County of San Diego

ELISE ROTHSCHILD
Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
COMMUNITY HEALTH DIVISION
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AMY HARBERT
Assistant Director

FILED
Ernest J Dronenburg, Jr. Recorder County Clerk
AUG 28 2018
BY an
DEPUTY

NOTICE OF PREPARATION
PROGRAM ENVIRONMENTAL IMPACT REPORT
INTEGRATED VECTOR MANAGEMENT PROGRAM
SAN DIEGO COUNTY, CALIFORNIA

August 23, 2018

The County of San Diego (County) Department of Environmental Health (DEH) is the lead agency in the preparation of a Program Environmental Impact Report (PEIR) for the **Integrated Vector Management Program (IVMP) (Proposed Project)** as specified by Section 15168 of the California Environmental Quality Act (CEQA) Guidelines.

This notice is issued pursuant to Section 15082 of the State CEQA Guidelines. It is intended to inform those persons and organizations that may be concerned with the environmental effects of the Proposed Project. Those public agencies with specific statutory responsibilities are requested to indicate their specific role in the project approval process. The Initial Study for the Proposed Project can be viewed at the Department of Environmental Health at two office locations: 5500 Overland Avenue, Suite 170, San Diego, CA 92123; or 5570 Overland Avenue, Suite 102, San Diego, CA 92123. It is also available at http://www.sandiegocounty.gov/content/sdc/deh/pests/vector_disease.html.

Because of time limits mandated by State law, responses should be sent at the earliest possible date, but no later than **September 21, 2018** at 5:00 P.M. Please send your response to:

County of San Diego, Department of Environmental Health
Vector Control Program, Attn: KariLyn Merlos
5570 Overland Avenue, Suite 102
San Diego, CA 92123

Or via e-mail: IVMP@sdcounty.ca.gov

FILED IN THE OFFICE OF THE COUNTY CLE
San Diego County on AUG 28 2018
Posted AUG 28 2018 Removed OCT 09 2018
Returned to agency on OCT 09 2018
Deputy an

SCOPING MEETING

A public meeting to discuss the Proposed Project and potential contents of the PEIR will be held on **August 30, 2018** from 6:00 P.M. to 8:00 P.M. at the County Operations Center, Conference Center located at 5520 Overland Avenue, San Diego, CA 92123.

ENVIRONMENTAL DOCUMENT

The environmental document will be a Program EIR (PEIR) as defined in Section 15168 of the CEQA Guidelines. The PEIR is intended to allow the County to examine the overall effects of implementation of the IVMP and to take steps to avoid environmental impacts. As a program within the County DEH, the Vector Control Program (VCP) is responsible for implementing the IVMP.

PROJECT LOCATION

The IVMP includes vector and vector-borne disease surveillance and control services throughout all 18 incorporated cities and the unincorporated areas of San Diego County, totaling approximately 4,261 square miles (Figure 1). This encompasses the VCP's existing service area.

BACKGROUND

The VCP has been reducing and controlling mosquitoes and other vectors, and protecting the county against vector-borne diseases for over 40 years. For the purposes of the CEQA analysis, a vector is defined as an organism that is capable of spreading disease to humans or presents a public nuisance by negatively impacting farm and other outdoor workers, outdoor recreation and tourism industries, real estate values, or the public in general. Vectors may include mosquitoes, ticks, fleas, rodents, and eye gnats. In 1989, the County Board of Supervisors (Board) assumed the powers of a Vector Control District, which is staffed by the VCP.

Since 1989, the VCP has continued to reduce the potential for the spread of diseases and the impact that vectors have on property through ongoing educational outreach, surveillance activities, source reduction (i.e., physical control), and source treatment (i.e., biological and chemical control). The VCP's five core services include (1) early detection of public health threats through comprehensive vector surveillance and testing; (2) control and reduction of vectors that transmit diseases to humans; (3) disseminating vector-borne disease information to provide county residents and property owners with tools for prevention, protection, and reporting of vectors that transmit diseases; (4) appropriate and timely response to vector-related customer complaints; and (5) detection of vector-borne pathogens.

As identified in County Code of Regulatory Ordinances Section 64.201 and the California Health and Safety Code Sections 2001 et. seq, a board of supervisors is allowed under Government Code Section 25842.5 to provide the same services and exercise the powers of a mosquito abatement and vector control district. Pursuant to this statutory authority, the Board resolved to act as a mosquito abatement and vector control district in both the incorporated cities and the unincorporated areas of the county. The city council of each incorporated city in San Diego County consented to the Board's resolution. The Board also resolved to delegate implementation and enforcement duties to the Department of Environmental Health. By Government Code section 25842.5 and County Code of Regulatory Ordinances Sections 64.201 through 64.206, the VCP is authorized to order responsible persons to control and abate disease-transmitting[1] vectors and eye gnats in San Diego County. The VCP is also authorized by Government Code section 25842.5 to directly control and abate mosquitoes and other vectors and to recover its costs to do so, in order to protect the public health, safety, and welfare of the entire San Diego County community from vector-borne diseases and vector-related public nuisances.

PROJECT DESCRIPTION

The VCP protects the public from vector-borne disease and nuisance while protecting the environment through a coordinated set of activities collectively known as the IVMP. These activities and services are described in the annual *Engineer's Report*, which provides an overview of the VCP's general practices and procedures. As the Proposed Project, the IVMP would continue to operate using a comprehensive approach by applying various techniques, including surveillance, source reduction (i.e., physical control), source treatment (i.e., biological and chemical control), public education, and outreach. Each of these techniques could be applied to the applicable vectors under the IVMP, including:

- Disease-transmitting mosquitoes (i.e., *Culex* spp. and *Aedes* spp.);
- Nuisance mosquitoes (not disease-transmitting);
- Vectors associated with mammal disease and transmission (i.e., ticks and rodents);
- Other nuisance species (e.g., eye gnats) deemed necessary for control as approved by VCP officials.

Where applicable, the Proposed Project incorporates various vector management principles and techniques from guidance documents, such as the VCP's annual *Engineer's Report*, *West Nile Virus Strategic Response Plan*, and *Aedes Transmitted Disease Strategic Response Plan.* These guidance documents are attached to the published Initial Study.

The Proposed Project will also allow for inclusion of progressive and emerging vector control activities and materials. VCP staff is in communication with other regional vector control districts as well as State and Federal agencies to identify new vector-borne diseases and outbreaks, and to share eradication techniques. New vector control methods based on scientific evidence and expert guidance may be implemented to address public risks as they

[1] "Disease-transmitting vector" means "an animal capable of transmitting the causative agent of human disease." See, County Code Section 64.202(h).

arise. These emerging vector control strategies could include increased or advanced/early source prevention, reduction, surveillance, and/or physical/biological/chemical control, depending on the assessment of public health risk.

Specifically, the IVMP would include the following activities that will be evaluated for potential environmental impacts in the PEIR:

Surveillance

The VCP currently monitors approximately 1,500 mosquito-breeding sources throughout San Diego County, including such techniques as counting and testing mosquito batches (i.e., trapping), testing dead birds, monitoring/testing sentinel chickens, and conducting aerial reconnaissance to identify sources. Surveillance is also conducted for ticks (for tularemia or Lyme disease), and rodents (for plague or hantavirus). Also, routine and complaint-based inspections are conducted to assure the prevention and abatement of flies associated with Commercial Poultry Ranches. Lastly, as part of the VCP's surveillance technology, the Vector Disease and Diagnostics Laboratory (VDDL) was added in July 2010, in which scientists use state-of-the-art molecular tests to detect vector-borne pathogens in a wide variety of samples ranging from mosquitoes and ticks, to birds, rodents, and other animals.

Source Reduction (i.e., Physical Control)

The VCP directs and assists property owners to manage mosquito habitat (breeding sources) to reduce mosquito production. The physical control method primarily targets mosquitoes in their larval stage. This may include the removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, improving, or removing culverts, tide gates, and other water control structures in wetlands. VCP staff direct property owners to coordinate water management efforts under the guidance of Federal and State regulatory agencies.

Source Treatment (i.e., Biological and Chemical Control)

Biological Control

Mosquito fish, *Gambusia affinis*, are one of the VCP's primary biological control agents used against mosquitoes. Mosquito fish are not native to California, but have been widely established in the state since the early 1920s and now inhabit most natural and constructed water bodies. Mosquito fish are made available to property owners to control mosquito production only in artificial containers such as ornamental fishponds, water plant barrels, horse troughs, and neglected green swimming pools.

The VCP also uses natural biological larvicides registered by the Federal Environmental Protection Agency, California Environmental Protection Agency, and other environmental agencies to control mosquito populations.

Chemical Control

Many mosquito-breeding sources cannot be entirely managed with physical or biological control measures, so the use of chemical applications may be required, which may include but is not limited to pesticides such as insecticides and herbicides. Specifically, chemical controls that eradicate or target mosquito eggs (or larvae) are referred to as larvicide, while adulticide is referenced when treating adult mosquitoes; both of which are forms of pesticides. Chemical controls can be applied in a variety of methods including manual (back-pack) hand-operated devices, truck-mounted applicators, or other motorized vehicles (e.g., aircraft, watercraft) to access remote locations. Regarding rodents, although the VCP retains the ability to use chemical controls, it primarily offers advice and assists property owners with their control efforts by providing inspections and consultations, as well as educational information for control measures focusing on exclusion and elimination.

Public Education and Outreach

Health education, outreach, and raising awareness about vectors are all integral parts of the IVMP. A proactive approach is used to educate people within the County about the risks of vectors and preventive measures they can take to protect themselves and their communities. To achieve this goal, VCP staff distribute educational materials such as brochures, pamphlets, bookmarks, and tip cards in multiple languages. Social media is used to notify the public of press releases and scheduled aerial larvicide treatments. The education campaign emphasizes prevention, protection, reporting, and behavior change. A similar proactive approach is used for educating the public about diseases transmitted by rats, ticks, mice, and fleas. Educational presentations, tabletop displays, and pamphlets are used and distributed to local communities.

It should be noted that the Board also adopted a Countywide Eye Gnat Program on December 5, 2012 (03) and associated Negative Declaration (Environmental Review No. 12-00-001) dated October 31, 2012. Therefore, the program is incorporated by reference into the Proposed Project but will not be included in the PEIR analysis since it was previously approved by the Board. In addition, on March 24, 2010 (04) the Board certified a PEIR for the Vector Habitat Remediation Program, which has offered competitive and direct grants to private and public organizations with the goal of implementing long-term solutions to eliminate or reduce mosquito-breeding habitat.

POTENTIAL ENVIRONMENTAL IMPACTS

An analysis of the environmental impacts is currently being conducted. As a result of implementation of the Proposed Project, there are potentially significant environmental effects that may occur to Air Quality, Biological Resources, Cultural Resources, Geology & Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology & Water Quality, Noise, and Tribal Cultural Resources. These issues, along with an analysis of project alternatives, cumulative effects, and potential for growth inducement, will be analyzed and discussed in the PEIR.

Figure 1 – IVMP Service Area Vicinity Map

County of San Diego

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AMY HARBERT
Assistant Director

August 23, 2018

CEQA Initial Study - Environmental Checklist Form
(Based on the State CEQA Guidelines, Appendix G)

1. Proposed Project Title:

   Integrated Vector Management Program

2. Lead agency name and address:

   County of San Diego, Department of Environmental Health
   Vector Control Program
   5570 Overland Avenue, Suite 102
   San Diego, CA 92123

3. a. Contact: KariLyn Merlos, Program Coordinator
   b. Phone number: (858) 495-5799
   c. E-mail: KariLyn.Merlos@sdcounty.ca.gov

4. Project location:

   The Integrated Vector Management Program (IVMP) (Proposed Project) includes vector and vector-borne disease surveillance and control services throughout all 18 incorporated cities and the unincorporated areas of San Diego County totaling approximately 4,261 square miles (Figure 1). As a program within the County Department of Environmental Health (DEH), the Vector Control Program (VCP) is responsible for implementing the IVMP, which encompasses the VCP's existing service area.

5. Project Applicant name and address: *see Lead Agency*

6. General Plan

Community Plan:	Countywide
Land Use Designation:	N/A
Density:	N/A
Floor Area Ratio (FAR):	N/A

7. Zoning

Use Regulation:	N/A
Minimum Lot Size:	N/A
Special Area Regulation:	N/A

8. Description of project:

The VCP has been reducing and controlling mosquitoes and other vectors, and protecting the county against vector-borne diseases for over 40 years. For the purposes of the California Environmental Quality Act (CEQA) analysis, a vector is defined as an organism that is capable of spreading disease to humans or presents a public nuisance by negatively impacting farm and other outdoor workers, outdoor recreation and tourism industries, real estate values, or the public in general. Vectors may include mosquitoes, ticks, fleas, rodents, and eye gnats. In 1989, the County of San Diego (County) Board of Supervisors (Board) assumed the powers of a Vector Control District, which is staffed by the DEH.

Since 1989, the VCP has continued to reduce the potential for the spread of diseases and the impact that vectors have on property through ongoing educational outreach, surveillance activities, source reduction (i.e., physical control), and source treatment (i.e., biological and chemical control). The VCP's five core services include (1) early detection of public health threats through comprehensive vector surveillance and testing; (2) control and reduction of vectors that transmit diseases to humans; (3) disseminating vector-borne disease information to provide county residents and property owners with tools for prevention, protection, and reporting of vectors that transmit diseases; (4) appropriate and timely response to vector-related customer complaints; and (5) detection of vector-borne pathogens.

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The VCP protects the public from vector-borne disease and nuisance while protecting the environment through a coordinated set of activities collectively known as the IVMP. These activities and services are described in the annual Engineer's Report, which provides an overview of the VCP's general practices and procedures. As the Proposed Project, the IVMP would continue to operate using a comprehensive approach by applying various techniques, including surveillance, source reduction (i.e., physical control), source treatment (i.e., biological and chemical control), public education, and outreach. Each of these techniques could be applied to the applicable vectors under the IVMP, including:

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[1] "Disease-transmitting vector" means "an animal capable of transmitting the causative agent of human disease." See, County Code Section 64.202(h).

- Other nuisance species (e.g., eye gnats and flies) deemed necessary for control as approved by VCP officials.

Where applicable, the Proposed Project incorporates various vector management principles and techniques from guidance documents, such as the VCP's annual *Engineer's Report*, *West Nile Virus Strategic Response Plan*, and *Invasive Aedes Mosquito Strategic Response Plan*. These guidance documents are attached to this Initial Study.

The Proposed Project will also allow for inclusion of progressive and emerging vector control activities and materials. VCP staff is in communication with other regional vector control districts as well as State and Federal agencies to identify new vector-borne diseases and outbreaks, and to share eradication techniques. New vector control methods based on scientific evidence and expert guidance may be implemented to address public risks as they arise. These emerging vector control strategies could include increased or advanced/early source prevention, reduction, surveillance, and/or physical/biological/ chemical control, depending on the assessment of public health risk or nuisance level.

Specifically, the IVMP would include the following activities that will be evaluated for potential environmental impacts in the Program Environmental Impact Report (PEIR):

Surveillance

The VCP currently monitors over 1,400 mosquito-breeding sources throughout San Diego County, including such techniques as counting and testing mosquito batches (i.e., trapping), testing dead birds, monitoring/testing sentinel chickens, and conducting aerial reconnaissance to identify sources. Surveillance is also conducted for ticks (for tularemia or Lyme disease), and rodents (for plague or hantavirus). Also, routine and complaint-based inspections are conducted to assure the prevention and abatement of flies associated with commercial poultry ranches. Lastly, as part of the VCP's surveillance technology, the Vector Disease and Diagnostics Laboratory was added in July 2010, allowing in-house scientists use state-of-the-art molecular tests to detect vector-borne pathogens in a wide variety of samples ranging from mosquitoes and ticks, to birds, rodents and other animals.

Source Reduction (i.e., Physical Control)

The VCP directs and assists property owners to manage vectors on their property to reduce both attractants and breeding sources. To reduce mosquito production, physical control method primarily targets mosquitoes in their larval stage. This may include the removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, improving, or removing culverts, tide gates, and other water control structures in wetlands. VCP staff direct property owners to coordinate water management efforts under the guidance of federal and state regulatory agencies.

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Many mosquito-breeding sources cannot be entirely managed with physical or biological control measures, so the use of chemical applications may be required, which may include but is not limited to pesticides (such as insecticides) and herbicides. Specifically, chemical controls that eradicate or target mosquito eggs (or larvae) are referred to as larvicide, while adulticide is referenced when treating adult mosquitoes; both of which are forms of pesticides. Chemical controls can be applied in a variety of methods including manual (back-pack) hand-operated devices, truck-mounted applicators, or other motorized vehicles (e.g., aircraft, watercraft) to access remote locations. Regarding rodents, although the VCP retains the ability to use chemical controls, it primarily offers advice and assists property owners with their control efforts by providing inspections and consultations, as well as educational information for control measures focusing on exclusion and elimination.

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It should be noted that the Board also adopted a Countywide Eye Gnat Program on December 5, 2012 (03) and associated Negative Declaration (Environmental Review No. 12-00-001) dated October 31, 2012. Therefore, the program is incorporated by reference into the Proposed Project but will not be included in the PEIR analysis since it was previously approved by the Board. In addition, on March 24, 2010 (04) the Board certified a Program EIR for the Vector Habitat Remediation Program, which has offered competitive and direct grants to private and public organizations with the goal of implementing long-term solutions to eliminate or reduce mosquito-breeding habitat.

9. Surrounding land uses and setting:

The IVMP applies to all 18 incorporated cities and the unincorporated areas of San Diego County. San Diego County is bounded by Orange and Riverside counties to the north, Imperial County to the east, Pacific Ocean to the west, and the United States/Mexico International Border to the south.

10. Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	Agency
Cooperative Agreement for Pesticide-related Requirements	California Department of Public Health
NPDES Order No. 2016-0039-DWQ for Vector Control (previously No. 2011-0002-DWQ)	State Water Resources Control Board
General Note: during implementation of individual IVMP activities, entry onto public or private lands will be necessary to conduct vector control activities. Coordination with applicable responsible parties will be conducted on an as-needed basis.	

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

YES	NO
☐	☒

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Because the IVMP would be implemented countywide, all Native American tribes will be notified within San Diego County (who previously requested notification) regarding the proposed IVMP during the Initial Study/Notice of Preparation comment period. However, consultation has not begun, and it is anticipated to occur during preparation of the draft PEIR.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☑ Air Quality
☑ Biological Resources	☑ Cultural Resources	☑ Geology & Soils
☑ Greenhouse Gas Emissions	☑ Hazards & Hazardous Materials	☑ Hydrology & Water Quality
☐ Land Use & Planning	☐ Mineral Resources	☑ Noise
☐ Population & Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☑ Tribal Cultural Resources	☐ Utilities & Service Systems
☑ Mandatory Findings of Significance		

DETERMINATION: (To be completed by the Lead Agency)
On the basis of this initial evaluation:

☐ On the basis of this Initial Study, the Department of Environmental Health finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ On the basis of this Initial Study, the Department of Environmental Health finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ On the basis of this Initial Study, the Department of Environmental Health finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

KariLyn A. Merlos	8/23/18
Signature	Date
KariLyn Merlos	Program Coordinator
Printed Name	Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. The explanation of each issue should identify:
   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands, but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups. The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and to individual visual resources.

Less than Significant Impact: The Proposed Project includes implementation of the countywide Integrated Vector Management Program (IVMP). As such, individual activities could occur in a wide range of locations within San Diego County, and may be located near, within, or visible from a scenic vista. However, the proposed IVMP does not include the construction of new structures or facilities. Furthermore, none of the proposed features of the IVMP would substantially physically modify existing structures or visual features of the landscape. Therefore, the proposed IVMP would not substantially change the composition of an existing scenic vista in a way that would adversely alter the visual quality or character of the view, and the Proposed Project would have a less than significant adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

State scenic highways refer to those highways that are officially designated by the California Department of Transportation as scenic (California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

Less than Significant Impact: While it is possible that future vector control activities have the potential to occur near one of the County's officially designated State scenic highways (State Routes 52, 75, 78, 125, and 163)[2], the proposed IVMP activities are intended to reduce the spread of mosquito-borne and other vector-borne disease. The proposed IVMP includes surveillance and public education of vector threats as well as physical, biological, and chemical control methods. It is not expected to result in removal or damage of these highways other scenic resources such as

[2] http://www.dot.ca.gov/design/lap/livability/scenic-highways/2017-03DesigandEligible.xlsx (Updated March 2017)

trees, rock outcroppings, or historic buildings. Therefore, impacts to scenic resources within a State scenic highway system will be less than significant.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The proposed IVMP would include surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. This would also include public outreach and education in communities across San Diego County. As a result of the various implementation methods, grading or dredging activities may occur; however, no substantial earthwork would be proposed that would significantly alter the visual character of a site. Also, no major structures would be proposed that would be incompatible or substantially degrade the existing visual character.

Specifically, physical control activities may include restricting the size of onsite native and nonnative vegetation. Where dense vegetation is present, certain activities may potentially alter the visual character of the site by reducing the vegetation present. However, such activities would not result in a landscape that would be incompatible or substantially degrade the existing visual character.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The Proposed Project does not propose any use of outdoor lighting or building materials with highly reflective properties such as highly reflective glass or high-gloss surface colors. Therefore, the Proposed Project will not create any new sources of light pollution that could contribute to skyglow, light trespass, or glare that would adversely affect day or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES -- Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. Because these activities would occur across the entire county, there is potential for the IVMP and its associated activities to be located on farmland pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. However, the proposed activities would not result in a change in land use of these sites, and they would not result in the conversion of agricultural lands to a non-agricultural use. Therefore, no impacts are anticipated to occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- ☐ Potentially Significant Impact
- ☐ Less than Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ No Impact

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP with the intent to reduce the spread of mosquito-borne and other vector-borne diseases and nuisance vectors. The activities would not install new uses that would conflict with the existing zoning of a site, including any sites designated as agriculture or under a Williamson Act contract. Therefore, no impacts are anticipated to occur to agriculture zoned areas or lands under Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- ☐ Potentially Significant Impact
- ☐ Less than Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ No Impact

Discussion/Explanation:

No Impact: Because these activities would occur across the entire county, there is potential for the IVMP and its associated activities to be located within forest land or timberland. However, the Proposed Project would be consistent with existing zoning because it would not propose a rezone of property. San Diego County does not contain any existing Timberland Production Zones. Therefore, implementation of the Proposed Project would not conflict with existing zoning for or cause the rezoning of forest land, timberland, or Timberland Production Zones.

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

- ☐ Potentially Significant Impact
- ☐ Less than Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ No Impact

Discussion/Explanation:

No Impact: Because these activities would occur across the entire county, there is potential for the IVMP and its associated activities to be located within forest land as defined in Public Resources Code Section 12220(g). However, the intent of the proposed IVMP is to reduce the spread of

mosquito-borne and other vector-borne disease. Implementation of IVMP would not result in the disturbance, loss or conversion of forest land resources to a non-forest use. Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: While the proposed IVMP would include surveillance and physical, biological, and chemical control methods, this would not result in any land use conversions. The proposed IVMP is not expected to introduce a change to the existing environment which could ultimately result in the conversion of land use. Therefore, no Important Farmland, or other agricultural resources will be converted to a non-agricultural use. As such, no impacts would result.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The San Diego RAQS is based on population and vehicle trends as well as land use plans developed by the cities and the County as part of the development of their general plans. As such, projects that propose development consistent with the growth anticipated by the general plans and San Diego Association of Governments (SANDAG) growth forecasts would be consistent with the RAQS and SIP. The IVMP would not generate growth, increase population, or require the alteration of an existing land use designation through amendments to general plans or changes to zoning. The proposed IVMP includes surveillance and public education of vector threats as well as physical, biological, and chemical control methods. Therefore, the Proposed Project is not anticipated to conflict with the applicable land use plans nor conflict with or obstruct the implementation of the RAQS or applicable portions of the SIP. Impacts are anticipated to be less than significant; however, this will be further addressed in the PEIR.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

In general, air quality impacts are the result of emissions from motor vehicles, and from short-term construction activities. The San Diego County Land Use Environment Group has established guidelines for determining significance which incorporate the Air Pollution Control District's (SDAPCD) established screening-level criteria for all new source review in SDAPCD Rule 20.2. These screening-level criteria can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since SDAPCD does not have screening-level criteria for emissions of volatile organic compounds (VOCs), the use of the screening level for reactive organic compounds from the South Coast Air Quality Management District for the Coachella Valley (which are more appropriate for the San Diego Air Basin) are used.

Potentially Significant Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisance vectors. This would also include public outreach and education in communities across San Diego County. As a result, air quality emissions are anticipated to occur. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard for ozone (O_3). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of particulate matter less than or equal to 10 microns (PM_{10}) under the California Ambient Air Quality Standard. O_3 is formed when VOCs and nitrogen oxides (NO_X) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM_{10} in both urban and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Potentially Significant Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. This would also include public outreach and education in communities across San Diego County. As a

result, the IVMP has the potential to result in an increase of criteria pollutants (O_3 and PM_{10}) for which San Diego County is in non-attainment. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

d) Expose sensitive receptors to substantial pollutant concentrations?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Air quality regulators typically define sensitive receptors as schools (Preschool–12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County also considers residences as sensitive receptors since they house children and the elderly.

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP in which individual activities would occur throughout San Diego County. This could potentially include activities near sensitive receptors since mosquito control and other vector control methods are needed to protect the public health and to reduce the spread of vector-borne diseases and nuisance vectors. The proposed mosquito and other vector control activities would not include construction of new stationary sources of air emissions. Specifically, surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods would be temporary and sporadic in nature depending on the location of an identified vector threat. Activities are also intended to occur over a wide geographic area. Furthermore, any application of chemical controls would be conducted in full compliance with legal application rates as regulated by the California Department of Pesticide Regulation. Therefore, while individual sites would be targeted for vector remediation, the proposed IVMP is not anticipated to result in the exposure of sensitive receptors to substantial pollutant concentrations and would not place sensitive receptors near said emission sources carbon monoxide hotspots.

e) Create objectionable odors affecting a substantial number of people?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The proposed IVMP includes surveillance and public education of vector threats as well as physical, biological, and chemical control methods. Chemical control activities are the only component that could potentially create objectionable odors. Although all chemicals, including pesticide, larvicide, and adulticide are applied in accordance with label requirements and legal application rates, various compounds found within these chemicals could emit odors when they evaporate into the air resulting in airborne particles and vapors. Therefore, an application containing an odorous compound could potentially impact people for a period of time. However, spraying (or applying) chemical controls would be temporary and sporadic depending on the location of an identified vector risk. Therefore, while the proposed IVMP has the potential to result in odors, they are anticipated to be confined and localized to a specific area for a short period of time, and are not anticipated to affect a substantial number of people. As such, impacts from objectionable odors would be less than significant.

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 Wildlife or U.S. Fish and Wildlife Service?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP in which individual activities would occur throughout San Diego County. It would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, the IVMP has the potential to result in adverse effects, either directly or through habitat modifications, to special status species. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

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

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP in which individual activities would occur throughout San Diego County. It would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. As a result, the IVMP has the potential to result in adverse effects on riparian habitat or other sensitive natural communities. However, any potential impacts to riparian habitat or other sensitive natural communities would be avoided or minimized to the extent feasible, and would be permitted and mitigated in accordance with applicable federal, state, and local requirements. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

As of November 2011, pesticides applied to Waters of the U.S. for vector control purposes must be conducted in accordance with the Statewide National Pollutant Discharge Elimination System (NPDES) Permit for *Biological and Residual Pesticide Discharges to Waters of the U.S. from Vector Control Applications*. At that time the VCP received a Notice of Authorization from the State Water Resources Control Board (SWRCB) to operate under this general permit. In 2014, the SWRCB amended the permit (2014-0106-DWQ) which: (1) added all larvicides and adulticides that are currently registered by Department of Pesticide Regulations (DPR) using the same active ingredients; (2) included additional receiving water limitations and receiving water monitoring

triggers for newly added active ingredients; and (3) included a provision for reopening the permit to include new active ingredients that DPR registers for vector control. Most recently, the SWRCB reissued the general permit (2016-0039-DWQ), which became effective on July 1, 2016. The updated permit includes the addition of minimum risk pesticides which are pesticides exempted from Federal Insecticide, Fungicide, and Rodenticide Act requirements when used only in the manner specified by federal regulations. The VCP remains an authorized enrollee under the current permit.

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?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP in which individual activities would occur throughout San Diego County. It would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, the IVMP has the potential to result in adverse effects on federally protected wetlands. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

As discussed above in response to Biological Resources – IV(b), the VCP is a current enrollee of the SWRCB NPDES Permit 2016-0039-DWQ, which authorizes vector control application in Waters of the U.S.

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?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The proposed IVMP would target identified vector threats and apply various control methods to protect the public from vector-borne disease and nuisances. The Proposed Project is not intended to interfere with the movement of any native resident or migratory fish or wildlife species. However, habitat supporting said species could potentially result in interference with wildlife movement. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP in which individual activities would occur throughout San Diego County. It would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. Implementation of the IVMP could potentially result in conflicts with Habitat Conservation Plans, Natural Communities Conservation Plan or other approved local, regional or state habitat conservation plan. This potential conflict with habitat conservation plans will be further discussed in the PEIR.

V. CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. Physical control activities are the only components that may involve minor grading or vegetation management in order to survey and abate vectors and nuisances. Implementation of the IVMP would not include development or construction of new structures or facilities that would result in the disturbance or alteration of existing historical resources or structures. Therefore, no impacts to historical resources would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the proposed IVMP may include physical control methods for the purpose of monitoring and abatement to improve water circulation in aquatic habitats. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. As a result, these activities may have the potential to result in an adverse change in the significance of an archeological resource. However, any potential impacts to archeological resources would be avoided or minimized to the extent feasible, and would be mitigated in accordance with applicable federal, state, and local requirements. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

c) Directly or indirectly destroy a unique geologic feature?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County.

Potentially Significant Impact: As discussed above in response to V(b), physical control activities proposed under the IVMP could potentially involve grading or earthwork-related activities. As a result, the Proposed Project has the potential to directly or indirectly destroy a unique geologic feature. Therefore, impacts to unique geologic features will be further discussed in the PEIR.

d) Directly or indirectly destroy a unique paleontological resource or site?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: As discussed above in response to V(b), physical control activities proposed under the IVMP could potentially involve grading or earthwork-related activities. As a result, the Proposed Project has the potential to result in a direct or indirect impact to a unique paleontological resource. Therefore, impacts to unique paleontological resources will be further discussed in the PEIR.

e) Disturb any human remains, including those interred outside of dedicated cemeteries?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: As discussed above in response to V(b), physical control activities proposed under the IVMP could potentially involve grading or earthwork-related activities. As a result, the Proposed Project has the potential to disturb human remains, including those interred outside of formal cemeteries. Therefore, this will be further discussed in the PEIR.

If implementation of the IVMP resulted in the discovery of human remains, the County Coroner would be contacted and appropriate measures implemented, consistent with State Health and Safety Code Section 7050.5, which prohibits unauthorized disinterring, disturbing, or removing of human remains from any location.

VI. GEOLOGY AND SOILS -- Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

☐ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and may be located near or within fault rupture hazard zones. However, the proposed IVMP would not involve the construction of habitable buildings or structures. Rather, the IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods. This would also include public outreach and education in communities across San Diego County. Therefore, the IVMP will not expose people or structures to the risk of loss, injury, or death involving a known fault-rupture hazard zone.

ii. Strong seismic ground shaking?

☐ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The proposed IVMP would target identified vector threats and apply various control methods to protect the public from vector-borne disease and nuisances, and it would not propose habitable buildings or structures. Therefore, the IVMP will not expose people or structures to the risk of loss, injury, or death involving strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

☐ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP. Individual activities could occur in a wide range of locations and may be located near or within potential liquefaction areas. However, the proposed IVMP would not involve the construction of habitable buildings or structures. Therefore, the IVMP will not expose people or structures to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

iv. Landslides?

☐ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP. Individual activities could occur in a wide range of locations and may be located near or within landslide susceptibility areas. However, the proposed IVMP would not involve the construction of habitable buildings or structures. Therefore, the IVMP will not expose people or structures to the risk of loss, injury, or death involving landslides.

b) Result in substantial soil erosion or the loss of topsoil?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the proposed IVMP would include physical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, minor grading activities could potentially occur resulting in soil erosion and/or the loss of topsoil. In order to minimize the potential for soil erosion, activities will consider implementation of Best Management Practices, if applicable. Therefore, the potential for IVMP activities to result in soil erosion and the loss of topsoil will be further discussed in the PEIR.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP. Individual activities could occur in a wide range of locations and may be located on a geologic unit or soil that is unstable. While it is possible that IVMP activities may include physical control methods such as minor grading or vegetation management, the proposed IVMP is intended to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances, and is not anticipated to include significant earthwork or other activities that would result in an unstable geologic unit or soil. For further information regarding landslides, liquefaction, and lateral spreading, refer to *VI. Geology and Soils, Question a., iii-iv* listed above. As such, impacts are expected to be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP. Individual activities could occur in a wide range of locations and may be located on expansive soils. However, the proposed IVMP is intended to reduce the spread of mosquito-borne

and other vector-borne diseases and nuisances, and is not anticipated to include installation of structures or other facilities that would create substantial risks to life or property. Therefore, impacts are anticipated to be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. Activities would not include installation of any septic tanks or alternative wastewater disposal systems; therefore, no impact would result due to implementation of the Proposed Project.

VII. GREENHOUSE GAS EMISSIONS -- Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Greenhouse Gas (GHG) emissions result in an increase in Earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, and is known as global climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, halocarbons, and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources. A regional GHG inventory prepared for the San Diego Region[3] identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions in the region, accounting for 46% of the total regional emissions. Electricity and natural gas combustion were the second (25%) and third (9%) largest regional contributors, respectively, to regional GHG emissions.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level O_3 and particulate matter, ecosystem changes,

[3] San Diego County Greenhouse Gas Inventory: An Analysis of Regional Emissions and Strategies to Achieve AB 32 Targets. University of San Diego and the Energy Policy Initiatives Center, September 2008.

increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as Assembly Bill 32 (AB 32), which set the GHG emissions reduction goal for the State of California into law. In 2008, the California Air Resources Board (CARB) adopted the first iteration of the Climate Change Scoping Plan: A Framework for Change (Initial Scoping Plan), which identified the main strategies California would implement to achieve the GHG reductions necessary to reduce forecasted business-as-usual emissions in 2020 to the State's historic 1990 emissions level (CARB 2008). CARB approved the first update to the Initial Scoping Plan in May 2014 (2014 Scoping Plan Update).

In 2015, Executive Order B-30-15 directed the CARB to update the Scoping Plan to establish a mid-term GHG reduction target for California of 40 percent below 1990 levels by 2030. In November 2017, CARB released the 2017 Climate Change Scoping Plan Update, the Strategy for Achieving California's 2030 GHG Target (2017 Scoping Plan Update; CARB 2017). The 2017 Scoping Plan Update identifies state strategies for achieving the state's 2020 and 2030 GHG emissions reduction targets codified by the California Global Warming Solutions Act of 2006 (AB 32) and Senate Bill (SB 32), which amended and extended the California Global Warming Solutions Act of 2006 beyond 2020 to 2030.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. SANDAG has prepared a Sustainable Communities Strategy, which is a new element of the 2050 Regional Transportation Plan (RTP). The strategy identifies how regional GHG reduction targets, as established by the CARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

It should be noted that an individual project's GHG emissions will generally not result in direct impacts under CEQA, as the climate change issue is global in nature, however an individual project could be found to contribute to a potentially significant cumulative impact. CEQA Guidelines Section 15130 states that an EIR shall discuss cumulative impacts of a proposed project when the project's incremental effect is cumulatively considerable.

On February 14, 2018, the County Board of Supervisors adopted the Climate Action Plan (CAP), which identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated areas of San Diego County as well as County government buildings and operations. The CAP updates and implements the County's 2011 General Plan Update goals, policies, and reduction measures to meet the State's GHG reduction targets including AB 32 (2020 goal) and SB 32 (2030 goal), and to demonstrate progress towards a 2050 GHG reduction goal (County 2018). The plan includes six chapters: (1) Introduction; (2) Greenhouse Gas Emissions Inventory, Projections, and Reductions Targets; (3) Greenhouse Gas Reduction Strategies and Measures; (4) Climate Change Vulnerability, Resiliency, and Adaptation; (5) Implementation and Monitoring; and (6) Public Outreach and Engagement.

Concurrent with adoption of the CAP, the County adopted new Guidelines for Determining Significance for Climate Change, which identifies that a proposed project would have a less than significant cumulatively considerable contribution to global climate change if it is consistent with the County's CAP. As defined in these Guidelines, consistency with the CAP is determined through the CAP Consistency Review Checklist (Checklist). The Checklist follows a two-step process to determine if projects are consistent with the CAP and whether they may have a significant

cumulative impact under the County's adopted GHG thresholds of significance. The Checklist further explains that if a project is consistent with the projections and land use assumptions in the 2011 General Plan Update and CAP, its associated growth in terms of GHG emissions would have been accounted for in the CAP's projections and project implementation of the CAP reduction measures will contribute towards reducing the County's emissions and meeting the County's reduction targets.

Potentially Significant Impact: The proposed IVMP includes a range of vector management activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. As a result, the IVMP would result in GHG emissions from various sources including on-road fleet vehicles, watercraft, aircraft, portable equipment (pumps, sprayers, generators), and small equipment (handheld sprayers, foggers, dusters). The dominant fuel used for these mobile sources is motor gasoline along with some diesel fuel (larger trucks), and jet fuel (turbine-powered aircraft).

As noted in the CAP Appendix B,

> the County's vehicle fleet operated on gasoline, diesel, and compressed natural gas (CNG) fuels in 2014. This included both on-road and off-road vehicle fleet and equipment, such as construction equipment and airport ground support equipment…Fuel use and mileage by vehicle type was recorded into [the Climate Registry Information System (CRIS)] from County records and fuel-specific or vehicle-specific emission factors from [The Climate Registry (TCR)] were applied to estimate vehicle fleet emissions in 2014. CO_2 emission factors for all three fuel types are based on the volume of gasoline or diesel and the total energy content of purchased CNG fuel.

As cited above, the CAP accounted for the County's vehicle fleet usage, which includes the County's DEH fleet, as part of the baseline inventory of GHG emissions. The potential for the IVMP to result in GHG impacts on the environment will be further analyzed in the PEIR, but for the purpose of this Initial Study, impacts are considered potentially significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: As explained above in response to Greenhouse Gas Emissions - VII(a), the IVMP would result in GHG emissions from various sources as a result of implementation of physical, biological, and chemical controls as well as surveillance and public outreach to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. Therefore, the IVMP's potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

<u>VIII. HAZARDS AND HAZARDOUS MATERIALS</u> -- Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably

foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the Proposed Project would include chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. This may include, but not be limited to, of insecticides, pesticides, and herbicides. Regarding mosquitoes, the frequency and extent of the chemical applications will vary depending on the type of species, mosquito abundance, water temperature, organic content, time of year, and other factors. In addition, phased risk levels have been established to identify when there is an elevated public health risk, and how the VCP would respond to each risk level (e.g., outreach, testing, treatment, etc.). The VCP strives to safeguard the public's health from West Nile Virus, Zika, and other diseases as well as to minimize harmful effects on the environment by using this risk-analysis approach to control the spread of such diseases. Public communication, education, and transparency of operations are the cornerstones of the VCP's strategy to protect the public. In addition, various federal, state, and local regulatory agencies conduct oversight of vector control activities, which must adhere to current regulations and manufacturer label requirements. Any application of chemical controls would be conducted in full compliance with legal application rates as regulated by the California Department of Pesticide Regulation.

Also, as discussed above in response to Biological Resources – IV(b), the VCP is a current enrollee of the SWRCB NPDES Permit 2016-0039-DWQ, which authorizes vector control application in Waters of the U.S.

While the IVMP would comply with all governing regulations and applicable agencies, for the purpose of this Initial Study impacts could be potentially significant. This will be further analyzed in the PEIR.

b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could potentially be located within one-quarter mile of an existing or proposed school. As discussed above in response to Hazards and Hazardous Materials – VIII(a), the VCP strives to safeguard the public's health from West Nile Virus, Zika, and other diseases as well as to minimize harmful effects on the environment by using a risk-analysis approach to control the spread of such diseases. Public communication, education, and transparency of operations are the cornerstones of the VCP's strategy to protect the public. Therefore, this will be further analyzed in the PEIR.

c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been

subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could potentially be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances. As discussed above in response to Hazards and Hazardous Materials – VIII(a), for the purpose of this Initial Study impacts could be potentially significant, and this will be further analyzed in the PEIR.

d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations potentially including within an airport land use planning area or within two miles of a public airport or public use airport where such a plan has not been adopted. However, the Proposed Project would not construct residential or other habitable or commercial structures that would create a safety hazard for people residing or working in the project area. Therefore, no impacts would occur.

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations potentially including within the vicinity of a private airstrip. However, the Proposed Project would not construct residential or other habitable or commercial structures that would create a safety hazard for people residing or working in the project area. Therefore, no impacts would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

The following sections summarize the Proposed Project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

Less than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in San Diego County, including all cities and the County unincorporated areas. The IVMP will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: Implementation of the countywide IVMP will not interfere with the San Diego County Nuclear Power Station Emergency Response Plan due to the nature of the Proposed Project. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the unincorporated jurisdiction of the County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could potentially be located within the coastal zone or coastline. However, the intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne disease, and will not prevent the goals and objectives from the Oil Spill Contingency Element from being implemented.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan will not be interfered with because the Proposed Project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could potentially be located within a Dam Inundation Area. However, the intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne disease, and will not prevent the goals and objectives from Dam Evacuations Plans from being implemented. Since the IVMP will not construct unique institutions in a dam inundation zone, the Proposed Project will not impair implementation of or physically interfere with the implementation of an emergency response plan.

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The IVMP will not expose people or structures to a significant risk of loss, injury, or death involving wildland fires because individual activities would not involve the construction of habitable buildings or structures.

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The proposed IVMP includes a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. This would also include public outreach and education in communities across San Diego County. The IVMP would not propose a use, or place residents adjacent to an existing or reasonably foreseeable use, that would substantially increase current or future resident's exposure to vectors.

IX. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any waste discharge requirements?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: All proposed IVMP activities would comply with applicable federal, state, and local regulations. As discussed above in response to Biological Resources – IV(b), the VCP is a current enrollee of the SWRCB NPDES Permit 2016-0039-DWQ, which authorizes vector control application in Waters of the U.S. The proposed IVMP's compliance with waste discharge requirements will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

☒ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP with the intent to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As such, individual activities could occur in a wide range of locations and could potentially be located near an impaired water body as listed on the Clean Water Act Section 303(d) list. Therefore, the potential for the Proposed Project to result in an increase in any pollutant for which the water body is already impaired will be further analyzed in the PEIR.

c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

☒ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the proposed IVMP would include physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease and nuisances. The implementation of these control methods could potentially cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Therefore, this will be further analyzed in the PEIR as potentially significant.

d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

☐ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: Among other activities, the proposed IVMP would include physical control methods; however these activities are not expected to result in the depletion of groundwater supplies or interference with groundwater recharge. Individual activities are not expected to result in increased surface runoff as they will not increase the amount of impervious areas (which will reduce recharge). The use of groundwater is not proposed as a component of the IVMP. As such, no impacts are anticipated.

e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

☒ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the proposed IVMP would include physical control methods. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. These activities could potentially alter the existing drainage pattern of a site or area, which could affect erosion or siltation on- or off-site. Therefore, the potential for the IVMP to substantially alter the existing drainage pattern of a site will be further discussed in the PEIR.

f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: As discussed above in response to Hydrology and Water Quality – IX(e), the proposed IVMP would include physical control methods. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. These activities could potentially alter the existing drainage pattern of a site or area, which could increase the rate or amount of surface runoff in a manner which could result in flooding on- or off-site. Therefore, the potential for the IVMP to substantially alter the existing drainage pattern of a site will be further discussed in the PEIR.

g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The IVMP does not propose to create or contribute runoff water that will exceed the capacity of existing or planned storm water drainage systems. Therefore, impacts will be less than significant.

h) Provide substantial additional sources of polluted runoff?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The IVMP does not propose to construct any structures, facilities, or services that would result in new or additional sources of runoff. In addition, among other activities the proposed IVMP would include chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This may include, but not be limited to, insecticides, pesticides, and herbicide. As such, various federal, state, and local agencies conduct oversight over vector control activities, and all activities must adhere to certain regulations and manufacturer label requirements. Any application of chemical controls would be conducted in full compliance with legal application rates as regulated by the California Department of Pesticide Regulation. Therefore, impacts would be less than significant.

i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP with the intent to reduce the spread of mosquito-borne and other vector-borne disease. The IVMP activities would not include the construction of housing or other habitable structures. Therefore, no impacts will occur.

j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: While housing and habitable structures will not be proposed under the IVMP, water control structures or other facilities, such as water circulation systems, culverts, or tide gates, could be proposed and could potentially be placed within a 100-year flood hazard area. Therefore, the potential for IVMP activities to impede or redirect flood flows through placement within a 100-year flood hazard area will be further discussed in the PEIR.

k) Expose people or structures to a significant risk of loss, injury or death involving flooding?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The IVMP does not propose construction of housing or habitable structures; therefore, the Proposed Project will not expose people to a significant risk of loss, injury or death. Also, water circulation techniques (such as water control structures) may be included in the IVMP as discussed above in response to Hydrology and Water Quality - IX(f). However, the installation of such facilities are not anticipated to expose people or structures to a significant risk of loss, injury or death. This will be further analyzed in the PEIR.

l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: As discussed above in response to Hydrology and Water Quality – IX(k), although individual IVMP activities could be located within dam inundation areas, activities will not include the construction of habitable buildings or structures that will be susceptible to flooding as a result of the failure of a dam or levee. Therefore, impacts will be less than significant.

m) Inundation by seiche, tsunami, or mudflow?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

i. SEICHE

No Impact: The Proposed Project includes implementation of the countywide IVMP with the intent to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As such, individual activities could occur in a wide range of locations and could potentially be located along the shore of a lake or a reservoir subject to seiche. However, the IVMP will not result in the construction of habitable structures that will place people at risk or harm if a seiche event were to occur. Therefore, no impacts will occur.

ii. TSUNAMI

No Impact: The Proposed Project includes implementation of the countywide IVMP, and as such, individual activities could occur in a wide range of locations potentially including within a mile of the coast. However, the IVMP will not result in the construction of habitable structures that will place people at risk or harm if a tsunami event were to occur. Therefore, no impacts will occur.

iii. MUDFLOW

No Impact: The Proposed Project includes implementation of the countywide IVMP, and as such, individual activities could occur in a wide range of locations potentially including within a landslide susceptibility zone. However, the IVMP will not result in the construction of habitable structures that will place people at risk or harm if a mudflow event were to occur. Therefore, no impacts will occur.

X. LAND USE AND PLANNING -- Would the project:

a) Physically divide an established community?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation
- ☐ Less than Significant Impact
- ☒ No Impact

Incorporated

Discussion/Explanation:

No Impact: The Proposed Project would not introduce new infrastructure such as major roadways, water supply systems, or utilities to the area. Therefore, the Proposed Project will not significantly disrupt or divide the established community.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP with the intent to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. It includes a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. This would also include public outreach and education in communities across San Diego County. These activities would not alter the type of land use nor interfere with existing land uses, and therefore, would be consistent and not conflict with local land use plans or regulations.

XI. MINERAL RESOURCES -- Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could potentially be located on lands designated MRZ-2 by the California Department of Conservation Division of Mines and Geology. MRZ-2 is defined as an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presents exist. However, the intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne disease. Therefore, while it is possible that IVMP activities may include physical control methods such as minor grading or vegetation management, it would not include significant earthwork or other activities that would result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state. Furthermore, the IVMP would not result in the redesignation of existing land uses or zoning regulations, nor would it preclude future mining activities. Therefore, impacts will be less than significant.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

☐ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: As discussed above, the Proposed Project includes implementation of the countywide IVMP. Individual activities could occur in a wide range of locations and could potentially be located on lands designated MRZ-2 by the California Department of Conservation Division of Mines and Geology. While it is possible that IVMP activities may include physical control methods such as minor grading or vegetation management, it would not include significant earthwork or other activities that would result in the loss of availability of a known mineral resource that will locally important. Furthermore, the IVMP would not result in the redesignation of existing land uses or zoning regulations, nor would it preclude future mining activities. Therefore, impacts will be less than significant.

XII. NOISE -- Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

☒ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the proposed IVMP would include physical and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, temporary short-term noise sources may expose people to potentially significant noise levels that exceed the allowable limits of the applicable noise ordinance and/or General Plan Noise Element, depending on the distance of activities to sensitive receptors. Noise sources could potentially include, but not be limited to, truck- or trailer-mounted gas-powered sprayers used for pesticide application, gas-powered backpack and hand-held application equipment, and other motorized vehicles (e.g., aircraft, watercraft). Therefore, noise impacts will be further discussed in the PEIR.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

☐ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: Activities proposed under the IVMP will not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.

2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Also, IVMP activities will not propose any major, new, or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Among other activities, the proposed IVMP would include physical and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As discussed above, temporary short-term noise sources may expose people to potentially significant noise levels; however, no activities are proposed that are anticipated to result in a substantial permanent increase in ambient noise levels.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- ☒ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: See response to Noise – XII(a) and (c) above. Individual activities would include implementation of physical or chemical control methods that could potentially generate periodic increases in ambient noise levels in the vicinity of an individual site. Therefore, the potential noise impacts will be further addressed in the PEIR.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The Proposed Project does not propose to construct residential or other habitable or commercial structures. The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could

potentially be located within an airport land use plan area or within two miles of a public airport or public use airport. However, based on the temporary nature of proposed IVMP activities, the Proposed Project would not expose people residing or working in the project areas to excessive noise levels.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: See response to Noise – XII(e) above. Because the Proposed Project includes implementation of the countywide IVMP, individual activities could occur in a wide range of locations and could potentially be located within the vicinity of a private airstrip. However, based on the temporary nature of proposed IVMP activities, the Proposed Project would not expose people residing or working in the project areas to excessive noise levels.

XIII. POPULATION AND HOUSING -- Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne disease. Individual activities under IVMP will not induce substantial population growth because they will not propose any physical or regulatory change that would involve removing a restriction to or encouraging population growth in an area including, but limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or Local Agency Formation Commission annexation actions. Therefore, no impacts will occur.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The proposed IVMP includes a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include

public outreach and education in communities across San Diego County. The IVMP would not include displacement of existing housing. Therefore, no impact will occur.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

- ☐ Potentially Significant Impact
- ☐ Less than Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ No Impact

Discussion/Explanation:

No Impact: The proposed IVMP includes a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. The IVMP would not include displacement of people. Therefore, no impact will occur.

XIV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?
ii. Police protection?
iii. Schools?
iv. Parks?
v. Other public facilities?

- ☐ Potentially Significant Impact
- ☐ Less than Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ No Impact

Discussion/Explanation:

No Impact: The intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. Individual activities under IVMP will not include residential components. Therefore, the Proposed Project will not result in the need for the provision of additional governmental facilities, and as such, no impact will occur.

XV. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- ☐ Potentially Significant Impact
- ☐ Less than Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ No Impact

Discussion/Explanation:

No Impact: Individual activities under IVMP will not include any residential use, included but not limited to a residential subdivision, mobile home park, or construction of a single-family residence that may increase the use of existing neighborhood or regional parks or other recreational facilities in the vicinity. Furthermore, the IVMP would not result in any changes to existing land uses that would accelerate or result in the deterioration of recreational facilities. Therefore, no impacts will occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: Individual activities under IVMP will not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact will occur.

XVI. TRANSPORTATION AND TRAFFIC -- Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee Program and the Congestion Management Program.

Less than Significant Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. As a result, light truck and automobile trips would be required to transport workers, materials, and equipment. These trips would be consistent with present traffic operation levels and not result in a substantial change in vehicle use over existing conditions. Although impacts are anticipated to be less than significant, this will be further discussed in the PEIR.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

☐ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

The designated congestion management agency for the San Diego region is SANDAG. SANDAG is responsible for preparing the RTP of which the Congestion Management Program (CMP) is an element to monitor transportation system performance, develop programs to address near- and long-term congestion, and better integrate land use and transportation planning decisions. The CMP includes a requirement for enhanced CEQA review applicable to certain large developments that generate an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak hour vehicle trips. These large projects must complete a traffic analysis that identifies the project's impacts on CMP system roadways, their associated costs, and identify appropriate mitigation. Early project coordination with affected public agencies, the Metropolitan Transit System and the North County Transit District is required to ensure that the impacts of new development on CMP transit performance measures are identified.

Less than Significant Impact: As discussed above, the proposed IVMP would include the ongoing and continued use of light truck and automobile trips to transport workers, materials, and equipment through San Diego County. Individual activities under IVMP would result in ongoing vehicle trips; however, trips associated with existing VCP activities have occurred since the VCP inception in 1989. Therefore, existing vehicle trips are considered part of the IVMP's baseline conditions as existing operations, and the proposed IVMP is not expected to substantially increase trips that would conflict with an applicable congestion management program.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

☐ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The main compatibility concerns for the protection of airport airspace are related to airspace obstructions (building height, antennas, etc.) and hazards to flight (wildlife attractants, distracting lighting or glare, etc.). Because the Proposed Project includes implementation of the countywide IVMP throughout San Diego County, individual activities could potentially be located within an Airport Influence Area or within two miles of a public airport. However, the IVMP does not propose installation of structures that would contribute to or directly result in the obstruction of airspace resulting in a change to air traffic patterns. Therefore, the Proposed Project would result in less than significant impacts on air traffic patterns.

In addition, the proposed IVMP would include countywide surveillance and chemical control methods to monitor and reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, this could include the use of aircraft. During the peak mosquito breeding season (April – October), aerial applications may occur routinely based on VCP surveillance and observations. However, because aircraft operations typically do not occur during off-peak mosquito season, and are infrequent during peak mosquito season, the proposed IVMP is not anticipated to result in a change in air traffic patterns. All aircraft operations would be conducted in accordance with established air traffic patterns. Therefore, the Proposed Project would result in less than significant impacts on air traffic patterns.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- ☐ Potentially Significant Impact
- ☐ Less than Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ No Impact

Discussion/Explanation:

No Impact: Individual activities under IVMP will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls which impede adequate site distance on a road. Therefore, no impact would result.

e) Result in inadequate emergency access?

- ☐ Potentially Significant Impact
- ☐ Less than Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ No Impact

Discussion/Explanation:

No Impact: The intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. Individual activities under IVMP are not anticipated to include the construction of new structures or facilities that would interfere or otherwise affect existing emergency access. Therefore, no impacts would result from implementation of the IVMP.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

- ☐ Potentially Significant Impact
- ☐ Less than Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ No Impact

Discussion/Explanation:

No Impact: The intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. Individual activities under IVMP are not anticipated to include the construction of new structures or facilities that would interfere with the provisions of public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, no impact would result from implementation of the IVMP.

XVII. TRIBAL CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

- ☒ Potentially Significant Impact
- ☐ Less than Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: As discussed above in response to Cultural Resources – V(b), the proposed IVMP would include physical control methods for the purpose of monitoring and abatement to improve water circulation in aquatic habitats. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. As a result, these activities have the potential to result in a substantial adverse change in the significance of a tribal cultural resource, including sites that are listed or eligible for listing in the California or local Register of Historical Resources. However, any potential impacts to tribal cultural resources would be avoided or minimized to the extent feasible, and would be mitigated in accordance with applicable requirements. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

☒ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: As discussed above in response to Cultural Resources – V(b), the proposed IVMP would include physical control methods for the purpose of monitoring and abatement to improve water circulation in aquatic habitats. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. As a result, these activities have the potential to result in a substantial adverse change in the significance of a tribal cultural resource, including resources determined to be significant pursuant to criteria defined in subdivision (c) of Public Resources Code §5024.1. However, any potential impacts to tribal cultural resources would be avoided or minimized to the extent feasible, and would be mitigated in accordance with applicable requirements. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

<u>XVIII. UTILITIES AND SERVICE SYSTEMS</u> -- Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

☐ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

Discussion/Explanation:

No Impact: The Proposed Project does not involve any uses that will discharge any wastewater to sanitary sewer or on-site wastewater systems (septic). Therefore, the Proposed Project will not exceed any wastewater treatment requirements.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne disease. Individual activities proposed under IVMP would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. Therefore, no impacts will occur.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Among other activities, the proposed IVMP would include physical control methods. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. However, the Proposed Project itself would not require or result in the construction of new or expanded storm water drainage facilities.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: The proposed IVMP includes a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. The IVMP would not include development nor propose a use requiring water supplies. As such, no impacts will occur.

e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☐ Less than Significant Impact
- ☒ No Impact

Discussion/Explanation:

No Impact: As discussed above in Utilities and Services Systems – XVIII(a), the Proposed Project does not involve any uses that will generate or discharge any wastewater to sanitary sewer or on-site wastewater systems (septic). Therefore, the Proposed Project will not require a wastewater treatment provider.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Among other activities, the proposed IVMP would include physical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, minor grading activities could potentially occur. Specifically, physical control activities may involve minor grading or vegetation management in order to survey and abate vectors and nuisances. As a result, this could potentially generate solid waste. If such activities require solid waste disposal, there are numerous solid waste disposal facilities within San Diego County with remaining capacity. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the DEH, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.). Therefore, there is sufficient existing permitted solid waste capacity to accommodate the Proposed Project's solid waste disposal needs.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

- ☐ Potentially Significant Impact
- ☐ Less than Significant With Mitigation Incorporated
- ☒ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Implementation of the IVMP could potentially generate solid waste. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the DEH, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.). Individual activities under the IVMP will deposit all solid waste at a permitted solid waste facility and therefore, will comply with federal, state, and local statutes and regulations related to solid waste.

XIX. 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, substantially 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?

☒ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Per the instructions for evaluating environmental impacts in this Initial Study, 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 were considered in the response to each question in sections IV and V of this form. In addition to project-specific impacts, this evaluation considered the projects potential for significant cumulative effects. As a result of this evaluation, the Proposed Project was determined to have **potential significant effects related to biological, cultural, and tribal cultural resources**. While mitigation may be proposed in some instances that reduce these effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear. Therefore, this Proposed Project has been determined to potentially meet this Mandatory Finding of Significance.

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, the effects of other current projects, and the effects of probable future projects)?

☒ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Potentially significant Impact: Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects was considered in the response to each question in sections I through XVIII of this form. In addition to project-specific impacts, this evaluation considered the Proposed Project's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is a **potential for cumulative effects** associated with this Proposed Project. Therefore, cumulative impacts will be further discussed in the PEIR.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

☒ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in the following eight sections: Aesthetics, Air Quality, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Population and Housing, and Transportation and Traffic. As a result of this evaluation, there were determined to be **potentially significant effects related to Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, and Noise**. While mitigation may be proposed in some instances that reduce these significant effects to a level below significance, the

effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear. Therefore, this Proposed Project has been determined to potentially meet this Mandatory Finding of Significance.

XX. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to http://www4.law.cornell.edu/uscode/. For State regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

PROJECT-SPECIFIC REFERENCES

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STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

Notice of Preparation

August 22, 2018

To: Reviewing Agencies

Re: Integrated Vector Management Program
SCH# 2018081060

Attached for your review and comment is the Notice of Preparation (NOP) for the Integrated Vector Management Program draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

KariLyn Merlos
San Diego County
5570 Overland Ave, Suite 102
San Diego, CA 92123

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

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# 2018081060
Project Title Integrated Vector Management Program
Lead Agency San Diego County

Type NOP Notice of Preparation

Description The County Dept. of Environmental Health Vector Control Program protects the public from vector-borne disease and nuisance while protecting the environment through a coordinated set of activities collectively known as the Integrated Vector Management Program. These activities and services are described in the annual Engineer's Report, which provides an overview of the VCP's general practices and procedures. As the proposed project, the IVMP would continue to operate using a comprehensive approach by applying various techniques, including surveillance, source reduction (i.e., physical control), source treatment (i.e., biological and chemical control), public education, and outreach.

Lead Agency Contact

Name KariLyn Merlos
Agency San Diego County
Phone (858) 495-5799 **Fax**
email
Address 5570 Overland Ave, Suite 102
City San Diego **State** CA **Zip** 92123

Project Location

County San Diego
City
Region
Cross Streets
Lat / Long
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Geologic/Seismic; Noise; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Vegetation; Water Quality; Wetland/Riparian

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Reviewing Agencies Resources Agency; Department of Conservation; Cal Fire; Department of Parks and Recreation; Department of Fish and Wildlife, Region 5; Office of Emergency Services, California; Caltrans, Division of Aeronautics; Native American Heritage Commission; Caltrans, District 11; Department of Toxic Substances Control; Department of Pesticide Regulation; California Department of Justice, Attorney General's Office; San Diego River Conservancy; Regional Water Quality Control Board, Region 9

Date Received 08/22/2018 **Start of Review** 08/22/2018 **End of Review** 09/20/2018

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

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2018081060

Project Title: Integrated Vector Management Program

Lead Agency: County of San Diego - Department of Environmental Health Contact Person: KariLyn Merlos

Mailing Address: 5570 Overland Avenue, Suite 102 Phone: (858) 495-5799

City: San Diego Zip: 92123 County: San Diego

Project Location: County: San Diego City/Nearest Community: countywide

Cross Streets: n/a Zip Code: n/a

Longitude/Latitude (degrees, minutes and seconds): ____° ____′ ____″ N / ____° ____′ ____″ W Total Acres: n/a

Assessor's Parcel No.: n/a Section: ____ Twp.: ____ Range: ____ Base: ____

Within 2 Miles: State Hwy #: ____ Waterways: ____

Airports: ____ Railways: ____ Schools: ____

Document Type:

CEQA: ☒ NOP ☐ Draft EIR
☐ Early Cons ☐ Supplement/Subsequent EIR
☐ Neg Dec (Prior SCH No.) ____
☐ Mit Neg Dec Other: ____

NEPA: ☐ NOI ☐ EA ☐ Draft EIS ☐ FONSI

Other: ☐ Joint Document ☐ Final Document ☐ Other: ____

Governor's Office of Planning & Research
AUG 22 2018
STATE CLEARINGHOUSE

Local Action Type:

☐ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, etc.) ☐ Other: ____

Development Type:

☐ Residential: Units ____ Acres ____
☐ Office: Sq.ft. ____ Acres ____ Employees ____
☐ Commercial: Sq.ft. ____ Acres ____ Employees ____
☐ Industrial: Sq.ft. ____ Acres ____ Employees ____
☐ Educational: ____
☐ Recreational: ____
☐ Water Facilities: Type ____ MGD ____

☐ Transportation: Type ____
☐ Mining: Mineral ____
☐ Power: Type ____ MW ____
☐ Waste Treatment: Type ____ MGD ____
☐ Hazardous Waste: Type ____
☒ Other: see Project Description below

Project Issues Discussed in Document:

☐ Aesthetic/Visual ☐ Fiscal ☐ Recreation/Parks ☒ Vegetation
☐ Agricultural Land ☐ Flood Plain/Flooding ☐ Schools/Universities ☒ Water Quality
☒ Air Quality ☐ Forest Land/Fire Hazard ☐ Septic Systems ☐ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☐ Sewer Capacity ☒ Wetland/Riparian
☒ Biological Resources ☐ Minerals ☒ Soil Erosion/Compaction/Grading ☐ Growth Inducement
☐ Coastal Zone ☒ Noise ☐ Solid Waste ☐ Land Use
☒ Drainage/Absorption ☐ Population/Housing Balance ☒ Toxic/Hazardous ☐ Cumulative Effects
☐ Economic/Jobs ☐ Public Services/Facilities ☐ Traffic/Circulation ☐ Other: ____

Present Land Use/Zoning/General Plan Designation:

Project Description: *(please use a separate page if necessary)*

The County Department of Environmental Health (DEH) Vector Control Program (VCP) protects the public from vector-borne disease and nuisance while protecting the environment through a coordinated set of activities collectively known as the Integrated Vector Management Program (IVMP). These activities and services are described in the annual Engineer's Report, which provides an overview of the VCP's general practices and procedures. As the Proposed Project, the IVMP would continue to operate using a comprehensive approach by applying various techniques, including surveillance, source reduction (i.e., physical control), source treatment (i.e., biological and chemical control), public education, and outreach.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NOP Distribution List MS

County: San Diego

SCH# 2018081060

Resources Agency

- [x] **Resources Agency**
  Nadell Gayou
- [ ] **Dept. of Boating & Waterways**
  Denise Peterson
- [ ] **California Coastal Commission**
  Allyson Hitt
- [ ] **Colorado River Board**
  Elsa Contreras
- [x] **Dept. of Conservation**
  Crina Chan
- [x] **Cal Fire**
  Dan Foster
- [ ] **Central Valley Flood Protection Board**
  James Herota
- [ ] **Office of Historic Preservation**
  Ron Parsons
- [x] **Dept of Parks & Recreation**
  Environmental Stewardship Section
- [ ] **S.F. Bay Conservation & Dev't. Comm.**
  Steve Goldbeck
- [ ] **Dept. of Water Resources**
  Resources Agency
  Nadell Gayou

Fish and Game

- [ ] **Depart. of Fish & Wildlife**
  Scott Flint
  Environmental Services Division
- [ ] **Fish & Wildlife Region 1**
  Curt Babcock
- [ ] **Fish & Wildlife Region 1E**
  Laurie Harnsberger
- [ ] **Fish & Wildlife Region 2**
  Jeff Drongesen
- [ ] **Fish & Wildlife Region 3**
  Craig Weightman
- [ ] **Fish & Wildlife Region 4**
  Julie Vance
- [x] **Fish & Wildlife Region 5**
  Leslie Newton-Reed
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6**
  Tiffany Ellis
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6 I/M**
  Heidi Calvert
  Inyo/Mono, Habitat Conservation Program
- [ ] **Dept. of Fish & Wildlife M**
  William Paznokas
  Marine Region

Other Departments

- [ ] **California Department of Education**
  Lesley Taylor
- [x] **OES (Office of Emergency Services)**
  Monique Wilber
- [ ] **Food & Agriculture**
  Sandra Schubert
  Dept. of Food and Agriculture
- [ ] **Dept. of General Services**
  Cathy Buck
  Environmental Services Section
- [ ] **Housing & Comm. Dev.**
  CEQA Coordinator
  Housing Policy Division

Independent Commissions,Boards

- [ ] **Delta Protection Commission**
  Erik Vink
- [ ] **Delta Stewardship Council**
  Anthony Navasero
- [ ] **California Energy Commission**
  Eric Knight
- [x] **Native American Heritage Comm.**
  Debbie Treadway
- [ ] **Public Utilities Commission**
  Supervisor
- [ ] **Santa Monica Bay Restoration**
  Guangyu Wang
- [ ] **State Lands Commission**
  Jennifer Deleong
- [ ] **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Cal State Transportation Agency CalSTA

- [x] **Caltrans - Division of Aeronautics**
  Philip Crimmins
- [ ] **Caltrans – Planning HQ LD-IGR**
  Christian Bushong
- [ ] **California Highway Patrol**
  Suzann Ikeuchi
  Office of Special Projects

Dept. of Transportation

- [ ] **Caltrans, District 1**
  Rex Jackman
- [ ] **Caltrans, District 2**
  Marcelino Gonzalez
- [ ] **Caltrans, District 3**
  Susan Zanchi - North
- [ ] **Caltrans, District 4**
  Patricia Maurice
- [ ] **Caltrans, District 5**
  Larry Newland
- [ ] **Caltrans, District 6**
  Michael Navarro
- [ ] **Caltrans, District 7**
  Dianna Watson
- [ ] **Caltrans, District 8**
  Mark Roberts
- [ ] **Caltrans, District 9**
  Gayle Rosander
- [ ] **Caltrans, District 10**
  Tom Dumas
- [x] **Caltrans, District 11**
  Jacob Armstrong
- [ ] **Caltrans, District 12**
  Maureen El Harake

Cal EPA

Air Resources Board

- [ ] **Airport & Freight**
  Jack Wursten
  - [ ] **Transportation Projects**
    Nesamani Kalandiyur
  - [ ] **Industrial/Energy Projects**
    Mike Tollstrup
- [ ] **California Department of Resources, Recycling & Recovery**
  Kevin Taylor/Jeff Esquivel
- [ ] **State Water Resources Control Board**
  Regional Programs Unit
  Division of Financial Assistance
- [ ] **State Water Resources Control Board**
  Cindy Forbes – Asst Deputy
  Division of Drinking Water
- [ ] **State Water Resources Control Board**
  Div. Drinking Water #_____
- [ ] **State Water Resources Control Board**
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] **State Water Resouces Control Board**
  Phil Crader
  Division of Water Rights
- [x] **Dept. of Toxic Substances Control Reg. #_____**
  CEQA Tracking Center
- [x] **Department of Pesticide Regulation**
  CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- [ ] **RWQCB 1**
  Cathleen Hudson
  North Coast Region (1)
- [ ] **RWQCB 2**
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] **RWQCB 3**
  Central Coast Region (3)
- [ ] **RWQCB 4**
  Teresa Rodgers
  Los Angeles Region (4)
- [ ] **RWQCB 5S**
  Central Valley Region (5)
  - [ ] **RWQCB 5F**
    Central Valley Region (5)
    Fresno Branch Office
  - [ ] **RWQCB 5R**
    Central Valley Region (5)
    Redding Branch Office
- [ ] **RWQCB 6**
  Lahontan Region (6)
  - [ ] **RWQCB 6V**
    Lahontan Region (6)
    Victorville Branch Office
- [ ] **RWQCB 7**
  Colorado River Basin Region (7)
- [ ] **RWQCB 8**
  Santa Ana Region (8)
- [x] **RWQCB 9**
  San Diego Region (9)

- [x] **Other** Attorney General Officer
- [x] San Diego River Conservancy

Last Updated 5/22/18

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

September 19, 2018

KariLyn Merlos
Vector Control Program
County of San Diego, Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123
(858) 694-2888
IVMP@sdcounty.ca.gov

Subject: Comments on the Notice of Preparation of a Draft Program Environmental Impact Report for the Integrated Vector Management Program Project SCH# 2018081060

Dear Ms. Merlos:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) for the Integrated Vector Management Program (IVMP) Project Draft Program Environmental Impact Report (PEIR).
Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act [CEQA] Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may

result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.
CDFW also administers the Natural Community Conservation Planning (NCCP) program. San Diego County (County) participates in the NCCP program through implementation of its Subarea Plan (SAP) and preparation of its draft North County Subarea Plan (NC-MSCP).

Project Location:
The IVMP includes vector and vector-borne disease surveillance and control services throughout all 18 incorporated cities and the unincorporated areas of San Diego County, totaling approximately 4,261 square miles.

Project Description/Objective:
The Proposed Project would include progressive and emerging vector control activities and materials. New vector control methods based on scientific evidence and expert guidance may be implemented to address public risks as they arise. These emerging vector control strategies could include increased or advanced early source prevention, source reduction, surveillance, and physical or biological chemical control, depending on the assessment of public health risk. Activities would also include public education and outreach.

COMMENTS AND RECOMMENDATIONS
CDFW offers the following comments and recommendations to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

1. CDFW has responsibility for wetland and riparian habitats. It is the policy of CDFW to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion that would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks that preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the PEIR and must compensate for the loss of function and value of a wildlife corridor.

    a) The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the PEIR. The delineation should be conducted pursuant

to the U. S. Fish and Wildlife Service wetland definition adopted by CDFW.1 Please note that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

b) The CDFW also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSAA.2

2. CDFW considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and G. Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation

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1 Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

2 A notification package for a LSA may be obtained by accessing the Department's web site at http://www.wildlife.ca.gov/Conservation/LSA.

monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

3. To enable CDFW to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the PEIR.

   a) The document should contain a complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.

   b) A range of feasible alternatives should be included to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

Biological Resources within the Project's Area of Potential Effect

4. The document should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year. The PEIR should include the following information.

   a) CEQA Guidelines, section 15125(c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.

   b) A thorough, recent floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see https://www.wildlife.ca.gov/Conservation/Plants/Info). CDFW recommends that floristic, alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 20083). Alternately, for assessing vegetation communities located in western San Diego County, the Vegetation Classification Manual for Western San Diego County (Sproul et al. 20114) may

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3 Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

4 Sproul, F., T. Keeler-Wolf, P. Gordon-Reedy, J. Dunn, A. Klein and K. Harper. 2011. Vegetation Classification Manual for Western San Diego County. First Edition. Prepared by AECOM, California Department of Fish and Game Vegetation Classification and Mapping Program and Conservation Biology Institute for San Diego

be used. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. CDFW's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

d) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the PEIR.

   a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.

   b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with any NCCP in San Diego County). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to

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Association of Governments.

undisturbed habitats in adjacent areas, should be fully evaluated in the PEIR.

c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

6. The PEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance.

7. The PEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

8. For proposed preservation and/or restoration, the PEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

9. CDFW recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations. Sections 3503.5 and 3513 of the California Fish and Game Code prohibit take of all raptors and other migratory nongame birds and section 3503 prohibits take of the nests and eggs of all birds. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian

breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

10. CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Eric Hollenbeck, Senior Environmental Scientist Specialist at (858) 467-2720 or Eric.Hollenbeck@wildlife.ca.gov.

Sincerely,

Gail K. Sevrens
Environmental Program Manager

cc: Office of Planning and Research, State Clearinghouse, Sacramento
Doreen Stadtlander, USFWS

State of California • Natural Resources Agency
Edmund G. Brown Jr., *Governor*
DEPARTMENT OF PARKS AND RECREATION
Lisa Ann L. Mangat, *Director*
San Diego Coast District
4477 Pacific Highway
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September 21, 2018

County of San Diego, Department of Environmental Health
Vector Control Program, Attn: KariLyn Merlos
5570 Overland Avenue, Suite 102
San Diego, CA 92123
IVMP@sdcounty.ca.gov

RE: NOP of Program Environmental Impact Report for Integrated Vector Management Program

Dear Ms. Merlos,

Thank you for the opportunity to comment on the Integrated Vector Management Program (IVMP) Notice of Preparation of Program Environmental Impact Report. California State Parks (CSP) is a Trustee Agency responsible for the protection of natural, cultural and historical resources within the units of the CSP system. The mission of CSP is to provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation. Invasive mosquito species that are known to carry pathogens are present at Los Peñasquitos Lagoon Natural Preserve, a sub-unit of Torrey Pines State Natural Reserve, and at Tijuana Estuary Natural Preserve. The VCP currently coordinates with CSP on an ongoing basis to gain access to habitats at these park units for the purposes of vector monitoring and control. We are providing comments to ensure that the proposed IVMP incorporates measures to avoid and minimize direct and indirect impacts associated with monitoring and controlling disease-carrying mosquito species to threatened and endangered species and sensitive habitats on CSP lands.

Potential impacts to sensitive natural communities and species

The IVMP has the potential to result in adverse effects on sensitive natural communities, such as salt marsh, riparian, and transitional habitats. The habitats of Torrey Pines SNR and Los Peñasquitos Natural Preserve have been afforded the highest level of resource protection in the State Parks system, and natural resource protection is a primary management goal for park units classified as State Reserves and for sub-units classified as Natural Preserves (DOM 0304.2). Natural Preserves (Public Resource Code § 5019.71) are distinct areas of outstanding natural or scientific significance established within the boundaries of other State Park System units, whose purpose is to preserve rare or endangered plant and animal species and their supportive ecosystems (DOM 0304.2.5). The Tijuana Estuary Natural Preserve has been designated as a Wetland of International Importance by the Ramsar Convention. State and federally listed bird species at these units include the Light-footed Ridgway's rail, Belding's savannah sparrow, least Bell's Vireo, Western Snowy plover, California Least Tern, and coastal California gnatcatcher. CSP generally restricts access to sensitive habitats, including riparian, coastal sage scrub and salt marsh, during nesting season to avoid disturbance to nesting birds.

The Proposed PEIR must analyze potential impacts to listed species and sensitive vegetation that may result from the IVMP. Minimization, avoidance, and/or mitigation measures must be proposed to reduce potential significant impacts from IVMP (for example, foot traffic, boating, or aerial treatment during bird breeding season). These potential impacts will need to be permitted in accordance with applicable federal, state and local requirements. Additionally, the County's plan for proceeding with VCP activities at Torrey Pines SNR, including the testing of longer lasting larvicide options and the use of aerial applications to avoid the need to enter sensitive habitats by foot during nesting season should be incorporated in the IVMP.

Nuisance species

During warm summer months, conditions may become favorable for nuisance species like the black salt marsh mosquito to proliferate in salt marshes. While the VCP considers nuisance species in their list of vector species (Initial Study, page 2), the black salt marsh mosquito is not known to transmit disease to humans and its status as a vector species is questionable. Its aggressive day biting elicits a vocal response from residents living near lagoons and estuaries, and CSP is aware of the high volume of complaints fielded by the VCP when black salt marsh mosquitoes are breeding. Nonetheless, the CSP Department of Operations Manual states that pest control by other public agencies on Department lands is permissible for disease vectoring mosquitoes, not those considered to be nuisance (i.e., non-disease carrying) species.

CSP does not support the VCP accessing the salt marsh at park units for the control of nuisance species, particularly during bird breeding season. Nuisance species do not pose a significant threat to public health, while monitoring and treatment activities have the potential to harm sensitive habitats and species.

In conclusion, a thorough analysis of potentially significant impacts to biological resources including special status species and wetlands should be included in the PEIR. CSP is supportive of establishing phased risk levels to identify when there is an elevated public health risk and how the VCP would respond to each risk level (Section VIII). This tool would better our understanding of VCP activities and thresholds for treatment of vector species. Thank you again for the opportunity to comment. Please feel free to contact me (darren.smith@parks.ca.gov) for questions or further discussion of our concerns.

Sincerely,

Darren Smith
District Services Manager

cc: Garratt Aitchison, San Diego Coast District Superintendent
Lisa Urbach, North Sector Superintendent
Chris Peregrin, Senior Environmental Scientist
Cara Stafford, Environmental Scientist
Lorena Warner-Lara, Park and Recreation Specialist
Reading File

STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
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August 31, 2018

KariLyn Merlos
San Diego County
5570 Overland Ave, Suite 102
San Diego, CA 92123

RE: SCH# 2018081060 Integrated Vector Management Program, San Diego County

Dear Ms. Merlos:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
    a. A brief description of the project.
    b. The lead agency contact information.
    c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
    d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
    a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
    a. Alternatives to the project.
    b. Recommended mitigation measures.
    c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
    a. Type of environmental review necessary.
    b. Significance of the tribal cultural resources.
    c. Significance of the project's impacts on tribal cultural resources.
    d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
    a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
    b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
    a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
    b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.
        ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        i. Protecting the cultural character and integrity of the resource.
        ii. Protecting the traditional use of the resource.
        iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
    a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
    a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
    b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
    c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Frank.Lienert@nahc.ca.gov.

Sincerely,

Frank Lienert
Associate Governmental Program Analyst

cc: State Clearinghouse

VIEJAS
TRIBAL GOVERNMENT

P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

Phone: 619.445.3810
Fax: 619.445.5337
viejas.com

August 28, 2018

KariLyn Merlos
Vector Control Program
County of San Diego, Department of Environmental Health
5570 Overland Avenue, Suite 102
San Diego, CA 92123

RE: Integrated Vector Management Program

Dear Ms. Merlos,

In reviewing the above referenced project the Viejas Band of Kumeyaay Indians ("Viejas") would like to comment at this time.

The project area may contain many sacred sites to the Kumeyaay people. We request that these sacred sites be avoided with adequate buffer zones.

Additionally, Viejas is requesting, as appropriate, the following:

- All NEPA/CEQA/NAGPRA laws be followed
- Immediately contact Viejas on any changes or inadvertent discoveries.

Thank you for your collaboration and support in preserving our Tribal cultural resources. I look forward to hearing from you. Please call me at 619-659-2312 or Ernest Pingleton at 619-659-2314, or email, rteran@viejas-nsn.gov or epingleton@viejas-nsn.gov, for scheduling. Thank you.

Sincerely,

Ray Teran, Resource Management
VIEJAS BAND OF KUMEYAAY INDIANS

LOS PEÑASQUITOS LAGOON FOUNDATION

P.O. Box 940
Cardiff by the Sea
CA, 92007

September 21, 2018

County of San Diego, Dept. of Environmental Health
Vector Control Program, Attn: KariLyn Merlos
5570 Overland Avenue, Suite 102
San Diego, California 92123

Subject: Notice of Preparation – Program EIR, Integrated Vector Management Program

Dear Ms. Merlos,

Thank you for this opportunity to provide input during the Notice of Preparation (NOP) for the Program EIR for the County's proposed Integrated Vector Management Program. The Los Peñasquitos Lagoon Foundation appreciates both past and ongoing partnerships and collaboration with staff from the County's Vector Control Program (VCP) to explore alternative methods for vector management in Los Peñasquitos Lagoon, a State Marsh Natural Preserve, that prioritize restoration and enhancement of the Lagoon's natural systems with emphasis on tidal circulation for effective vector management in this fragile and unique coastal lagoon while avoiding impacts to its Environmentally Sensitive Habitat Areas and the sensitive/rare plants and rare/endangered animals that rely on it. I have attached our comments with regard to the NOP and look forward to working with you and other VCP staff to develop the Integrated Vector Management Program and, eventual, site-specific plan for Los Peñasquitos Lagoon and adjacent areas around the Lagoon.

If you have any questions, please feel free to contact me at (760) 271-0574 or mikehastings1066@gmail.com.

Sincerely,

Mike Hastings

Mike Hastings
Executive Director
Los Peñasquitos Lagoon Foundation

Cc:
Darren Smith, California Department of Parks and Recreation (San Diego Coastal District)
Cara Stafford, California Department of Parks and Recreation (San Diego Coastal District)
Eric Hollenbeck, California Department of Fish and Wildlife (San Diego Office)
Toni Ross, California Coastal Commission (San Diego Office)
Carolyn Lieberman, United States Fish & Wildlife Service (San Diego Office)
Patrick Gower, United States Fish & Wildlife Service (San Diego Office)
Dennis Ridz, Torrey Pines Community Planning Board (president)

DESCRIPTION OF PROJECT

1. **Definition of "vector" needs to be revised** – Current definition is too broad and needs to differentiate between disease carrying species that pose threats to public safety (e.g. *Culex tarsalis* and West Nile virus) and species that are considered a nuisance as the former is objective and latter very subjective. 4 of 5 Vector Control Program's core services identified in the Initial Study relate specifically to Disease Carrying Species and only 1 related to "customer complaints." References to "vector" within the Initial Study are either "vector-borne disease" or "vector-related public nuisance" and therefore, should be addressed separately since grouping the two together under one definition misleads the need and intent to perform treatments which could include virtually any insect that is considered bothersome.

   A State Marsh Natural Preserve, Los Peñasquitos Lagoon has numerous insect species that are vital to the wetland's ecology and only ones that pose a direct threat to public health should be prioritized for treatment within the Lagoon to avoid impacts that could damage sensitive flora and fauna in Los Peñasquitos Lagoon and other coastal protected areas. While treating specific types of nuisance species may be permitted within Los Peñasquitos Lagoon on a case by case basis, it should not be assumed that treatment is mandatory and justified regardless of impacts. This distinction was made by Robin Greene (Superintendent, San Diego Coastal District of State Parks) at a meeting with County Vector Program (VCP) staff and upper management in Old Town, San Diego, on July 19 2016.

   Suggested Correction – Separate definition and protocols/plans for vector into 1) Disease Carrying and 2) Nuisance Species to allow better interpretation and understanding of treatment priority, needs, methods and potential impacts for vector management in a State Marsh Natural Preserve.

2. **Surveillance** – Work with State Parks and the Los Peñasquitos Lagoon Foundation to develop a monitoring and vector management plan that can be implemented within a State Marsh Natural Preserve by establishing impact avoidance measures and meeting other requirements of the associated Right of Entry Permit or related permits and/or agreements. Any surveillance activities conducted on foot within Los Peñasquitos Lagoon will require a trained biologist to accompany VCP staff in order to avoid impacts to sensitive plant species that could be easily trampled by uniformed individuals. Any surveillance activities conducted on foot or by boat along or within Los Peñasquitos Lagoon during nesting season of listed bird species (Feb 15th – Sept 15th) will require the services of a permitted biologist accompanying VCP staff to avoid "take" of listed species and to minimize any indirect impacts (e.g. noise) that cannot be avoided. Consultation with regulatory staff from California Department of Fish & Wildlife (CDFW) and United States Fish & Wildlife (USFW) will be needed to ensure compliance with recovery plans prepared for listed species beyond what is conditioned by State Parks through an agreement and/or Right of Entry Permit.

SOURCE REDUCTION

1. **Source Reduction.** Coordinate outreach efforts to community planning groups (e.g., Torrey Pines Community Planning Board) to improve efforts and increase opportunities for comprehensive approaches (e.g., educate/inform planning boards so they can respond accordingly during review of planned development projects) as well as threats/concerns over vector populations. Have VCP staff attend board meetings for local planning boards to provide updates on vector issues, VCP needs and priorities.

SOURCE TREATMENT (BIOLOGICAL AND CHEMICAL CONTROL)

1. Mosquito fish (*Gambusa affinis*) are invasive species that greatly impact native species within coastal lagoons in San Diego that include Los Peñasquitos Lagoon due to their aggressive behavior and should never be introduced directly into coastal lagoons without prior consultation with reserve managers or into water bodies or facilities (e.g. storm water detention basins) that are tributary (i.e. drain) to these systems. Improve methods for tracking and following up on public distribution to ensure that they comply with allowed uses for this approach in vector management (e.g. ponds, horse troughs).

2. **Chemical Control.** Chemical controls should always be a last resort to protect public health and never used for nuisance species within a State Natural Marsh Preserve (and related protected coastal lagoons) or in areas that are tributary to these receiving water bodies and/or through aerial dispersal from prevailing winds. Impact avoidance measures should include selecting chemical treatments that do not harm aquatic species or plants native to Los Peñasquitos Lagoon and conducted by trained staff that are certified and experienced in applying chemical controls near sensitive areas.

PUBLIC EDUCATION AND OUTREACH

1. Better coordinate outreach efforts to community planning groups (e.g., Torrey Pines Community Planning Board) to proactively improve public outreach and education efforts and increase opportunities for comprehensive approaches (e.g., educate/inform planning boards so they can respond accordingly during review of planned development projects). Have VCP staff attend board meetings for local planning boards to provide updates on vector issues, VCP needs, management efforts and priorities.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

1. Need to "check" recreation as applications of chemicals my impact recreation (exposure) and/or access for passive recreation.

IV. BIOLOGICAL RESOURCES

1. <u>Substantial adverse effects on any riparian habitat or other sensitive natural community – plans, policies, regulation, CDFW, USFW.</u> (General Comment) The PEIR needs to acknowledge and consider potential impacts to sensitive species (flora and fauna) for implementing the IVMP within or adjacent to protected coastal marshes within the County. The PEIR should also reference the need to prepare individual monitoring and management plans for disease carrying vectors and for nuisance species that will need to approved by

landowners and management entities to set the stage for project-level design and CEQA determination for the IVMP. The County already has monitoring and management plan in place for the Tijuana Estuary in conjunction with USFW which could be used as a general template to help guide the development of a similar plans for each coastal marsh within the County and their associated tributaries and/or facilities that drain into them.

2. Substantial adverse effects on any riparian habitat or other sensitive natural community – plans, policies, regulation, CDFW, USFW. (Specific to Los Peñasquitos Lagoon) VCP staff will need to work with State Parks and the Los Peñasquitos Lagoon Foundation to develop a monitoring and management plan that can be implemented within a State Marsh Natural Preserve and that, at the very least, establishes impact avoidance measures and meets other requirements of the associated Right of Entry Permit or related agreements. Any surveillance and/or treatment activities conducted on foot within Los Peñasquitos Lagoon will require a trained biologist to avoid impacts to sensitive plant species that could be easily trampled by uniformed individuals. Any surveillance and/or treatment activities conducted on foot or by boat along or within Los Peñasquitos Lagoon during nesting season of listed bird species (Feb 15th – Sept 15th) will require a permitted biologist to avoid "take" of listed species and minimize indirect impacts (e.g. noise) that cannot be avoided. Consultation with State Parks (landowner), Los Peñasquitos Lagoon Foundation (land manager), California Coastal Commission (ESHA, Listed Species), CDFW (State-Listed Species), SDRWQCB (401 Certification), USFW (Federally-Listed Species) and Army Corps (404 permit) will be needed for comprehensive and coordinated resource protection.

3. Adverse Effects on federally protected wetlands. Please identify within the PEIR how SWRCB NPDES Permit 2016-0039-DWQ applies to discharges directly or indirectly to protected water bodies such as Los Peñasquitos Lagoon.

4. Impede Use of Native Wildlife Nursery Sites. PEIR needs to acknowledge and consider supporting ongoing sensitive species surveys and associated mapping in protected habitats to improve understanding of species health and temporal/spatial characteristics during nesting season. For Los Peñasquitos Lagoon, this effort would include (but not be limited to) the following listed species: Belding's savannah sparrow (*Passerculus sandwhichensis*), CA Gnatcatcher (*Polioptila californica*), and Ridgway Rail (*Rallus obsoletus*). Mapping of individual sensitive plant species, Environmentally Sensitive Habitat Areas, active nesting areas and historic nesting areas will be needed to determine mitigation avoidance measures during hand and/or boat distribution of larvicide in Los Peñasquitos Lagoon.

5. Conflict with provisions of adopted Habitat Conservation Plan, Natural Communities Conservation Plan, etc. Impacts to sensitive species (flora and fauna), including but not limited to "take," for implementing the IVMP within Los Peñasquitos Lagoon would conflict with provisions set by the Lagoon's status as a designated State Marsh Natural Preserve under Public Resource Code § 5019.71 and adopted resource management and protection plans that include:

Local Level

- Wildlife Management Plan for Torrey Pines State Natura Reserve
- Torrey Pines State Natural Reserve Vegetation Management Statement (2009)
- Los Peñasquitos Lagoon Enhancement Plan
- Los Peñasquitos Lagoon Sediment Total Maximum Daily Load (TMDL) – Lagoon Compliance Target
- City of San Diego Multi-Habitat Planning Area (MHPA)
- City of San Diego Multiple Species Conservation Program (MSCP)
- Community Plans that include Torrey Pines, Carmel Valley, Del Mar Mesa, and Sorrento Hills

Regional Level

- San Diego Basin Plan, San Diego Water Quality Control Board
- San Diego Coastal State Park System General Plan, California Department Parks & Recreation
- Southern California Wetlands Recovery Project's Work Plan
- Southern California Wetlands Recovery Project's Regional Strategy

State and National Level

- Natural Resources Handbook, California Department Parks & Recreation
- General Plan, California Department Parks & Recreation
- Public Resources Code, ESHA requirements of the California Coastal Act of 1976
- Species Conservation and Recovery Programs, CA Department of Fish & Wildlife
- U.S. Fish & Wildlife Service Recovery Plans for least Bell's vireo, light-footed Ridgeway's rail, and western snowy plover

IX. HYDROLOGY AND WATER QUALITY

1. **Degradation of Beneficial Uses.** Trampling of sensitive/rare plant species, disturbance of listed species during nesting season, unauthorized "take" of listed bird species and/or use of chemicals harmful to aquatic species within or tributary to Los Peñasquitos Lagoon would be considered degradation of its Beneficial Uses as identified in the San Diego Basin Plan and may conflict with attempts to meet the Lagoon Compliance Target of the Los Peñasquitos Lagoon Sediment Total Maximum Daily Load.

From:	Lynne Blackman
To:	IVMP
Subject:	Mosquito Control
Date:	Friday, September 07, 2018 9:45:19 AM

We are in favor of early (pre-disease)
elimination of mosquitos. The infestation in Del Mar area is intolerable. All outdoor activity impossible.
Lynne and Vernon Blackman
13591 Nogales Drive
Del Mar 92014
Sent from my iPhone

From: Home
To: IVMP
Subject: Mosquitos in Del Mar
Date: Thursday, September 06, 2018 9:42:47 PM

Dear Sir or Madam,

I grew up around North County and have never experienced mosquitos in this area as I have this year. As a physician, I recognize that mosquitos actually are a serious health threat and without getting into a political discussion about climate, may become more of a problem in the coming years. We recently purchased a home in Del Mar Heights, and moved in around August 10. We have literally stepped out the door of our home and been swarmed by at least 5-10 mosquitos during all hours of the day. At times during the month, I have had 10-15 bites on my legs and arms at any given time. These have fortunately been a nuisance only, but for older adults and children who do not fight infection as well, they could certainly become serious. My father-in-law, who is more allergic, developed huge welts while visiting us during the month.

It has come to my attention that the city has been treating with a chemical that will kill the mosquito larvae, but will not affect the adult mosquitos. This will likely need to change, given the ongoing problem this year. Other areas of the country have used foggers for treatment of these adults, and this may become necessary should the current weather patterns continue. I would urge you to please consider further measures in the future, for the health and safety of your residents. Your consideration is most appreciated.

Sincerely,

Lisa M. Coles, M.D.

From:	Andrew Cunningham
To:	IVMP
Subject:	Mosquito control in Del Mar area
Date:	Sunday, September 09, 2018 7:48:14 PM

Hi,

I would be in favor of larvicide being applied preemptively to the lagoons when it is suspected conditions are 'ripe' for a mosquito infestation.

Andrew

From:	Faye Detsky-Weil
To:	IVMP
Subject:	Mosquitoes
Date:	Thursday, September 06, 2018 11:21:07 PM

It is important that you be proactive in preventing and eliminating the upsurge of mosquitoes in the Del Mar area. I am particularly sensitive to mosquitoes and they seem to find me quickly and easily. For example, I was outside for five minutes and found a bite when I returned inside the house. My body reacts by swelling up in the bite area. I hope that you can curtail the mosquitoes breeding by using non-breeding mosquitoes/larvae and keeping spraying to a minimum.

Is there something you suggest that homeowners spray or lay down to help eliminate mosquitoes, besides removing standing water?

Thank you.

Faye Detsky-Weil
13464 Calais Drive
Del Mar, CA 92014

From: robie faulkner
To: IVMP
Cc: diannejacob@sdcounty.ca.gov
Subject: Comments on vcp environmental review
Date: Thursday, August 30, 2018 3:45:25 PM

The vector control propaganda information concerning the proposed air spraying of poisonous chemicals to kill larva is not convincing. The County of San Diego should use medical experts to determine if the secret chemicals to be used will endanger the health of the people they are representing. They should do their job and not just rest on vector control rhetoric to promote genocide.

Robie Faulkner 619-445-5748

From: nina ho
To: IVMP
Subject: mosquitoes near the racetrack lagoon
Date: Saturday, August 25, 2018 8:24:20 AM

This year especially now there seems to be a huge infestation of mosquitoes. We cannot open our doors in spite of the heat and high humidity. We are being bitten all over both inside and outside the house that it is getting to be intolerable. There is no stagnant water anywhere in or around the house. PLEASE spray more often around the lagoon. All my neighbors are complaining.Desperately need help.

This is the first time the situation has been so bad.

Sent from my iPhone

From: Kathy Montgomery
To: IVMP
Subject: Vector Management Program - Mosquitoes - Torrey Pines Lagoon
Date: Friday, September 07, 2018 1:42:31 PM

I appreciate all that you do in the treating of the mosquitoes however, this year the mosquito problems were much worse than previous years. There should be more treatments when Vector is aware that there is an issue. We were basically held hostage in our homes this summer due to the mosquitoes. We could not leave our doors open without screens therefore, were in a hot atmosphere in our own homes. We live in a beautiful city and it's a shame that we cannot enjoy it due to these pesky insects. I feel that Vector should spray more often or treat the lagoon more often.

Thanks,

Kathy Montgomery

PSBUSINESSPARKS.

Kathy Montgomery | Sr. Director of Leasing
6440 Lusk Blvd., Suite D200 | San Diego, CA 92121
t. 858-452-9660 X 301 f.858-558-8285 c.858-335-2655

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From: Mary Sasso
To: IVMP
Cc: Mary Sasso
Subject: Saltmarsh mosquitos
Date: Friday, September 07, 2018 9:44:36 PM

I live in the Del Mar Heights area which was badly hit with the salt marsh mosquitoes this summer. I have lived at this location for over 45 years and have never seen the mosquitoes in the numbers we had this year, nor do I remember them being so active in the day time. Even if they do not carry disease, they are troublesome. Having received multiple bites over several weeks, which sometimes calm down only to return to their very itchy state multiple times. I think that when weather and super high tides are known factors that increase their breeding, it would be advisable to Vector Control to move more quickly to controlling the population.

From: Leslie Shaw
To: IVMP
Subject: Vector Control in Del Mar
Date: Thursday, September 06, 2018 9:59:56 PM

I am a Del Mar resident. I cannot go out after 6 pm without getting eaten alive even through some thin clothing. Please take action before the problem gets out of hand.

Leslie S. Shaw, Esq.
Law Office of Leslie S. Shaw A P.C.
7860 Mission Center Court, Ste 111
San Diego, CA 92108
Ph: 619-683-2346 Fax: 619-683-2457
****
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****

From:	Jocie Van Reusen
To:	IVMP
Subject:	Del Mar mosquitoes
Date:	Thursday, September 06, 2018 9:39:00 PM

Hi there
I am in favor of not spraying or treating with more insecticides/larvacides especially if they carry no known disease - the salt marsh mosquitoes.

We live in Del Mar and have been very affected by lots of bites and limited time outside. While not understanding the full nature of what made them disrupted, I do believe it's better to let nature take its course and not have more toxins in the air/ground/water. It is merely an inconvenience of nature that we will have to deal with.

Thank you
Jocie Van Reusen
Del Mar, CA

Sent from my iPhone

From: Karen Vaughan
To: IVMP
Subject: mosquitoes Del Mar Heights
Date: Saturday, August 25, 2018 4:35:32 PM

To whom it may concern:

Having been a resident of Del Mar for 29 years, I have never seen such an explosion of mosquitoes as we are having right now. I cannot use my backyard at all, and cannot even let the dog out, as she is getting attacked. I am resorting to driving her across the freeway to Carmel Valley just to walk her.

Please consider stepping up the spraying, and include treatment for mature mosquitoes, not just larvae. I realize the environmental implications, but this is getting ridiculous. We should not be captive in our own homes. And I am greatly fearful of the poor children down the street at Del Mar Heights on the first day of school in just two short days. Spraying the field is just a bandaid on a hemorrhage; the mosquitoes will be right back.

Please help us!

Karen Vaughan

Del Mar Heights