

# 1 Introduction

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This Responses to Comments/Text Revisions document has been prepared by the San Mateo County Mosquito and Vector Control District (SMCMVCD or District) to accompany the revised Draft Programmatic Environmental Impact Report (Draft PEIR) for the proposed Integrated Mosquito and Vector Management Program (IMVMP). The revised Draft PEIR (released in July 2018) identified the environmental consequences associated with the District's revision of its existing IMVMP, which consists of a range of chemical and nonchemical treatment components (e.g., methods/tools) for its ongoing program of surveillance and control of mosquitoes and other vectors. The revised Draft PEIR included discussion of the District's best management practices (BMPs), which are part of the IMVMP and provide environmental protection and promote environmental stewardship policies and staff safety while maintaining vector control effectiveness. The revised Draft PEIR also identified a mitigation measure to reduce the sole potentially significant impact to air quality to a less than significant level. The revised Draft PEIR identified one significant and unavoidable impact to surface water resources where no feasible mitigation exists.

This Responses to Comments/Text Revisions document presents responses to public comments received on the revised Draft PEIR and makes limited revisions to the Draft PEIR text, as necessary, in response to those comments. **Together with the revised Draft PEIR (dated July 2018), this Responses to Comments/Text Revisions document constitutes the Final PEIR for the District's proposed IMVMP Plan.**

California Environmental Quality Act (CEQA) Guidelines Section 15204 provides direction for parties reviewing and providing comment on a Draft EIR, as follows:

"In reviewing the EIR, persons and agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated."

Thus, comments received on the revised Draft PEIR should be focused on the sufficiency and adequacy of the documents. CEQA Guidelines Section 15151 provides the standards of adequacy for an EIR, as follows:

"An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

Finally, CEQA Guidelines Section 15204 provides specific direction to lead agencies responding to comments, as follows:

"When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

Thus, the District is only required to respond to comments pertaining to significant environmental issues and to ensure that the revised Draft PEIR makes a good faith effort to disclose potential environmental impacts. The District is not required to respond to comments that express an opinion about the project merits (i.e. the merits of the IMVMP) but do not otherwise relate to environmental issues covered in the

revised Draft PEIR. In accordance with Sections 15088 and 15132 of the CEQA Guidelines, a Final EIR must include a response to comments on the Draft EIR pertaining to environmental issues analyzed under CEQA.

The District is the lead agency under the California Environmental Quality Act (CEQA) with responsibility for preparing responses to public comments and the Final PEIR. The Final PEIR is an informational document that must be considered by the District's Board of Trustees (decision-makers) before approving or denying the Proposed Program represented in the PEIR and in the separate IMVMP Plan. The CEQA Guidelines (§15132) require the following contents to be included in the Final PEIR:

- a. Draft PEIR or a revision of the draft
- b. Comments and recommendations received on the Draft PEIR, either verbatim or in summary
- c. A list of persons, organizations, and public agencies commenting on the Draft PEIR
- d. Responses of the lead agency (SMCMVCD) to significant environmental points raised in the review and consultation process
- e. Any other information added by the lead agency

## **1.1 Environmental Review Process**

The District recirculated the Draft PEIR (dated March 2016) as a revised Draft PEIR (July 2018). As a result, the District is not required to address the comments on the previous March 2016 document. The District chose to provide responses as part of the revised Draft PEIR in its Appendix F. New comments on the revised Draft PEIR are addressed herein and incorporated into the Final PEIR.

The District released the revised Integrated Mosquito and Vector Management Program Draft PEIR on July 19, 2018, for public review (State Clearinghouse No. 2012052063). The 47-day public review and comment period began on July 20 and concluded on September 4, 2018 (45 days minimum requirement under CEQA plus 2 extra days). During this time, the District held one public hearing at the Veterans Memorial Recreation Center in San Bruno, California on August 22, 2018, from 3 pm to 5 pm. There were no oral comments from the public provided at the public hearing; therefore, the hearing transcript is not included herein.

The State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit provided a letter dated September 5, 2018, that the District has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act. This letter is provided herein at the end of this Chapter 1.

The District received three written comment letters. Each of the District's responses addresses and disposes of any environmental issues raised by the commenter. These responses supplement material contained in the text of the revised Draft PEIR. In many cases, the responses refer to material located in the revised Draft PEIR. Where the response is intended to result in a text revision to the July 2018 document, that revision is made to the revised Draft PEIR as indicated in this Responses to Comments/Text Revisions document (in Chapter 5). These revisions provide only clarifications or minor corrections to material in the Draft PEIR, and recirculation of the revised Draft PEIR is not required. None of these text changes 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. Furthermore, no new significant impacts were discovered based on the public comments and the responses.

## 1.2 Report Organization

This Responses to Comments/Text Revisions document contains comments and responses from three commenters in the following chapters with a brief explanation of chapter contents.

- > **Chapter 2. Public Agency Comments and Responses:** One comment letter from a local agency is provided with District responses following the letter.
- > **Chapter 3. Organization Comments and Responses:** One comment letter from a private organization/special interest group is provided with District responses and an attachment following the responses.
- > **Chapter 4. Private Individual Comments and Responses:** One email comment from an individual is provided with District responses following the email and an attachment following the responses.
- > **Chapter 5. Revisions to Revised Draft PEIR:** This chapter presents minor revisions to PEIR text based on comments received or errors/errata discovered by the PEIR preparers. None of these text changes provide substantial new information nor do they 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. No new significant impacts were discovered.

The following is a list of all commenters on the revised Draft PEIR: public agency (coded “L” [local]), private organization (coded “O”), and private individual (coded “I”) who submitted written comments on the Draft PEIR during the comment period. Each written comment is assigned a code that includes up to three letters for the agency, organization, or individual name. To protect the privacy of individuals, their address in the comment letter/email may be redacted (obscured).

### Public Agency

- > L-TPV Town of Portola Valley

### Organization

- > O-HCA Healthy Children Alliance, San Mateo County

### Private Individual

- > I-NC Nona Chiariello, PhD., Jasper Ridge Biological Preserve, Stanford University

The District did not receive any oral or written comments at its noticed public hearing on the project on August 22, 2018.

Therefore, in accordance with all requirements of CEQA and the CEQA Guidelines, the District has provided responses to the written comments received on the revised Draft PEIR in Chapters 2, 3, and 4 of this document.



EDMUND G. BROWN, JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX  
DIRECTOR

September 5, 2018



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

Subject: San Mateo County MVCD Integrated Mosquito and Vector Management Program  
SCH#: 2012052063

Dear Chindi Peavey:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 4, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2012052063  
**Project Title** San Mateo County MVCD Integrated Mosquito and Vector Management Program  
**Lead Agency** San Mateo County Mosquito and Vector Control District

**Type** EIR Draft EIR  
**Description** The San Mateo County Mosquito and Vector Control District (District/Project Sponsor) undertakes activities through its Integrated Mosquito and Vector Management Program (IMVMP) to control the following vectors of disease and/or discomfort within its San Mateo County Service Area: mosquitoes, rats, yellow jackets, and ticks. (A vector is defined as "any animal capable of transmitting the causative agent of human disease or capable of producing human discomfort or injury..." (The CA Health and Safety Code, Section 2200(f)). The District is preparing a PEIR to evaluate the effects of the continued implementation of the control strategies and methods prescribed in its IMVMP.

**Lead Agency Contact**

**Name** Chindi Peavey  
**Agency** San Mateo County Mosquito and Vector Control District  
**Phone** 650-344-8592 **Fax**  
**email**  
**Address** 1351 Rollins Road  
**City** Burlingame **State** CA **Zip** 94010

**Project Location**

**County** San Mateo  
**City**  
**Region**  
**Lat / Long**  
**Cross Streets** NA - possible activities throughout San Mateo County  
**Parcel No.**  
**Township**

	<i>Range</i>	<i>Section</i>	<i>Base</i>
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**Proximity to:**

**Highways** Hwy 101, 280  
**Airports** San Francisco  
**Railways**  
**Waterways**  
**Schools**  
**Land Use** NA - covers all cities and unincorporated, developed and undeveloped area within San Mateo County

**Project Issues** Biological Resources; Noise; Public Services; Recreation/Parks; Septic System; Toxic/Hazardous; Vegetation; Water Quality; Landuse; Cumulative Effects; Other Issues; Wetland/Riparian

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 1; Regional Water Quality Control Board, Region 2; Native American Heritage Commission

**Date Received** 07/20/2018 **Start of Review** 07/20/2018 **End of Review** 09/04/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

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