

## **RESPONSES TO COMMENTS**

The Greater Los Angeles County Vector Control District (“District”) posted and circulated for public review and comment from February 18, 2011 through March 19, 2011 a draft Mitigated Negative Declaration (“MND”) for the proposed Integrated Vector Control Management Program (the “Project”). No comments were received during this period. On March 23, 2011, the District received a comment letter dated March 21, 2011 from the California Department of Fish and Game.

Although the California Environmental Quality Act (“CEQA”) does not require a lead agency to prepare written responses to comments on an MND (*see* 14 Cal. Code Regs. § 15088), the District has elected to prepare the following written responses to the Department of Fish and Game’s comment letter with the intent of conducting a comprehensive and meaningful evaluation of the proposed Project.

---

### **Introductory Statement**

Thank you for providing comments on the MND. The District was established in 1952 with the mission of protecting the residents of Los Angeles County and its respective cities from vector borne disease and nuisance. Over the last 59 years, the District has adapted its practices and procedures to keep pace with the emerging issues associated with vector control and their related diseases. The District’s practices and procedures have also been modified as new information on the environment emerges, and best management practices are adopted to mitigate any potential impacts related to District activities while still fulfilling the District’s mission.

The District covers 1330 square miles of highly urban and suburban area with a relatively small percentage populated by listed protected and endangered species and species of concern. The District works cooperatively with other public and private agencies to ensure that potential vector breeding habitat is maintained properly and that the District has access to provide surveillance and control as required. The District’s authority comes from the California Health and Safety Code, sections 2000-2007. While the District has the authority and duty to protect the public from vectors and their associated diseases, the District also remains sensitive to the concerns and mandates of other agencies, and takes steps to be responsive thereto.

### **Biological Resources**

#### **Response to Item 1(a)**

No response necessary. The District takes extreme care to avoid any adverse impacts to special status endangered and threatened species and their habitats.

Response to Item 1(b)

The MND for the proposed Project concluded, supported by substantial evidence, that the proposed Project would not have a significant adverse impact on special status species or plant communities. No substantial evidence supporting a fair argument to the contrary has been presented. The District's surveillance and treatment activities occur along established paths and access points which are plentiful in the anthropogenically-altered areas within District boundaries. Surveillance and treatment are only necessary in areas where human activity is likely to occur and, at this juncture, access to remote areas is not required to fulfill the District's mission. The intrusion into areas for surveillance and treatment is transitory by its nature and does not cause any change to the environment. Moreover, District personnel exercise all due care to ensure that District activities do not create significant adverse impacts to special status species or plant communities.

Response to Item 1(c)

The District has researched various databases regarding habitat types in the areas in which it conducts its statutorily authorized activities. According to the Department of Fish and Games website, DFG Ecological Reserves Region 5 – South Coast Region, there are no Ecological Reserves located within District boundaries. There is no evidence that District activities adversely affect special status species, or that the District's species assessment is inadequate. The District has worked and continues to work with various agencies on projects involving constructed wetland and riparian habitat, and the District advocates proper planning and maintenance of these projects to promote vector minimization and to provide access if control measures are required as the project matures. In the event that special status species are identified in areas in which the District fulfills its obligation, the District will conform to established practices and procedures designed to ensure that there are no significant adverse impacts to special status species.

Response to Item 1(d)

Please see Response to Item 1(c).

Response to Item 1(e)

As stated above, the District's vector control activities occur largely in highly urban and suburban locales. To the extent that Project activities take place in more rural settings, those activities represent only limited and transitory impacts. Specifically, the District does not engage in any activities that constitute a "take" as defined by the Fish and Game Code (see Fish and Game Code § 2080) of any species protected by the California Endangered Species Act. Should the scope or location of the District's activities change such that an Incidental Take Permit (ITP) is required, the District will consult with the Department of Fish and Game and will take all feasible steps to obtain the ITP.

**Protection of Native Birds**

Please refer to the Responses to Items 1(b) and 1(e) above. In addition, the District routinely coordinates with various park and recreation districts and departments with oversight of the areas in which District activities are conducted to ensure that District activities do not adversely affect bird species in the area. The District makes a concerted

effort to avoid conducting its activities during the breeding bird season, but if there is a serious risk to public health posed by vectors, the District is obligated to perform its statutorily-authorized activities during this time period.

### **Impacts to Riparian Resources**

The District does not engage in any activity that diverts or obstructs the natural flow, or changes the bed, channel, bank (which may include associated riparian resources), river or stream, or uses material from a stream bed. If such a need presents itself in the future, the District will provide written notification pursuant to Section 1602 of the Fish and Game Code and will comply with all appropriate requirements.

### **Project Activities Conducted Within Ecological Reserves**

As stated in Response to Item 1(b) above, the District has no Ecological Reserves within its boundaries. Ballona Wetland Ecological Reserve is within the boundaries of Los Angeles County West Vector Control, which is a different legal entity. Los Angeles County West Vector Control may be reached at (310) 915-7370.

### **Conclusion**

The District appreciates the Department of Fish and Game's comments on the draft MND. Please contact Ms. Susanne Klueh, Director of Scientific/Technical, should you have further questions. We look forward to working with you in the future.