

## 5 Revisions to Revised Draft PEIR

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### 5.1 Introduction

This chapter presents minor revisions to the revised Draft PEIR text based on comments received or errors/errata discovered by the revised Draft PEIR preparers and/or District staff. None of these text changes or additions result in any changes to the conclusions and determinations of significant impact. In other words, no “less than significant” impacts were changed to “potentially significant” or “significant and unavoidable” impacts.

### 5.2 Text Revisions in Response to Draft PEIR Comments or District Identified Errors and Omissions/Clarifications

The sections below explain both content clarifications and typographical and transcriptional errors that were identified since the public release of the Integrated Mosquito and Vector Management Program (IMVMP) and revised Draft Programmatic EIR (revised Draft PEIR) on July 19, 2018. Material to be added is underlined; material to be deleted is shown with ~~strikethrough font~~.

#### 5.2.1 Chapter 2, Program Description

Section 2.3.5.3 (page 2-59) includes the following text modification for clarification purposes to the end of the first paragraph.

All stations are placed within 100 feet of a man-made structure, subject to product label limitations and restrictions designated in the California Code of Regulations (under Title 3. Food and Agriculture, Section 6471. Brodifacoum, Bromadiolone, Difenacoum, and Difethialone), ~~unless a “feature” is associated with the site beyond 100 feet that is harboring rodents that could infest the main structure.~~

Table 2-8 in Section 2.7.2 (page 2-94) is revised to correct a typographical error in Subheading J.

J. Worker Illness and Injury Prevention Program and ~~e~~Emergency Response

#### 5.2.2 Chapter 3, Land Use and Planning

Section 3.1.3.3 (page 3-5) has a typographical error at the beginning of the last paragraph.

The ~~e~~County IPM policy specifies that employees implementing pest management operations will use IPM techniques that emphasize nonpesticide components where feasible and, when necessary, employ the least toxic chemicals.

Section 3.1.3.3 (page 3-7) is revised to add new material at the end of the local regulations discussion to reflect new information provided by the Town of Portola Valley as follows.

In 2017, the Town of Portola Valley passed a resolution urging residents to discontinue the use of rodenticides, especially second-generation rodenticides.

#### 5.2.3 Chapter 5, Biological Resources – Terrestrial

Section 5.2.7.1.4 (page 5-78) is revised to correct a typographical error and add a clarification.

Tamper proof bait stations may also be placed aboveground during summer months along creek banks within ~~50~~100 feet of a structure, subject to product label limitations and restrictions designated in the California Code of Regulations (under Title 3. Food and Agriculture, Section 6471. Brodifacoum, Bromadiolone, Difenacoum, and Difethialone), in

residential and commercial areas. They are never placed at water level and are removed in early fall to prevent them from becoming submerged in storm events. Tamper-proof bait stations are used to reduce impacts to nontarget organisms. The USEPA has determined that many of these rodenticides pose little risk to the environment (see Section 6.2.7.4 and Appendix B).

The typographical/punctuation error on page 5-79 is corrected.

Outside of sewers, bromadiolone is typically contained in tamper-proof bait stations, which are most frequently deployed along urban creek corridors.

#### 5.2.4 Chapter 6, Ecological Health

Section 6.2.2.2 Assumptions (page 6-24) is modified after the first paragraph to include additional explanation of the assumption that the key issue is the impact of pesticide use on predator populations rather than individuals and whether loss of individuals causes an impact on a population.

The precise impact on populations of predators by the purposeful use of pesticides, including rodenticides, is difficult to determine and accurately quantify. In fact, predator populations fluctuate over time and are affected by many different contributing factors. It is not possible to definitively link use of vector control products by the District (at levels established by the USEPA and according to additional District BMPs) to a long-term predator decline or one that would adversely impact the predator population of interest. It is well known in population biology that every population can adequately respond to and recover from a loss of even large numbers of individuals based on their intrinsic reproductive capabilities and vigor. Populations with very short reproductive gestation periods (many birds and small mammals) will recover much faster than populations with long reproductive cycles (large mammals and some large birds) (Andrewartha 1972). In fact, there are many current theories about exactly how many individuals in a population can be lost before the likelihood of significant impact or extinction may occur. Some experts suggest the total population of animals with very short reproductive cycles (gestation times) can lose as much as 30 percent of the population and still experience complete recovery to pre-stress numbers (Emlen 1989; Emlen et al. 2003). In the case of bird and mammal predators, although this hypothetical large level of loss of individuals is far beyond any likely level of exposure to District use of rodenticides, the remaining number of individuals would still be adequate to replenish the population to pre-exposure levels (Fleeger et al. 2003; Mitra et al. 2011). The greatest factor causing adverse impacts on populations is loss of habitat caused by expanding residential and industrial (human) use of wildlife habitat.

Section 6.2.7.4 (page 6-47) is clarified as follows.

All stations are placed within 100 feet of a man-made structure, subject to product label limitations and restrictions designated in the California Code of Regulations (under Title 3, Food and Agriculture, Section 6471. Brodifacoum, Bromadiolone, Difenacoum, and Difethialone), unless a "feature" is associated with the site beyond 100 feet that is harboring rodents that could infest the main structure.

### 5.2.5 Chapter 7, Human Health

At the end of Section 7.2.7.2.2, the text is corrected to address only pyrethroids, pyrethroid-like compounds, and synergists.

Some synthetic insecticides are similar to pyrethroids, such as etofenprox, but have a slightly different chemical composition. The pyrethroids that were identified for further evaluation in Appendix B (based on toxicity and/or use patterns) are discussed below: resmethrin, permethrin, and etofenprox, ~~PBO, and naled.~~

PBO is addressed in Section 7.2.7.2.6, and naled is addressed in Section 7.2.7.2.7.

In Section 7.2.7.4 (page 7-37), the correction made elsewhere is also made to the last paragraph.

All stations are placed within 100 feet of a man-made structure, subject to product label limitations and restrictions designated in the California Code of Regulations (under Title 3. Food and Agriculture, Section 6471. Brodifacoum, Bromadiolone, Difenacoum, and Difethialone), unless a "feature" is associated with the site beyond 100 feet that is harboring rodents that could infest the main structure.

### 5.2.6 Chapter 13, Cumulative Impacts

Table 13-2 in Section 13.4.1 (page 13-17) is revised to move the product "Habitat" from the category of "Herbicide dyes and surfactants used for Coastal Conservancy project" to the category "Herbicides used for Coastal Conservancy project", as the first product above Polaris by Coastal Con. (gal).

### 5.2.7 Chapter 15, Alternatives

The end of Section 15.4 (Do Nothing) has typographical errors (in the last sentence at the top of page 15-11) that are corrected as indicated.

...outbreaks of disease and illness would occur more frequently. See Appendix E<sub>7</sub> (Section 4.2) for a more extensive discussion ~~of No Program~~ than presented herein with historical information going back to 1772.

### 5.2.8 Chapter 17, References

The following references are added to Chapter 17 to address the citations in text revisions to Section 6.2.2.2 explained above.

Andrewartha, H.G. 1972. Introduction to the Study of Animal Populations. 2nd edition. University of Chicago Press.

Emlen, J.M. 1989. Hazard assessment review, terrestrial population models for ecological risk assessment: a state-of-the-art review. *Environmental Toxicology and Chemistry* 8: 831-42.

Emlen, J.M., D.C. Freeman, M.D. Kirchoff, C.L. Alados, J. Escos, and J.J. Duda. 2003. Fitting population models from field data. *Ecological Modelling* 162:119-143.

Fleeger, J.W. K.R. Carman, and R.M. Nisbet. 2003. Indirect effects of contaminants in aquatic ecosystems. *Sci Total Environ.* Dec 30;317(1-3):207-33.

Mitra, A., C. Chatterjee, and F.B. Mandal. 2011. Synthetic chemical pesticides and their effects on birds. *Research Journal of Environmental Toxicology* 5(2):81-96.

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