:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lisa Taunt
1040 E Funquest Dr
Fallbrook, CA 92028-2714

?

#1 with small changes

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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There is no reason to not find alternatives unless the plan is to destroy organic farming. PLEASE this affects everyone....including YOU!!

Sincerely,

Lisa and Brian Taunt

A1.360

From: lwbassett@gmail.com
Sent: Saturday, June 16, 2012 7:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Larry Bassett
5594 soledad road
la jolla, CA 92037-7046

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Larry Bassett

A1.361

From: zeamora@cox.net
Sent: Saturday, June 16, 2012 7:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Zeamora Pablo
1705 Prospect Street
National City, CA 91950-5150

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Zeamora Pablo

A1.362

From: dpreato@san.rr.com
Sent: Saturday, June 16, 2012 8:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Dennis Preato
5007 McGill Way
San Diego, CA 92130-2711

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Dennis Preato

A1.363

From: jerrymic@dslextreme.com
Sent: Saturday, June 16, 2012 8:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jerry Michelsen
1706 Orchard Wood Road
Encinitas, CA 92024-5655

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jerry Michelsen

A1.364

From: thepatch@cox.net
Sent: Saturday, June 16, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Steven Surber
2126 Terrace View Pl
Escondido, CA 92026-1310

June 16, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Steven Surber
760-798-0305

A1.365

From: tinerg@gmail.com
Sent: Saturday, June 16, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Christina Gagelmann
4720 Bermuda Ave
San Diego, CA 92107-3810

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Christina Gagelmann

A1.306

From: xmrkiddx@yahoo.com
Sent: Saturday, June 16, 2012 9:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Kurren Kidd
5144 Sunnyside Drive
Bonita, CA 91902-2131

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Kurren Kidd
(619) 587-0964

A1.367

From: annefehlman@gmail.com
Sent: Saturday, June 16, 2012 9:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Anne Fehlman
1824 altura Place
San Diego, CA 92103-1204

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Anne Fehlman

A1.368

From: rrrachel@cruzio.com
Sent: Saturday, June 16, 2012 10:01 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Rachel Wolf
403 Emeline Avenue
Santa Cruz, CA 95060-2244

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Rachel Wolf

A1.369

From: dneffew@hotmail.com
Sent: Saturday, June 16, 2012 10:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

David Neffew
493 berland way
chula vista, CA 91910-6422

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

Why do you NOT care about public health? Why does it always have to be BIG money winning and the people's health and welfare not mattering? Why do you want even more negative publicity?

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

David Neffew

A1.370

From: alloth@yahoo.com
Sent: Saturday, June 16, 2012 12:01 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ann Loth
143 Mexicali Court
Solana Beach, CA 92075-2518

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Ann Loth

A1.371

From: dsotiros@gmail.com
Sent: Saturday, June 16, 2012 12:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Dorothea Sotiros
4532 Shirley Ann Pl.
San Diego, CA 92116-2826

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Dorothea Sotiros

A1.292

From: bevjenn@cruzio.com
Sent: Saturday, June 16, 2012 1:26 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Beverly Jennings
602Chestnut St.
Santa Cruz, CA 95060-3646

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Beverly Jennings

A1.373

From: jacquiefilm@gmail.com
Sent: Saturday, June 16, 2012 1:41 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jacquie Schmall
14131 Old El Camino Real, #14
San Diego, CA 92130-3056

June 16, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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A1.374

From: chrisngin@sbcglobal.net
Sent: Saturday, June 16, 2012 2:01 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Virginia Smith
2541 Marathon Dr
San Diego, CA 92123-3618

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Virginia Smith

A1-375

From: loyoung@cox.net
Sent: Saturday, June 16, 2012 2:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lois Young
4301 Gordon Way
La Mesa, CA 91942-5816

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Lois Young

A1.376

From: pat.young@cvesd.org
Sent: Saturday, June 16, 2012 5:31 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Patricia Young
226B REGENCY CT
CHULA VISTA, CA 91911-6341

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Patricia Young
619-392-4964

A1.377

From: fduggan@earthlink.net
Sent: Saturday, June 16, 2012 5:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Charlie Faye Duggan
5861 Haber Street
San Diego, CA 92122-3135

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Charlie Faye Duggan
8585468179

A1,378

From: gwscott68@gmail.com
Sent: Saturday, June 16, 2012 6:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

George Scott
1247 Granger St
Imperial Beach, CA 91932-3616

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

George Scott

A1.379

From: norrierobbins@cox.net
Sent: Saturday, June 16, 2012 7:41 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Norrie Robbins
11017 Via Merida
La Mesa, CA 91941-7381

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Norrie Robbins

A1.380

From: sandykuntz@yahoo.com
Sent: Saturday, June 16, 2012 8:11 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Sandy Kuntz
8791 Wahl St
Santee, CA 92071-3352

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Sandy Kuntz

A1.381

From: mcbash11@yahoo.com
Sent: Saturday, June 16, 2012 8:26 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Roy Gash
8838 mulvaney dr
San Diego, CA 92119-2124

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Roy Gash
6194644964

A1.382.

From: dolphinheartsong@yahoo.com
Sent: Saturday, June 16, 2012 8:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Barbara Guss
13459 El Presidio Trail
San Diego, CA 92130-1419

June 16, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Barbara Guss

A1.383

From: epachon44@msn.com
Sent: Saturday, June 16, 2012 8:51 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Elvira Pachon
7702 Caminito Leon #203
Carlsbad, CA 92009-8656

June 16, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Elvira Pachon

A1.384

From: clobel1@san.rr.com
Sent: Sunday, June 17, 2012 1:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Colleen Lobel
8111 Kenova St
San Diego, CA 92126-3121

June 17, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Colleen Lobel
8585663034

A1.385

From: hiebelh@yahoo.com
Sent: Sunday, June 17, 2012 7:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Harvey Hiebel
24065 Starlight mtn rd
Ramona, CA 92065-6736

June 17, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Harvey Hiebel
760 788 3914

A1.386

From: s.broussard@yahoo.com
Sent: Sunday, June 17, 2012 8:01 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Sandra Broussard
16619 4S Ranch Parkway
San Diego, CA 92127-3452

June 17, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Sandra Broussard
858 583-1025

A1.387

From: john@ediblesandiego.com
Sent: Sunday, June 17, 2012 8:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

John Vawter
3643 Voltaire Street
San Diego, CA 92106-1259

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

John Vawter
619-222-8267

A1 366

From: avatb3@gmail.com
Sent: Sunday, June 17, 2012 8:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ava Torre-Bueno
1818 Tulip Street
San Diego, CA 92105-5150

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Ava Torre-Bueno

A1.395

From: lvassier@san.rr.com
Sent: Sunday, June 17, 2012 10:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Linda Vassier
2855 Marathon Dr
San Diego, CA 92123-3230

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

I am also concerned that the spraying of pesticides will impact the plants and animals in the San Pasqual Valley. Your document looks a lot at County policies, but the impacts to Be Wise and the Valley are in the City of San Diego. The San Pasqual Valley is a City open space park and agricultural preserve, and supports endangered and threatened species like the Arroyo Toad, the Least Bell's Vireo, and California Gnatcatcher. The use of organic farming methods is in harmony with the protection of these species, because it uses natural methods to grow crops and control pests. Spraying pesticides would change the nature of farming in this area, and allow pesticides to enter the food chain of the animals in the area. Your environmental document gives no analysis to these impacts.

Finally, I am concerned that the pesticides required by this ordinance could run off into the San Dieguito River and enter the Lake Hodges drinking water reservoir and end up in my water supply. Agricultural pesticides in drinking water are a serious health concern that has not been addressed by your study. Organic farming lowers the risk of pesticides entering the water system, while the ordinance you propose raises that risk.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Linda Vassier

A1,390

From: dosmanos@gmail.com
Sent: Sunday, June 17, 2012 10:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Adriana Barraza
2561 44th Street
San Diego, CA 92105-4703

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Adriana Barraza

A1.391

From: avocadofred@gmail.com
Sent: Sunday, June 17, 2012 11:01 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Frederick Rasp
1261 Rainbow Valley Blvd
Fallbrook, CA 92028-9773

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Frederick Rasp

A1.392

From: kdmuni@gmail.com
Sent: Sunday, June 17, 2012 11:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

kasi schnell
1548 monroe avenue
san diego, CA 92116-3933

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

kasi schnell

A1.393

From: wizmoworld@yahoo.com
Sent: Sunday, June 17, 2012 11:56 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Walter Wiszowaty
4402 Yerba Santa Dr
San Diego, CA 92115-1030

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Walter Wiszowaty
619-961-8893

A1.394

From: yvibibi@hotmail.com
Sent: Sunday, June 17, 2012 12:01 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Yvette Le Clair
2042 F Street, Apt. 3
San Diego, CA 92102-1852

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Yvette Le Clair

A1.395

From: matidah@hotmail.com
Sent: Sunday, June 17, 2012 1:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Monica Petre
5069 Long Branch Ave.
San Diego, CA 92107-2005

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Monica Petre

A1.396

From: heezit@cox.net
Sent: Sunday, June 17, 2012 1:56 PM
To: LUEG, DEH-Eyegnat
Subject: Save Be Wise! Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jim Wilkerson
1538 Brighton Glen Rd
San Marcos, CA 92078-5494

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I buy Be Wise produce every week. I trust and support the local organic producers in San Diego County, and and I expect my elected officials to do the same. I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. Work with local organic farmers to develop a pesticide free alternative to this ordinance!

Sincerely,

Jim Wilkerson
7605335359

A1.397

From: oxfordmail-other@yahoo.com
Sent: Sunday, June 17, 2012 2:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Nigel Crawford
309 W Lewis St
San Diego, CA 92103-1923

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Nigel Crawford

A1.398

From: adkinsbsu@gmail.com
Sent: Sunday, June 17, 2012 3:31 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jonathan Adkins
2062 Balboa Ave
San Diego, CA 92109-4601

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Jonathan Adkins
7652103282

A1.399

From: textbuyer@hotmail.com
Sent: Sunday, June 17, 2012 3:56 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lisa Crawford
309 W Lewis St
San Diego, CA 92103-1923

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Lisa Crawford
8585878000

A1.400

From: njbeas@yahoo.com
Sent: Sunday, June 17, 2012 6:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Nina Beas
816 La Huerta Way
San Diego, CA 92154-2657

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Nina Beas

A1.401

From: bodhikt@aol.com
Sent: Sunday, June 17, 2012 8:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Kathleen Sumida
7331 Princess View Dr
San Diego, CA 92120-1333

June 17, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Kathleen Sumida

A1.402

From: meredithwatkins.mft@gmail.com
Sent: Sunday, June 17, 2012 9:16 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Meredith Watkins
4628 Buckingham Lane
Carlsbad, CA 92010-6401

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Meredith Watkins
7605803613

A1.403

From: foster22@cox.net
Sent: Sunday, June 17, 2012 9:31 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

holly Foster
12447 McFeron Road
Poway, CA 92064-3630

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

holly Foster

A1.404

From: shewelder@gmail.com
Sent: Sunday, June 17, 2012 9:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

ConnieSue Dickinson
630 East 5th Avenue
Escondido, CA 92025-4409

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

ConnieSue Dickinson
7608023318

Please use this link to SEE ME and view more information about me
http://capwiz.com/grassrootsnetroots/picturepages.tt?id=418321

A1.405

From: ebholajp@gmail.com
Sent: Sunday, June 17, 2012 9:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Elizabeth Bhola
10217 Lipscomb Dr
San Diego, CA 92126-3730

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Elizabeth Bhola

A1.406

From: deedeevarner@hotmail.com
Sent: Sunday, June 17, 2012 11:31 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lynda Varner
7448 Batista St.
San Diego, CA 92111-3523

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Lynda Varner

A1. 407

From: clcarpen@gmail.com
Sent: Monday, June 18, 2012 12:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Carol Carpenter
1262 Kettner Blvd 605
San Diego, CA 92101-3457

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Carol Carpenter
858-304-6071

M.408

From: lmajerman@cox.net
Sent: Monday, June 18, 2012 8:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lori Jerman
1475 Liggett Way
San Diego, CA 92106-2026

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Lori Jerman
6192264329

A1.409

From: rmsca@hotmail.com
Sent: Monday, June 18, 2012 8:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Rachel Bartels
4092 Goldfinch Street
San Diego, CA 92103-1828

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Rachel Bartels

A1.410

From: geralyncat@cox.net
Sent: Monday, June 18, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Geralyn Schulkind
1353 Trieste Dr
San Diego, CA 92107-3949

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Geralyn Schulkind

A1.411

From: sadieking@san.rr.com
Sent: Monday, June 18, 2012 10:17 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Sadie King
3969 Mahaila Ave. #404
San Diego, CA 92122-5772

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Sadie King

A1.412

From: lubbabub@gmail.com
Sent: Monday, June 18, 2012 10:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

April Ricchio
3619 Harwich Drive
Carlsbad, CA 92010-7049

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

April Ricchio

A1.413

From: jen.applegate@hotmail.com
Sent: Monday, June 18, 2012 10:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jennifer Applegate
3776 Keating Street
San Diego, CA 92110-1925

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Jennifer Applegate

A1.414

From: shauna@yourlifevents.com
Sent: Monday, June 18, 2012 10:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Shauna Henry
3322 33rd Street
San Diego, CA 92104-4740

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Shauna Henry

A1.415

From: salbistegui@yahoo.com
Sent: Monday, June 18, 2012 11:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Sharon Albistegui
1024 Eucalyptus Ave.
Vista, CA 92084-6346

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Sharon Albistegui

A1.416

From: kdoob8@yahoo.com
Sent: Monday, June 18, 2012 11:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Katie Haffeman
1855 St Thomas Road
Vista, CA 92081-7018

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Katie Haffeman
7607271442

A1 417

From: richlaxfreak3@yahoo.com
Sent: Monday, June 18, 2012 11:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Richard Aguilo
Belmont street
Santa cruz, CA 95060-2240

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Richard Aguilo

A1,41 B

From: lwbassett@gmail.com
Sent: Monday, June 18, 2012 11:51 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

larry bassett
5594 soledad road
la jolla, CA 92037-7046

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

larry bassett

A1 419

From: birdfreak13@yahoo.com
Sent: Monday, June 18, 2012 12:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Christine DiSimone
2920 Clairemont Dr Apt 3
San Diego, CA 92117-6713

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Christine DiSimone

A1.420

From: kccweaves@yahoo.com
Sent: Monday, June 18, 2012 12:51 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Kathleen Cook
24705 High Country Road
Ramona, CA 92065-5141

June 18, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Kathleen Cook
7607899724

A1.421

From: aroeschlein@ucsd.edu
Sent: Monday, June 18, 2012 1:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Amelia Roeschlein
4561 Terrace Dr #1
San Diego, CA 92116-3860

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Amelia Roeschlein, LMFT
6192466963

A1,422

From: ramaudio@hotmail.com
Sent: Monday, June 18, 2012 2:01 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Rob Mailman
1270 entrada glen
escondido, CA 92027-1272

June 18, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Rob Mailman
760-631-7979

A1,423

From: twinks2@cruzio.com
Sent: Monday, June 18, 2012 2:33 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

celia scott
1520 Escalona Dr
Santa Cruz, CA 95060-3312

June 18, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

celia scott

A1.424

From: alisamonian@gmail.com
Sent: Monday, June 18, 2012 5:12 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Alisa Monian
P.O. Box 87081
San Diego, CA 92138-7081

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

I am also concerned that the spraying of pesticides will impact the plants and animals in the San Pasqual Valley. Your document looks a lot at County policies, but the impacts to Be Wise and the Valley are in the City of San Diego. The San Pasqual Valley is a City open space park and agricultural preserve, and supports endangered and threatened species like the Arroyo Toad, the Least Bell's Vireo, and California Gnatcatcher. The use of organic farming methods is in harmony with the protection of these species, because it uses natural methods to grow crops and control pests. Spraying pesticides would change the nature of farming in this area, and allow pesticides to enter the food chain of the animals in the area. Your environmental document gives no analysis to these impacts.

Finally, I am concerned that the pesticides required by this ordinance could run off into the San Dieguito River and enter the Lake Hodges drinking water reservoir and end up in my water supply. Agricultural pesticides in drinking water are a serious health concern that has not been addressed by your study. Organic farming lowers the risk of pesticides entering the water system, while the ordinance you propose raises that risk.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Alisa Monian

A1.425

From: meebugg@yahoo.com
Sent: Monday, June 18, 2012 6:01 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Lindsay Chambers
3776 Keating St
San Diego, CA 92110-1925

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Lindsay Chambers
513-404-3406

A1.426

From: mc@matrixmasters.com
Sent: Monday, June 18, 2012 6:46 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

MC Hagerty
POB 131133
carlsbad, CA 92013-1133

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

MC Hagerty

A1.427

From: sheprojecthex@hotmail.com
Sent: Monday, June 18, 2012 7:16 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Tina Jordan
3740 park blvd #309
san diego, CA 92103-0917

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Tina Jordan

A1.428

From: edd.mabrey@gmail.com
Sent: Monday, June 18, 2012 8:36 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Edd Mabrey
POB 4797
Laguna Beach, CA 92652-4797

June 18, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Edd Mabrey

A1.429

From: 7birdsong@gmail.com
Sent: Monday, June 18, 2012 9:16 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

b vogelsang
4040 Hancock St
San Diego, CA 92110-5108

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

b vogelsang

A1.430

From: panoramafarms@gmail.com on behalf of Soleil Develle [soleil.develle@gmail.com]
Sent: Monday, June 18, 2012 9:22 PM
To: LUEG, DEH-Eyegnat
Subject: eyegnat
Attachments: Eye Gnat Neg Declaration.pdf

To whom it may concern.

Please see the attached response to the Proposed Negative Declaration for the eye gnat policy.

--
Soleil Develle
Fallbrook CA

6-18-2012

Regarding the proposed eye gnat ordinance change and Negative Declaration.
eyegnat@sdcounty.ca.gov

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland. Customers of organic produce consume these products based on convincing data that chemicals and poisons such as these pesticides are harmful to humans, the environment and water resources at a minimum.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce. And, to that end, the organic farm is actively and aggressively developing BMPs to address these eye gnats. Scientific and sustainable approaches must be developed. Using pesticides is only a temporary fix and creates an imbalance that will perpetuate the eye gnat problem. I have read that using pesticides may even cause a greater population resurgence (another reason to do an EIR.) It is also interesting to note that the gnat catcher habitat has been severely compromised due to development and the 2007 fires and this may correlate to the eye gnat problem. An independent EIR will address these issues and I would hope support current and on-going activities to address the problem.

I am also concerned that the spraying of pesticides will impact the plants and animals in the San Pasqual Valley. Your document looks a lot at County policies, but the impacts to Be Wise and the Valley are in the City of San Diego. The San Pasqual Valley is a City open space park and agricultural preserve, and supports endangered and threatened species like the Arroyo Toad, the Least Bell's Vireo, and California Gnatcatcher. The use of organic farming methods is in harmony with the protection of these species, because it uses natural methods to grow crops and control pests. Spraying pesticides would change the nature of farming in this area, and allow pesticides to enter the food chain of the animals in the area. Your environmental document gives no analysis to these impacts.

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers.

Regards, Soleil Develle -2987 Sumac Road, Fallbrook CA 92028

A1.431

From: dancingriver@hotmail.com
Sent: Monday, June 18, 2012 10:06 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Rae Newman
2727 De Anza Rd Spc H19
San Diego, CA 92109-6847

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Rae Newman
7862292275

A1.432

From: baker314@gmail.com
Sent: Monday, June 18, 2012 11:21 PM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Laura Ruival
6780 Mission Gorge Road, #33
San Diego, CA 92120-2449

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Laura Ruival

A1.433

From: nathanmkeller@hotmail.com
Sent: Tuesday, June 19, 2012 6:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Nathan Keller
6333 Mt Ada Rd #178
san diego, CA 92111-3138

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Nathan Keller

A1.434

From: rvallely@sbcglobal.net
Sent: Tuesday, June 19, 2012 7:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

renee vallely
4211 madison ave
san diego, CA 92116-4825

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

renee vallely

A1 435

From: mrpat4u@cox.net
Sent: Tuesday, June 19, 2012 9:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Patrick Cameron
12970 Hwy 8 Bus #81
El Cajon, CA 92021-1839

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Patrick Cameron

A1.436

From: epachon44@msn.com
Sent: Tuesday, June 19, 2012 9:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Elvira Pachon
7702 Caminito Leon #203
Carlsbad, CA 92009-8656

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Elvira Pachon

A1.437

From: joshua@integrity-brokerage.com
Sent: Tuesday, June 19, 2012 9:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Joshua Helmle
5067 Palmera Dr
Oceanside, CA 92056-2111

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Joshua Helmle

A1.438

From: james@arcanaempothecary.com
Sent: Tuesday, June 19, 2012 9:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

James Mattioda
P.O. Box 1126
Del mar, CA 92014-1126

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

James Mattioda
8587550288

A1.439

From: hbrazier@aol.com
Sent: Tuesday, June 19, 2012 9:06 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Helene Brazier
8258 Via Urner Way
Bonsall, CA 92003-4809

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Helene Brazier

A1.440

From: michael_js@hotmail.com
Sent: Tuesday, June 19, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Michael J. Gorga
8479 Calle Morelos
San Diego, CA 92126-1819

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Michael J. Gorga

A1.441

From: goldie-fish@hotmail.com
Sent: Tuesday, June 19, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Nicole Fish
1705 South Myers Street Apt 7
Oceanside, CA 92054-5845

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Nicole Fish

A1,442

From: spam@gaiastream.com
Sent: Tuesday, June 19, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Ken Klaser
427 Minnesota Ave
Fallbrook, CA 92028-2140

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Ken L. Klaser

A1.443

From: almack@interiorarch.com
Sent: Tuesday, June 19, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Charles Almack
555 West Beech Street
San Diego, CA 92101-2936

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Charles Almack
6192301244

A1. 444

From: flash@scripps.edu
Sent: Tuesday, June 19, 2012 9:11 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

kay cole
1362 darby street
spring valley, CA 91977-3716

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

kay cole
858-784-2510

A1.445

From: j_cunnyngham@yahoo.com
Sent: Tuesday, June 19, 2012 9:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jeannie Cunnyngham
3845 Elijah court #634
San Diego, CA 92130-6009

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jeannie Cunnyngham

A1,446

From: patk@sapphirerealty.tv
Sent: Tuesday, June 19, 2012 9:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Patrick Kruse
5700 Baltimore Dr
LaMesa, CA 91942-1616

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Patrick Kruse

A1.447

From: nancysandy@roadrunner.com
Sent: Tuesday, June 19, 2012 9:16 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Nancy Drake
1281 Calma Court
Vista, CA 92081-5021

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

Locally produced, organic vegetables are part of how we can make our region more sustainable. This ordinance takes us backwards on the road to sustainability. I was shocked by the document's comment that organic farming could continue, but only as an orchard or animal keeping, because those don't harbor eye gnats. There are very few organic vegetable farms in San Diego and we should be advocating for more not fewer sources of local organic produce.

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Finally, I am concerned that the pesticides required by this ordinance could run off into the San Dieguito River and enter the Lake Hodges drinking water reservoir and end up in my water supply. Agricultural pesticides in drinking water are a serious health concern that has not been addressed by your study. Organic farming lowers the risk of pesticides entering the water system, while the ordinance you propose raises that risk.

Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

Nancy Drake

A1.448

From: isacharlie@gmail.com
Sent: Tuesday, June 19, 2012 9:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Charlie Upham
1283 Johnson Ave
San Diego, CA 92103-2317

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Charlie Upham
1234567890

A1.449

From: ttosbt@gmail.com
Sent: Tuesday, June 19, 2012 9:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jessica Stone
3293 McKinley Street
San Diego, CA 92104-4716

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jessica Stone
858220-4817

A1.450

From: darguetty@gmail.com
Sent: Tuesday, June 19, 2012 9:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Danny Arguetty
2596 Montgomery Ave # 6
Cardiff By The Sea, CA 92007-2145

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Danny Arguetty

A1.451

From: ksmitaz@yahoo.com
Sent: Tuesday, June 19, 2012 9:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jennifer Hall
1394 Macaulay St
San Diego, CA 92106

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jennifer Hall

A1.452

From: teamparkmer@gmail.com
Sent: Tuesday, June 19, 2012 9:21 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Meredith Park
510 Beach Street
Encinitas, CA 92024-3749

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

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Sincerely,

Meredith Park

A1.453

From: john@websterdesign.net
Sent: Tuesday, June 19, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

John Webster
1357 Fern Place
Vista, CA 92081-7424

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

John Webster
760 945-6576

A1.454

From: occupant@san.rr.com
Sent: Tuesday, June 19, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Kim Smith
8479 Calle Morelos
San Diego, CA 92126-1819

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Kim Smith

A1.455

From: lexi.dreambig@gmail.com
Sent: Tuesday, June 19, 2012 9:26 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Alexandra Meyerowitz
13310 via Magdalena
San diego, CA 92129-5100

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Alexandra Meyerowitz

A1,456

From: carolee@opalfinearts.com
Sent: Tuesday, June 19, 2012 9:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

CAROL LEE WILLIAMS
2801 Preece ST
San Diego, CA 92111-5417

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

CAROL LEE WILLIAMS
619 422 4542

A1.457

From: stacy@unreal-art.com
Sent: Tuesday, June 19, 2012 9:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Stacy D'Aguiar
2027 3rd Ave
San Diego, CA 92101-2005

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

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Sincerely,

Stacy D'Aguiar

A1 458

From: csoragha@hotmail.com
Sent: Tuesday, June 19, 2012 9:31 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

c soragha
saratiga ave
san diego, CA 92107

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Please consider the significant impacts to the environment and human health, and the comments of the over 1600 residents who opposed the San Diego Eye Gnat Ordinance and Program earlier this year. We are asking you to work with the organic farmers on a pesticide free alternative to this ordinance.

Sincerely,

c soragha

A1.459

From: cabosmom@hotmail.com
Sent: Tuesday, June 19, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Barb Dunsmore
2060 Balboa Ave
San Diego, CA 92109-4601

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Dear Jack Miller:

I am writing to request that a full Environmental Impact Report be prepared for San Diego County's proposed Eye Gnat Ordinance and Program. The Negative Declaration that was prepared is inadequate and provides almost no analysis of important environmental impacts that will be caused by the ordinance.

The proposed ordinance is likely to result in the spraying of pesticides (Acephate, Malathion, Diflubenzuron, Cyromazine, and Cyfluthrin) on the organic crops grown at the Be Wise Ranch and other organic farms. This will mean the loss of organic status for these farms, an end to the local, healthy, fresh produce the farms provide, and a loss of productive organic farmland.

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Sincerely,

Barb Dunsmore
8582203304

A1.460

From: kahndesign@gmail.com
Sent: Tuesday, June 19, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jeff Kahn
8791 wahl st
santee, CA 92071-3352

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jeff Kahn

A1.461

From: stevierayhall@yahoo.com
Sent: Tuesday, June 19, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Steven Hall
16005 Caminito Tomas
San Diego, CA 92128-3353

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Steven Hall

A1.46r

From: jezabelu@yahoo.com
Sent: Tuesday, June 19, 2012 9:36 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jezabel Urbina
25 E. Flower St #177
Chula Vista, CA 91910-7624

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jezabel Urbina
619-940-8089

A1.463

From: bc_phntom@operamail.com
Sent: Tuesday, June 19, 2012 9:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Collins Birmingham
6792 Bluefield Ct
San Diego, CA 92120-3204

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Collins Birmingham

A1.464

From: mjbailey29@sbcglobal.net
Sent: Tuesday, June 19, 2012 9:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

M J Bailey
4220 Eastridge Drive
La Mesa, CA 91941-7830

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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M J Bailey

A1.465

From: eyexam@cox.net
Sent: Tuesday, June 19, 2012 9:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jeffrey Anshel
842 Arden Drive
Encinitas, CA 92024-4507

June 19, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Jeffrey Anshel
7609441200

A1.466

From: jenyeager66@yahoo.com
Sent: Tuesday, June 19, 2012 9:41 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jennifer Yeager
214 Guajome Street, Apt. A
Vista, CA 92083-5956

June 19, 2012

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Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Sincerely,

Jennifer Yeager
7037283397

A1.467

From: jessa.west@ymail.com
Sent: Tuesday, June 19, 2012 9:46 AM
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!

Jessa West
5998 Alcala Park Unit 4119
San Diego, CA 92110-8001

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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Jessa West

A1.468

From: jfuol05@cox.net
To: LUEG, DEH-Eyegnat
Subject: Oppose the Negative Declaration and Request a full Environmental Impact Report for the San Diego proposed Eye Gnat Ordinance and Program!
Date: Tuesday, June 19, 2012 9:45:55 AM

Michelle Killian-Ridings
4654 Nebo Dr
La Mesa, CA 91941-5204

June 19, 2012

Jack Miller
Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

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