

2 Public Agency Comments and Responses

L-TPV

TOWN of PORTOLA VALLEY

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September 4, 2018

Dr. Chindi Peavey
District Manager
San Mateo County Mosquito and Vector Control District
1351 Rollins Road
Burlingame, CA 94010

Dear Dr. Peavey,

Thank you for the opportunity to comment on the San Mateo County Mosquito and Vector Control District's Draft Integrated Mosquito and Vector Management Program (IMVMP).

As you may know, last year the Town of Portola Valley passed a resolution urging residents to discontinue the use of rodenticides, especially second-generation rodenticides. Such rodenticides are known to stay in the remains of rodents and poison raptors and predators.

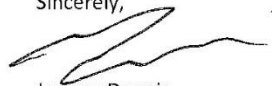
The Town itself has ended the use of rodenticides on all of its playing fields and facilities after a successful trial showed that other, more environmentally-friendly ways to prevent and reduce the number of rodents is possible (including mechanical trapping).

Our review of the IMVMP indicates that second-generation rodenticides may still be used in a variety of situations throughout the District, should the integrated pest management program call for their use. We also understand, based on conversations with your staff, that such rodenticides would not be considered for use in a jurisdiction should said jurisdictions not wish them to be deployed.

We commend the District for giving every city control over the deployment of poisons such as second-generation rodenticides in their jurisdictional limits, and the Town will employ this discretion in the future to not allow their use.

We also urge the District to consider ending the use of second-generation rodenticides overall, as their impact is too great a price to pay, especially with many viable alternatives available.

Sincerely,



Jeremy Dennis
Town Manager, Town of Portola Valley

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Comment Letter L-TPV

Town of Portola Valley

Jeremy Dennis, Town Manager

September 4, 2018

Response 1

The commenter points out that last year, the Town passed a resolution urging residents to discontinue the use of rodenticides, especially second-generation rodenticides. Furthermore, the Town has discontinued the use of rodenticides on all of its playing fields and facilities in favor of other methods including trapping.

The comments contained in this letter do not state a specific question or concern regarding the adequacy of the Draft PEIR or otherwise address the adequacy of the Draft PEIR on environmental topics covered or determinations of significance for impacts. Therefore, pursuant to CEQA Guidelines Section 15204, no further response to this comment is required. However, the commenter has made comments on the IMVMP which is described in Chapter 2, Program Description. The comments are acknowledged herein for the record and will be forwarded to the decision-making body for their review and consideration.

The District notes that the Town of Portola Valley indicates that it has ended the use of rodenticides on its playing fields and facilities, and that the Town believes that rodenticides would not be considered for use in the Town because the Town does not wish them to be deployed.

The District is supportive of IPM protocols for control of rodents which relies on nonchemical control methods first and the use of rodenticides only where deemed necessary for control. As described in Section 2.3.5.3 of the Draft PEIR, the limited use of rodenticides by the District is performed because individual cities have identified areas with excessive rodent issues and request that the District applies rodenticides as part of an IPM approach in those areas. A contractual agreement is required to obtain this service. When the applicator is a third party pest control operator (PCO), the District serves as a quality control component to ensure best management practices are followed. Furthermore, District personnel educate District residents on rodenticide alternatives such as proper sanitation and exclusion.

Response 2

The commenter expresses his understanding that second-generation rodenticides may still be used in a variety of situations throughout the District.

Second-generation rodenticides are not currently used by the District in the Town of Portola Valley and there are no existing plans to expand its use in this area as long as other effective and appropriate rodent control options are available.

Response 3

The commenter implies that every city can place limitations on the use of pesticides by the District in their jurisdictional limits, and the Town has the discretion to do this.

While the District can be responsive to some requests for not using specific pesticides for some instances of vector control, where other pesticide or nonchemical control methods are appropriate, the District cannot ignore its responsibility delegated from the California Department of Public Health (CDPH) wherein state law preempts local restrictions on the use of pesticides. Section 3.1.3.2 in the PEIR discusses this preemption concept, and Section 1.1.3.1.1 in the PEIR explains the District's cooperative agreement with CDPH that allows for CDPH to conduct regulatory oversight of vector control agencies and their use of pesticides approved by California Department of Pesticide Regulation (CDPR).

Response 4

Town urges the District to consider not using second-generation rodenticides.

Comment noted and considered. See Response 2 above.

References

No references were cited in the responses. No additional references beyond those used in preparing the PEIR were consulted.

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