

Environmental Evaluation Report

Comments from the Public



During the public review period, the District received a total of 229 comments from 30 individuals and five organizations. The District is not accepting additional comments on the Environmental Evaluation, but there will be an opportunity for the public to review the comments list until June 19. Comments or questions about the list can be emailed to vectorinfo@deh.sccgov.org. Following the review period, the District's responses to the 229 comments will be provided at the website by July 3. The draft document will then be reviewed in light of the comments and revised into a final version for website publication.

Below are the list of comments we received during the public review period for our Environmental Evaluation and during the 2012 Public Scoping period. The District will produce two types of responses. The first type will be designated as **master responses**. These will address those issues that were repeatedly raised among the comments from multiple individuals, but which all have the same response from the District. The second type will be designated as **individual responses** which need more specific response than is covered in the master responses. The list is sorted first by Type of Response, second by Date Received, and thirdly by Comment Number.

Type of Response	Date Received	Comment Number	Issue Description
Master	6/28/2012	126	– West Nile virus (WNV) was excuse for pesticide use. Widespread broadcasting of pesticide meet criterion for EIR. Question: How many cases of WNV are there? What is verification of tests? PEIR must have all chemicals in formula (adulterant). Only independent research used. EIR preparers must be independent. Old malathion may be more toxic. How long is chemical in air on land, what about droplet size – risk assessment needed. Fogging exposure to open homes. Effects on baby with reduced liver function. Read Zenivex label. MSDS says avoid contact. Kidney dialysis patient exposure or exposure to chemically sensitive people.
Master	6/28/2012	127	2. – Objection to spraying humans, killing good, beneficial animals, California is dry state. WNV epidemic never happened.
Master	6/28/2012	128	3. – WNV is a benign, insignificant virus; no such thing as a safe pesticide; read from document he wrote. Deadbird program is not science, its propaganda. Pesticides increase WNV impacts; people get more sensitive to pesticides chemicals over time while insects develop resistance.
Master	6/28/2012	131	> Concerned with use of Zenivex; it mimics chrysanthemums but is a harmful neurotoxin.
Master	7/1/2012	134	> Provide a "No Project" alternative where no release of pesticides is made, and natural processes take the primary role in control.
Master	7/3/2012	136	> Provide alternative programs to control mosquito population (mosquito fish planting and swimming pool monitoring).
Master	7/4/2012	137	> Public education towards preventing mosquito bites (i.e., colors of clothing, fragrances, etc.).
Master	7/5/2012	138	> Planting vegetation attracting natural predators of mosquitoes through a variety of methods.
Master	7/6/2012	139	> Advanced technology of California should yield more effective, less hazardous alternatives.

Master	7/8/2012	141	> Private resident has certification by the National Wildlife Federation for Backyard Habitats preventing use of chemical pesticides, and resident does not give permission for pesticides via drift to be used.
Master	7/14/2012	147	> Ensure mosquito abatement staff minimize impact to tidal marsh and vernal pool habitats (especially during breeding season).
Master	7/15/2012	148	> Operation of vehicles should be restricted to levees and existing roads, and avoid vernal pool plants during blooming season (Mar-Jun).
Master	7/16/2012	149	> Describe the impact of chemicals on pollinator and vegetation productivity in the area.
Master	7/17/2012	150	> Avoid crushing California Tiger Salamander burrows through proper usage of ATVs; avoid tidal marsh habitat of salt marsh harvest mouse and California clapper rail with any vehicle (foot access only).
Master	7/19/2012	152	> Pesticides can also kill the natural predators of mosquitoes, which have great difficulty in recovery from pesticides.
Master	7/20/2012	153	> The continued spray program leads to survival of mosquitoes resistant to pesticides – “the pest mill”.
Master	7/21/2012	154	> Describe the role of mosquitoes within the food chain, and subsequent impacts if they were removed in terms of amphibians, birds, reptiles, fish and insects.
Master	7/23/2012	156	> Adulicides present greater danger to humans than the threat of WNV, as many are known carcinogens and endocrine disruptors.
Master	7/24/2012	157	> Exposure to pesticides can result in compromised immune system, which would allow for development of allergies or autoimmune disorders.
Master	7/25/2012	158	> Pyrethrins disrupt the normal functioning of sex hormones while PBO affect the functioning of hormone-related organs.
Master	7/26/2012	159	> How long are pesticides retained in humans (young infant through elderly), pets, home garden vegetables and fruit, etc.?
Master	7/27/2012	160	> What are the long term effects of repeated exposure to these chemicals?
Master	7/28/2012	161	> Concerned with request of several community members to be “relocated” after they had exhibited adverse reactions to continued spraying/fogging.
Master	7/30/2012	163	> Expressed concern on impacts at school sites.
Master	8/2/2012	166	> The concern is that months of spraying/fogging will adversely affect air quality for humans and pets alike.
Master	8/6/2012	170	> Ensure research papers and studies concerning pesticides have been performed by independent researchers unencumbered by profit motive. NOTE – if the pesticide is too new for independent research to have been completed, the pesticide is to be considered experimental and, therefore, cannot be used.
Master	8/7/2012	171	> West Nile Virus is not a significant threat to human beings and does not warrant aerial dispersion or pesticides.
Master	8/9/2012	173	> Concerned after experience with dog having heart failure after exposure to fogging.
Master	8/10/2012	174	> Concerned with lack of notification to the general public.
Master	8/11/2012	175	> Test the chemicals on bats for several years before implementation on public.
Master	8/12/2012	176	> Name specialist health care providers in Santa Clara County who treated chemically injured individuals with success.

Master	1/21/2015	177	This report seems to be a boilerplate
Master	1/22/2015	178	a. Not true that we assess persistence
Master	1/23/2015	179	b. We don't know what 96% of Zenivex is, how can we know what combination of chemicals are applied
Master	1/24/2015	180	c. Synergists
Master	1/25/2015	181	d. Nuisance mosquitoes
Master	1/27/2015	4	I urge you to please stop the spraying of pesticides to combat mosquitoes in Santa Clara County as the project harms humans and wildlife and does not provide a long-term solution to mosquito control. Pesticides are poisons intended to kill, and their public spraying means humans, including children, will be breathing them in, as well as eating their residues on fruit and other food. These insecticides are supposed to be relatively "safe", of course, so that they can be legally used, but the pesticide industry has a long history of selling chemicals that are eventually found out to be extremely harmful to humans and wildlife, and with the billions of dollars these companies have at their disposal, they have managed to lobby their way towards legality for chemicals that should be banned, and that in many other countries are banned. Many pesticides that are currently legal have large bodies of scientific information describing the sublethal harm they cause. Instead of harming the ecosystem and human health with pesticides, mosquitos can be much more effectively controlled in the long term by restoring wetlands that encourage mosquito eating wildlife like frogs, salamanders, bats, birds and fish (all of which are devastated by insecticides), and by educating the public about taking care of mosquito-breeding stagnant water on their property. Santa Clara County does not have a serious problem with mosquito-borne illness anyway, which might argue for urgent measures. Please stop spraying insecticides as a form of mosquito control.
Master	1/27/2015	5	Please refrain from spraying the public and wildlife with toxins. There are other ways to control Mosquitos without poisoning the amphibians.
Master	1/27/2015	6	Please do not use pesticides to kill the mosquitoes in Santa Clara. I can't imagine that Santa Clara has much of a mosquito problem with the heat, but even so, the pesticides do more harm to the environment, innocent creatures and people than the bother of an itchy mosquito bite.
Master	1/27/2015	7	This isn't the mid-20th century. They figured out a long time ago that spraying dangerous chemicals everywhere to kill mosquitoes is a really bad idea and causes health concerns for people and kills wildlife. That's why they got rid of DDT. It was killing the eagles to extinction. The chemicals nowadays are no better. Your current spraying of pesticides to combat mosquitoes in Santa Clara County is a giant step backwards. I urge you to find non-lethal ways to control your mosquito population. Bats eat millions of mosquitoes. Birds eat mosquitoes, yet your lethal pesticide plan is probably killing these very effective mosquito killers. It's a lose-lose plan for everyone except the chemical industry which has a long history of selling chemicals that are eventually found out to be extremely harmful to humans and wildlife, and with the billions of dollars these companies have at their disposal, they have managed to lobby their way towards legality for chemicals that should be banned, and that in many other countries are banned. Many pesticides that are currently legal have large bodies of scientific information describing the sublethal harm they

			cause. I really hope Santa Clara County cleans up its act and finds more modern and effective ways to deal with mosquitoes. The people, animals and environment are counting on it.
Master	1/27/2015	8	Please do not follow thru with your plan to spray insecticides for mosquitoes in Santa Clara County. I learned through www.savethefrogs.org . that a healthy wetland is the best and most effective way to control mosquitoes. Insecticides sprayed in the air are always dangerous to people and animals. Insecticides will also kill Dragonflies which are one of nature's mosquito-eaters. Please concentrate your Tax Payer Dollars on developing and protecting healthy wetlands. In a healthy wetland frogs, dragonflies, bats, waterscooters and other animals control mosquito populations naturally. It is also important to educate people to keep their rain gutters clear of debris, remove or overturn pots, old abandoned tires, etc. where mosquitoes breed, (these are mini-wetlands--but are not healthy wetlands!) A healthy wetland is beautiful, has water plants in it and is naturally inhabited by California Native predators (frogs, dragonflies, bats...) I recently participated in a pond-building workshop with Save the Frogs in a Santa Cruz Elementary School, where I learned about Healthy Wetlands, and I had questions about mosquitoes, and learned a lot. I urge you to visit with, Save the Frogs, Dr. Kerri and his staff can also teach you this invaluable information.
Master	1/28/2015	1	I urge you to stop the taxpayer-funded spraying of insecticides as part of the County's Integrated Mosquito and Vector Control Programs.
Master	1/28/2015	2	On behalf of SAVE THE FROGS! and our worldwide network of supporters, staff and volunteers, I am writing to submit an official comment related to the County's Integrated Mosquito and Vector Control Programs. SAVE THE FROGS! (www.savethefrogs.com) is the world's leading amphibian conservation organization. Our mission is to protect amphibian populations and to promote a society that respects and appreciates nature and wildlife. Headquartered in Berkeley, we work in California, across the USA, and around the world to prevent the extinction of amphibians, and to create a better planet for humans and wildlife. Since 2008, SAVE THE FROGS! scientists and volunteers have held over 1,400 educational events in 59 countries to educate people about the plight of frogs and teach them ways to protect amphibians. SAVE THE FROGS! opposes the spraying of pesticides to combat mosquitoes in Santa Clara County as the project harms humans and wildlife and does not provide a long-term solution to mosquito control. Pesticides are intended to kill. The pesticide industry has a long history of selling chemicals that are eventually found out to be extremely harmful to humans and wildlife, and with the billions of dollars these companies have at their disposal, they have managed to lobby their way towards legality for chemicals that should be banned, and that in many other countries are banned. Many pesticides that are currently legal have large bodies of scientific information describing the sublethal harm they cause. There is no health organization in the world that suggests the inhalation of pesticides or the consumption of pesticides in food or water as part of a healthy lifestyle, and it is extremely evident that spraying pesticides in Santa Clara communities contaminates the air and water and puts humans and wildlife at direct risk of exposure to chemicals intended to kill. We urge you to stop the taxpayer-funded spraying of insecticides as part of the County's Integrated Mosquito and Vector Control Programs.

<p>Master</p>	<p>1/28/2015</p>	<p>3</p>	<p>On behalf of SAVE THE FROGS! and our worldwide network of supporters, staff and volunteers, I am writing to submit an official comment related to the County's Integrated Mosquito and Vector Control Programs. SAVE THE FROGS! (www.savethefrogs.com) is the world's leading amphibian conservation organization. Our mission is to protect amphibian populations and to promote a society that respects and appreciates nature and wildlife. Headquartered in Berkeley, we work in California, across the USA, and around the world to prevent the extinction of amphibians, and to create a better planet for humans and wildlife. Since 2008, SAVE THE FROGS! scientists and volunteers have held over 1,400 educational events in 59 countries to educate people about the plight of frogs and teach them ways to protect amphibians. SAVE THE FROGS! opposes the spraying of pesticides to combat mosquitoes in Santa Clara County as the project harms humans and wildlife and does not provide a long-term solution to mosquito control. Pesticides are intended to kill. The pesticide industry has a long history of selling chemicals that are eventually found out to be extremely harmful to humans and wildlife, and with the billions of dollars these companies have at their disposal, they have managed to lobby their way towards legality for chemicals that should be banned, and that in many other countries are banned. Many pesticides that are currently legal have large bodies of scientific information describing the sublethal harm they cause. There is no health organization in the world that suggests the inhalation of pesticides or the consumption of pesticides in food or water as part of a healthy lifestyle, and it is extremely evident that spraying pesticides in Santa Clara communities contaminates the air and water and puts humans and wildlife at direct risk of exposure to chemicals intended to kill. We urge you to stop the taxpayer-funded spraying of insecticides as part of the County's Integrated Mosquito and Vector Control Programs.</p>
<p>Master</p>	<p>1/28/2015</p>	<p>9</p>	<p>Dear Santa Clara County, On behalf of SAVE THE FROGS! and our worldwide network of supporters, staff and volunteers, I am writing to submit an official comment related to the County's Integrated Mosquito and Vector Control Programs. SAVE THE FROGS! (www.savethefrogs.com) is the world's leading amphibian conservation organization. Our mission is to protect amphibian populations and to promote a society that respects and appreciates nature and wildlife. Headquartered in Berkeley, we work in California, across the USA, and around the world to prevent the extinction of amphibians, and to create a better planet for humans and wildlife. Since 2008, SAVE THE FROGS! scientists and volunteers have held over 1,400 educational events in 59 countries to educate people about the plight of frogs and teach them ways to protect amphibians. SAVE THE FROGS! opposes the spraying of pesticides to combat mosquitoes in Santa Clara County as the project harms humans and wildlife and does not provide a long-term solution to mosquito control. Pesticides are intended to kill. The pesticide industry has a long history of selling chemicals that are eventually found out to be extremely harmful to humans and wildlife, and with the billions of dollars these companies have at their disposal, they have managed to lobby their way towards legality for chemicals that should be banned, and that in many other countries are banned. Many pesticides that are currently legal have large bodies of scientific information describing the sublethal harm they cause. There is no health organization in the world that suggests the inhalation of pesticides or the consumption of pesticides in food or water as part of a healthy lifestyle, and it is extremely evident that spraying pesticides in Santa Clara communities contaminates the air and water and puts humans and wildlife at direct risk of exposure to chemicals intended to kill. We urge you to stop the taxpayer-funded spraying of insecticides as part of the County's Integrated Mosquito and Vector Control Programs.</p>

Master	1/28/2015	10	Hello. I and my family are a resident of Saratoga and we are opposed to frequent fogging that has been going on for years. Look at the colonies of bees that we have lost and now a days we are going dead pigeons everywhere. America has the highest number of allergy related illnesses on the world. Please discontinue this practice and safe our tax dollars for better use. Thanks
Master	1/28/2015	11	Please stop the tax-payer funded spraying of insecticides as part of the county's Integrated Mosquito and Vector Control Programs-as this harms people and wildlife and is a costly short-term solution since is does not offer sustainable elimination. Thanks for your time and consideration.
Master	1/28/2015	12	Santa Clara County's Vctor Control division is spraying an array of legal insecticides in San Jose communities. I oppose the spraying of pesticides to combat mosquitoes in Santa Clara County as the project harms humans and wildlife and does not provide a long-term solution to mosquito control. Pesticides are intended to kill. The pesticide industry has a long history of selling chemicals that are eventually found out to be extremely harmful to humans and wildlife, and with the billions of dollars these companies have at their disposal, they have managed to lobby their way towards legality for chemicals that should be banned, and that in many other countries are banned. Many pesticides that are currently legal have large bodies of scientific information describing the sublethal harm they cause. Would you want to breathe that in after a long day at work? Would you want your kid eating fruit laced with the residues? Should the fish, frogs and other creatures have to drink the chemicals that inevitably will get washed into the streams and ponds?
Master	1/30/2015	13	I oppose the spraying of pesticides to combat mosquitoes in Santa Clara County because this spraying harms humans and wildlife and does not provide a long-term solution to mosquito control. The pesticide industry has a long history of selling chemicals that are eventually found out to be extremely harmful to humans and wildlife, and with the billions of dollars these companies have at their disposal, they have managed to lobby their way towards legality for chemicals that should be banned, and that in many other countries are banned. Many pesticides that are currently legal have large bodies of scientific information describing the sub-lethal harm they cause. Please stop spraying insecticides as a form of mosquito control.
Master	1/30/2015	14	Please discontinue the use of DDT and the like. It/they is/are harmful to both humans and animals! Just think about it by using these harmful things as a means to control or rid of insects that cause disease after awhile we will have killed off those animals that were placed on this earth that do so naturally and the consequences will be for worse!
Master	2/1/2015	15	Hello, I just reviewed the Draft Environmental Evaluation and wanted to compliment you on a very well done report. It was very extensive and well written. It appears there are many methods of reducing the negative impact of vectors. I was hoping to attend the meeting in Campbell but I have a conflict so I am writing to express my opinion.I am finding more and more of my friends are dying of cancer and cancer appears to be very connected to the amount of toxins in the body and a person who is under stress.I had 5 friends pass away from cancer in 2014. My concern is we continue to put toxins into our environment and the fogging is putting more airborne toxins into the environment. While I did read your group believes fogging is the lowest cost and most effective way of reducing mosquitos, I would ask that you not do fogging or only do it once a year as opposed to 3 times a year. It would be difficult to show this increases cancer but fogging puts more toxins into the air that we breathe and that our skin absorbs and therefore must increase the likelihood of increasing toxins in a body. So for human health reasons, I ask for less if not zero fogging. Thank you for taking this into consideration.

Master	2/28/2015	23	5.2.1 Environmental concerns on page 104. Although bees are not active at the time of spraying , according to Russ Parman's deposition on 2/26/15 the bees are out shortly thereafter. Therefore, since bees and damsel are out about 2-3 hours foraging on leaves and flowers that have been fogged with pesticides, please provide scientific data that the bees and damsel flies are not adversely affected when it clearly states the etophenprox is in the air, ground and soil from several hours to several days. I would like scientific studies NOT sponsored by pesticide companies. Are you aware in Santa Clara County there are increased amount of bee hive collapsed? Are you also studying why all the bees are disappearing in Santa Clara County?
Master	2/28/2015	26	Question/Comment #4 Why does Vector Control not test dead birds for pesticide poisoning to see if that was their cause of death? Just because they test positive for WNV does not mean they died from that.
Master	2/28/2015	27	Question/Comment #5 You clearly state above that adulticiding is ineffective So why are you doing it????????????
Master	2/28/2015	182	The West Nile poison fogging program requires an Environmental Impact Report where the letter and comments I made would have been included. At the December 4th meeting I provided another copy of my 2012 letter.
Master	2/28/2015	184	1.5 Environmental Issue Areas Page 1-11 "It should be noted that because this document is not a CEQA document, it does not address impacts and mitigations per CEQA requirements but rather assesses the District's activities in relation to limited environmental issues." I add: Nor does it provide a basis for decision making on the part of the Board of Supervisors or this District.
Master	2/28/2015	185	Executive Summary, EC-1: "However, upon further review of the options available to accomplish this goal for local residents, the County has instead decided to issue a locally-focused, comprehensive environmental study, instead of the PEIR, that will thoroughly inform the public about the environmental impacts associated with the VCD's activities authorized under the vector-control plan, specific to this County". An Environmental Impact Report is not to "thoroughly inform the public." It is to provide the decision makers a range of studied options for which to decide public policy.
Master	2/28/2015	186	These are very broad claims for a District which refuses to investigate calls regarding anything on their list but mosquitoes and rats. The District should not be taking credit for activities done or mostly done by residents. Residents must set their own traps for cockroaches, flies, mice, most rats and yellow jacket wasps. Vector has refused to capture the urban/suburban tick vector, the black tailed mule deer. They respond to none of the other night-active creatures they list (skunks, raccoons or opossums). Their failure to control the night creatures, including deer, have made this valley a smorgasbord for mountain lions (Puma concolor) and Bobcats (Lynx rufus) as these apex predators find food here. These apex predators regularly take house cats and are an actual threat to small children. Dogs and cats pick up fleas from the uncontrolled wildlife. This is addressed not by Vector but by the dog and cat owners.
Master	2/28/2015	188	P. 1-5: "Pursuant to Sections 2040-2045, the District may conduct all of the following activities: . . . (b) Take any and all necessary or proper actions to prevent the occurrence of vectors and vector-borne diseases." Emphasis added. So what is a "proper action?" Does it include poisoning half of the residents of the valley? Does this include causing brain damage to our children. Where is spreading a brain damaging chemical defined 4 in law as a necessary or proper action? Does it include toxic trespass on everyone's property and person? The California Constitution does not allow such an interpretation. It provides:

Master	2/28/2015	191	Zenivex was "conditionally registered" in 2010 and this product seems to have been "conditionally registered" through at least part of 2014 and for most of those three years it has been used by Vector Control for fogging. The MSDS accurately admits it kills fish and bees. As we have seen here, it also apparently kills birds and their food, frogs and their food, mosquito eaters and their food, and as it is fogged just at the time bats come out it may also impact bats as used.
Master	2/28/2015	192	Further, Zenivex E4 contains 96% undisclosed ingredients. We, the people don't know, Vector doesn't know, and the Board of Supervisors (Vector's Board) does not know what is being fogged on our communities. How could it even be legal for such a pesticide to be used?
Master	2/28/2015	193	Etofenprox is in the class pyrethroids, already known to cause an increase in autism spectrum disorder. Should the public be "distrustful?" Absolutely. When we see a governmental agency broadcasting a largely unknown chemical, which nobody is allowed to know what it is, this is a significant reason to be distrustful.
Master	2/28/2015	194	? In fact, the obvious message from their increasing actions is that they have increased mosquitoes and West Nile incidence. As evidence for this consider the ever-increasing numbers of fogging each year and the over and over repeat foggings over the same geography in the summer of 2014 year.
Master	2/28/2015	198	Now we know that pyrethroid (etofenprox) exposure, for example, is linked with autism spectrum disorder. Environmental Health Perspectives, June 24, 2014, http://ehp.niehs.nih.gov/1307044/ Environmental and State-Level Regulatory Factors Affect the Incidence of Autism and Intellectual Disability Steven C. Bagley, Kanix Wang, Christopher S. Lyttle, Edwin H. Cook Jr, Russ B. Altman, Robert D. Gibbons http://www.ploscompbiol.org/article/info%3Adoi%2F10.1371%2Fjournal.pcbi.1003518
Master	2/28/2015	202	2.3.0 "The pesticides the District selects are designed to degrade rapidly in the environment, thereby reducing the opportunity for residual presence and environmental persistence." According to the ERA, pyrethroids are specifically designed to resist the sunlight breakdown common with pyrethrins. So this statement is inaccurate. We have been trying to find out the persistence of these chemicals in the various environments and have found no reliable information.
Master	2/28/2015	203	TESTING, Page 2-7 (37) This document is apparently designed to be used by many Vector Control Districts so the routine for testing may, but may not be the routine of the SCCo. Vector Control District. The actual routine should be set forth.
Master	2/28/2015	209	This document though voluminous actually gives almost no specific information on how this is all to be done, or how it is to be done in an environmentally acceptable manner. It does not provide a range of alternatives as required by the California Environmental Quality Act.
Master	2/28/2015	216	The pesticide Zenivex 4E has only been on the market since mid 2010. Thus long term effects of exposure to this pesticide have not taken place in the real environment. The time it has been on the market is too short for these long-term effects to be observed.
Master	2/28/2015	217	Further they are not tested by the US EPA or CDPR as this statement implies. They are tested by the manufacturer and the manufacturer's testing companies. Due to the obvious conflict of interest built into the system of testing we have no idea of the range of injuries of which these chemicals are capable of. There has been no OBJECTIVE testing.
Master	2/28/2015	219	2.8.1.1 California Regulatory Program, page 66. This paragraph reads as if everything is fine as long as the hazards are described on a label. This of course is not so. The pesticides the district has used are poison designed to kill on contact and alter cellular functions, particularly brain and nerve functions, on contact.

Master	2/28/2015	225	There is considerable discussion about the timing on this directive. However, we have yet to learn anything definitive on exactly how long Zenivex remains on vegetation. What we know is we have seen numerous beehives in the valley seriously impacted by these foggings including the bees on my property in which the broods and queens were killed. The loss of bees has serious implications for our food.
Master	2/28/2015	229	The old saw, "dose makes the poison" has been proven untrue. We now know that even tiny amounts of toxic chemicals can substantially alter hormone function and profoundly impact sex characteristics of an infant, impact thyroid function, impact adrenalin and other major life impacts.
Master	3/1/2015	28	SCC Vector has been stating since 1012 that they would be doing a CEQA/EIR for their West Nile spraying program. However, recently they are saying that they are exempt from doing a CEQA/EIR because of the Environmental Declaration dated 5/31/07. On this document is receipt #339831 with a \$50 payment to the CA Dept. of Fish and Game. This Declaration states that Vector Control is exempt because "the project will have no effect on Fish, Wildlife and Habitat". There are several reasons why this 5/31/07 Environmental Declaration is no longer valid for what Vector Control is doing seven years later: a. This Declaration is dated before SCC Vector Control began their current West Nile Virus Program; b. Since 2007 SCC Vector Control has changed the major pesticide they are using; c. For the past two mosquito seasons SCC Vector Control has been using the Zenivex pesticide. On Zenivex's Material Safety Data Sheet (MSDS) it states under #12 "Ecological Information: Toxic to aquatic organisms including fish and invertebrates; Toxic to bees exposed to direct treatment on blooming crops and weeds." d. The MSDS quote in "c" is in direct conflict to what the CA Dept of Fish and Game stated on SCC Vector Control's now expired Environmental Exemption. The MSDS clearly indicates that Vector Control is required by law to prepare a real CEQA/EIR for their West Nile Virus spray program because it is toxic to aquatic organisms including fish and invertebrates and also to bees.
Master	3/1/2015	29	BEES There is very little information in the DEE about bees although in the first part of the DEE under Biological Resources-Terrestrial (1.5.3) it states that in Chapter 5 and Appendix A it would be discussed and is only in 5.2.1 the DEE states "fogging is scheduled during the night (11pm to 3 am) when bees are not active and are sheltered within hives." If SCC Vector Control listened to the citizens, they could never write such a lie. This statement is totally untrue. Nowhere in the report is there a discussion of any details in the MSDSs for the pesticides used by SCC Vector Control. For example, if the MSDS labeling was listed it would be clear that the major pesticide sprayed for West Nile Virus (Zenivex) is toxic to bees. Following is #12 in the Zenivex MSDS: "Ecological Information: Toxic to aquatic organisms including fish and invertebrates; Toxic to bees exposed to direct treatment on blooming crops and weeds." It is clear from many testimonies by SCC bee-keepers and those with bee hives like myself that Zenivex is killing our bees. In the past two years of Vector Control's sprays near my home I have lost all bees in one bee hive and at least half in the other. This last year was worse because the spraying was closer. The bees that remained alive were sick and none made it through the winters.
Master	3/1/2015	30	How can this DEE write that bees are not effected by their night West Nile sprays? This sentence is a lie and should be eliminated in the DEE.
Master	3/1/2015	31	Please start a program that does not kill our bees, butterflies, beneficial insects, and birds.
Master	3/1/2015	32	Why is the MSDS pesticide information missing from the DEE and SCC Vector Control's website?
Master	3/1/2015	33	Why doesn't SCC Vector Control take information from its citizens about this?

Master	3/1/2015	34	Although many have told SCC Vector Control at meetings about this problem, we are ignored. They will take information about dead birds but not dead bees which are more important to our food system and the health of citizens.
Master	3/1/2015	36	The report does not touch on how SCC Vector Control is worsening our ecosystem health. It does not do detailed research on the problems it is creating and does not listen to its citizens. Why are these missing elements in the DEE?
Master	3/1/2015	37	Since the DEE thinks the ecosystem should be addressed in the report, who are the SCC Vector Control staff ecologists who look at the entire ecosystem? Why does SCC Vector Control not work with the SCC IPM Program? Since natural alternatives will help create a healthier ecosystem, why are not more mentioned in the DEE? SCC Vector Control's website lists a number of IPM websites and even shows a Mosquito IPM handout which can be printed. However, it is clear they are not using the IPM sources in the community or on their website. Where is the IPM leadership in SCC Vector Control?
Master	3/1/2015	40	The DEE has no discussion of the local IPM programs which may or may not exist in other California counties. There is no discussion about the requirement the SCC County Supervisors gave to SCC Vector Control in 2012: first use IPM and alternatives and only if they are proven not to work should pesticides and chemicals be used. There is nothing in this DEE which states exactly what SCC Vector Control has done to meet this requirement which is part of the way this county works. Explain this.
Master	3/1/2015	41	Please explain how SCC Vector Control is educating the public in direct opposition to programs and education created by our county and city governments (i.e. SCC IPM Program and Green Gardening Program)? Why is SCC Vector Control so out of touch with our educational institutions and what county citizens want?
Master	3/1/2015	42	In Ground Adulticiding Techniques it states: All mosquito adulticiding activities follow reasonable guidelines to avoid affecting nontarget species including bees. Timing of applications . . . avoiding sensitive habitat areas. . . and following label instructions all result in environmentally sound mosquito control practices. We have many members who have planted California native plants for the express purpose of creating habitat for native bees, butterflies, insects, invertebrates and birds. We have received reports from these habitat gardeners that after their neighborhood was sprayed for adult mosquito abatement-that their habitat garden which is usually full of pollinators was suddenly devoid of bees, butterflies and insect life. This does not seem to us to be consistent with "environmentally sound mosquito control practices." Our members are working hard to reverse the decline in bees that are needed for food crop pollination. They are trying to do their part to stem the decline in Monarchs and other butterflies by planting the host plants needed to support their reproductive success. Spraying these habitat gardens with insecticides is counterproductive to the recovery of these species.
Master	3/1/2015	43	BMPs for Applications of Pesticides and Surfactants "Whenever possible, do not apply pesticides that could affect insect pollinators during the day when honeybees are active or at dawn/dusk when other pollinators are active. Application of these specific pesticides are to occur after dark." Although it is better to spray at night than during the day this method does not prevent pollinator death. With a half life of 1.5 days the insecticide is still potent and present on foliage when the pollinators become active the next morning.

Master	3/2/2015	95	It is clear from the many testimonies by SCC bee-keepers and those with bee hives like myself that Zenivex and previous pesticides are killing our bees, birds, butterflies, soil biological organisms, and beneficial insects. Nowhere in the DEE is there a discussion about this. Following is #12 in the Zenivex MSDS: "Ecological Information: Toxic to aquatic organisms including fish and invertebrates; Toxic to bees exposed to direct treatment on blooming crops and weeds."
Master	3/2/2015	96	1. How can this DEE write that bees are not effected by their night West Nile sprays? This sentence is a lie and should be eliminated in the DEE.
Master	3/2/2015	97	2. Please start a program that does not kill our bees, butterflies, beneficial insects, and birds.
Master	3/2/2015	98	3. Pesticides kill. Do not keep changing the pesticides used by SCCVC so the public must continue to point out the same problems over and over.
Master	3/2/2015	99	4. Why is the MSDS pesticide information missing from the DEE and SCCVC's website?
Master	3/2/2015	100	5. Why doesn't SCC Vector Control take information from its citizens about the above problems and use it to have the less toxic programs? 6. Although many have told SCC Vector Control at meetings about this problem, the public is ignored. SCCVC will only take information about dead birds from the public. Build a program that helps rather than hurts the public.
Master	3/2/2015	101	7. The pesticides that SCCVC is using creates sick birds, bees, and people. This makes them more susceptible to disease. Does SCCVC test for this problem when they test the dead birds?
Master	3/2/2015	102	In 1.5.3 Biological-Terrestrial the DEE states that the following concerns will be addressed in Chapter 5 or Appendix A: "Describe the effects of all chemicals that are used and/or proposed for use on wildlife and natural ecosystems, including insect prey, birds, mammals, fish, vegetation and site topography." This subject is not addressed in any serious detail. The great loss of mosquito predators, bees, butterflies, beneficial insects, and birds is not addressed. The increased diseases in plants because of these loses and the need for increased pesticide spraying because SCC Vector Control has been killing our ecosystem which keeps mosquitoes in balance is not addressed.
Master	3/2/2015	103	Following are some of the recent diseases I have seen in my garden in the past two years. 1. Roses with the worst mildew and rust problems in history. 2. No strawberry and raspberry production. 3. Spinach and grape plants died. 4. Powdery mildew and Downey mildew on many vegetables and fruit (kale, potatoes, strawberries, tomatoes). 5. Heavy White Fly infestation on many plants that never even had it after the Malathion spray. 6. Aphids on species that have never been effected by this problem.
Master	3/2/2015	104	1. The DEE does not discuss how SCC Vector Control is worsening our ecosystem health, creating diseases, and killing bees, butterflies, beneficial insects, insects that keep mosquitoes in control, and wildlife. Why?
Master	3/2/2015	105	2. The DEE does not do detailed research on the problems it is creating and does not listen to its citizens. Why are these missing elements in the DEE?
Master	3/2/2015	106	3. Since the DEE thinks the ecosystem should be addressed in the report, who are the SCCVC staff ecologists with university degrees who look at the entire ecosystem? Please do not list people like Russ Parman who come from a pesticide history background.
Master	3/2/2015	107	4. Why has SCCVC never attended the quarterly SCC IPM Tag meetings? Note: all county agencies attend these meetings except SCCVC.
Master	3/2/2015	108	5. Why has SCCVC's program never been on any IPM agenda meeting? It has never been discussed at these meetings except when citizens come to complain about their experiences with SCCVC.

Master	3/2/2015	111	8. SCCVC's website lists a number of IPM websites and even shows a Mosquito IPM handout which can be printed. However, it is clear they are not using the IPM sources in the community or on their website. Where is the IPM leadership in SCCVC?
Master	3/2/2015	115	The DEE needs to be reorganized to address each program and not lump all of them together. The way it is currently written hides the details of what SCC Vector Control actually does.
Master	3/2/2015	116	1. Why is there no stand alone EIR/CEQA for SCC Vector Control's most visible program (and probably most expensive), the West Nile Program?
Master	3/2/2015	117	2.The DEE has no discussion of the local IPM programs which may or may not exist in other California counties. There is no discussion about the requirement the SCC County Supervisors gave to SCC Vector Control in 2012: first use IPM and alternatives and only if they are proven not to work should pesticides and chemicals be used. There is nothing in this DEE which states exactly what SCC Vector Control has done to meet this requirement which is part of the way this county works. Explain the reasons for this.
Master	3/2/2015	118	3. Please explain how SCC Vector Control is educating the public in direct opposition to programs and education created by our county and city governments (i.e. SCC IPM Program and Green Gardening Program)?
Master	3/2/2015	119	4. Why is SCC Vector Control place ecologically and IPM progressive organizations on their website and then not do what these organizations recommend?
Master	3/2/2015	122	We also want to know about the SCCVC employees with degrees in ecology who are addressing the alternatives to chemicals and pesticides.
Master	3/6/2015	45	This 2014/2015 Environmental Evaluation of the S.C.C.V.C. District's Integrated Vector Management Program, which states that it is primarily a public information document on the environmental aspect of the Vector Control District's Program of activities, is an overly-lengthy document which is not public-friendly. There are twelve sections and entire paragraphs are repeated, verbatim, in each of these sections.
Master	3/6/2015	47	This E.E.R. narrates and describes V.C.D. history and activities, rather than addressing the impacts-mitigations-and alternatives.
Master	3/6/2015	48	These statutes do not regulate inert ingredients; they only regulate active ingredients. This V.C.D. and our County need to set up different guidelines since this population cares about their air quality. This population wants to know all the ingredients that are being used on us and all potential effects. This population deserves to have remedies and antidotes to any and all ingredients in the pesticides available and in place. This population deserves to have reporting in place for all reactions to the pesticides. * Page 4-1: June, 2013 Evaluation of Active Ingredients (Ecological and Human Health Assessment Report Integrated Mosquito And Vector Management Programs for Nine Districts): "The toxicity data...are generally derived from rigidly controlled laboratory animal studies...However, these, and other, coordinated and focused laboratory tests...do not realistically reflect the likely exposures or toxicity in the District field application scenarios...However adverse effects may still occur to some non-target organisms."

Master	3/6/2015	49	7.1.4.2 Since the State of California has an Environmental Hazards Assessment, how was it possible for this V.C.D. to spray during and after drought, heat, extremely bad air-quality, and in the midst of huge wildfire outbreaks in most of Northern California? Each summer when there is heat, drought-conditions, measurably bad-air quality, will this V.C.D. continue to disperse pesticides into our air, regardless? Even though the pesticides they use are not "measured," it is common sense to NOT ADD them to our air. Will V.C.D., Santa Clara County, consider respiratory issues for a majority of our population, less significant and less important than the (statistically-small) risk of a severe reaction to an infected mosquito bite to a minority of our population? If there are already measurable levels of toxic particles in the air, V.C.D. needs to demonstrate that it is safe to add more chemical particles, and that it is not detrimental. What isn't studied, measured, or known cannot be deemed safe.
Master	3/6/2015	51	There has been no independent studies to show the extent of the damage to our environment & our population by pesticide dispersal and there have been no independent studies showing the time it might take both to recover. Since neither has been done, and since there are undisclosed ingredients in the pesticides & since we have seen studies showing that bunching chemicals together creates different chemicals & different reactions than a chemical corporation anticipates, then a no project alternative is the safest course of action
Master	3/6/2015	58	2. Make certain that the majority of the population who could use mosquito fish know about their availability & make certain that the mosquito fish are not adversely affected by pesticide dispersal.
Master	3/6/2015	61	6. V.C.D. could subsidize vegetation so all County residents can help attract natural predators.
Master	3/6/2015	62	6. a). Utilize the detailed maps V.C.D. has drawn up of areas of high-repeat female mosquito populations, & assist landscapers, homeowners, community gardeners, Our City Forest, volunteers, V.C. & other County employees, educators, students, and youth organizations in planting vegetation to attract natural predators in these suspect areas. Since W.N. mosquitoes are high on V.C.D.'s agenda, then start with vegetation that would attract natural mosquito predators.
Master	3/6/2015	63	*Number 6 also serves to educate the population on mosquitoes & on possible mosquito diseases, which is one of V.C.D.'s goals. Additionally, though, it provides a positive step towards rebuilding healthy habitats. Equally important, it provides County residents with a positive and practical way to help curb future mosquito populations.
Master	3/6/2015	66	6. c). V.C.D. could provide recognition to anyone in Silicon Valley who can organize nurseries and agricultural growers into donating vegetation that attracts natural mosquito predators.
Master	3/6/2015	67	6. d). V.C.D. could provide recognition and rewards for anyone/ any organization who can help get V.C.D.'s mosquito "hot spots" filled in with vegetation.
Master	3/6/2015	68	6. e). Summerwinds Nursery offers hand-constructed vegetable plots to certain populations so that they can learn how to grow healthier foods for their families; they are also offering greenhouses, the food, the plants & the instructions so that families can grow their own food but sell them as income supplements. Could V.C.D. see if this chain of nurseries would offer free or discounted plants and other vegetation that will encourage natural mosquito predators? Could V.C.D. offer financial assistance to this, and other local nurseries who offer free plants (obviously only those plants that are pesticide-free)?
Master	3/6/2015	69	6. f). Los Gatos Birdwatchers' shop offers a one-hour yard consultation for bird-friendly gardens; that fee is then put towards shop purchases. V.C.D. could encourage these consultations especially for homeowners in the areas of repeat mosquito populations, emphasizing gardens which attract natural mosquito predators.

Master	3/6/2015	71	"...Intentionally breeding and mass releasing birds...is not viable at this time."
Master	3/6/2015	72	I am not suggesting the importation of species, or importation of endangered species into our County's habitats. Many of the studies cited about swallows and purple martens that were done almost a century ago may not relate to our current mosquito issue.
Master	3/6/2015	73	Supporting and encouraging insectivorous birds BY restoring their habitats and BY welcoming them back into our County, and By discontinuing further chemical pesticides...stops the detrimental domino effects of pesticides on the birds, and their normal natural habitats and is viable.
Master	3/6/2015	74	6. g). Yamagami's Nursery offers a one-hour consultation for yard/ space and then puts that towards plants. V.C.D. could see if the nursery would offer consultations which focus on landscapes that attract natural predators. Educating homeowners and then helping them purchase better landscaping habitats is a win-win.
Master	3/6/2015	75	6. h). V.C.D. could subsidize or offer rebates on hummingbird feeders. Hummingbird and other bird feeders supplement natural vegetation and encourage birds to remain active in an area. Hummingbirds use the nectar, but need insect protein. Hummingbirds are voracious mosquito eaters and do fly at the heights in which mosquitoes are prevalent. V.C.D. could see if plant, bird, feed, home and garden centers would offer free or discounted feeders.
Master	3/6/2015	76	6. i). V.C.D. could subsidize garden fountains. Fountains which recycle water and that don't have stagnant water help offer sources of drinking and bathing water to natural mosquito predators. Drought conditions, artificial and painted grass, some "water-wise" landscaping do discourage birds, dragonflies, bees, and so on. A concerted effort to distribute and establish fountains and bird-friendly gardens, throughout this County, and especially in areas of high-repeat mosquito populations, will support, encourage, and attract natural mosquito predators.
Master	3/6/2015	78	Saving and reusing water to further encourage natural habitats and further discourage mosquitoes seems like a win-win situation for us all, and one that would stretch far into the future.
Master	3/6/2015	79	6. k). V.C.D. could work with our Department of Agriculture and set aside some of the commercial agriculture land in and around our Valley for the specific purpose of growing plants that attract natural predators as well as plants that deter mosquitoes. It may not sound like a good idea to the commercial growers, but it would be a sound investment in the health of the Valley. * small studies done in areas outside this County consider growing mosquito-repelling plants to be anecdotal. Again, these potentially-repelling plants cannot hurt, and can be considered a small part of the larger effort to discourage mosquitoes.
Master	3/6/2015	80	7. V.C.D. could sponsor articles & media attention on ways to reduce mosquito bites & all the ways to make people less attractive to female mosquitoes. (other than using a pesticide product on yourself or your family. There is evidence that demonstrates that Deet is not safe and definitely not safe for infants or people with chemical sensitivities).
Type of Response	Date	Comment Number	Issue Description
Individual	2/12/2015	16	Hello - I'm a resident of Saratoga, and a (backyard) beekeeper. And a parent of 3 small children. I'm concerned about the blanket fogging activity in the county, and its potential impact on children and wildlife (including honeybees). I urge the county to not proceed with further fogging until an environmental IMPACT report is conducted and completed to the satisfaction of concerns around impact to wildlife, our children and the environment. It is not clear at all that there has been a

			risk/reward assessment that satisfactorily indicates that indiscriminate fogging is the lesser of two evils. Thank you
Individual	6/28/2012	129	A thorough and complete Project Description should be included in PEIR to facilitate meaningful environmental review of potential impacts, mitigation measures, and alternatives.
Individual	6/28/2012	130	> Expectation that the Program will be presented as a series of distinct but related sequential activities (as the Project is described as "Programmatic").
Individual	6/29/2012	132	> Request for details concerning the chemical component phase of vector management, how chemicals will be utilized, and distribution patterns. Provide map concerning spray zone/No Spray Zones.
Individual	6/30/2012	133	> What substances are proposed to be fogged or otherwise broadcast? Provide label, MSDS, individual substances with specific formulas and as formulated for broadcasting.
Individual	7/2/2012	135	> Provide rationale for size of fogging areas and proposed actions for reducing size of these areas.
Individual	7/7/2012	140	> Discuss the population density (age, health, disabilities, etc) within the designated residential developments and list the effects of pesticides on their health and daily activity.
Individual	7/9/2012	142	> Concern that title holders of foreclosed/neglected properties that provided habitat for mosquitoes have not paid a fine.
Individual	7/10/2012	143	> What effects will the proposed chemicals have on furniture, fabrics, exterior finishes and roofs of home, car paint, windows of any kind?
Individual	7/11/2012	144	Please be advised that use of any sovereign lands for any part of the Program would require the District to obtain a lease from the CSLC. Examples of sovereign lands within the County, under CSLC jurisdiction, include Guadalupe River, Alviso Slough, Steamboat Slough, and Coyote Creek. CSLC staff is requesting that more detailed information and Program maps be provided to the CSLC for our review as they become available. As the Program proceeds, the CSLC requests that the District contact the Public Land Management Specialist listed at the end of this letter for further information on the extent of the CSLC's jurisdiction, and whether a lease or permit may be required.
Individual	7/12/2012	145	> Consider direct/indirect effects of using mosquito fish as control.
Individual	7/13/2012	146	> Describe the impact of pesticides on the proposed mosquito fish control strategy.
Individual	7/18/2012	151	> Coordinate with DFG, CNDDV, USFWS, and IPaC to identify special-status plant or wildlife species. If impacts are found to be significant, PEIR should identify adequate mitigation measure to reduce impacts to lower levels.
Individual	7/22/2012	155	> Upon application and broadcast of pesticides, what is the fate and transport of these chemicals? Droplet size, dispersal patterns given wind, conversion products (both in storage and environment) and impacts of conversion products.
Individual	7/29/2012	162	> Provide a list of all rodent or wildlife species that could also be considered a threat to humans and management activities for said threat.
Individual	7/31/2012	164	> Describe, quantify, and evaluate impacts of dredge or fill activities.

Individual	8/1/2012	165	> Upon application and broadcast of pesticides, what is the fate and transport of these chemicals? Droplet size, dispersal patterns given wind, conversion products (both in storage and environment) and impacts of conversion products.
Individual	8/3/2012	167	> Request for a specific section within EIR for dealing with areas of controversy.
Individual	8/4/2012	168	> Prohibit use of adulticides in vernal pool habitat (ensure only Bti or Bs will be applied in pools with California tiger salamander (CTS), vernal pool tadpole shrimp, or vernal pool fairy shrimp), within listed species habitat (CTS, vernal pool tadpole shrimp, vernal pool fairy shrimp, California red legged frog (CRLF), California clapper rails, salt marsh harvest mice), in open water, or at high tide.
Individual	8/5/2012	169	> If adulticides must be used, ensure use is justified with documented, mosquito-borne disease activity within or within flight range of the tidal marsh.
Individual	8/8/2012	172	> How many human cases of WNV have been documented in SCC? Proof? Provide lab documentation and source showing this testing confirming the presence of the virus.

<p>Individual</p>	<p>2/26/2015</p>	<p>17</p>	<p>Re: PUBLIC DRAFT ENVIRONMENTAL EVALUATION OF THE SANTA CLARA COUNTY VECTOR CONTROL PLAN Subject: THE SERIOUS NATURE OF THE HEALTH RISKS ASSOCIATED WITH LARGE NUMBERS OF FERAL CATS AND FALLACIES OF TNVR</p> <p>I have attached the letter image scan from JAVMA, Feb 15, 2015, Vol 246, No 4, sent to me kindly by the wildlife veterinarian David A. Jessup DVM, MPVM, Dipl. ACZM.</p> <p>It points out the serious nature of the health risks associated with large numbers of feral cats, the devastation they cause to wilidlife, and the fallacy that once established TNVR sites diminish and expire on their own.</p> <p>TNVR cat colony extinguishment simply doesn't happen under most prevailing circumstances, or unless people remove large numbers (not just trap, neuter, vaccinate and reabandon). Those cats removed are usually dropped off at other sites, simply metastasizing the problems. The JAVMA letter has 11 signers representing six large zoo, wildlife, avian, reptile, PUBLIC HEALTH and ONE HEALTH professional associations with a total membership in the thousands.</p> <p>I had mentioned the letter in a previous comment, but failed to attach the letter, as it is an image file and wasn't sure if it would be receivable in comments. Let me know if further source information would be useful.</p> <p>Quotes from the JAVMA letter follow: "...Outbreaks of hookworm infection and typhus at sites where dense populations of feral cats, rats, and fleas coexist are serious human public health problems. Feral cats remain the most common rabid domestic animal, and exposure to rabid cats leads to post exposure prophylactic treatment of more humans than exposure to any other species. Rabies vaccination of feral cats does not reduce the incidence of post exposure prophylaxis or the associated public health risks and costs. Cats are the only known shedder of Toxoplasma oocysts, which are increasingly recognized as causes of waterborne and point-source community outbreaks. Toxoplasmosis is a devastating disease in a wide array of marsupials, sea otters, and other marine animals and poses a health risk for many species that generally do not ingest raw meat. An increasing body of evidence is implicating it as a factor in several serious human behavioural, neurodegenerative, and dementia conditions.... ...Public funds spent on TNVR programs could, we believe, be better spent promoting and enforcing mandatory spay-neuter provisions and adopting out homeless cats... ...We strongly believe that TNVR does not serve one health goals or the welfare of feral cats or wildlife or advance public health..."</p>
<p>Individual</p>	<p>2/28/2015</p>	<p>18</p>	<p>1. Since cumulative impacts were not evaluated in the document, the District has failed to ensure public health and safety, and an assessment of the combined effects of multiple biocides and toxicants in the environment is needed. An assessment of the cumulative impacts to human and environmental health is needed, as well as a detailed schedule that clearly delineates how the timing and planning of the use of pesticides and other toxicants will be coordinated with other agencies in a given area. Without such assessment and schedule, the document fails to disclose the full impacts of the actions it seeks to permit, and the District cannot ensure that there will not be a significant impact to human health or the environment. It is imperative to evaluate the combined effects of different toxicants, and inform the appropriate agencies of any unscheduled spraying prior to the release of toxicants into the environment. Please provide a protocol for coordination with all other Cities and</p>

			other government agencies that use biocides in the County (for example, the Santa Clara Valley Water District, VTA, Caltrans etc.).
Individual	2/28/2015	19	<p>2. SCVAS remains concered over the use of second-generation anticoagulants to control. The District failed to mention concerns over the use of second-generation anticoagulants California and changes in legislation. The California Department of Pesticide Regulations released a memorandum on June 27, 2013 calling for a restricted use designation for all secondgeneration anticoagulant rodenticides. DPR analyzed 492 animals from 1995 to 2011 and that “approximately 73% had residues of at least one second generation anticoagulant rodenticide” (DPR 2013). DPR found second-generation anticoagulants in a range of including bobcats, mountain lions, coyotes, foxes, skunks, hawks, crows, and owls. indicate that exposure and toxicity to non-target wildlife from second-generation anticoagulant rodenticides is a statewide problem. In addition, the data suggest that the problem exists urban and rural areas. Furthermore, it has been well established that individuals chronically exposed to sub-lethal doses of anticoagulants can and do experience negative effects that have been known to reduce an individual’s biological fitness (DPR 2013). In addition to DPR restricting the use of all second generation anticoagulants in California, the State Congress passed AB 2657, which was later signed into law by Governor Brown in 2014 “prohibiting, except as specified, the use of any pesticide that contains one or more of specified anticoagulants, including brodifacoum and bromadiolone, in wildlife habitat areas, as defined” (California Food and Ag Code: 12978.7.). The bill includes restrictions for brodifacoum, bromadiolone, difenacoum and difethialone in sensitive wildlife areas, including state parks, state wildlife refuges, and state conservancies. The bill does not apply to the use of pesticides for agricultural activities. Generally speaking, the District evaluated and provided mitigation measures for primary exposure to second-generation anticoagulants by using bait boxes or dangling the bait block a wire; however, the District failed to consider or evaluate anywhere within the document secondary exposure pathways, which are the primary threat to predators including owls raptors. It is well established that due to the nature of anticoagulants individuals take anywhere from 5 to 12 days after exposure to die from the toxicant. Additionally, toxicant individuals often experience sublethal affects making them a perfect target for predators. SCVAS would like the District to discontinue the use of these toxicants in the county and find alternative rodent control methods. Ideally, we would like to see the District agree to abolish the use of second-generation anticoagulants throughout the district, as some other cities and counties have already done (for example, Marin County). The hazards to both birds and wildlife are too high and they compound the danger to children, and domestic animals. At the very least the District must evaluate and mitigate for secondary exposure to second-generation anticoagulants, in addition to ensuring that they are not used in areas with known wildlife habitat.</p>
Individual	2/28/2015	20	<p>3. Section 2.3.4.4 proclaims, “No effective predators exist to control high rodent populations in urban areas. Although they sometimes inhabit residential neighborhoods, raptors... do not provide adequate rodent control in urban environments.”The EIR provides no evidence to support this statement. Considering the pervasive documented impacts of anticoagulant rodenticides to wildlife and the risks to children and household pets, the District should make an effort to increase raptor and owl populations in urban areas by a) providing owl nest boxes and b) educating the public about alternatives such as biological control and traps.</p>

Individual	2/28/2015	21	4. Section 2.8.2 proposes, "Survey all predetermined treatment sites every year prior to work to determine the potential presence of special-status plants and terrestrial wildlife using the CNDDDB, relevant Habitat Conservation Plans (HCPs), NOAA Fisheries and USFWS websites, CALfish.org, and other biological information developed for other permits." Considering that the District proposed to introduce toxicants and biocides into the environment, it is not sufficient to limit surveys to only a data search of databases that are often years behind, or are developed for other permits. The District must provide on-the-ground endangered species surveys prior to application of any biocides and toxicants into any habitat that could support endangered species.
Individual	2/28/2015	22	In addition, the DEIR proposes, "Establish a predetermined buffer of reasonable distance from known special-status species locations and do not allow application of pesticides/rodenticides (including fumigants) within this buffer without further agency consultations". Please provide scientifically based criteria for the establishment of "reasonable distance" and explain the process for application for "agency consultation" within this buffer.
Individual	2/28/2015	24	Question/Comment #2 Why did Santa Clara County Vector Control recruit Dr. Sarah Cody to come in and speak on the risks VS the benefits? When we (some HAP members) spoke with Dr. Sarah Cody we found out she did not know what a MSDS therefore she truly cannot give an accurate report as to risk VS the benefits. Furthermore, why did Dr. Cody not address the signs and symptoms of pesticide poisoning to inform bay area doctors as she did with the signs, symptoms and diagnostics of WNV.
Individual	2/28/2015	25	Question/Comment #3 Many people have complained of the adverse affects of the pesticide spraying. I and others gave a report to the dept of Agriculture. Nothing has been done about it. Is the Dept of Agriculture the right dept to give an adverse reporting to? If not, what is the correct procedure?
Individual	2/28/2015	183	"VCD intends to prepare written responses to all public comments to consider and address all public concern." ES-1 Are these comments and the earlier comments to become part of this document?
Individual	2/28/2015	187	Western Equine Encephalomyelitis, St. Louis Encephalitis (SLE), Malaria and many other tick and mosquito diseases are described in this document BUT they are not present here, so why are they in this document? Is this filler to intimidate people so they cannot get to the issues. This is said to be a document concerning Vector Control's response to local conditions so why are all these diseases of other places and climates appearing here?
Individual	2/28/2015	189	Relying on registration is no guarantee or even an indication of safety or benign effect, especially for broad scale use. For a long time chlorpyrifos (Dursban) was registered for use inside dwellings and other buildings. ..
Individual	2/28/2015	190	Neither the EPA nor the CDPR do independent testing for toxic or other effects. They accept the formulator's "studies" for what the chemical does and does not do.
Individual	2/28/2015	195	Page A-31 Reproduction has damaged the flow of and obscured the content of this document. Pages are missing and some pages have print overs and missing pieces.
Individual	2/28/2015	196	Page 7.3 ¶ 1 Wrong. Toxicity does not depend on exposure. Toxicity does not always increase as dose increases. In many cases, the more dose mimics natural hormones in amount and structure, the more it disrupts functioning hormones.
Individual	2/28/2015	197	There is no such thing as a "proven safe" dose of pesticide. Effects can show themselves even 45-50 years later as they have for Agent Orange Vietnam vets who now show chunks of skin peeling off 45 years later. Toxic chemicals are rarely tested for more than a few months, the tests never done by independent researchers prior to registration.

Individual	2/28/2015	199	They fog right on homes advising people not even to close windows, thus actively poisoning people. This sensitive receptor, asked for accommodation for disability but it has not stopped Vector Control
Individual	2/28/2015	200	(g) landowner policies or concerns, [Not so. Concerns of California Fish and Game were ignored, concerns of the SC Valley Water District ignored, concerns of citizens ignored.]
Individual	2/28/2015	201	most of the land within the District's Service Area has never been directly treated for vectors. This statement is substantially misleading. In 2014, 19 treatments encompassing 4.1 SQUARE MILES each resulted in 77.9 square miles contaminated or recontaminated. With drift, more than half of the urban Santa Clara North County was contaminated by Vector Control in the summer of 2014.
Individual	2/28/2015	204	2-3 Table, p. 2-32 Yellow Jacket and Bee Swarm Control Abatement These toxic chemicals listed for yellow jackets are completely unnecessary as yellow jacket traps are completely effective without 16 contaminating the environment. These traps with their attractant can be used year after year so are low impact and cost little.
Individual	2/28/2015	205	2.3.2.1 Mosquitoes, §10 Asserts this district "maintains or improves habitat values for desirable species." No examples were given or described. Which species are desirable? Which habitats? The District asserts "endangered species review," however the Baylands, with it's endangered species was the target of pesticide fogging in spite of there being no West Nile there.
Individual	2/28/2015	206	2.3.2.1.1The District has provided mosquito fish for fresh water bodies but has systematically killed them off with their pesticide fogging.
Individual	2/28/2015	207	As for the birds, ducks and geese, the mosquitoes and their larva provide a portion of the food for these animals. The District has claimed a very large bird kill from the West Nile Virus largely based on the technique of swabbing the beaks of birds, throwing out the carcass, looking for West Nile antibodies in the swabs, but utterly failing to test the birds for pesticide poisoning from their pesticide fogging. They are not even tested for starvation, their food having been killed by the pesticide fog. The actual reason for the bird deaths is not investigated.
Individual	2/28/2015	208	The report says "vegetation management" but does not mention the types of vegetation that they intend to "manage" or how it is to be managed. (In the later chapters it calls for certain removals.) .) This report says they may mandate the use of herbicides even though herbicides are extremely toxic and can poison the recharge water and the Bay. This report contains no disclosure of these chemicals they may mandate. No mention is made of the toxic aspect of their "vegetation management" in this document. Further the vegetation they may remove, or demand a property owner remove, may be critical habitat for the predators of the mosquitoes.
Individual	2/28/2015	210	The Bayland mosquitoes are not vectors of anything so should not even be a part of the Districts business.
Individual	2/28/2015	211	. Yet this District uses helicopters to spread methoprene, a hormone disrupter, and Bti, a digestive bacteria disrupter, in the Baylands to kill off the mosquitoes at a time of year exactly when the mosquitoes are emerging to feed hundreds of thousands of migrating birds
Individual	2/28/2015	212	This report claims Vector Control provides trapping service for other vectors other than mosquitoes. I have not found this to be the case. I have asked for help with deer (which spreads lime disease) and no help is available.
Individual	2/28/2015	213	2.3.3 Biological Control Bti is not specific to mosquitoes and can cause other creatures, including humans, to fail to thrive as it kills the intestinal bacteria and incorporates into human cells. There is now much discussion about obesity being caused by Bti in the corn, corn oil and other GMOs. Many people avoid these foods now due to this biological agent. It should not be in our water.

Individual	2/28/2015	214	In addition, the hazard to airborne wildlife from the helicopters or fixed wing aircraft and the hazard to the aircraft from airborne wildlife should be addressed in the EIR.
Individual	2/28/2015	215	2.7.1.2, page 65: No State Water Resources Control Board Permit has been issued for either the Baylands toxic applications nor the direct and deliberate contamination of our reservoirs. These contamination projects do not have a West Nile excuse. Furthermore the pesticide Zenivex 4E was not in a District's permit. The Vector Control District was in violation of their permit for three years for using Zenivex 4E and has been issued a violation. The Water Board may be exempt from CEQA. The District is not.
Individual	2/28/2015	218	"All applicators and handlers will use proper personal protective equipment." This is not the case as drivers fogging pesticide have been observed in shirt sleeves with no protective gear.
Individual	2/28/2015	220	How is one to avoid repeated exposure when it hangs in the air as a fog and may re-arise for several days, must be breathed as in a pesticide fog because there is no fresh air, and coats the skin, eyes clothing and surfaces one must touch?
Individual	2/28/2015	221	Urban ULV Mosquito Control Applications For control of resting or flying adult mosquitoes, biting flies and non-biting midges in areas such as utility tunnels, sewers, storm drains and catch basins, pipe chases, underground basements, underground passages, parking decks, crawl spaces or uninhabited buildings, apply Zenivex® E4 RTU using mechanical foggers, hand-held or truck-mounted ULV equipment, thermal foggers or other spray equipment suitable for this application. Apply Zenivex® E4 RTU at rates up to but not exceeding 0.0070 pounds of etofenprox per acre. [Emphasis added.] Nowhere does this label say: occupied residential houses. It specifically says: "uninhabited buildings". Thus Zenivex is fogged by the District on occupied residential neighborhoods, workplaces, commercial buildings, schools and other public facilities in outright violation of the label.
Individual	2/28/2015	222	Application rates, amounts: The Specimen Label includes a table linking pesticide application rates and amounts to vehicle speed. Thus the assertion that ultra low rates are used could very well be 100% false as the vehicles cannot keep a particular speed as they go in and out of neighborhood streets and often must stop, meaning very heavy applications in intersections and other places where the vehicle must slow or stop. Spraying does not stop at corners of blocks, so corner lots can be doused at least twice doubling the dose. The Specimen Label says: "Apply when wind is ? 1 mph. Do not apply when wind speeds exceed 10 mph." Nevertheless the Districts fogging has proceeded when announced despite absolutely still air, and when wind speeds have been well over 10 miles per hour in violation of the label.
Individual	2/28/2015	223	The Specimen Label says: "Do not apply over bodies of water (lakes, rivers, permanent streams, natural ponds, commercial fish ponds, swamps, marshes or estuaries), except when necessary to target areas where adult mosquitoes are present, and weather conditions will facilitate movement of applied material away from water in order to minimize incidental deposition into the water body. Thus any pesticide fogging on or near any bodies of water can only be done if mosquitoes are present there, not a mile away AND when the winds can blow the pesticide in such a way it does not enter the water, an almost impossible task.
Individual	2/28/2015	224	The reservoir recharges our aquifers, which provide our predominant water supply in the drought. No water treatment is known or available to remove Zenivex from our water. So the entire population dependent on this water is not only breathing this toxic pesticide, but also sooner or later drinking it.
Individual	2/28/2015	226	Nothing has addressed the effect of methoprene on the young of the species present in the baylands, young and pregnant females being extra sensitive to hormone altering substance.

Individual	2/28/2015	227	The code requirement for posting notice when pesticide is applied to public property has been in effect the whole time of the West Nile issue. I have seen no such posting in all this time.
Individual	2/28/2015	228	In each of these cases the findings effects of toxicity is specifically limited to the 4% active ingredient as either the product as a whole was not tested, or the tests were adverse and so are not being reported we don't know which.
Individual	3/1/2015	35	In 1.5.3 Biological-Terrestrial the DEE states that the following concerns will be addressed in Chapter 5 or Appendix A: "Describe the effects of all chemicals that are used and/or proposed for use on wildlife and natural ecosystems, including insect prey, birds, mammals, fish, vegetation and site topography." This subject is not addressed in any serious detail. The great loss of mosquito predators, bees, butterflies, beneficial insects, and birds is not addressed. The increased diseases in plants because of these loses and the need for increased pesticide spraying because SCC Vector Control has been killing our ecosystem which keeps mosquitoes in balance is not addressed.
Individual	3/1/2015	38	The major portion of this DEE was clearly written by the State for all its Vector Control programs. It lacks the details of exactly what is done in SCC and these need to be added. The DEE is too general and not specific to our Santa Clara County. It needs to be rewritten to address our particular situation and problems.
Individual	3/1/2015	39	The DEE needs to be reorganized to address each program and not lump all of them together. The way it is written hides the details of what SCC Vector Control actually does. This is especially true of SCC Vector Control's most visible program, the West Nile Program.
Individual	3/1/2015	44	Use of Herbicides for Vegetation Management - We would like to introduce an additional concern concerning the use of herbicides. The continual use of herbicides as a method of vegetation control ultimately results in the creation of "super weeds" that become resistant to the herbicide resulting in a cycle of needing stronger and stronger chemicals to produce the result. We ask that herbicides be used as only an initial treatment and that other methods are then employed to prevent the reemergence of the weeds. One possible alternative would be the planting of California native groundcovers that would out-compete the weeds and stop the cycle of endless spraying. The new plantings would need to be managed to ensure the establishment of the plants.
Individual	3/2/2015	89	1. Given the above, please explain how SCC Vector Control can legally use this 2007 Environmental Declaration seven years later when so much of their program has changed.
Individual	3/2/2015	90	2. It appears a real EIR/CEQA is legally required as was stated at Vector Control's EIR meeting for the public in June, 2012. Please comment.
Individual	3/2/2015	91	3. How is it possible for SCCVC to spray pesticides which are toxic to fish, invertebrates, and bees when the CDFG states on their exemption that "the project will have no effect no fish, wildlife, and habitat"?
Individual	3/2/2015	92	4. Has CDFG been informed about the Zenivex pesticide spraying? Were they informed that its MSDS states it will be toxic to fish, wildlife, and bees?
Individual	3/2/2015	93	5. Where is the form for citizens to file a complaint about the killing of our bees, beneficial insects, birds, and butterflies? It certainly is not SCCVC or SCC Board of Supervisor meetings.
Individual	3/2/2015	94	There is very little information in the DEE about bees although in the first part of the DEE under Biological Resources-Terrestrial (1.5.3) it states that in Chapter 5 and Appendix A it would be discussed and is only In 5.2.1 the DEE states "fogging is scheduled during the night (11pm to 3 am) when bees are not active and are sheltered within hives." If SCCVC listened to its citizens, they could never write this lie.

Individual	3/2/2015	109	6. Since natural alternatives will help create a healthier ecosystem, why are not more alternatives mentioned in the DEE?
Individual	3/2/2015	110	7. In February 2015 approximately one-half of our Don Edwards National Wildlife Sanctuary (the only urban one in the U.S.) was sprayed by SCCVC to control mosquitoes. There is endangered wildlife living here. Since SCCVC was mandated to first try alternatives to chemical and pesticide spraying, why didn't they consider building solar panels around the edge of our sanctuary? The electricity from these solar panels could then run pumps which would move the stagnant water where mosquitoes live and thus eliminate their habitat here. This is a far more healthy alternative for all of life.
Individual	3/2/2015	112	9. Why has SCCVC ignored the SCC County Supervisor's 2012 mandate to first use alternative approaches in their programs? Why is this not clearly addressed in the DEE? Three years is sufficient time to develop such a program.
Individual	3/2/2015	113	Most of this DEE was clearly written by the State Vector Control for its many state Vector Control programs. Therefore, it lacks the details of exactly what is done in SCC and these need to be added.
Individual	3/2/2015	114	The DEE is too general and not specific to our Santa Clara County. It needs to be rewritten to address SCC's particular situation and problems.
Individual	3/2/2015	120	Question: Who is paying for the West Nile spraying advertising on billboards, television, and the radio? I have talked with local and state legislators and this is not in their budgets. This advertising is putting fear into our citizens and not a positive thing.
Individual	3/2/2015	121	The public would like to know about SCCVC's budget and the diversity of employees working for them. Please break it down into cost per program. We are especially interested in the costs of each part of the West Nile Program.
Individual	3/6/2015	46	V.C.D. needs to present the public and Board of Supervisors with a summary of basic points and answer the six questions. This County has asked specific questions for at least the past 8 1/2 years, and V.C.D. needs to provide concise answers which focus on this County's V.C.D. Program of Activities. Mosquito-related activities are woven into and obscured in a broad general report that sometimes discusses Federal and State activities, regulations, and programs. Since this report was prepared for the public who are not all be physical scientists but who are, nevertheless, absolutely impacted by this Vector Control District's plans, and since the report was supposed to answer specific questions that pertain to this County, I do not see how it has achieved its purpose.
Individual	3/6/2015	50	Table 10-4 I do not understand this. Please clarify what percentage of time, energy, and financial resources go into all the methods of mosquito control in this County.
Individual	3/6/2015	52	B. Opt-out of further spraying/ fogging. I'm confused; I don't understand the difference between "No Project Alternative" and "Opting-Out" of V.C.D. Mosquito Fogging/ Spraying?
Individual	3/6/2015	53	Brazil releases sterile male mosquitoes at certain times of the year. Who is studying sterilization of mosquitoes? Why couldn't this be tried, here, as part of V.C.D.'s efforts? I do not mean genetically-altered male mosquitoes; I mean sterilized male mosquitoes for any W.N. -carrying female mosquito population. How effective has this been, elsewhere, and how could it help reduce future mosquito populations here? How could it be detrimental? * In one of the reports, V.C.D. maintains that releasing sterile mosquitoes is only a temporary measure, so it should not be utilized, at all. "Knock-downs" of female mosquitoes in this County, over the past 8 years, using chemical pesticides, have been temporary measures.
Individual	3/6/2015	54	1. Prior to mosquito season, devote more money to vigorously cleaning storm drains. It should be simple to ascertain if the storm drains are functioning effectively, or not.

Individual	3/6/2015	55	It should be simple to demonstrate if positive female populations are flourishing around the same storm drains, year after year.
Individual	3/6/2015	56	The storm drains (especially in areas of repeat mosquito populations) don't seem to be designed to sufficiently handle the mosquito population. If needed, alter the storm drains so that they function more effectively.
Individual	3/6/2015	57	*If the alterations seem costly, start with the areas which have had the most female mosquito activity over the past few years.
Individual	3/6/2015	59	3. Stop using County money to pay for companies who use dogs to discourage geese, duck & bird populations (Vasona Creek & Vasona lake). Re-think the strategy & encourage back the population, as they are part of an eco-system that eats mosquitoes (& other "nuisance" insects).
Individual	3/6/2015	60	5. V.C.D. could offer scholarships and/ or other incentives to any individual or organization who can find ways to neutralize female mosquitoes.
Individual	3/6/2015	64	6. b). Perhaps Our City Forest can help with obtaining & planting specific trees that attract mosquito predators in those area that V.C.D. identifies as having repeat positive mosquito populations. Rather than an individual applying for a tree, V.C.D. work with Our City Forest to plant trees which will specifically support natural predators for decades to come.
Individual	3/6/2015	65	Our City Forest realizes that trees decrease noise and air pollution, increase oxygen for us all, support bird habitat, reduce energy costs and create a more beautiful Valley. Is there any plan to work with this organization to plant trees in V.C.D.'s recurring target areas?
Individual	3/6/2015	70	* page 2-24: Integrated Mosquito and Vector Management Programs Appendix E, Alternatives Analysis Report:
Individual	3/6/2015	77	6. j). Rain barrels. V.C.D. could figure out which rain barrels will not attract mosquitoes and then let the public know. V.C.D. could help the public obtain these barrels free or at reduced prices. Why not offer rebates for residential as well as business owners who purchase and install these barrels? Why not offer rebates for residents who want to use water captured in rain barrels to cultivate plants that attract natural predators?
Individual	3/6/2015	81	7. a). Encourage people to not be mosquito magnets.
Individual	3/6/2015	82	b). Encourage people to choose colors for clothing & outdoor landscaping that does not attract mosquitoes.
Individual	3/6/2015	83	c). Encourage people to not use floral & highly-scented products for laundry, clothing, socks, hats, picnic & sports' blankets & chairs.
Individual	3/6/2015	84	If W.N. virus and other mosquito viruses are a true threat and public health issue, in this County, then V.C.D. should contact fabric stores and textile manufacturers and have them donate mosquito netting for residents without central air-conditioning as well as residents who spend time outdoors (home patios).
Individual	3/6/2015	85	d). V.C.D. should have stores stop offering fabric colors to sports' teams that attract mosquitoes.
Individual	3/6/2015	86	e). V.C.D. should contact pool & patio shops; lawn & garden supply stores; pet stores and ask that they stop offering fabrics for outdoor cushions, drapes, seating, banners, and so on that attracts mosquitoes.
Individual	3/6/2015	87	Or V.C.D. could, at a minimum, post warnings at all the above places that certain fabric colors & designs may attract mosquitoes so that parents, sports' team managers & participants, educators and residents would realize that what they're purchasing and using might attract rather dangerous biting mosquitoes.

Individual	3/6/2015	88	f). V.C.D. should definitely advise commercial enterprises in the Valley, as well as parents, educators, sports' teams, and residents that scented products will attract female mosquitoes. And then post warnings prior to mosquito season that the use of scented products may attract dangerous biting mosquitoes.
Individual	12/12/2015	123	1) Where do you get the authority to "issue a locally-focused, comprehensive environmental study, instead of the PEIR?
Individual	12/12/2015	124	2) Has SCCVCD received any compensation, lab equipment, or anything of value from any Pesticide company I corporation(s)?
Individual	12/12/2015	125	3) According to Jennie Loft, acting communications manager for San Jose's Environmental Services Department, "Anything that IS not storm water or rainwater is considered a pollutant. If it goes into a storm drain, that pollutant will harm wildlife and habitats in the creeks". How can Vector Control stop the pesticides from fogging from being washed into the storm drains by lawn sprinklers and rain? Does this not out SCCVCD in violation of this rule?