

**CITY OF MALIBU  
NOTICE OF INTENT TO ADOPT  
A MITIGATED NEGATIVE DECLARATION**

Notice is hereby given that the City of Malibu has completed an Initial Study for the following project in accordance with California Environmental Quality Act (CEQA):

**Project Title** Earth Friendly Management Policy

**Application Nos.** Initial Study No. 17-001  
Mitigated Negative Declaration No. 18-002

**Locations** Where City-administered pest control activities occur:

- Malibu Bluffs Park
- Trancas Park
- Malibu Equestrian Park
- Las Flores Creek Park
- Legacy Park
- City Hall, 23825 Stuart Ranch Road (parking lot planters)
- Pacific Coast Highway median, between Webb Way and Cross Creek Road
- Civic Center/Malibu Canyon Road triangle planter
- John Tyler Drive median, beginning at Pacific Coast Highway and running one block north to Pepperdine University security gate
- Civic Center Wastewater Treatment Facility, 24000 Civic Center Way (currently under construction)
- Super Care Drugs/Malibu Medical (exterior only), 23661 Pacific Coast Highway

**Project Applicant/Owner** City of Malibu

**Project Description:** The Earth Friendly Management Policy (proposed project) consists of replacing the City's Integrated Pest Management (IPM) program with practices that incorporate an ecosystem-based strategy for managing pests, applying science and pest monitoring to determine if pest levels warrant treatment. Treatment methods are required to emphasize avoidance of pesticides and other chemical applications. The proposed project builds on current practices and strictly prohibits the following on all City property:

- (1) use of synthetic fertilizers and organic or toxic chemical pesticides, irradiation, and genetically engineered products containing genetically engineered ingredients, including fungicides, herbicides, insecticides, and rodenticides; and
- (2) animal trapping of any kind, with the exception of live-trapping of pests from building interiors that are released unharmed into the immediate outdoor environment. The "immediate environment" means the nearest suitable habitat.

This CEQA study focuses on the most extreme type of policy which prohibits all pesticides, including organic pesticides, in addition to the prohibition on trapping and killing of rodents. As an alternative, it evaluates the potential for limited use of organic pesticides in emergency circumstances.

**Public Review:** The purpose of this review is to allow public agencies and interested members of the public the opportunity to share expertise, disclose agency analysis, check for accuracy, detect omission, discover public concerns and solicit counter proposals pursuant to CEQA Section 15200 (Purposes of Review).

The Initial Study and Mitigated Negative Declaration will be circulated for a 30-day review period. Written comments will be received by the City of Malibu Planning Department until 5:30 p.m. on the ending date of the public review period.

**Review Period:** Begins: **May 4, 2018** Ends: **June 4, 2018**

**Where to Send Comments and Where Documents are Available for Review:**

Post: City of Malibu  
Planning Department  
23825 Stuart Ranch Road  
Malibu, CA 90265

Fax: (310) 456-3356  
Email: [bblue@malibucity.org](mailto:bblue@malibucity.org)

**City of Malibu Website:**

<https://www.malibucity.org/701/Environmental-Documents-Notices>

**Public Hearing:** A public hearing for the City of Malibu Planning Commission to receive comments on the document and to adopt the Initial Study / Mitigated Negative Declaration will be scheduled and noticed at a later date.

**Contact:** For more information regarding this notice, please contact the following staff member:

Bonnie Blue, Planning Director  
(310) 456-2489, extension 258  
[bblue@malibucity.org](mailto:bblue@malibucity.org)

 Adrian Fernandez  
for

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Bonnie Blue, Planning Director

Date: May 3, 2018

CITY OF MALIBU  
EARTH FRIENDLY MANAGEMENT POLICY  
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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*Prepared for:*

CITY OF MALIBU  
23825 STUART RANCH ROAD  
MALIBU, CA 90265-4861

*Prepared by:*

**Michael Baker**

**INTERNATIONAL**

3760 KILROY AIRPORT WAY, SUITE 270  
LONG BEACH, CA 90806

**MAY 2018**



**TABLE OF CONTENTS**

Environmental Checklist Form ..... 1

Proposed Project ..... 7

Environmental Setting ..... 11

Environmental Factors Potentially Affected ..... 17

Evaluation of Environmental Impacts ..... 19

    1. Aesthetics ..... 20

    2. Agriculture and Forestry Resources ..... 22

    3. Air Quality ..... 23

    4. Biological Resources ..... 25

    5. Cultural Resources ..... 30

    6. Geology and Soils ..... 32

    7. Greenhouse Gas Emissions ..... 34

    8. Hazards and Hazardous Materials ..... 35

    9. Hydrology and Water Quality ..... 39

    10. Land Use and Planning ..... 41

    11. Mineral Resources ..... 43

    12. Noise ..... 44

    13. Population and Housing ..... 46

    14. Public Services ..... 47

    15. Recreation ..... 48

    16. Transportation/Traffic ..... 50

    17. Tribal Cultural Resources ..... 52

    18. Utilities and Service Systems ..... 54

    19. Mandatory Findings of Significance ..... 56

References ..... 58

**APPENDICES**

Appendix A: Policy 49-Integrated Pest Management

Appendix B: Poison Free Malibu Draft Earth Friendly Management Policy

**TABLE OF CONTENTS**

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**LIST OF TABLES**

Table 1 Comparison of Pest Management Approaches..... 10

**LIST OF FIGURES**

Figure 1 Regional Location Map..... 3

Figure 2 Project Location Map ..... 5

ENVIRONMENTAL CHECKLIST FORM

1. Project title: Earth Friendly Management Policy ("EFMP")
2. Lead agency name and address: City of Malibu  
23825 Stuart Ranch Road  
Malibu, CA 90265-4861
3. Contact person and phone number: Bonnie Blue, Planning Director  
(310)456-2489, ext. 258
4. Project location: The proposed EFMP would apply citywide within the City of Malibu for all City-administered pest control activities. See **Figure 1** (Regional Location Map) and **Figure 2** (Project Location Map).
5. Project sponsor's name and address: City of Malibu  
23825 Stuart Ranch Road  
Malibu, CA 90265-4861
6. General Plan designation: Not applicable
7. Zoning: Not applicable
8. Description of project: The proposed project consists of replacing the City's Integrated Pest Management (IPM) program and organic-only pesticides pilot program with a more restrictive Malibu EFMP, which is an ecosystem-based strategy for managing pests, applying science and pest monitoring to determine if pest levels warrant treatment. Treatment methods are required to avoid applications of toxic pesticides, and to avoid trapping pests, except in limited circumstances at selected building interiors. Please refer to the more detailed project description on the following pages.
9. Surrounding land uses and setting: Malibu is located along the Pacific Ocean northwest of the City of Los Angeles and is bounded on the north by the Santa Monica Mountains, on the east by Topanga Canyon, on the west by Leo Carrillo State Park near the Ventura County line, and on the south by the Pacific Ocean. City-administered pest control activities presently occur or will occur at the following City facilities which will be subject to the EFMP:
  - Malibu Bluffs Park
  - Trancas Park
  - Malibu Equestrian Park
  - Las Flores Creek Park

## ENVIRONMENTAL CHECKLIST

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- Legacy Park
- City Hall, 23825 Stuart Ranch Road (parking lot planters)
- Pacific Coast Highway median, between Webb Way and Cross Creek Road
- Civic Center/Malibu Canyon Road triangle planter
- John Tyler Drive median, beginning at Pacific Coast Highway and running one block north to Pepperdine University security gate
- Civic Center Wastewater Treatment Facility, 24000 Civic Center Way (currently under construction)
- Super Care Drugs/Malibu Medical (exterior only), 23661 Pacific Coast Highway

10. Other public agencies whose approval is required:

None. The only approvals required are from the Malibu City Council for the proposed ordinance implementing the EFMP after review and adoption of a California Environmental Quality Act (CEQA) determination based on the results of this Initial Study.

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

On May 8, 2017, the City notified the four Native American tribes that have requested notification of projects subject to CEQA. The tribes are:

- Barbareño/Ventureño Band of Mission Indians
- Torres Martinez Desert Cahuilla Indians
- Gabrieleño Band of Mission Indians – Kizh Nation
- Fernandeno Tataviam Band of Mission Indians

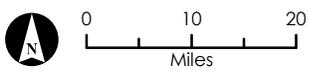
None the tribes responded or requested further consultation. Please refer to subsection 17, Tribal Cultural Resources, for additional details.

T:\GIS\Los\_Angeles\_County\Map\Management\Regional.mxd (6/5/2017)



**Legend**

City of Malibu



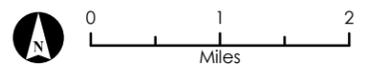
**FIGURE 1**  
Regional Location Map

## ENVIRONMENTAL CHECKLIST

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**FIGURE 2**  
Project Location Map

**ENVIRONMENTAL CHECKLIST**

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**PROPOSED PROJECT**

**Background**

The aim of the City's pest control efforts is to use best management practices for controlling pests that are harmful to the health, function, or aesthetic value of park landscapes and other City owned and maintained facilities in an efficient, effective and environmentally responsible manner while paying careful attention to public safety.

On October 8, 2013, the Council adopted Council Policy No. 49 (IPM Policy) and the IPM Program formally committing Malibu to reduce or eliminate the use of pesticides, when reasonable, through the use of IPM principles and practices. The IPM Policy and Program reflected the Council's commitment to safe and environmentally-responsible pest control and the City's goal of being a leader in environmental efforts. The Program allowed for the use of pesticides in extremely limited circumstances when all other options to effectively manage City-owned parks, roads and property were exhausted. Policy No. 49 is included in Appendix A.

On May 17, 2016, the Parks and Recreation Commission reviewed the IPM Policy and Program. The review included discussion on action thresholds, pest control measures and effectiveness of those control measures, safety issues, pesticide use, product descriptions, locations, purpose and amounts. The Commission also reviewed the IPM balance between environmental sensitivity, safety and effectiveness, and program affordability necessary to manage a proper IPM program. The Commission recommended that the Council implement a pilot program to completely eliminate the use of pesticides at Legacy Park, Las Flores Creek Park and the Equestrian Park, with the goal of having all City parks become pesticide-free.

At the Regular meeting on June 27, 2016, the City Council heard a staff report and public comment regarding the IPM program, the use of pesticides and trapping. After hearing comments and discussing the item, Council adopted the pilot program but stated the policy and program should be referred to as an Earth Friendly Management Policy (EFMP) and to eliminate the use of all toxic chemical pesticides and trapping on City-owned parks, roads, and property, similar to the practices outlined in the policy drafted by Poison Free Malibu, which allows limited use of organic pesticides in certain emergency circumstances. Poison Free Malibu's EFMP document is included in Appendix B. Staff then posted an RFP for a new landscape maintenance agreement considering that the scope of the current agreement had changed significantly due to Council's decision.

The City is currently still implementing the pilot program and has not used non-organic pesticides or conducted trapping at any City facilities since June 27, 2016. In preparation for returning to Council for adoption of a formal Malibu EFMP, staff initiated the process of preparing this CEQA document.

On April 24, 2017, during consideration of the professional services agreement for this CEQA document, Council directed staff to make the Malibu EFMP an all-encompassing Earth Friendly Management Policy with an absolute prohibition on use of any pesticides under any circumstances.

This CEQA study focuses on the most extreme type of policy which prohibits all pesticides, including organic pesticides, in addition to the prohibition on trapping and killing of rodents. As an alternative, it evaluates the potential for limited use of organic pesticides in emergency circumstances.

## PROJECT DESCRIPTION

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### Malibu Earth Friendly Management Policy

The proposed project consists of implementing an EFMP in the City's pest control program that builds on current practices and strictly prohibits the following on all City property:

- (1) use of synthetic fertilizers and organic or toxic chemical pesticides, irradiation, and genetically engineered products containing genetically engineered ingredients, including fungicides, herbicides, insecticides, and rodenticides; and
- (2) animal trapping of any kind, with the exception of live-trapping of pests from building interiors that are released unharmed into the immediate outdoor environment. The "immediate environment" means the nearest suitable habitat.

The terms above shall have the following meanings:

- Pests are any living organisms that occur where they are not wanted and that cause damage or economic loss or transmit or produce a disease. Pests can include but are not limited to animals like insects or mice, unwanted plants, like weeds, or microorganisms, like plant diseases, bacteria, fungi and viruses.
- Synthetic fertilizers are man-made inorganic chemically manufactured materials containing one or more of the primary nutrients necessary for plant growth: nitrogen, phosphorus and potassium.
- Chemical pesticides are any substances or mixture of substances intended for preventing, destroying, repelling or mitigating any pest. A pesticide is considered toxic if it contains ingredients identified in the following sources:
  - Products listed as Toxicity Category 1, 2, or 3, meeting the appropriate toxicity categories and bearing on the front label panel the word Danger, Warning, or Caution, as specified in Section 156.10 of Title 40 of the Code of Federal Regulations.
  - California's Proposition 65 list (the Safe Drinking Water and Toxic Enforcement Act of 1986, materials known to the State to cause cancer or reproductive or developmental toxicity)
  - California Department of Pesticide Regulation groundwater protection list (Food and Agriculture Code 13145(d))
  - Organophosphates, organochlorines, or carbamates listed by the US Environmental Protection Agency (US EPA), Department of Pesticide Regulation Chemical Inquiries Database
  - A known carcinogen, probable carcinogen or possible carcinogen by the US EPA as specified in the "List of Chemicals Evaluated for Carcinogenic Potential"
  - Any known endocrine disruptor listed by the US EPA or the European Union, Endocrine Disruptors Website
- Organic pesticides include eco-exempt pesticides, and products listed by the Organic Materials Research Institute (OMRI). Eco-exempt means pesticides designated by US EPA as minimum risk pesticides by Federal Insecticide, Fungicide and Rodenticide Act (FIFRA),

Section 25(b), or California Code of Regulations Section 6147, or products approved for organic production systems by the National Organic Program, which is the US Department of Agriculture's organic accreditation program.

All City departments would comply with the EFMP, and all contractors retained by the City to conduct services for the City would be required to comply with the EFMP. City parks, City Hall and other sites affected by the proposed EFMP program are described in the Environmental Setting subsection.

*Pest Management Implementation Strategies Under Consideration*

Strategies under consideration to aid implementation of the EFMP include, but are not necessarily limited to the following:

- Physical controls, including hand-weeding, overseeding, solarization, application of mulch, and trap cropping (where a companion crop is planted which attracts pests away from the crop or plant that is to be protected from pests)
- Design, construct, or modify indoor and outdoor areas to reduce or eliminate pest habitats
- Eliminate habitats and conditions supportive of pest population increase
- Biological controls, such as raptor poles and owl nesting boxes
- Indoor live trapping limited to capture and release into the immediate outdoor environment, consistent with California Code of Regulations Title 14, Section 465.5
- Regular and effective sanitation, litter, and trash maintenance
- Exclusion, from buildings, play fields and walkways, involving installation of metal screens around perimeters that extend beneath the ground to prevent pests from burrowing under the screen and beneath the building, field or walkway surfaces)
- Filling of rodent holes with soil
- Removal of vegetation in targeted areas where invasives have been difficult to control without chemical treatments, possibly including replacement with other natural materials such as rock, stone, wood chips, or artificial surfaces
- Education of City staff and the public about earth-friendly management techniques
- Review and consideration of all available non-chemical options
- Identification and evaluation of conditions that encourage problems
- Careful and efficient inspection, monitoring, and assessment of problems by designated personnel knowledgeable of earth-friendly management methods
- Maintenance of records by City departments on earth-friendly management methods considered and used to prevent and control issues
- Environmental enhancement including a soil enrichment program and soil testing

**PROJECT DESCRIPTION**

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- Maintaining compliance with organic horticultural science practices, including but not limited to, use of water-conserving plants and mulching
- Selection of native plantings using criteria of hardiness, suitability to native conditions, drought tolerance, and ease of maintenance

**TABLE 1  
COMPARISON OF PEST MANAGEMENT APPROACHES**

<b>Treatment Practices</b>	<b>IPM Prior to June 27, 2016</b>	<b>Pilot Program June 27, 2017 to Present</b>	<b>Proposed Project Malibu Proposed EFMP</b>
<b>Pesticides</b>	Allowed when reasonable through IPM principles and best management practices	Organic Only; Toxic Not Allowed	Not Allowed
<b>Rodenticides</b>	Allowed when reasonable through IPM principles and best management practices	Organic Only; Toxic Not Allowed	Not Allowed
<b>Trapping – Outdoor</b>	Allowed, with euthanizing	Not Allowed	Not Allowed
<b>Trapping – Indoor</b>	Allowed, with euthanizing	Indoor trapping allowed with release into the immediate environment	Indoor trapping allowed with release into the immediate environment

This initial study compares the proposed Malibu EFMP to the baseline conditions in place under the IPM/Policy No. 49. It also evaluates certain alternatives the Council could choose that are less restrictive but still protective in the event of an emergency.

**ENVIRONMENTAL SETTING**

**CITY OF MALIBU FACILITIES SUBJECT TO EFMP**

**Malibu Bluffs Park**

24250 Pacific Coast Highway  
Malibu, CA 90265

Malibu Bluffs Park is a 6-acre community park located at the intersection of Pacific Coast Highway and Malibu Canyon Road, overlooking the Pacific Ocean. The park consists of two baseball diamonds, a soccer/multipurpose field, a playground suitable for children ages 2–12, a jogging path, picnic tables, a whale watching station, and the Michael Landon Community Center. Malibu Bluffs Park hosts a wide variety of community classes, special events, and sports leagues for tiny tots, youths, and adults.

Current outdoor pest control challenges at this park include ground squirrels, gophers, rodents, ants, mosquitos, non-native invasive broadleaf flowers, and weeds. Current indoor pest control challenges include mice and ants.



*Malibu Bluffs Park*

## ENVIRONMENTAL SETTING

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### Trancas Canyon Park

6050 Trancas Canyon Road  
Malibu, CA 90265

Trancas Canyon Park is an 8-acre park that includes a multisport athletic field, dog park, picnic area, playground, restroom building, and parking. Current pest control challenges at this park include ground squirrels, gophers, rodents, ants, mosquitos, non-native invasive broadleaf flowers, and weeds.



*Trancas Canyon Park*

### Malibu Equestrian Park

6225 Merritt Drive  
Malibu, CA 90265

The Malibu Equestrian Park is located adjacent to Malibu High School. It features two riding arenas, a picnic area, and restrooms. This facility is available for rent for horse shows and lessons, but is otherwise open to the public for practice and recreational riding. Current pest control challenges at this park include ground squirrels, gophers, rodents, ants, mosquitos, non-native invasive broadleaf flowers, and weeds.



*Malibu Equestrian Park*

## ENVIRONMENTAL SETTING

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### Las Flores Creek Park

3805 Las Flores Canyon Road  
Malibu, CA 90265

Las Flores Creek Park is a neighborhood park located along Las Flores Creek. The park has on-site parking, picnic tables, restrooms, a small playground, benches, a pedestrian bridge, and over one-third of a mile of walking trails. The park also has over 45 varieties of native plant species and interpretive signage throughout the park with information about the plants, riparian habitat, the creek stabilization project, and the history of the area. Current pest control challenges at this park include ground squirrels, gophers, rodents, ants, mosquitos, non-native invasive broadleaf flowers, and weeds.

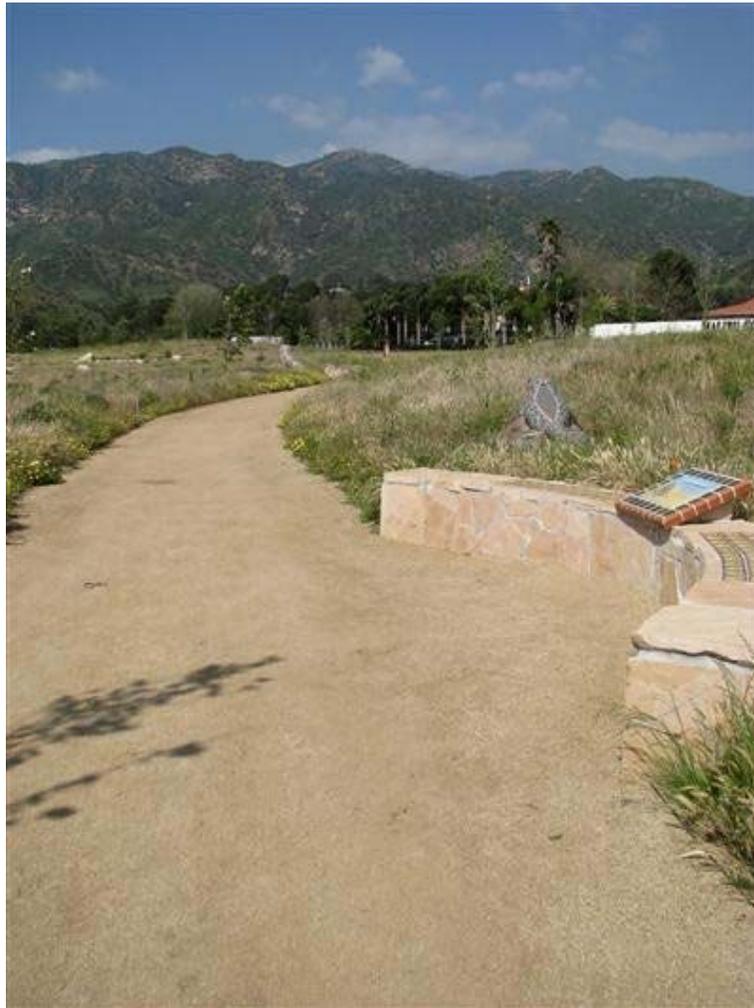


*Las Flores Creek Park*

**Legacy Park**

23500 Civic Center Way  
Malibu, CA 90265

Malibu Legacy Park, consisting of approximately 12 acres of land, is at the heart of the only location in California where four natural coastal habitats—coastal prairies, coastal bluffs, Southern California native woodlands, and riparian/wetland—are linked and accessible. As an outdoor living learning center, Legacy Park features stormwater treatment technology and a passive park with a detention basin, walking paths, trellis-covered benches, and a small amphitheater space. Current pest control challenges at this park include ground squirrels, gophers, rodents, ants, mosquitos, non-native invasive broadleaf flowers, and weeds.



*Legacy Park*

## ENVIRONMENTAL SETTING

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### **City Hall**

23825 Stuart Ranch Road  
Malibu, CA 90265

Facilities maintained include all planters around the parking lot and driveway areas, and the interior of the 37,000-square foot building. Maintenance of the adjacent slope areas is limited to brush clearance and tree trimming. Current outdoor pest control challenges include ground squirrels, gophers, rodents, ants, mosquitos, non-native invasive broadleaf flowers, and weeds. Current indoor challenges involve termites, spiders, ants, rodents, snakes and lizards. Termites have been the biggest problem, with citrus oil treatment proving to be ineffective.

### **Pacific Coast Highway Median**

Facility consists of the median on Pacific Coast Highway between Webb Way and Cross Creek Road. Current pest control challenges include Bermuda grass, rodents, non-native invasive broadleaf flowers, and weeds.

### **Civic Center/Malibu Canyon Road Triangle Planter**

Facility consists of triangle planter located at Civic Center Way and Malibu Canyon Road. Current pest control challenges include Bermuda grass, rodents, non-native invasive broadleaf flowers, and weeds.

### **John Tyler Drive Median**

Facility consists of median on John Tyler Drive beginning at Pacific Coast Highway and running one block north to the Pepperdine security gate. Current pest control challenges include Bermuda grass, rodents, non-native invasive broadleaf flowers, and weeds.

### **Civic Center Wastewater Treatment Facility**

Since this facility is under construction, the City does not currently conduct pest control activities, but similar pest control issues to those occurring in the parks are anticipated, including ground squirrels, gophers, rodents, ants, mosquitos, non-native invasive broadleaf flowers, and weeds.

## PRIVATE SITES WHERE CITY PROVIDES PEST CONTROL SERVICES

### **Super Care Drugs/Malibu Medical**

These two tenants occupy a 4,380 square-foot building located within the City's Civic Center site on land leased from the City. As such, maintenance of the exterior landscape area is provided by the City, including pest control of that area. The private business entities are responsible for pest control and maintenance of the building interiors.

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## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

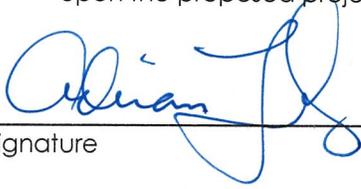
- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Aesthetics                         | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                   |
| <input type="checkbox"/> Biological Resources               | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Geology and Soils             |
| <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials    | <input type="checkbox"/> Hydrology and Water Quality   |
| <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                  | <input type="checkbox"/> Noise                         |
| <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                    | <input type="checkbox"/> Recreation                    |
| <input type="checkbox"/> Transportation/Traffic             | <input type="checkbox"/> Tribal Cultural Resources          | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Mandatory Findings of Significance |   |  |

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

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Determination (to be completed by the lead agency)  
On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
\_\_\_\_\_  
Signature

5/3/18  
\_\_\_\_\_  
Date

Adrian Fernandez  
\_\_\_\_\_  
Printed Name

Senior Planner  
\_\_\_\_\_  
Title

**EVALUATION OF ENVIRONMENTAL IMPACTS**

- 1) All answers take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 2) A “No Impact” answer indicates the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone).
- 3) “Less Than Significant Impact” applies where the analysis indicates there could or would be an adverse impact that does not rise to the level of significant, or that the impact would be beneficial.
- 4) “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.”
- 5) “Potentially Significant Impact” is indicated if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

## EVALUATION OF ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>1. AESTHETICS.</b> Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### BACKGROUND

The City conducts pest control activities at all City-owned parks and other City-owned facilities, including City Hall, outdoor landscape areas in the Civic Center, and selected landscaped street medians and planter areas. The pest control program is focused on controlling a variety of rodents and other pests, including ground squirrels, gophers, rats, mice, ants, termites, and a large range of non-native invasive weeds. Pest control activities occur intermittently, at ground level, involving one or two people at a time. No landform alteration or construction of buildings or other structures is associated with any pest control activities.

### DISCUSSION OF IMPACTS

- a, b) *No Impact.* The proposed EFMP would not entail grading or alteration of natural landforms, would not require alteration or removal of any natural or scenic features, and would not involve building construction or any above-ground-level alterations to any facilities. Periodic weeding and removal or replacement of invasive plants, or installation of subsurface fencing or meshing or other rodent barriers, would not affect any scenic vistas or scenic resources because of the brief periods of time involved and the ground surface location of the activity. Malibu Bluffs Park, Legacy Park, and the Super Care Drugs site are adjacent to Pacific Coast Highway, which is identified as an eligible state scenic highway in the California Scenic Highway Program. The periodic and ground-level pest control activities at these sites do not involve scenic resources such as a historic building, a rock outcropping or other unique geologic features, or any stands of trees. The proposed project would not adversely affect any scenic views from Pacific Coast Highway.
- c) *Less Than Significant Impact.* In implementing earth-friendly pest management practices, it is possible that some turf or other landscape elements could be removed and/or replaced to prevent the spread of invasive plants or to eliminate habitat conducive to rodents. Such removal of turf or landscape elements could have a minor impact on the visual character of those specific areas. However, individual landscape features represent only one aspect of the visual character of a site, and the overall visual character of the affected park or other site would not be significantly affected. As such, the project impact would be less than significant.

- d) *No Impact.* Pest control activities are not currently conducted at night and this is not expected to change as a result of implementing earth-friendly management practices. No new permanent light sources and no temporary light sources beyond perhaps an occasional use of flashlights would be necessary to implement the proposed EFMP. As such, there would be no impacts associated with new lighting sources. No new structures would be built and no existing structures would be modified. Therefore, there would be no impact involving installation of building surfaces with highly reflective characteristics that could cause glare.

**EVALUATION OF ENVIRONMENTAL IMPACTS**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>2. AGRICULTURE AND FORESTRY RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forestland or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**BACKGROUND**

None of the affected sites contain any farmland or other agricultural resources, and there is no forestland on any of these sites.

**DISCUSSION OF IMPACTS**

a-e) *No Impact.* As stated above, there are no agricultural resources or any forestland on any of the sites where the City’s pest control activities occur. No additional areas are under consideration for the City’s pest control program. Therefore, project implementation would have no direct or indirect effect on agriculture or forestry resources.

EVALUATION OF ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>3. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

BACKGROUND

Pesticide application is regulated by the California Department of Pesticide Regulation and is not under the control of the South Coast Air Quality Management District (SCAQMD). Pest control activities conducted in Malibu are not regulated with respect to air quality impacts and these kinds of activities are not addressed by the regional air quality management plan because they are not substantial sources of criteria pollutants for which the South Coast Air Basin is designated a nonattainment area.

DISCUSSION OF IMPACTS

a-c) *Less Than Significant Impact.* New pest control practices under consideration would have a negligible effect on the existing air emissions profile of the City's pest control program. To implement the proposed program, one or two workers may be added to conduct weed pulling, indoor trapping or landscape maintenance activities. In such instances, there could be a slight increase in the number of automobile trips per day, which would generate a small and less than significant amount of air pollutants in exhaust emissions. If there is more hand labor, coupled with hand-held tools or machinery powered by gasoline and/or diesel fuels, there could be exhaust emissions from those minor sources, with negligible levels of emissions that would not be significant. The City prohibits gasoline-powered leaf blowers and it is considered unlikely that the proposed EFMP pest control practices would require use of such machinery or other gas-powered hand-held machinery. Since the minimal pesticide spraying that occurred under the IPM would be entirely eliminated under the proposed EFMP, there would be no impact due to any increases in air pollutants due to emissions from spraying practices. If the Council elected

to allow spraying of organic pesticides under the very limited eligible emergency circumstances contemplated in the Poison Free Malibu program, such circumstances would be short in duration and allowable substances limited to a restricted list of organic materials/products and no adverse impacts would be expected. The proposed EFMP would not conflict with or obstruct implementation of the regional air quality management plan, would not violate or contribute to an existing violation of an air quality standard, and would not result in a cumulatively considerable net increase of ozone or particulate matter, which are pollutants for which the region is in nonattainment with respect to federal and state air quality standards. Impacts would be less than significant.

- d) *No Impact.* Sensitive receptors are members of the population who are considered to have higher than normal sensitivity to airborne pollutants and, as a result, more susceptibility to health problems. These receptors include the elderly, children, people with lung and heart diseases, people who are ill and have compromised immune systems, and facilities that have concentrations of such people. Examples of those facilities include convalescent and nursing homes, hospitals, and elementary schools. The proposed EFMP eliminates the limited applications of pesticides allowed under the IPM, and replaces it with the practice of no pesticide applications at all. With no pesticide applications, there would be no potential exposure of sensitive receptors on or off the pest control sites. If the Council elected to allow spraying of organic pesticides under the very limited eligible emergency circumstances contemplated in the Poison Free Malibu program, such circumstances would be short in duration and allowable substances limited to a more restricted list of organic materials/products than under the IPM. No impacts would occur under the proposed EFMP or the organic alternative.
- e) *Less Than Significant Impact.* The proposed EFMP would ban all pesticide applications, including spraying, that could generate odors that are considered offensive or undesirable by people directly exposed to those odors. With the proposed EFMP, there may continue to be some odor generation for short time periods in which there are exhausts from combustion engine-powered hand tools that may be used in installation of different types of pest barriers. If some type of mulch is placed in a landscape area as a way to reduce irrigation that could attract pests, it is possible that the mulch could generate some localized odors, particularly in the immediate time period after it is installed. The type and intensity of any odors associated with such applications would be minor and short-term in nature and would be less than significant. As noted above, if the Council elected to allow spraying of organic pesticides under the very limited eligible emergency circumstances contemplated in the Poison Free Malibu program, such circumstances would be short in duration and allowable substances limited to a more restricted list of organic materials/products than the IPM. Any odor impacts from the proposed EFMP or the alternative would be less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>4. BIOLOGICAL RESOURCES.</b> Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**BACKGROUND**

The Point Dume, Malibu Beach, and Topanga 7.5-minute US Geological Survey quadrangles include Malibu and surrounding areas that support a variety of habitats. A total of 66 special-status plant and wildlife species have been recorded within these quadrangles, many of which are within the City of Malibu. The City’s pest control program includes targeting small rodents whose burrows can cause trip hazards in pedestrian areas, undermine sidewalks, and get into buildings. Several species of rodents and ground squirrels carry disease that can be contracted by humans when in close contact with each other.

The San Diego desert woodrat (*Neotoma lepida intermedia*) is a California Species of Special Concern and is known to occupy the scrub habitats within the City. Neither the IPM, the pilot

program nor the proposed EFMP has any method of excluding this particular species from capture or control methods. Additionally, there are some special-status species recorded from the area that feed on rodents. These include Golden Eagle, Swainson's hawk, San Diego mountain kingsnake, and American badger. Some or all of these species may forage in or near the City's parks, which support both natural and human-altered landscapes in an open space context that sometimes includes abutting wildlands. These species would be less likely to be found at the Civic Center or Super Care Drugs sites, or the landscape street medians and planter areas that are included in the City's pest control program. The proposed EFMP would not be expected to substantially affect predators of pest control target species.

Pest control activities at the City's parks are conducted within human-altered landscapes where natural vegetation communities have been replaced with turf grass, pavement, structures, sand, or other non-native vegetation or materials, except for Legacy Park. However, wildlife can and do utilize human altered habitats intentionally and can wind up in these areas inadvertently. There are no activities that involve work within any water bodies, drainage courses, lakes, streams, ponds, or any wetland areas.

### DISCUSSION OF IMPACTS

a) *Less Than Significant Impact with Mitigation Incorporated.* According to the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB), seven special-status invertebrates (insects and the like) and one special-status small mammal have been recorded within the City of Malibu and include the following:

- Santa Monica shieldback katydid (*Aglaothorax longipennis*)
- Crotch's bumble bee (*Bombus crotchii*)
- Sandy Beach tiger beetle (*Cicindela hirticollis gravida*)
- Globose dune beetle (*Coelus globosus*)
- Monarch butterfly – California overwintering population (*Danaus plexippus* pop. 1)
- Gertsch's socialchemmis spider (*Socalchemmis gertschi*)
- Santa Monica grasshopper (*Trimerotropis occidentiloides*)
- San Diego desert woodrat (*Neotoma lepida intermedia*)

The majority of the invertebrate species have very specific habitat requirements that would likely preclude them from being impacted by the proposed EFMP. Further, the areas targeted by the City for pest control are either completely developed (e.g. Civic Center, Super Care Drugs, landscape medians and planters) or are City parks that are at least partially developed through altered landscape, paving, and the like that would not be conducive to supporting most of these species. However, the San Diego desert woodrat can be found in and immediately adjacent to parks that support or are near native scrub habitats.

The rodents targeted in the pest management plan are predominantly non-native pest species such as black rat (*Rattus rattus*), Norway rat (*Rattus norvegicus*), and house mouse (*Mus musculus*). However, indoor trapping cannot be conducted in a species-specific manner, and could feasibly capture a native special-status desert woodrat. Capture of

rodents can result in their injury, stress, and even death, which would be considered a “take” in the sense of federal or state wildlife permitting regulations, in the event a special-status woodrat were captured. However, native woodrats are expected to remain close to native habitat. The only facility within the City that has a building adjacent to native habitat is Malibu Bluffs Park. The likelihood of a native woodrat entering the building at Bluffs Park is relatively low as these species are more likely to seek seeds and cactus available to them in the native scrub. Current practices that would be continued under the EFMP include blocking building openings and cleaning up potential food sources. The IPM program allowed for euthanizing rodents trapped indoors and outdoors. The proposed indoor trapping measures under the EFMP include the required release of captured animals unharmed back into the environment. No significant impact would occur.

Rodents are known to have potential to carry disease and to be destructive of property by burrowing and chewing. Euthanizing non-native rodents humanely could elicit environmental benefits by reducing these problems and reducing the competition with native species for food and habitat. Should the Council consider that alternative, a training program for any person responsible for rodent trapping inside City buildings or within City-maintained outdoor areas could be instituted to ensure there is no significant impact with respect to special status species. The training would include identification of small rodent species in the region to ensure that any native rodents are released unharmed into the nearest appropriate habitat. Any non-native rodents, such as Norway rat, black rat, and house mouse, would be euthanized in a humane manner. These criteria will be required if the City Council should authorize the optional humane euthanizing approach, as required by Mitigation Measure BIO-1. With this mitigation measure, the proposed EFMP and the alternative would have less than significant impacts on special status species compared to the IPM.

***Mitigation Measure BIO-1:*** In the event the City elects to apply humane euthanizing of non-native rodent pests, this shall be conducted in accordance with appropriate training for the personnel involved, which would include identification of small rodent species in the region to ensure that any native rodents are released unharmed into the nearest appropriate habitat.

- b) *No Impact.* None of the City’s pest control activities occur in sensitive natural communities, including any riparian habitat, and this would not change with the proposed EFMP. The City may experiment with different approaches to rodent control in turf areas and other ornamental landscape plantings, including removal of existing vegetation and possible replacement with other kinds of ornamental vegetation or other types of natural or artificial materials such as wood chips, gravel, wood, pavement, and other treatments, that would resist or act as barriers to pests. None of the proposed pest control methods would result in any impact to riparian or other sensitive natural communities. As such, no impact is anticipated.
  
- c) *No Impact.* The spaces in the City’s parks that are targeted for pest control do not include any wetlands. There are also no wetlands on any of the other sites included in the City’s pest control program. There is a wetland on the Civic Center Wastewater Treatment System property, but a setback requirement included in the development permit results in no facilities that would require rodent control in the vicinity of the wetland. No new areas for pest control are under consideration. The proposed earth-friendly pest control practices would not include any physical modifications to any type of federally protected

wetlands, as such, there would be no need for physical intrusions into any such resources, and no impact would result.

- d) *Less Than Significant Impact.* The fully developed pest control sites, including City Hall, Super Care Drugs, and landscaped street medians and planters, do not provide important biological resources to support the movement of fish or wildlife species. Many of the City's parks, however, are less developed in character (limited building and hardscape) and/or abut natural open spaces where wildlife movement regularly occurs. While some City parks contain water resources such as a stream course with ephemeral to seasonal flows, no pest control activities occur within these waters, and no effect is expected on any fish populations in these areas. Further, none of the proposed pest control practices would be expected to have any effect on existing wildlife movement in the area.

In addition to the non-native rodents described previously, other native rodents considered to be pests and requiring control within the City's park sites include California ground squirrel (*Otospermophilus beecheyi*) and Botta's pocket gopher (*Thomomys bottae*). Therefore, although there is some limited potential for impacts to breeding native wildlife, they would be expected to be minor and not affect a local or regional population, nor substantially alter a breeding site. Therefore, impacts would be considered less than significant.

- e) *Less Than Significant Impact.* Chapter 5 of the City's Local Coastal Program (LCP) Local Implementation Plan (LIP) prohibits the removal of native oaks, alders, walnuts, sycamores, and toyons of a certain size, unless there is no other feasible alternative.<sup>1</sup> Earth-friendly pest management practices would normally not involve any tree cutting or removal; however, there might be some circumstances where such an action could be considered to eliminate an infestation of burrowing insects that are killing the tree. An example of this is the problem of the polyphagous shot hole borer, a beetle that is affecting trees throughout Southern California. No pesticides or fungicides have been effective so far against this pest, and both native and non-native trees have been infested. Some public entities are developing alternative protocols for eliminating the shot-hole borer, such as removing the tree when the infestation level reaches a threshold point. The removed tree is then treated by solarization<sup>2</sup> or chipping to prevent a release of more beetles. Infestations of the western oak bark beetle have been identified in Los Angeles County, and in severe cases, removal of the infested tree has been determined to be the best option. In the event it is determined that removal of a California native tree protected under LIP Chapter 5 is warranted for pest control purposes, the City would evaluate treatment options and determine whether replacement of the removed tree is necessary to protect biological resources.

The potential number of tree removals due to EFMP measures to eliminate infestations by insects that are harming the trees cannot be predicted or estimated. Because these removals would occur only in the event that a harmful infestation has occurred, and because neither the current nor proposed practices to protect trees would be any

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<sup>1</sup> The Local Implementation Plan (LIP) is the regulatory mechanism to enforce the City's Local Coastal Program, which governs land use and conservation actions throughout the Malibu Coastal Zone.

<sup>2</sup> Solarization is a nonchemical method for controlling pests using high temperatures produced by capturing radiant energy from the sun. The method involves heating the affected media by covering it with a clear plastic tarp for 4 to 6 weeks during a hot period of the year when it will receive the most direct sunlight. The degree various pests can be controlled is related to the intensity, depth, and duration of the elevated temperatures. Although some pests may be killed within a few days, 4 to 6 weeks of exposure to full sun during the summer is required to ensure control of many others.

different, this would be considered a less than significant impact on locally protected tree species.

- f) *No Impact.* The Malibu LCP's Land Use Plan (LUP) contains numerous policies intended to preserve and protect the significant biological resources, both marine and terrestrial, that occur throughout the City's planning area. The emphasis is on avoiding habitat and resource destruction from development activities through careful planning of land use decisions and sensitive design of new construction projects, as well as compliance with federal and state regulations and permitting requirements. Policies 3.18 and 3.19 are directed at pest control practices, as follows:

LUP Policy 3.18: The use of insecticides, herbicides, or any toxic chemical substance which has the potential to significantly degrade Environmentally Sensitive Habitat Areas, shall be prohibited within and adjacent to ESHAs, where application of such substances would impact the ESHA, except where necessary to protect or enhance the habitat itself, such as eradication of invasive plant species, or habitat restoration. Application of such chemical substances shall not take place during the winter season or when rain is predicted within a week of application.

LUP Policy 3.19: The use of insecticides, herbicides, or other toxic substances by City employees and contractors in construction and maintenance of City facilities shall be minimized.

Locations subject to City EFMP activities include little if any ESHA. It is not anticipated there would be any need for the products referenced in these policies to be used in areas subject to City EFMP activities. In creeks and lagoon areas, certain herbicides are used to eliminate invasive species such as arundo. ESHA maintenance in such locations would fall under the direction of state or federal agencies, rather than the City.

Rodent control and removal of invasive plant species in the City's parks and other sites involved in the pest control program would not require the removal of habitat that supports sensitive plants or wildlife species and would not allow for harming of any sensitive, candidate, or listed species that are protected under federal or state laws or are identified as sensitive and targeted for conservation in the LCP. As such, there would be no conflict with any conservation plans.

## EVALUATION OF ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>5. CULTURAL RESOURCES.</b> Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### BACKGROUND

Cultural resources consist of prehistoric and historic sites, structures, and districts or any other physical evidence associated with human activity considered important to a culture, a subculture, or a community for scientific, traditional, or religious reasons.

Historical resources, as described in CEQA, include buildings, sites, structures, objects, or districts, each of which may have historical, prehistoric, architectural, archaeological, cultural, or scientific importance and be listed or eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or a local register of historical resources.

The Malibu area contains numerous archaeological sites associated with prehistoric Native American villages, burial grounds, camps or food processing areas, quarries, and rock art. Many of these have been destroyed or disturbed. A relatively small portion of the Malibu area has been surveyed for archaeological resources (City of Malibu 1995).

Fossilized remains are found in the sedimentary rocks of the Santa Monica Mountains that have been tilted and uplifted. Three significant paleontological resources have been found in the Santa Monica Mountains, in the vicinity, but outside of Malibu (City of Malibu 1995).

### DISCUSSION OF IMPACTS

- a) *No Impact.* For the most part, the City's pest control activities occur within outdoor landscape areas, and there are limited applications for structures such as City Hall, and restrooms and other small structures at the City's parks. None of these buildings and structures are historic resources. The proposed EFMP would not authorize new pest control work at any historic resource sites; therefore, there would be no impact on such resources.
- b, c) *Less Than Significant Impact With Mitigation Incorporated.* The existing pest control program does not occur on the site of any known prehistoric archaeological or paleontological resources, or in any cemetery or other known human burial ground. Since the land area included in the pest control program would not change as a result of the

proposed EFMP, other areas that might contain such resources would not be affected. Additionally, the proposed EFMP would not change regulations or oversight related to preserving and protecting historical, paleontological, and archeological resources. The proposed EFMP does not include proposals for development projects and would not grant any entitlements for development that would have the potential to adversely affect cultural or paleontological resources. The proposed EFMP would not authorize any kind of demolition or construction that could affect any known or potential cultural or paleontological resources. If turf grass covering sports fields or passive play areas were to be removed/replaced so that underground wire mesh could be installed as a rodent barrier, this would likely occur in the shallow subsurface only, where there has been previous land disturbance. In those instances, impacts to archaeological or paleontological resources would not be expected. Given the generally high sensitivity of the Malibu area with respect to archaeological and paleontological resources, however, if some form of ground surface alteration that would disturb native soils would occur associated with mechanical pest controls, there is a possibility that buried archaeological or paleontological resources might be disturbed or damaged. In accordance with Malibu General Plan Conservation Element Policy 2.1.2, mitigation measure **CUL-1** will be applied to proposed activities that would disturb native soil materials.

**Mitigation Measure CUL-1:** As part of the planning and design process for any new pest control activities that would entail ground alterations that could penetrate into native soil materials, as determined by the Planning Director, the City shall retain a qualified professional archaeologist and a qualified professional paleontologist to assess the sensitivity of the affected site for archaeological and paleontological resources. Based on these assessments, the City shall implement recommendations from the archaeologist and/or paleontologist regarding grading controls and monitoring that would enable identification of potential resources during the ground disturbing process and provide for a halt work response in the immediate vicinity of an identified resource, so that further investigations and possibly salvage, recovery, and documentation can occur, to preserve the important scientific value of the resource(s) in question.

- d) *Less Than Significant Impact.* The existing pest control program does not occur in any cemetery or other known human burial ground. Since the land area included in the pest control program would not change as a result of the proposed EFMP, other areas that might contain human remains would not be affected. If turf grass covering sports fields or passive play areas were to be removed/replaced so that underground wire mesh could be installed as a rodent barrier, this would likely occur in the shallow subsurface only, where there has been previous land disturbance. In those instances, impacts to human remains would not be expected. If some form of ground surface alteration that would disturb native soils would occur associated with mechanical pest controls, there is a remote possibility that buried human remains might be disturbed or damaged. In the event of a discovery of a human burial, bone, or suspected human bone, the work would be halted and the Los Angeles County Coroner would be notified to examine the material and determine whether it is of human origin, pursuant to California Health and Safety Code Section 7050.5. If the material is determined to be human of Native American origin, then, pursuant to California Public Resources Code Section 5097.98, the coroner will contact the Native American Heritage Commission to identify the proper descendants and consult with those descendants to determine the most appropriate form of treatment for the human remains. Compliance with these existing state regulations will avoid inadvertent destruction of human remains.

**EVALUATION OF ENVIRONMENTAL IMPACTS**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>6. GEOLOGY AND SOILS.</b> Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**BACKGROUND**

The City of Malibu’s existing pest management practices and the proposed EFMP include using best management practices for controlling pests that are harmful to the health, function, or aesthetic value of park landscapes and other City owned and maintained facilities in an efficient, effective, and environmentally responsible manner while paying careful attention to public safety. None of these practices are affected by seismic activity or soils conditions, since these practices do not involve any construction activities or maintenance or repair of any structural features that provide for mitigation of unstable soils or potentially high seismic ground shaking.

DISCUSSION OF IMPACTS

- a i-iv) *No Impact.* None of the pest management practices outlined in the proposed EFMP would have the potential to expose people or structures to ground rupture, seismic ground shaking, seismic-related ground failure, or landslides. Pest control activities occur intermittently, involve one or two people at a time, and would not involve any new construction or repair of buildings or other structures. There would be no associated impacts.
- b, d) *Less Than Significant Impact.* As stated above, the proposed EFMP would implement more restrictive pest management practices, primarily through the elimination of all toxic chemical and organic pesticides. Most pest control activities occur at the ground's surface or in the near subsurface, involving vegetation management, installation of subsurface wire meshing, and sometimes drainage and irrigation controls, where moist conditions need to be eliminated to avoid certain kinds of pests. None of these types of activities would induce soil erosion or otherwise adversely affect soil stability. The presence of expansive soils would not affect these types of installations or any other anticipated methods of pest control.
- c) *Less Than Significant Impact.* The proposed EFMP would prohibit applications of all organic and toxic pesticides, plus the outdoor trapping of rodents and other animals and euthanization that was allowed under the IPM. Since the IPM trapping and euthanizing has been discontinued, there has been an increase in rodent infestation within some City parks. Under the proposed EFMP, infestations could increase and also occur within unstable ground, especially in slopes or bluff areas. This may, in turn, increase the unstable conditions if burrowing increases and further loosens the already unstable soils in those areas. The probability or extent of such potential conditions is difficult, if not impossible to predict. If some such areas become more unstable as a result of the proposed EFMP practices, the City may need to install barriers or otherwise prevent public access where such conditions are deemed hazardous. Implementation of the proposed project would not, therefore, result in significant and unavoidable impacts involving unstable ground conditions and the impact would be less than significant. If the City determined the exclusionary methods were not effective enough, it could consider reinstating outdoor trapping and euthanizing non-native rodents to further reduce potential impacts related to unstable ground conditions. In those instances, Mitigation Measure BIO-1 would apply.
- e) *Less Than Significant Impact.* No septic tanks or alternative, soils-based wastewater disposal systems are required for the existing pest management program, and none are proposed as part of the EFMP. Current pest control activities do not affect existing subsurface wastewater disposal systems at any of the City's pest control sites. With the proposed EFMP there could be some ground altering activities such as installation of shallow subsurface wire mesh systems to provide a rodent barrier, but that would not significantly affect leach lines, septic tanks or leach fields that may occur on the same site. There would be no impact involving any type of soils-based wastewater disposal system.

**EVALUATION OF ENVIRONMENTAL IMPACTS**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>7. GREENHOUSE GAS EMISSIONS.</b> Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**BACKGROUND**

The City of Malibu’s existing pest control practices generate negligible greenhouse gases through vehicle emissions generated during travel by pest control personnel to sites where maintenance occurs, as well as for their commutes to Malibu. There may also be occasional exhaust emissions from small combustion engine-powered machinery if such machinery is involved in the removal of invasive plants or other vegetation management efforts. There is no greenhouse gas generation due to the production or consumption of building energy, lighting, or water extraction or treatment associated with the EFMP.

**DISCUSSION OF IMPACTS**

a, b) *Less Than Significant Impact.* Pest control practices consistent with the proposed EFMP may continue to include the limited use of small combustion engine-powered equipment for the removal of invasive plants or other vegetation management efforts, for installation of subsurface rodent barriers, or possibly for other small-scale activities where the use of hand tools is insufficient. The level of greenhouse gas emissions associated with these periodic and small-scale activities would be insignificant and consistent with the level of emissions generated during current practices. If more pest control workers are added to handle increased mechanical and hand applications because of reduced applications of pesticides or other chemical agents, there could be a minor increase in the amount of occasional greenhouse gases generated by those workers’ vehicular travel. This increase would represent a nominal amount of greenhouse gas emissions and a less than significant impact. Implementation of the proposed EFMP would not conflict with any plans or programs adopted to reduce greenhouse gases.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>8. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**BACKGROUND**

The entire city is classified by the California Department of Forestry and Fire Protection (2011) as being in a Very High Fire Hazard Severity Zone. This classification is based on a combination of topography, vegetation, prevailing winds, temperature, accessibility by fire engines and crews, and availability of water supplies. Twelve locations in Malibu appear on a list of active or closed hazardous wastes or substances sites, or as a site governed by some form of Waste Discharge Requirements. These listings identify locations where some form of environmental contamination

## EVALUATION OF ENVIRONMENTAL IMPACTS

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or wastewater discharge has been reported and/or is being monitored for compliance with cleanup requirements, or where a case was opened by the government agency responsible for oversight and then closed. There are no private or public airstrips or airports in Malibu, and any air traffic associated with airports outside of Malibu does not affect the City's pest control activities, which occur at ground level and do not involve high concentrations of people or habitable structures.

### DISCUSSION OF IMPACTS

- a) *No Impact.* Under the proposed EFMP, the City would continue to implement pest control services through an outside contractor, who would be responsible for the storage, transport, use, and disposal of any hazardous substances used in the pest control program. However, with a requirement not to use toxic pesticides, rodenticides, fungicides, or other forms of chemical treatments that could be harmful to humans or the environment, the proposed EFMP would be more restrictive than the IPM, and the pilot program allowing restricted use of organic pesticides. Quantities of hazardous substances associated with routine transport, use, or disposal of hazardous materials for pest management did not occur under the IPM or the pilot program, and would continue to not occur under the proposed EFMP. The use, transport, and/or disposal of any hazardous substances used in any pest control program would be subject to federal, state, and local regulations regarding the handling of such materials. Hazardous materials are regulated by state, federal, and local agencies, including the US Environmental Protection Agency, the California Environmental Protection Agency (CalEPA), the California Department of Pesticide Regulation, the California Department of Toxic Substances Control (DTSC), the Occupational Safety and Health Administration (OSHA), and the Los Angeles County Fire Department. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The impact would be less than significant, if not beneficial.
- b) *Less Than Significant Impact.* The IPM program includes rigorous standards for the qualifications of the pest management professionals who engage in the actual pest control activities. These standards include education, certification, licensing, and regular training. For example, whenever some form of chemical treatment is being considered, it must be accompanied by a written statement prepared by a licensed Pest Control Advisor (PCA). PCAs must have a bachelor's degree in pest management or in an agricultural, biological, or natural science that includes specific course material. Someone with a Qualified Applicator Certificate (QAC) or a Qualified Applicator License (QAL) must apply or supervise the application. This is required for government employees and some other categories of workers who apply or supervise the application of restricted pesticides for any purpose or on any property other than that in the definition of private applicator, or by maintenance gardeners and some other employees who perform pest control incidental to their job or business (that is, whose primary work is not pest control). QACs cannot supervise the operations of a pest control business (except for maintenance gardener businesses).

A QAC is usually enough for individuals that work for government agencies or for businesses other than pest control businesses, such as golf courses and schools. Both QAL and QAC applicants are required to take a laws and regulations exam and an exam in one or more of 17 categories of pest control for which the operator wishes to become qualified. Compliance with these standards ensures that the risk of accidental or uncontrolled releases of harmful chemical agents is low.

The current pilot program allows organic pesticides to be used, but only on an emergency basis. Such pesticides must be effective, least toxic, and applied for a limited period of time. The proposed EFMP would prohibit all pesticide use. If the Council elected to allow organic pesticides as under the pilot program and the EFMP envisioned by Poison Free Malibu, risk of accidental or uncontrolled releases of harmful chemical agents would be low and less than significant.

- c) *No Impact.* The proposed EFMP specifically prohibits the use of dangerous toxic chemical products, as listed in the project description on page 8. The proposed EFMP would not authorize use of hazardous materials or wastes within one-quarter mile of a school. If the Council decided to allow application of organic pesticides under special circumstances, such as when there are compelling issues involving public health or safety or substantial economic detriment as contemplated by Poison Free Malibu, this would still be a more restrictive approach than the IPM. No impact would occur.
- d) *No Impact.* A search of the California Department of Toxic Substances Control's EnviroStor website, which lists locations of active or closed hazardous wastes or substances sites, identified three such locations in Malibu:
1. HRL Laboratories LLC: closed, non-operative; 3011 Malibu Canyon Road
  2. HRL Laboratories LLC: active, corrective action; 3011 Malibu Canyon Road
  3. Malibu High School Project: active, school cleanup; 30215 Morning View Drive

None of these sites are served by the City's pest control program; therefore, there would be no impact involving any hazardous wastes or substances at these three locations.

A search of the State Water Resources Control Board's GeoTracker website reveals nine locations subject to Waste Discharge Requirements pertaining to water quality standards in Malibu:

1. Geoffrey's Malibu: active; 27400 Pacific Coast Highway
2. Malibu Villas: draft; 28170–28400 Rey De Copas
3. Marcus Residence: completed – case closed; 27628 Pacific Coast Highway
4. Paradise Cove Beach Café: historical; 28128 Pacific Coast Highway
5. Paradise Cove Land Company: completed – case closed; 28128 Pacific Coast Highway
6. Paradise Cove Mobile Home Park: historical; 28128 Pacific Coast Highway
7. Residence Landslide Dewatering Project: active; 27547 Pacific Coast Highway
8. Tivoli Cove WWTP: active; 26665 Seagull Way
9. Villa Malibu Advanced OWTS: active; 6487 Cavalleri Road

## EVALUATION OF ENVIRONMENTAL IMPACTS

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None of these sites are served by the City's pest control program; therefore, there would be no impact involving any hazardous wastes or substances at these locations.

- e, f) *No Impact.* There are no private or public airstrips or airports in Malibu. The City's pest control program is not affected by and would not have an impact on any airport or airstrip operations. All activities occur at the ground level, and there are no environmental effects that could obstruct pilot visibility or otherwise interfere with normal flight operations and air traffic patterns in the area.
- g) *No Impact.* Pest control activities occur for short periods of time in limited areas in the various parks, street medians, structures, and landscape planters included in the program. These activities are typically carried out by one or two people at a time, who arrive/depart via passenger automobiles and light-duty trucks. As such, these activities would have no effect on any communications and command protocols engaged during an emergency and would have no effect on any emergency evacuation routes.
- h) *No Impact.* As noted in the Background discussion above, the entire city is classified by the California Department of Forestry and Fire Protection as being in a Very High Fire Hazard Severity Zone. All of the sites encompassed in the City's pest control program are therefore in this wildland fire hazard zone. Pest control activities occur for short periods of time in limited areas in the various parks, street medians, structures, and landscape planters included in the program. There is a minimal risk of fire hazards associated with current IPM practices. The proposed EFMP would not require the construction of any new buildings, structures, or other facilities, and no pest control activities are proposed that would involve burning vegetation or using machinery that generates flames. There would be no impact involving exposure of people or structures to wildland fire hazards.

EVALUATION OF ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>9. HYDROLOGY AND WATER QUALITY.</b> Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## EVALUATION OF ENVIRONMENTAL IMPACTS

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### BACKGROUND

The City's existing pest control program does not require any water quality permits, as the activities do not generate wastewater or urban runoff and no storm drainage infrastructure is involved. No application of chemical agents would occur. Activities to remove invasive plant species, or install subsurface pest barriers around buildings do not occur in flooded conditions or in any types of wetlands or natural or built drainage courses.

### DISCUSSION OF IMPACTS

- a) *No Impact.* None of the pest control strategies authorized under the proposed EFMP would trigger requirements for any waste discharge permits or jeopardize compliance with water quality standards. Toxic pesticide applications would remain prohibited in all City-maintained areas. The proposed EFMP would have no impact.
- b-d) *No Impact.* Implementation of the proposed EFMP would not require any groundwater extraction or have any effects on groundwater supplies. Likewise, implementation of the proposed EFMP would not alter any drainage patterns.
- e) *Less Than Significant Impact.* Generally, the proposed EFMP would not involve any construction or creation of new infrastructure and would therefore not contribute to an increase in runoff to any storm drainage facilities. In implementing the proposed EFMP, there is a possibility that some areas of turf or other vegetated areas could be replaced with impervious surfaces as a means to eliminate invasive plant species and/or to eliminate or establish barriers to rodents. In those instances, there could be a minor increase in runoff from the new impervious surfaces. Unless a large vegetated area were to be replaced with some type of impervious surface, which is not currently envisioned or anticipated, there would be an insignificant change in surface runoff, with minor changes in the composition of the runoff that would not create added pollution problems. If a large field were to be resurfaced with an impervious or partially impervious material, the City's storm water management regulations under its National Pollution Discharge Elimination System Permit (NPDES) would dictate implementation of drainage controls to manage any associated runoff, which may or may not affect storm drainage infrastructure. Application of these existing regulations would ensure that there is engineering analysis and installation of appropriate drainage and water quality control devices that may be warranted to prevent significant impacts to local storm drainage infrastructure.

Additionally, the proposed EFMP would prohibit the use of toxic pesticides, which would result in a decrease in the level of pollutants in runoff that could affect water quality in downstream receiving waters impacted by runoff from the sites included in the City's pest control program.

- f) *Less Than Significant Impact.* See responses 9(a) and 9(e) above. The proposed EFMP would prohibit all use of toxic pesticides, which would result in a decrease in the potential to degrade water quality. Impacts would be less than significant, if not beneficial.
- g, h) *No Impact.* The proposed EFMP would not require construction of any kind, including housing, within a flood hazard area. As such, there would be no associated impacts.
- i, j) *No Impact.* The proposed EFMP would not authorize any form of building construction. Pest control activities would not occur during any rainstorms, flooding, tsunamis, or seiche conditions that might occur in the Malibu area. There would be no associated impacts.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>10. LAND USE AND PLANNING.</b> Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**BACKGROUND**

All of the sites included in the City’s pest control program are within landscapes and hardscapes that have been altered from their natural conditions. Pest control activities occur periodically as a maintenance activity, and do not significantly influence the land use character of any of the affected sites or the physical character of the established community. Pest control activities are allowed in any of the City’s zoning districts. None of the sites is governed by a habitat conservation plan or a natural community conservation plan.

**DISCUSSION OF IMPACTS**

a) *No Impact.* The proposed EFMP focuses on the elimination of toxic pesticides throughout City-maintained properties. None of the practices contemplated in the proposed EFMP would involve construction activities or any modification of the layout of the City’s park sites, City Hall, street medians, or any other elements of the community. The proposed EFMP would not physically divide an established community, and there would be no impact to the physical structure of any part of any community.

b, c) *No Impact.* The proposed EFMP prohibits the use of all pesticides throughout City-maintained facilities and applying an environmentally friendly approach to pest management. None of the pest management practices that may be implemented under the EFMP would conflict with a land use plan or program established by the City or any regional agencies with jurisdiction over areas within the City boundaries. The proposed EFMP would be consistent with the following two LCP policies aimed at pest control activities:

LUP Policy 3.18: The use of insecticides, herbicides, or any toxic chemical substance which has the potential to significantly degrade Environmentally Sensitive Habitat Areas, shall be prohibited within and adjacent to ESHAs, where application of such substances would impact the ESHA, except where necessary to protect or enhance the habitat itself, such as eradication of invasive plant species, or habitat restoration. Application of such chemical substances shall not take place during the winter season or when rain is predicted within a week of application.

## EVALUATION OF ENVIRONMENTAL IMPACTS

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LUP Policy 3.19: The use of insecticides, herbicides, or other toxic substances by City employees and contractors in construction and maintenance of City facilities shall be minimized.

As discussed in Section 4, Biological Resources, no City pest management activities in ESHA would involve the need for these substances. Additionally, no adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan is applicable to the proposed program. Therefore, the proposed EFMP would have no associated impacts.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>11. MINERAL RESOURCES.</b> Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

BACKGROUND

There are no known mineral resources or areas currently being mined for any such resources in the Malibu area. The Malibu General Plan Conservation Element includes no reference to mineral deposits within the respective plan areas. Furthermore, the California Geological Survey (formerly the California Division of Mines and Geology) indicates that Malibu is not an area classified by the Surface Mining and Reclamation Act (SMARA) as a production-consumption region for mineral resources. In addition, according to California Department of Conservation, Division of Mines and Geology Special Report 143, Part II (1979) and Special Report 145, Part II (1981), there are no known significant mineral deposits present in Malibu and/or there is adequate information available that indicates little likelihood that significant mineral deposits would be present (Miller, Los Angeles Division of Mines and Geology, 2009).

DISCUSSION OF IMPACTS

a, b) *No Impact.* As discussed in the Background discussion above, there are no known mineral resources in the Malibu area. Furthermore, the City’s pest control activities do not occur at any mineral resource extraction sites and would not affect any mineral extraction activities that might occur. Accordingly, there would be no impacts.

## EVALUATION OF ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>12. NOISE.</b> Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### BACKGROUND

Current activities under the existing pest control program generate little noise and have a nominal effect on ambient noise conditions at any of the sites where pest control activities occur. There are no public or private airports or airfields in or near the affected sites.

### DISCUSSION OF IMPACTS

a, c, d) *Less Than Significant Impact.* Noise sources under the proposed EFMP would include occasional vehicular traffic to transport pest control workers to pest control sites, and the use of mechanical hand tools. Use of small hand-held combustion engine-powered leaf blowers is already prohibited by the City. There may be some short-term occasions where mobile combustion engine-powered machinery is utilized for minor earth-moving or trenching activities, such as to install exclusionary mesh in a sport field area. Any of these activities would occur only during normal daytime work hours, and would generate minor noise levels for brief periods of time on an intermittent basis. The minor and occasional noise associated with pest control activities would not generate noise levels that could conflict with any applicable ordinance, plan, or standard. Impacts would be less than significant.

- b) *No Impact.* There would be no sources of groundborne vibration in any pest control activities envisioned in the proposed EFMP, as no methods of control would require the use of vibratory equipment to penetrate hard ground materials or break up rocks or to demolish existing pavement or other structures. No impacts are anticipated.
  
- e, f) *No Impact.* As stated above, the City's parks, City Hall, the wastewater treatment facility, and the other sites included in the City's pest control program are not on or near any public or private airports or airfields. Additionally, the pest control practices envisioned under the proposed EFMP would not affect or be affected by any air traffic. No impacts would occur.

**EVALUATION OF ENVIRONMENTAL IMPACTS**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>13. POPULATION AND HOUSING.</b> Would the project:				
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**BACKGROUND**

There is no temporary or permanent housing or any temporary or permanent resident population on any of the sites included in the City's pest control program.

**DISCUSSION OF IMPACTS**

a-c) *No Impact.* The proposed EFMP would not authorize development of any housing, businesses, or any other type of development and would not induce population growth. No housing would be removed and no additional roadway network or other infrastructure that could induce growth would be required. As such, there would be no associated impacts.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>14. PUBLIC SERVICES.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

BACKGROUND

The City of Malibu’s IPM pest control practices include using best management practices for controlling pests that are harmful to the health, function, or aesthetic value of park landscapes and other City owned and maintained facilities in an efficient, effective, and environmentally responsible manner, while paying careful attention to public safety. Pest control activities do not generate a demand for public park space and have a nominal effect on the usage of City parks and other recreational resources due to their intermittent and temporary nature. Further, pest control activities do not affect demand for or performance of police, fire, or educational programs or facilities.

DISCUSSION OF IMPACTS

a-e) *No Impact.* The EFMP proposes to maintain certain existing pilot program pest management practices and to implement additional, more restrictive environmentally friendly pest management practices throughout the city, focused on prohibiting the use of all pesticides. These practices are anticipated to benefit the health of the public and the environment. Since pest control activities would have no effect on the number of local residents or businesses and would not authorize any new construction that could increase the local resident population or workforce, there would be no change in demand for any public services and no impacts involving construction of additional public facilities.

## EVALUATION OF ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>15. RECREATION.</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### BACKGROUND

City parks that are involved in pest control include Malibu Bluffs Park, Trancas Canyon Park, Malibu Equestrian Park, Las Flores Creek Park, and Legacy Park. The primary focus of pest control at these parks includes controlling a variety of rodents and other pests, including ground squirrels, gophers, rats, mice, ants, termites, and a large range of non-native invasive weeds. Pest control activities do not affect the usage of City parks or other recreational resources, except for intermittent periods of time when there is active pest control occurring, when public access to some areas may be restricted. In some City park play areas, rodent infestations have created uneven ground surfaces that could be hazardous to people, for example in ball fields where people typically run around on those surfaces.

### DISCUSSION OF IMPACTS

- a) *Less than Significant Impact with Mitigation Incorporated.* Pest control activities themselves have a nominal effect on the usage of City parks and other recreational resources by people because of their intermittent and temporary nature. The proposed EFMP would not result in new or more extensive disruptions to public access to the City's parks and would not result in increased park usage that would accelerate deterioration.

However, the inability to trap and euthanize rodents and ground squirrels under the current City Council pilot program that would be continued under the proposed EFMP has resulted in a significant increase in ground rodents and deterioration of park facilities in the form of holes on play fields and under park sidewalks, compared to the IPM. The affected playfield areas could become more uneven, inhibiting free movement and possibly increasing the chance of injury for people due to uneven surfaces. Depending on the severity of any such physical deterioration, there could be a need for playfield repairs, resurfacing, or other maintenance activities. Installation of exclusionary mesh under the proposed EFMP may alleviate this problem. In the event it is not effective, an alternative would be for the City to reinstate outdoor trapping and euthanizing of non-Special Status rodent species, as was allowed under the IPM. The training program outlined in Section 4(a), Biological Resources, and as required by Mitigation Measure BIO-1, would be instituted to ensure no significant adverse effect to special status rodents occurred.

- b) No Impact. The proposed EFMP would not include or result in the need for construction of any new recreation areas. As such, there would be no impacts with respect to expansion of recreation facilities.

**EVALUATION OF ENVIRONMENTAL IMPACTS**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>16. TRANSPORTATION/TRAFFIC.</b> Would the project:				
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**BACKGROUND**

The City of Malibu’s existing pest control practices include intermittent vehicular travel by pest control personnel to and from various sites. On average, current pest control activities include one to two workers in the field and two members of City staff at the administrative level. Thus, minimal traffic is generated by the existing program, with a corresponding negligible effect on the performance of the transportation network. Pest control crews and administrative staff do not travel by any form of public or private transit, by bicycle, or on foot, except within the pest control sites.

**DISCUSSION OF IMPACTS**

a, b, f) *No Impact.* Existing pest control practices generate a negligible effect on traffic, and the proposed EFMP would not introduce any new practices that have the potential to generate additional traffic. As such, there would be no impact to the performance of the

local or regional vehicular transportation network. There would be no impacts involving any physical modifications to streets, highways, sidewalks, transit stops, or bicycle routes, and no changes in usage of any of these modes of travel. There would be no associated impacts.

- c) *No Impact.* As discussed in response 12(e) in subsection 12, Noise, none of the sites included in the City's pest control program are on or near any public or private airports or airfields. Additionally, the pest control practices under the proposed EFMP would not affect any air traffic. Therefore, there would be no impact to air traffic patterns or associated safety risks.
- d, e) *No Impact.* As discussed above, the proposed EFMP would not require any physical modifications to streets, sidewalks, transit stops, or bicycle routes, and there would be no effect on any of these modes of travel. There would be no changes to the physical design of the local or regional transportation network or to the access to any particular property. As such, there would be no impact involving a design hazard or emergency access.

**EVALUATION OF ENVIRONMENTAL IMPACTS**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>17. TRIBAL CULTURAL RESOURCES.</b>				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**BACKGROUND**

The City provided written notification of the proposed EFMP and the corresponding CEQA process, pursuant to Public Resources Code Section 21074. Written correspondence was provided to the following Native American tribes that have requested notification of new projects subject to review under the City’s CEQA procedures for projects with discretionary approvals:

- Barbareño/Ventureño Band of Mission Indians
- Torres Martinez Desert Cahuilla Indians
- Gabrieleño Band of Mission Indians – Kizh Nation
- Fernandeno Tataviam Band of Mission Indians

No responses were received from any of the tribes and there has been no request for any consultation concerning this project. No tribal cultural resources were identified at any of the City’s pest control sites, and no potential impacts were identified as a possible consequence of the proposed EFMP.

**DISCUSSION OF IMPACTS**

a)(i, ii) *Less Than Significant With Mitigation Incorporated.* Pest control activities under either the current pest management program or the proposed EFMP would have no effect on any known or potential tribal cultural resources, because there is no construction involved and no alterations to existing land uses. Any vegetation removal, trimming, weeding, and

similar activities would not penetrate into subsurface areas where tribal cultural resources might occur. Any elimination of rodent burrows would occur at the ground surface or the shallow subsurface. If future pest control activities include the installation of subsurface fencing or other barriers to rodents, this would occur on land that has already been disturbed by development of the existing land use, and it is considered unlikely that any tribal cultural resources could be affected by that kind of work. Should some deeper level of ground alteration be proposed that could penetrate native soils, pursuant to Mitigation Measure CUL-1 listed in Subsection 5, the City would retain a professional archaeologist to monitor the work, to ensure that damage to potential archaeological materials, including Native American artifacts, would be avoided.

**EVALUATION OF ENVIRONMENTAL IMPACTS**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>18. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**BACKGROUND**

Local storm drainage infrastructure and stormwater treatment facilities are maintained by the City of Malibu. Regional storm drainage and flood control facilities are maintained by the Los Angeles County Department of Public Works and the Los Angeles County Flood Control District. Local water infrastructure is maintained by Los Angeles County Waterworks District 29, and Malibu is within the boundaries of the West Basin Municipal Water District, which supplies the City's potable and irrigation water. Local wastewater collection and conveyance infrastructure is generally not available in Malibu; however, the City recently began construction of a new wastewater treatment facility in the Civic Center area, designed to treat wastewater from sources in the Civic Center only. Local trash collection services are provided by Universal Waste Systems and Waste Management GI Industries (GI Rubbish).

**DISCUSSION OF IMPACTS**

a-e) *No Impact.* Current practices do not require connections to any water, wastewater, or storm drainage infrastructure. There is no wastewater generation and no stormwater runoff

associated with any pest control work. A minor amount of water is sometimes used to clean tools and machinery. This minor level of water consumption might increase slightly under the proposed EFMP if more water-based cleaning of tools and machinery should occur. This would not necessitate the construction of any new or physical modifications to any existing water infrastructure or the acquisition of any new or expanded water supply entitlements.

- f, g) *No Impact.* Current practices generate small volumes of liquid and solid wastes such as packaging waste, landscape trimmings, and empty containers which may have small amounts of residual liquid. These have a minor impact on the City's waste streams and disposal requirements. With the proposed EFMP, the types of solid and liquid wastes generated by pest control activities would not change from the current policy. There would be no effect on the capacities of regional landfills and no conflicts with any laws, regulations, programs, or practices involving waste disposal.

**EVALUATION OF ENVIRONMENTAL IMPACTS**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>19. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**DISCUSSION OF IMPACTS**

- a) *Less Than Significant Impact With Mitigation Incorporated.* As discussed in the responses in subsection 4, Biological Resources, implementation of the proposed EFMP, which continues the current policy of no trapping or euthanizing compared to the IPM, might result in some increases in local populations of common rodents such as ground squirrels, rats, mice, and gophers. This would not have a significant impact on any populations of sensitive plants or wildlife, or their habitats and ranges. Furthermore, excluding native rodent species from ballfields and other areas subject to the EFMP would not result in a substantial reduction in their habitat as these are human-altered environments and they would be more likely to occupy their nearby native habitats.

Rodents are known to have potential to carry disease and to be destructive of property by burrowing and chewing. Euthanizing non-native rodents humanely could elicit environmental benefits by reducing these problems and reducing the competition with native species for food and habitat. Should the Council consider that alternative, a training program for any person responsible for rodent trapping inside City buildings or within City-maintained outdoor areas could be instituted to ensure there is no significant impact with respect to special status species. The training would include identification of small rodent species in the region to ensure that any native rodents are released unharmed into the nearest appropriate habitat. Any non-native rodents, such as Norway rat, black rat, and house mouse, would be euthanized in a humane manner. These criteria will be required if

the City Council should authorize the optional humane euthanizing approach, as required by Mitigation Measure BIO-1.

EFMP methods to eliminate invasive plant species would not adversely affect any habitat that supports sensitive plants or wildlife species. As discussed in the responses in subsection 5, Cultural Resources, the proposed EFMP would have no effect on any historic resources. Compliance with existing state regulations would avoid a potentially significant impact to unknown buried human remains for activities that may be proposed in native soil materials. Implementation of mitigation measure CUL-1 would avoid significant impacts to potential archaeological or paleontological resources that might exist in native soil materials that are to be disturbed by the installation of mechanical controls in the subsurface of play fields or other turf areas.

- b) *Less Than Significant Impact.* As discussed throughout this Initial Study, the range of pest control activities that would occur to implement the proposed EFMP would generally result in no impact or a less than significant impact on the environment for all topics analyzed herein. Pest control activities occur regularly, but for brief periods of time at the affected sites. The minor environmental effects associated with these activities do not directly interact with the environmental effects of land development or new infrastructure projects or with the environmental effects of existing land uses in or outside of Malibu. The proposed EFMP would therefore not result in cumulatively considerable environmental effects.
- c) *Less Than Significant Impact.* No significant impacts affecting human beings have been identified for any of the topics analyzed in this Initial Study. By avoiding the use of all pesticides for various pest control purposes, the proposed EFMP would not contribute to potential health and environmental risks associated with toxics-based pest control practices, and could have a beneficial impact. With rodent and other types of animal trapping to be prohibited in outdoor landscapes, such as playfields at the City's parks, it is possible that there could be more problems with rodent disturbances that result in uneven play surfaces that could become hazardous to people engaging in recreation in those areas or require more repairs. It is not possible to predict the scope of such circumstances or the level of hazard that might occur, but this is not expected to become a significant public health risk, provided that the specified mitigation measures are employed. The City may also determine that if some play areas are hazardous for active recreation such as softball, soccer or other active sports, that those types of activities would be restricted or prohibited and only passive use of such areas would be allowed. As noted in the response to a) above, a benefit of humanely euthanizing rodent pests is a reduction in the potential for pest-borne diseases that could affect people visiting the City's parks and buildings where pest control activities occur. The City Council may consider authorizing this approach as an option to the no-trapping policy proposed as part of the EFMP.

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# **APPENDICES**

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**APPENDIX A:**  
**POLICY 49 INTEGRATED PEST MANAGEMENT**





# City of Malibu

## City Council Policy

Policy #49

Title: Integrated Pest Management Policy (IPM)

Purpose: To establish best management practices for controlling pests that are harmful to the health, function or aesthetic value of park landscapes in an efficient, effective, and environmentally responsible manner, while paying careful attention to public safety.

Policy Statement:

IPM is a coordinated decision-making and action process that uses the most appropriate pest control methods and strategies in an environmentally and economically sound manner to meet pest management objectives. The elements of integrated pest management include: (a) preventing pest problems; (b) monitoring for the presence of pests and pest damage; (c) establishing action thresholds to determine when control measures and treatment strategies shall be implemented; (d) apply control measures using biological, cultural, mechanical and pesticidal control methods based on ecological impact, feasibility and cost effectiveness; and (e) evaluating the effects and efficacy of pest treatments.

Implementation:

**1. City Policy**

- A. Under this IPM policy, the City commits to implementing best management practices to reduce or eliminate the use of pesticides whenever feasible through the basic IPM principles as described below.
- 1) Prevention – The first line of pest control is through policy implementation and thoughtful planning.
  - 2) Action Thresholds – The tolerance threshold level is the point when pest populations or environmental conditions indicate when control actions are to be taken.
  - 3) Identification and Monitoring – Identify pests and monitor them so the appropriate control decisions can be made in conjunction with action thresholds.
  - 4) Control Measure – Pest treatment strategies implemented to control pests through cultural, physical, biological or chemical control measures with a

minimum impact on health, safety, the environment and non-target organisms.

- 5) Evaluate the effects and efficacy of control measures. After a control method is implemented, the efficacy of the treatment is evaluated. Based on this evaluation, methods will be modified in an effort to continually improve outcomes and refine best management practices.

## **2. Designation of IPM Coordinator**

The City of Malibu shall designate the Parks Recreation Director to serve as the IPM Coordinator to oversee implementation of this policy. This person will be the primary contact for all matters related to pest control for the city and act as a liaison between the city departments and pest management professionals. The IPM Coordinator will serve as a contact for the public seeking information about pesticide use or other pest management practices. The IPM Coordinator will also be responsible for the developing and maintaining an IPM Operations Manual for the City.

Date Adopted:

October 28, 2013

**APPENDIX B:  
POISON FREE MALIBU DRAFT  
EARTH FRIENDLY MANAGEMENT POLICY**





# City of Malibu

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## Earth Friendly Management Policy

- I. PREAMBLE.....2
  - A. CITY POLICY.....2
  - B. EFM GOALS.....2
- II. DEFINITIONS FOR USE WITH THIS POLICY.....3
- III. EFM COMMITTEE.....3
  - A. COMPOSITION OF EFM COMMITTEE.....3
  - B. RESPONSIBILITIES OF EFM COMMITTEE.....3
- IV. EFM COORDINATOR.....4
  - A. DESIGNATION OF EFM COORDINATOR.....4
  - B. RESPONSIBILITIES OF EFM COORDINATOR.....4
- V. CITY DEPARTMENTS.....5
  - A. RESPONSIBILITIES OF DEPARTMENTS PERFORMING Earth Friendly Management.....5
  - B. RESPONSIBILITIES OF DEPARTMENTS not performing EFM.....5
- VI. PEST MANAGEMENT PLANNING.....5
  - A. CITY LOCATIONS REQUIRING COMPLEX AND ON-GOING EFM.....5
  - B. CITY DEPARTMENTS AND OFFICES REQUIRING EFM ON AS-NEEDED BASIS.....6
  - C. ASSESSMENT OF CONDITION/NEED.....6
  - D. GUIDELINES FOR TREATMENT.....7
- VII. GUIDELINES FOR PESTICIDE SELECTION.....7
  - A. DEVELOPMENT OF LIST OF ORGANIC PESTICIDES ALLOWED FOR USE ON CITY PROPERTY.....7
  - B. CHEMICAL PROHIBITION FOR THE PESTICIDE LIST.....8
  - C. SPECIAL USE PESTICIDE CATEGORY.....8
  - D. LIMITED USE EXEMPTIONS.....8
- VIII. CONTRACTS, NOTIFICATIONS AND RECORD KEEPING.....9
  - A. EFM CONTRACTS.....9
  - B. NOTIFICATIONS.....9
  - C. RECORD KEEPING AND REPORTING.....10



## I. PREAMBLE

An Integrated Pest Management Policy (IPM) was adopted by the City of Malibu Department of Parks and Recreation on October 8, 2013. The policy established best management practices for controlling pests that are harmful to the health, function or aesthetic value of park landscapes in an efficient, effective, and environmentally responsive manner, while paying careful attention to public safety.

In June of 2016, City Council mandated that Malibu become pesticide free on all of its parks, facilities and properties and established an Earth Friendly Management Policy (EFM).

The intent of the policy is to align with the City's vision and mission statement and to create and foster a program that is sensitive to impacts on the environment and the public in the use of harmful maintenance products.

The city will strive to preserve natural resources, which include the ocean, marine life, creeks, canyons, plant life, mountains, wildlife and open spaces.

Earth Friendly Management is a problem-solving strategy that designates a natural organic approach to the total environment - turf, landscape, and structure management.

EFM prioritizes STEP UP! Sanitation, Teaching, Environment enrichment, Preventative measures and Universal Policy, the Precautionary Principle.

The Precautionary Principle recognizes :

- a) essentially no pesticide product is free from risk or threat to human health, and
- b) industrial producers should be required to prove that their pesticide products demonstrate an absence of risks rather than requiring that the government or the public prove that human health is being harmed.

Application of EFM is a concrete way that the city can support the goals of the precautionary principle.

EFM incorporates the principles of Integrated Pest Management (IPM).

EFM strictly prohibits the use of synthetic fertilizers and chemical pesticides including herbicides, insecticides and rodenticides.

The city is committed to ensuring the health, safety and biological integrity of its citizens and environment through the development of EFM practices.

It is also the purpose and intent of this policy to outline how City departments are to perform EFM strategies and to ensure compliance with the City's EFM ordinance.

The City recognizes that pesticides are potentially hazardous to human health, wildlife and the environment, and shall give preference to available, safe and effective non-pesticide alternatives and cultural practices when considering options for management on City property.

#### A. City Policy

**It is the policy of the City that the EFM program will include the following components:**

1. Education of City staff and public about EFM including IPM methodology
2. Synthetic fertilizers, chemical pesticides, irradiation, and genetically engineered or products containing genetically engineered ingredients may not be used, including fungicides, herbicides, insecticides and rodenticides.
3. Eco-exempt products and those approved by the Organic Materials Research Institute (OMRI) or by the National Organic Program shall be considered for use in emergency only and time limited
4. The use of biological controls, including the introduction of natural predators that enhance the environment by using raptor poles and owl nesting boxes
5. Eliminating habitats and conditions supportive of population increase
6. All dumpsters must have tightly closed lids with no overflow
7. Exclusion from buildings
8. Review and consideration of all available non-chemical options
9. Identification and evaluation of conditions that encourage problems.
10. Careful and efficient inspection, monitoring, and assessment of problems by designated personnel knowledgeable of EFM methods.
11. Maintenance of records by City departments on EFM methods considered and used to prevent and control issues
12. Environmental enhancement including a soil enrichment program and soil testing
13. All outdoor management practices comply with organic horticultural science, including water conserving plants and mulching
14. Selection of native plantings using criteria of hardiness, suitability to native conditions, drought tolerant and ease of maintenance
15. Compliance with all applicable state and federal regulations
16. Glue traps are prohibited due to their inhumane nature
17. Trap and release
18. All City Departments will comply with the City of Malibu's EFM ordinance and policy. This policy will apply to all property owned, leased or managed by the City. Departments that require contractors management services will comply with the City EFM ordinance and EFM policy.

#### B. EFM Goals

**The integration of physical, cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity are our goals.**

1. To protect the public health by restricting the use of hazardous chemicals and pesticides on city owned property
2. To guarantee the right of citizens the safe use of city structures and recreation areas
3. All parks, turf grass, playgrounds, City structures and property designated as pesticide free zones
4. Organic pesticides used only under an emergency basis. The selected pesticide shall be both effective and least toxic and used for a limited time
5. Development of site specific management plans and specific plans to prevent or reduce the incidence of problems, with careful consideration given to protect public health and safety, of wildlife, and the environment.



## II. DEFINITIONS FOR USE WITH THIS POLICY

- A. Definitions for use with this policy shall be defined in Earth Friendly Management Policy Ordinance No. 16.####, adopted by the City Council on November ##, 2016, and its successors.

## III. EFM COMMITTEE

### A. Composition of the EFM Committee

The EFM committee shall consist of a subcommittee of the to be formed City of Malibu Environmental Commission

### B. Responsibilities of EFM Committee

#### The EFM Committee shall:

1. Meet quarterly. The EFM coordinator shall organize meeting agendas. All meetings shall be noticed and time will be allowed for public comment. Meetings will be conducted according to the Brown Act.
2. Develop an organic pesticide use list that may be used by the City in the case of emergency only.
3. Participate in training on the Brown Act and any additional training required by the City.
4. Review and understand the City of Malibu's EFM ordinance and policy.
5. Be knowledgeable concerning EFM and understand IPM management
6. Work together to ensure that all decisions follow the City Council's purposes and intents regarding the implementation of the EFM ordinance and policy.
7. Review the EFM coordinator's reports, including site specific management plans created during that year, and include their comments as part of the committee's annual report. During the interim, the chair may report success and known problems as they arise.
8. Create and submit to the City Council an annual report and work plan that shall include an update on goals and key initiatives, accomplishments; goals, and key initiatives for the next fiscal year, and any other City administrator requirements.
9. Additional and on-going duties of the EFM committee are to attend their regular meetings which include a review of quarterly reports and any recommendations for changes
10. Advise the City Council on EFM issues including budget reports
11. Review and comment on any proposed changes to the EFM ordinance or policy prior to the City Parks' presentation of such changes to the City Council.
12. Make recommendations to the City Council regarding EFM funding opportunities or needs.
13. Review and recommend any changes in bylaws to the City Council for final approval.

## IV. EFM COORDINATOR

### A. Designation of EFM Coordinator

The City Manager shall designate an EFM coordinator who will coordinate implementation of the EFM ordinance and policy, and provide administrative support to the EFM committee.

### B. Responsibilities of EFM Coordinator

#### The EFM Coordinator shall:

1. Ensure each City department has reviewed and understands the requirements of the City EFM ordinance and policy.
2. Organize EFM trainings for all City and department staff on an annual basis
3. Develop Best Management Practices (BMP)

4. Ensure that any public health issues are addressed as needed.
5. Establish and maintain an accurate record keeping and reporting system.
6. Review such records and reports to ensure compliance with the EFM ordinance and policy.
7. Review, determine, and track exemption requests and report exemptions granted to the EFM committee at their next regular meeting.
8. Track use of cultural practices, non-chemical actions
9. Attend City EFM committee meetings and provide updates.
10. Provide administrative support to the EFM committee.
11. Provide and update an EFM website.

## V. CITY DEPARTMENTS

### A. Responsibilities of Departments performing EFM City Departments Shall:

1. Comply with the EFM ordinance and policy.
2. Designate an EFM liaison and program manager knowledgeable and experienced in EFM practices, whose responsibilities include:
  - (a) Work with the EFM coordinator to review departmental IPM operations and help identify departmental EFM needs;
  - (b) Work with the EFM coordinator and departmental liaisons to prioritize and site specific management plans on BMP sheets within the budget process.
  - (c) Post and provide notification as required in this policy , including notification of the EFM coordinator in time to update the EFM website;
  - (d) Maintain emergency pesticide application records and provide reports to EFM coordinator on a quarterly basis;
  - (e) Collect and summarize data on non-pesticide alternatives and provide the information to the EFM coordinator on a monthly basis;
  - (f) Attend EFM committee meetings as needed;
  - (g) Work with EFM coordinator to organize staff training and encourage attendance by appropriate department staff;
  - (h) Disseminate pest management materials and policies at department level;
  - (i) Attend public meetings as needed.
3. Designation of EFM liaison  
See item Section V. B. 3. below.

### B. Responsibilities of Departments Not Authorized to Perform EFM

#### All City Departments not authorized to perform EFM shall:

1. Adhere to the EFM ordinance and policy.
2. Not apply or possess any pesticide on City properties.
3. Designate an EFM liaison who shall:
  - (a) Act as department contact on EFM matters
  - (b) Review and understand the City EFM ordinance and policy;
  - (c) Review compliance with the EFM ordinance and policy.

## VI. EFM PLANNING

### A. City Locations Requiring Complex and On-Going Management

For City locations requiring complex and on-going management, the EFM coordinator, in cooperation with department staff, shall help in the development and maintenance of site specific management

plans that provide sufficient information to facilitate EFM decision making. These site specific management plans should:

1. Provide education for department EFM contacts, staff performing EFM and City employees.
2. Establish ongoing scouting or inspection procedures to monitor population levels. Perform thorough in-field assessments of each issue. Keep records of such monitoring. Monitoring should be performed by designated personnel or contractor knowledgeable in EFM methods.
3. Assess EFM action in four primary areas: human health, wildlife protection, environmental conditions, and economic impacts in order to establish action levels
4. Determine corrective actions when an action level is reached. Review and consider all available alternative options for acceptability and feasibility, including considerations of the outcome if no action is taken.
5. Identify and evaluate conditions that encourage problems. Recommend modifications to ecosystems to reduce stress to food and living space through physical and cultural practices."
6. Evaluate landscape sites to help determine BMPs based on site needs and constraints
7. Establish and maintain an accurate record-keeping system to catalog monitoring information and to evaluate effectiveness of EFM practices:
  - (a) Use physical controls such as soil enrichment and exclusion barriers
  - (b) Employ practices, including water management, mulching, waste management, and food storage
  - (c) Design, construct, or modify indoor and outdoor areas to reduce or eliminate habitats.
  - (d) Use resistant plants and planting systems
  - (e) Use biological controls, i.e., owl boxes, raptor poles

#### **B. City Departments and Offices Requiring EFM on an As-Needed Basis**

City departments and offices requiring EFM on an as-needed basis are to maintain a specific Best Management Practices (BMP) sheet which will serve as the site plan. History sheets shall be developed by the EFM coordinator with the assistance of City staff

BMP sheets are to identify the department's EFM liaison, outline employee responsibilities in maintaining a pesticide free environment, identify issues likely to be encountered, identify who to contact when issues are found, and articulate immediate steps to mitigate the issue.

Site treatment history sheets shall document EFM procedures

BMP and site history sheets are to be maintained on site and readily available to staff, the EFM Committee, and members of the public upon request. These sheets will also be available on the City's EFM website.

#### **C. Assessment of Condition/Need**

When a report of a problem is received, an assessment will be performed by a person knowledgeable in EFM. This assessment should confirm and identify the issue, establish what actions have already been taken, and further action is deemed necessary. That person will contact the appropriate department responsible for performing EFM functions. That department, in consultation with the EFM coordinator (as needed), will determine whether a complaint warrants further action. Appropriate non-chemical options such as cultural practices and additional BMPs shall be considered at this time.

For structural treatment, a licensed pest control operator will determine appropriate products for treatment that will include only those pesticide products allowed for use on City property and will follow the "Guidelines for Organic Pesticide Selection" (Section VII). These recommendations for

treatment shall specify the material to be used, the rate of application, the dilution, and specify practices to address environmental or health hazards associated with that material's use.

Turf grass areas, playgrounds and picnic areas all city property and structures shall be designated as pesticide-free zones.

No chemical controls shall be used in these areas unless under an emergency to protect public health and safety per the Limited Use Exemption Process, Section VII (E). In the event a limited use exemption is granted, special precautions will be used to reduce potential exposure. The area will be fenced off to deny access while work is in progress and signage posted.

#### **D. Guidelines for emergency organic treatment**

If it is determined that an emergency exists the following criteria are to be used in determining the appropriate treatment strategy;

1. Least-disruptive of natural controls;
2. Least-hazardous to human health;
3. Least-toxic to non-target organisms;
4. Protective of wildlife and the native habitat;
5. Least-damaging to the general environment;
6. Cultural, biological, and mechanical solutions have been considered and evaluated;
7. Prior treatments used on site and an evaluation of the success of that approach;
8. Most likely to produce a permanent solution
9. Cost effectiveness in the short and long term.

### **VII. GUIDELINES FOR ORGANIC PESTICIDE SELECTION**

#### **A. Development of List of organic pesticides allowed for in an emergency on City Property**

Giving preference to eco-exempt products, those approved by the Organic Materials Research Institute (OMRI) , by the National Organic Program or similar program accepted by the EFM committee.

Pursuant to the criteria listed Section VI (D), and those outlined below, and in consultation with department personnel performing Earth Friendly Management and the EFM Committee the EFM coordinator will maintain a list of emergency organic pesticides allowed for use as part of the City's EFM program. This list will be developed by the Environmental Commission. This will be available for review and comment by the EFM committee at their next regularly scheduled meeting, but not less than thirty (30) days after the adoption of this policy. Once adopted by the City Council, the list will be available on the EFM website. Any pesticide use will be in accordance with state and federal laws and in accordance with this policy and the EFM ordinance, whichever is most restrictive.

Any proposed changes are to be supervised by the Environmental Committee before it is submitted to the City Council for consideration for approval.

#### **B. Chemical Prohibitions for the Pesticide List**

Pesticides included in the pesticide use list shall not contain ingredients identified in the following sources:

1. Products listed as Toxicity Category I, 2 , 3
2. California's Proposition 65 list (the Safe Drinking Water and Toxic Enforcement Act of 1986, materials known to the State to cause cancer or reproductive or developmental toxicity.)

3. California's Department of Pesticide Regulation groundwater protection list (Food and Agriculture Code 13145(d)).
4. Organophosphates, or organochlorines, or carbamates listed by the United States Environmental Protection Agency (Office of Pesticides Programs, Document 735-F-99-14, May 1999), or California Environmental Protection Agency, Department of Pesticide Regulation Chemical Inquiries Database.
5. A known carcinogen, probable carcinogen, or possible carcinogen by the United States Environmental Protection Agency as per "List of Chemicals Evaluated for Carcinogenic Potential".
6. Any known endocrine disruptor listed by the United States Environmental Protection Agency or the European Union, Endocrine Disruptors website.

### **C. Special Use Pesticide Category**

There may be circumstances when it is necessary to use a pesticide that does not meet the criteria or use under Section VI The pesticide list may include these special use categories of materials that are considered critical to the protection of public health, the environment, wildlife, safety, or the preservation of City property. These materials will only be used in conjunction with an EFM program where there are no feasible alternatives. These products will be identified on the organic pesticide list which will specify:

1. The particular criteria that is inconsistent with Section B above.
2. The specific circumstances and conditions for which the product may be used.
3. The method of application.
4. How the site is to be managed to preclude potential exposure.

### **D. Limited Use Emergency Exemptions**

City departments shall submit a request or an exemption to the EFM coordinator to use an organic pesticide that is not on the pesticide list as per Sections (B) and (C) above. The EFM coordinator may approve a limited use emergency exemption request if the material is being used in association with an active EFM program and the department, through submittal of an exemption request form, has demonstrated that:

1. An emergency need to use the pesticide, such as public health or safety, or substantial economic detriment;
2. The investigation of all available options and finding of no viable alternatives;
3. The development of a plan to preclude the need for future use; and
4. It is the department's intent to use the material for a limited period of time.

The EFM coordinator shall report any limited use exemptions to the EFM committee no later than one business day following the issuance of the waiver. Noticeable such waiver will be posted, in the manner provided for notice of public meetings, within two business days following the issuance of the waiver. Any waiver granting the use of pesticide on city land shall require the use of EFM protocol and shall specify the use of specific pesticides determined to be the least toxic material for the specific application. This information shall be included it in the quarterly communication and as part of the annual report to the City Council.

## **VIII. CONTRACTS, NOTIFICATIONS, AND RECORD KEEPING**

### **A. EFM Contracts**

All contractors on City owned or leased property shall be required to adhere to the guidelines established in the City's EFM ordinance and policy



1. The EFM coordinator shall assist City departments in developing contract language and in the selection of the successful contractor.
2. Contractors are required to maintain records of activities, and submit a summary of activities to the department upon completion of the job. Contractors providing regular and ongoing service shall submit summaries to the department on a quarterly basis. Records are to include the date, name of the pest, the site/location where the work was done, name of the technician performing the work, and corrective action(s) taken. If a pesticide was used, the product name and amount applied must also be reported.
3. Contractors are required to comply with the notification requirements as listed in this policy.

An RFP process is required for all contractors performing structural management on City-owned property.

## **B. Notification**

The City shall provide the public and its employees with notification of emergency organic pesticide applications through the use of signs.

1. Signs should be posted at all regular public and employee points of entry to the treated area pursuant to state and/or federal law, Malibu City EFM ordinance and policy, and according to product label instructions.
2. Signs shall be posted four days in advance of application and remain in place for four days following the application unless the manufacturer's product label specifies a longer posting period.
3. Signs shall contain the name and active ingredient(s) of the product, the re-entry interval as determined by the product label or regulation, the name and contact number for the City department responsible for the application, and the web address of the City EFM website.
4. Signs should be of a standardized design that is easily recognizable to the public and employees.
5. When using approved Category IV, Eco-exempt or OMRI approved pesticides, posting, and may be on the day of application and remain in place for at least four days.
6. City departments may obtain authorization from the EFM coordinator to apply a pesticide without providing a one to four day advance notice if there is a compelling need to use the pesticide, such as a threat to public health, safety, City property, or substantial economic detriment. Signs meeting the requirements as outlined above (#2), shall be posted as soon as possible prior to application, and remain posted four days following the application.

## **C. Record keeping and Reporting**

The City's EFM program is based on site specific EFM plans and BMP sheets that guide management practices, careful and efficient inspection and monitoring of issues as well as the maintenance of records by designated personnel who are knowledgeable in EFM methods.

All records and information concerning the City EFM program will be made available to employees, the EFM committee, and the public upon request in accordance with all applicable state and local laws governing public access to information.

### **1. City Departments**

Each City department that is responsible for EFM program implementations shall maintain records of EFM including cultural practices, and other strategies considered. These records shall be maintained per the City and state records retention policies and/or law.

Records of management and cultural activities are to be provided to the EFM coordinator on a quarterly basis and are to include:

- (a) The issue

- (b) Type of EFM management or cultural activity used;
- (c) Alternative plan of action
- (d) An estimate of time or cost.

2. Contractors

Contractors shall maintain application records and treatment information as outlined in Section VIII, (C-1) and are to provide this information to the responsible department immediately upon completion of treatment so the department can fulfill reporting obligations. For structural treatments, the contractor will also update the site treatment history sheet immediately following treatment.

3. EFM Coordinator

The EFM Coordinator shall:

- (a) Maintain all necessary records in order to prepare an annual report for the City Council that include a review and summary of the City's Earth Friendly Management Policy activities, exemptions granted, training offered, any proposed modifications to the City's organic pesticide use list and any suggestions for amendments or resources needed for effective implementation of the EFM policy and ordinance.
- (b) Maintain records of EFM liaisons, completed BMP sheets, site-specific management plans, and any other planning documents developed to guide departmental staff in implementing the EFM policy and ordinance.
- (c) Provide a copy of annual report to the EFM Committee prior to its first quarterly meeting.
- (d) Provide an annual report to the City Council that includes a review and summary of the City's Earth friendly management projects, training offered, and any proposed modifications to the City's pesticide list, or special use category designation
- (e) See that the EFM committee meeting agendas, minutes and other EFM documents are maintained as required by the City's Records

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