

**Santa Clara Valley Urban Runoff Pollution Prevention Program
Pesticide Management Plan:
Goals, Actions, and Monitoring Mechanisms**

**July 1, 2001
(Revised – October 15, 2001 and February 15, 2002)**

Introduction

The purpose of this Pesticide Management Plan is to control pesticide-related toxicity in urban runoff, by minimizing pesticide use and reducing the amount of pesticides in storm water and landscape runoff to the maximum extent practicable. The Plan identifies the goals of each work plan element, actions (referenced to the Pest Management Performance Standards (PS) and FY 01-02 Work Plan as applicable), monitoring mechanisms, and schedules. The monitoring mechanisms are actions that provide a measure of progress toward achieving the stated goals. The Plan also identifies whether actions will be implemented at the Program level, municipality level, or both, as well as the schedule for initiation and/or completion of Program-level actions. The details of municipality actions and schedules will be included in the individual Co-permittee pest management plans submitted with the Co-permittees' FY 00-01 annual reports.

Legend:

- “X” = will implement at this level (Program or municipality)
- “N” = not being implemented at this level
- “A” = assist with or develop guidance for implementation
- “R” = coordinate with regional effort
- “O” = optional (no. of Co-permittees implementing in parentheses)
- “CI” = continuous improvement
- “TBD” = completion date to be determined
- “AR” = annual report
- “PS” = performance standard
- Completion Dates for Municipality Tasks = range of dates from Co-permittee plans

Work Plan

<u>I. Municipal Pesticide Use</u>			
Goal I.A. Eliminate all unnecessary municipal pesticide use (particularly organophosphate (OP) pesticide use) and implement Integrated Pest Management (IPM) techniques.	Program	Municipality	Completion Date
Actions –			
I.A.1. Develop and implement a process for tracking pesticide use on municipally owned property (PS #8). Include in the process reporting and justification for the use of OP pesticides and BMPs employed during OP pesticide use.	A	X	Begin 9/01; 1 st report 9/02
I.A.2. Adopt an IPM policy and/or ordinance requiring the use of IPM techniques in the agency’s operations, minimization of pesticide use, and the restricted use of organophosphate pesticides only when their use is justified and adverse water quality impacts are minimized (PS #2).	N	X	4/02- 12/02

I.A.3.	Develop and implement standard operating procedures (SOPs) and best management practices (BMPs) for implementing the IPM policy. (PS #3). BMPs will include special precautions to reduce water quality impacts when applying pesticides.	A	X	Model BMPs 3/02; Muni. BMPs, SOPs 3/02-12/02
I.A.4.	Update local URMPs to incorporate/adapt the model Pest Management Performance Standard, including a description of the legal authority (IPM policy/ordinance, contract language), work plan elements, BMPs, and SOPs needed for implementation. (FY 01-02 Work Plan)	A	X	6/02-12/02
I.A.5.	Develop and implement a process to ensure that any contractor employed to conduct pest control and pesticide application on municipal property engages in pest control methods consistent with the IPM policy adopted by the agency (PS #5).	N	X	4/02-12/02
I.A.6.	Conduct a periodic agency-wide search of chemical storage areas for pesticides no longer legal for application per EPA, State, and/or local requirements, and properly dispose of any such pesticides pursuant to appropriate waste disposal regulations.	N	X	3/02-6/02, annually, or ASAP
Monitoring Mechanism I.A.1. Document completion of tasks in annual reports. Use pesticide tracking process to document pesticide use.		A	X	Annually; begin 9/02
Goal I.B. Raise awareness of all municipal employees and train employees who apply pesticides for the municipality about the municipality's IPM Policy and/or IPM techniques as appropriate.				
Actions –		Program	Municipality	Completion Date
I.B.1.	Ensure that employees who apply pesticides for the agency obtain the appropriate training as required by the County Agricultural Commissioner and the State Department of Pesticide Regulation (DPR) (PS #4a).	N	X	Annually or as required
I.B.2.	Provide annual training on the appropriate portions of the IPM Policy, SOPs, and BMPs, and the latest IPM techniques to employees within departments responsible for pesticide application (PS #4b).	N	X	Annually
I.B.3.	Periodically (at least annually) inform employees who are not authorized and trained to apply pesticides that they cannot use over-the-counter pesticides in or around the workplace, consistent with the IPM Policy (PS #4c).	N	X	At least annually
I.B.4.	Conduct a workshop for municipal staff on least-toxic pest control methods and pesticide management BMPs. (FY 01-02 Work Plan)	X	A	3/02
Monitoring Mechanism I.B.1. Document and evaluate effectiveness of staff training conducted each year (including attendance at the workshop) in annual reports. Use evaluation forms at the workshops to evaluate the usefulness of the workshop and identify follow-up topics for training.		A	X	Annually in ARs

II. Public Education and Outreach Goal II.A. Increase awareness of IPM so target audiences recall less toxic pest management messages and adopt IPM behaviors. Target audiences include residential and commercial users, pesticide retailers, municipal employees, and special districts. (PS #6) Actions –	Program	Municipality	Completion Date
II.A.1. Implement the Watershed Education & Outreach (WE&O) Campaign ¹ , which will target the general public and include messages about less-toxic pest control and proper disposal (FY 01-02 Work Plan). The Campaign will include extensive media campaign with South Bay English- and Spanish-language TV and radio stations.	X	A	Began dev't FY00-01; cont. 'til FY04-05
II.A.2. Develop simple, effective, targeted messages regarding proper pesticide use and disposal, effects on water quality, and IPM.	X (R)	A	Done; CI
II.A.3. Prepare appropriate outreach materials (e.g., fact sheets or a consumer guide regarding pest control services) to address target groups.	X (R)	N	Fact sheet CI; guide FY01-02
II.A.4. Identify and attend community events and distribute outreach materials. (Program will attend events strategic to the WE&O campaign.) (FY 01-02 Work Plan)	X	O (5)	Annually, with CI
II.A.5. Coordinate with local community groups, such as local gardening and environmental organizations, to distribute information.	N	O (1)	Annually
II.A.6. Create, update, and publicize web sites to promote IPM and reduce pesticide use.	X (R)	O (2)	Began FY00-01; complete 6/02; update annually
II.A.7. Coordinate with the Master Gardeners program and use their services to train residents. Provide IPM training and information on water quality impacts of pesticide use to Master Gardeners as needed.	X (R)	O	Begin FY 01-02; continue if effective
II.A.8. Create and/or publicize existing IPM demonstration gardens (such as the garden at the San Francisco Bay Wildlife Refuge in Alviso).	X	O (1)	Begin FY 01-02
II.A.9. Continue to fund BASMAA Regional Media Relations Campaign ² featuring pitches to Bay Area media and responses to breaking news on pesticide-related topics.(FY 01-02 Work Plan)	X	A	Ongoing (if effective)
II.A.10. Prepare and pitch IPM stories and press releases to local media.	N	X	6/02, or As needed or as appropriate

¹ Funded by all Co-permittees in FY 01-02.

² Funded by all Co-permittees each year.

			or quarterly
II.A.11. Identify consumer and business publications that could include articles about IPM or less toxic pest management, submit articles or letters to the editor, and encourage them to print them.	X (R)	O (1)	Begin FY 02-03
II.A.12. Develop a work plan for and implement a "Pesticide User Outreach" project ³ targeting residential and commercial users, which will include continuing the IPM Store Partnership Program and selected Household Chemical Management project tasks (see FY 01-02 Work Plan). Include an evaluation component in the work plan.	X	A	FY 01-02 (6/02)
II.A.13. Provide information on less toxic pest control (e.g., IPM techniques, municipal IPM policies, model contract language, training opportunities, etc.) to neighboring special districts (e.g., Valley Transportation Authority, sanitary and utility districts, open space districts, vector control districts, and school districts) as appropriate.	X	X	Program: FY 01-02 Muni: 5/02-9/02, ongoing
II.A.14. Conduct internal outreach on less toxic pest control to employees who do not necessarily purchase or apply pesticides during the course of their work (to encourage employees to use IPM techniques away from work).	N	X	4/02 or Annually
Monitoring Mechanism II.A.1. Document or estimate numbers of residents reached by outreach efforts, including events, web site promotion, municipal employee outreach, and media advertising. Monitor responses to outreach efforts through documentation of calls to the Program's general and watershed campaign hotlines.	X	X	Annually
Monitoring Mechanism II.A.2. Survey local public attitudes and behavior to evaluate the success of outreach efforts and the saturation of outreach messages. (Program will conduct countywide survey as part of evaluation of WE&O campaign. Program may also conduct surveys to evaluate effectiveness of specific projects.)	X	O	WEO - FY 04-05; others as defined in project work plans
Monitoring Mechanism II.A.3. Conduct evaluations of IPM training provided to or by Master Gardeners. Meet with Master Gardener program director at least annually to evaluate success of and needed improvements to joint efforts.	X	N	Annually; as needed
Goal II.B. Educate pesticide retailers and consumers about less toxic pest control products and promote the sale of such products. Actions –	Program	Municipality	Completion Date
II.B.1. Continue to fund and participate in the BASMAA Regional IPM Partnership ⁴ . (FY 01-02 Work Plan)	X (R)	A	Ongoing (if effective)
II.B.2. Continue to implement cost-effective elements of the IPM Store Partnership Program, as identified in the work plan developed for Action Item II.A.12. Create and provide fact sheets and other materials to pesticide retailers to facilitate point-of-purchase outreach. Visit stores as necessary to ensure	X (R)	X	FY 01-02; ongoing beyond FY 01-02 if

³ Funded by all Co-permittees in FY 01-02.

⁴ Funded by all Co-permittees in FY 01-02.

ongoing participation. (FY 01-02 Work Plan)			effective
II.B.3. Offer IPM training opportunities to pesticide retailer employees through coordination with Master Gardener-taught educational programs. (See Action II.A.7.)	X	A	FY 01-02; ongoing if effective
Monitoring Mechanism II.B.1. Document number of participating stores, materials distributed and employees trained. Evaluate the cost-effectiveness of the IPM Store Partnership Program each year. Implement the evaluation component of the Pesticide User Outreach work plan each year.	X	A	Annually
III. Pest Control Operators (PCOs)			
Goal III.A. Minimize pesticide use by PCOs contracted for structural pest control and landscape maintenance.			
Actions –	Program	Municipality	Completion Date
III.A.1. Develop a database of licensed structural and landscape maintenance PCOs.	X	O	Done; update periodically
III.A.2. Identify active PCO and landscape maintenance organizations in the South Bay and conduct awareness-raising presentations at their meetings	X	O	Begin FY 02-03
III.A.3. Develop and conduct accredited workshops for PCOs that focus on IPM techniques.	X (R)	O	7/9/01; FY 02-03
III.A.4. Require PCOs contracted for municipal applications to use pest control methods consistent with the municipality's IPM policy (through contract specifications). Specifically, municipalities will require contractors to: a) follow the agency's IPM policy, BMPs, and SOPs; b) provide evidence of current IPM training, when feasible; and c) provide documentation of pesticide use on agency property to the agency in a timely manner (PS#5).	A	X	Guidance 12/01; 6/02 and ongoing
Monitoring Mechanism III.A.1. Document the numbers of PCOs receiving presentations and/or training and pesticide use by PCOs on municipal property.	X	X	Annually; begin in FY01-02 annual report
Goal III.B. Require all PCOs to implement Best Management Practices (BMPs).			
Actions –	Program	Municipality	Completion Date
III.B.1. Identify and work with PCO trade organizations to develop industry standards for BMPs to protect water quality, through participation in UPC and BASMAA.	X (R)	N	FY 02-03
III.B.2. Require PCOs contracted by municipalities to implement BMPs through contract specifications (see Action III.A.4., PS #5)	N	X	Begin 6/02 – 9/02

Monitoring Mechanism III.B.1. Document efforts to complete the above actions.	X	X	Annually
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IV. Commercial Businesses	Program	Municipality	Completion Date
<p>Goal IV.A. Determine the extent of commercial business employees' use of pesticides (i.e., pesticide applications not performed by a licensed PCO) and conduct appropriate outreach regarding less toxic pest management.</p> <p>Actions –</p>			
<p>IV.A.1. Research reports and surveys of commercial business pesticide use and other stormwater programs' and POTWs' efforts to address this issue. Develop recommendations and a work plan (including an evaluation component) to provide outreach on less toxic pest control to target businesses in the South Bay, as appropriate and cost-effective.</p>	X	A	Work plan 3/02; begin FY 02-03
<p>IV.A.2. Develop and implement education programs that target commercial businesses, per recommendations from Action IV.A.1.</p>	A	X	Begin FY 02-03, annually
<p>Monitoring Mechanism IV.A.1. Document outreach efforts targeting businesses, as recommended in the work plan to be developed by the Program. Implement the evaluation component of the work plan.</p>	X	X	Annually; begin FY 02-03 AR
<p>V. Household Hazardous Waste Collection</p> <p>Goal V.A. Provide pesticide disposal services through household hazardous waste (HHW) collection programs for all residents and small businesses, and encourage use of these programs.</p> <p>Actions –</p>	Program	Municipality	Completion Date
<p>V.A.1. Ensure that adequate pesticide disposal services exist for residents and conditionally exempt small quantity commercial generators.</p>	N	X	6/02, 1-2 X annually, ongoing
<p>V.A.2. Ensure that hazardous materials "exchange" programs do not redistribute organophosphate or banned pesticides.</p>	N	O (2)	9/02, ongoing
<p>V.A.3. Work with HHW collection agencies to support, enhance, and help publicize programs for proper pesticide disposal (PS #7).</p>	X	X	Ongoing; began FY 00-01
<p>V.A.4. Offer incentives to encourage pesticide disposal, such as promoting "amnesty days" (turn-ins of banned pesticides).</p>	N	O (1)	periodically
<p>V.A.5. Provide hazardous waste disposal information to residents, through distribution of materials (e.g., utility bill insert, city newsletter, community events, etc.) or advertising in local media.</p>	N	X	Periodically, at least annually
<p>Monitoring Mechanism V.A.1. Document that household hazardous waste collection programs adequately serve residents and businesses and that any exchange programs do not exchange organophosphate or banned pesticides.</p>	A	X	Annually, begin FY 01-02 AR
<p>Monitoring Mechanism V.A.2. Document quantities of pesticide disposal at household hazardous waste collection facilities (only possible on a county-wide</p>	X	N	Annually, begin FY

basis at present).			01-02 AR
<u>VI. County Agricultural Commissioners</u>			
Goal VI.A. Engage County Agricultural Commissioners in efforts to reduce pesticide applications and promote less toxic pest management alternatives.	Program	Municipality	Completion Date
Actions –			
VI.A.1. Keep County Agricultural Commissioners informed of Program goals and activities and regional water quality issues through periodic meetings.	X	N (1)	Began FY 00-01; ongoing
VI.A.2. Involve County Agricultural Commissioners in education and outreach efforts targeting PCOs.	X	N (1)	Begin FY 01-02 annually
Monitoring Mechanism VI.A.1. Document meetings with County Agricultural Commissioner and staff involvement in outreach efforts.	X	N	Annually
<u>VII. New Development</u>			
Goal VII.A Minimize pesticide use at new and redevelopment sites.	Program	Municipality	Completion Date
Actions –			
VII.A.1. Coordinate with municipal arborists or other relevant municipal staff to identify landscaping techniques less likely to attract pests, including a list of pest-resistant plants, and develop model conditions of approval for pest resistant landscaping features and practices. (Required to meet NPDES Permit Provision C.9.d.ii. and Draft Permit Provision C.3.k.)	X	A	6/02
VII.A.2. Consider pest-resistant landscaping and design features in the design, landscaping, and environmental reviews of proposed development projects. (NPDES Permit Provision C.9.d.ii.)	A	X	Begin FY 02-03
VII.A.3. Train staff responsible for design review on pest-resistant landscaping techniques and model conditions of approval (see Actions VII.A.1. and VII.A.2.) and the importance of minimizing pesticide use in runoff from development sites (NPDES Permit Provision C.9.d.ii.).	X	A	Workshop FY 02-03
VII.A.4. Develop and propose enhanced reporting format for documenting use of pesticide reduction measures at development sites. (Draft Permit Provision C.3.n.)	X	A	FY 01-02 AR
Monitoring Mechanism VII.A.1. Summarize the types of pesticide reduction measures required (such as by conditions of approval) for new development and significant redevelopment projects, and the percentage of new development and significant redevelopment projects for which pesticide reduction measures were required. (Draft Permit Provision C.3.n.)	N	X	Annually, beginning in FY 02-03 AR

<u>VIII. Monitoring and Science</u> Goal VIII.A. Participate in coordinated monitoring efforts to support pesticide TMDL development and implementation. Monitoring activities for pesticides are defined in the Program's Multi-Year Receiving Waters Monitoring Program (submitted March 1, 2002). Actions –	Program	Municipality	Completion Date
VIII.A.1. Continue financial support of the Regional Monitoring Program (RMP) (FY 01-02 Program budget line item for \$150,000). Continue to actively participate in the RMP advisory and technical committees to focus RMP resources on 303(d) problem pollutants, including OP pesticides. (FY 01-02 Work Plan)	X	A	Annually
VIII.A.2. Work with Regional Board staff to refine the problem statement for the diazinon TMDL and determine data needs, with assistance from the BASMAA Pesticide Work Group. (FY 01-02 Work Plan)	X	N	FY 01-02
VIII.A.3. Participate in a coordinated regional plan to collect data for the diazinon TMDL, as defined in the RWQCB/BACWA/BASMAA MOU.	X	N	FY 01-02 & beyond
Monitoring Mechanism VIII.A.1. Submit monitoring data and reports to the Regional Water Quality Control Board and other interested parties (such as USEPA) per the reporting schedule in the Program's Multi-Year Receiving Waters Monitoring Program.	X	N	When available
<u>IX. Regional, State, and Federal Coordination</u> Goal IX.A. Actively participate with regional and state organizations to communicate to the U.S. EPA Office of Pesticide Programs and California Department of Pesticide Regulation the need to reduce pesticide-related toxicity in Bay Area water bodies. Actions –	Program	Municipality	Completion Date
IX.A.1. Support actions by the California Stormwater Quality Task Force to comment on and assist with USEPA's pesticide risk assessments and to assist USEPA in development of a scope for a diazinon TMDL case study. (FY 01-02 Work Plan)	X (R)	N	Ongoing; case study TBD
IX.A.2. Through participation in the UPC and SWQTF, work with the U.S.EPA, the California Department of Pesticide Regulation, and the pesticide industry to eliminate uses of pesticides likely to enter surface water from those listed on product labels.*	X (R)	N	Ongoing
Monitoring Mechanism IX.A.1. Document correspondence with U.S. EPA and the California Department of Pesticide Regulation and successes in achieving changes in registered uses and labeling that protect water quality.	X	N	Annually

Goal IX.B. Actively participate in regional and state coordination efforts.			
Actions –	Program	Municipality	Completion Date
IX.B.1. Participate in the activities of the Bay Area Stormwater Management Agencies Association, the California Storm Water Quality Task Force, and the Urban Pesticide Committee and communicate Program efforts. (FY 01-02 Work Plan)	X	O (1)	Ongoing, annually
IX.B.2. Collaborate in technical studies to support TMDL development and implementation.(See Action VIII.A.3.)	X	O (1)	As needed
IX.A.3. Continue to participate in the BASMAA Pesticide Work Group to evaluate implementation of and continuously improve the Pesticide Strategy and report on the results of the evaluation. (FY 01-02 Work Plan)	X (R)	N	Ongoing
Monitoring Mechanism IX.B.1. Document attendance by Program staff at regional and state-wide meetings and completion of regional and state-wide efforts.	X	N	Annually
<u>X. Review and Revision of Work Plan</u>			
Goal X.A. Implement a work plan that includes appropriate goals, actions, and monitoring mechanisms to reduce pesticide-related toxicity in urban runoff.			
Actions –	Program	Municipality	Completion Date
X.A.1. Review and continuously improve the goals, actions, and monitoring mechanisms of the work plan considering results of self-evaluations, comments from Regional Board staff and other interested parties, and results of local performance review meetings if any.	X	X	Annually
Monitoring Mechanism IX.A.1. Complete revised work plan that incorporates continuous improvement items, and report on completion of work plan tasks.	X	X	Annually; submit work plan updates in March; annual reports in September