



SECTION 5

PESTICIDE MANAGEMENT WORK PLAN

5. FY 06-07 PESTICIDE MANAGEMENT WORK PLAN

INTRODUCTION

The goals and objectives of the SCVURPPP Urban Runoff Management Plan (URMP) include effectively prohibiting non-storm water discharges to storm drains and watercourses; reducing pollutants in storm water discharges to the "maximum extent practicable" (MEP); and not causing or contributing to violations of water quality standards, as required by the Program's NPDES permit. The Program's approach to meeting these goals and objectives focuses on the use of best management practices (BMPs) for source control and pollution prevention; and public education and outreach.

The Program's approach to pesticide management has a similar focus on source control and pollution prevention. Program BMPs for pesticide management have included significant outreach efforts to residents, businesses, and municipal staff to provide education and achieve behavior changes relative to uses of pesticides and less toxic pest control methods. Outreach efforts have been supplemented by monitoring studies to define the problem; participation in regional monitoring and organizations to address pesticide issues; and development of performance standards and local pest management plans.

BACKGROUND

Diazinon and chlorpyrifos have been identified in recent studies as causing toxicity in local creeks and wastewater treatment plant effluent. In May 1999, the U.S. Environmental Protection Agency (USEPA) listed San Francisco Bay and 35 Bay Area urban creeks as impaired by diazinon under Section 303(d) of the Clean Water Act (CWA). The 303(d) listing triggered the need for USEPA and the State to develop Total Maximum Daily Loads (TMDLs) for the impaired waterbodies. In November 2005, the Water Board adopted a TMDL and Water Quality Attainment Strategy (WQAS) for diazinon and pesticide-related toxicity in San Francisco Bay Area urban creeks. The TMDL/WQAS provides a source assessment and pollutant allocation scheme; and discusses implementation actions relevant to urban runoff management programs, including the SCVURPPP. The TMDL/WQAS must be approved by the State Water Resources Control Board (State Board) and the USEPA before being included in the San Francisco Bay Water Quality Control Plan and municipal stormwater permits. These approvals are likely to occur during 2006.

The Program's reissued NPDES permit (Order No. 01-024, February 21, 2001) includes specific requirements for a pesticide control program. The Program and Co-permittees must develop and implement a pesticide control plan that addresses municipal uses of pesticides, including diazinon and other lower priority banned pesticides such as chlordane, dieldrin, and DDT, and the use of these pesticides by others within municipal jurisdictions. The Program will also continue to work with the Urban Pesticide Committee and the California Stormwater Quality Association Pesticide Work Group to assess impacts of pesticide use and encourage actions by other state and federal agencies.

As required by Permit Provision C.9.d., the Program developed a Pesticide Management Plan and submitted it to the Water Board by July 1, 2001 (June 26, 2001). The submittal to the Water Board included a preliminary draft Pest Management Performance Standard as well as municipal pesticide use surveys completed by each Co-permittee. The Pesticide Management Plan was revised in response to Water Board staff comments dated August

15, 2001 and December 21, 2001, and the revised version (dated February 15, 2002) submitted to the Water Board as Attachment 5-1 to the Program's *FY 02-03 Work Plan*. The Pest Management Performance Standard was also revised based on Water Board Staff comments emailed in November 2001. The final performance standard was submitted to the Water Board as Attachment 2-2 of the Program's *FY 02-03 Work Plan* and included as part of the updated URMP and permit application (per Permit Provisions C.2.b and C.14).

The purpose of the Pesticide 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, monitoring mechanisms and schedules. The Plan also identifies whether actions will be implemented at the Program level, municipality level, or both. Program-level actions in the Plan form the basis of this FY 06-07 Pesticide Management Work Plan. The details of municipality actions and schedules were provided in individual Co-permittee pest management plans submitted with the Co-permittees' FY 00-01 Annual Reports and future tasks are provided in the Co-permittees' FY 06-07 work plans (Section 9 of this Work Plan).

PAST PESTICIDE MANAGEMENT ACTIVITIES

The Program has, since its inception, actively participated in a number of activities aimed at understanding water quality problems in creeks and San Francisco Bay and reducing pollutants, including pesticides, to the MEP. Beginning with the FY 99-00 Work Plan, every Work Plan and Annual Report has presented the history of the Program's and Co-permittee's pesticide-related activities in the areas of monitoring and science, outreach and education and URMP implementation.

All of the Program tasks in the Pesticide Plan were scheduled to be completed or begin by FY 02-03. Table 5-1 presents the status of these tasks. Details of the FY 06-07 Pesticide User Outreach activities are provided within Section 3, Attachment 3-3.

FY 06-07 PESTICIDE MANAGEMENT TASKS

No new Pesticide Plan tasks have been identified for FY 06-07. The Program will continue implementing the ongoing Pesticide Plan tasks listed in Table 5-1. In addition, Program staff will focus efforts on working with Water Board staff on the Municipal Regional Permit; and begin to plan for any new pesticide-related requirements that may be contained in that permit.

**Table 5-1
Status of SCVURPPP Pesticide Management Plan Tasks**

<u>Action</u>	<u>Status</u>	<u>Notes</u>
I. Municipal Pesticide Use		
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 pesticide and BMPs employed during OP pesticide use.	Ongoing	The Pest Management Performance Standard includes a suggested reporting process that, for FY 01-02, is focused on reporting use of organophosphate pesticides, particularly chlorpyrifos and diazinon. All Co-permittees submit information on pesticide use in their Annual Reports. Program staff will work with the Co-permittees to review and improve the reporting process as needed.
I.A.3 Assist Co-permittees to 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.	Done	Program guidance completed as part of Model Pest Management Performance Standard, submitted to Water Board March 1, 2002. Guidance to Co-permittees included a packet of example IPM policies and practices.
I.A.4. Assist Co-permittees to 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.	Done	See notes for Action I.A.3. The Program held a workshop on March 20, 2002 on how to implement the performance standard.
I.B.4. Conduct a workshop for municipal staff on least-toxic pest control methods and pesticide management BMPs.	Done	Workshop held March 20, 2002. Program also co-sponsored ACCWP IPM Symposium held on 2/5/03, and the Regional IPM Conference on June 6, 2004
II. Public Education and Outreach		
II.A.1 Implement the Watershed Education & Outreach (WE&O) Campaign, which will target the general public and include messages about less-toxic pest control and proper disposal. The Campaign will include extensive media campaign with South Bay English- and Spanish-language radio stations, newspapers, and bus posters.	Done/Ongoing	An article on impacts of pesticide use to water quality and less toxic pest control was written and sent through the campaign distribution list. Pesticides are listed as a concern in the campaign brochure and the Watershed Watch song. The campaign web site added several new pages on IPM and IPM fact sheets are available to download. Print, radio and transit ads with less toxic pest management messages were developed in FY 02-03. Advertising has been conducted since FY 02-03.

**Table 5-1, continued
Status of SCVURPPP Pesticide Management Plan Tasks**

<u>Action</u>	<u>Status</u>	<u>Notes</u>
II.A.2 Develop simple, effective, targeted messages regarding proper pesticide use and disposal, effects on water quality, and IPM.	Done/Ongoing	See above for Watershed Watch activities. The Program continues to participate in regional IPM partnership and media relations efforts. The regional IPM partnership committee develops new fact sheets as needed.
II.A.3 Prepare appropriate outreach materials (e.g., fact sheets or a consumer guide regarding pest control services) to address target groups.	Done	Program developed landscape maintenance fact sheet. A PCO fact sheet has been developed through BASMAA participation. This fact sheets educates consumers on hiring pest control professionals who practice IPM.
II.A.4 Identify and attend community events and distribute outreach materials. (Program will attend events strategic to the WE&O campaign.)	Done/Ongoing	Program staff and Watershed Watch consultant staff attend 4-5 events each year. Brochures such as IPM fact sheets, "Grow It!" guide, "Pests Bugging You?", and "Backyard Bugs" are distributed.
II.A.6. Create, update, and publicize web sites to promote IPM and reduce pesticide use.	Done/Ongoing	The Watershed Watch website was launched in September 2001 and is continually updated. The website directs browsers to call the toll-free number to the Program office for information on less-toxic pest control. A web page specifically for IPM was completed in June 2002 and is updated regularly. The web page also includes links to other sites with information on IPM.
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.	Done	<p>The Program funded a proposal by Master Gardeners and San Jose Community Gardens staff to conduct an IPM training program for community gardeners. Four workshops were conducted and training materials were purchased with SCVURPPP funds.</p> <p>From FY 02-03 to FY 04-05, the Program conducted community IPM workshops in coordination with Watershed Watch, United Neighborhoods, Guadalupe Gardens, the Santa Clara County Household Hazardous Waste Program and Master Gardeners.</p>

**Table 5-1, continued
Status of SCVURPPP Pesticide Management Plan Tasks**

<u>Action</u>	<u>Status</u>	<u>Notes</u>
<p>II.A.8 Create and/or publicize existing IPM demonstration gardens (such as the garden at the San Francisco Bay Wildlife Refuge in Alviso).</p>	<p>Done/Ongoing</p>	<p>The Watershed Watch campaign has partnered with the Don Edwards San Francisco Bay Wildlife Refuge at Alviso. The Alviso site has a pesticide-free native plant demonstration garden. Garden workshops at this garden are promoted on the Watershed Watch website. In addition, the Watershed Watch consultant is working with Don Edwards staff to develop page on the website specific to the demonstration garden.</p> <p>The Program provided promotional support for the Going Native Garden Tour held on April 18, 2004 and April 17, 2005. Approximately 4,000 people attended the 2005 tour. The tour featured 32 gardens in 2004 and 28 in 2005. Featured gardens demonstrate environmentally sensitive gardening practices including use of native plants, water conservation, landscaping to prevent urban runoff, reducing pesticide and fertilizer use, etc. The Program will provide support in FY 05-06.</p>
<p>II.A.9 Continue to fund BASMAA Regional Media Relations Campaign featuring pitches to Bay Area media and responses to breaking news on pesticide-related topics.</p>	<p>Ongoing</p>	<p>The Program funds this campaign as part of its BASMAA baseline dues. Program staff participates in meetings of the work group and review draft products.</p>
<p>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.</p>	<p>Done/ Ongoing</p>	<p>An article describing impacts of pesticide use to water quality and containing hints for pesticide-free pest control was developed in December 2004 and sent to select publications. The article was included in the April 2005 issue of <i>Tideline</i> magazine and also placed on the Friends of Guadalupe Gardens website in October 2004.</p>
<p>II.A.12 Develop a work plan for and implement a "Pesticide User Outreach" project targeting residential and commercial users, which will include continuing the IPM Store Partnership Program and selected Household Chemical Management project tasks. Include an evaluation component in the work plan.</p>	<p>Ongoing (Complete Annually)</p>	<p>Work Plan implemented since FY 02-03; and ongoing for FY 05-06. Activities included:</p> <ul style="list-style-type: none"> • Media advertising • IPM Store Partnership Program • IPM Community Workshop • Outreach at Community Events

Table 5-1, continued
Status of SCVURPPP Pesticide Management Plan Tasks

<u>Action</u>	<u>Status</u>	<u>Notes</u>
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.	Done	VTA and open space and vector control district staff were invited to the Program's IPM Workshop in March 2003 and provided copies of the Program's Pest Management Performance Standard. In January 2005, the Program conducted a mailing (letter and IPM fact sheets) to these groups to provide them information about less-toxic pest control.
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.	Ongoing (Completed Annually)	Number of residents reached and outreach materials distributed are documented after each event. Response to outreach efforts is tracked by documenting calls to hotline and website visits. This information is provided in the Annual Report each year.
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.)	Done	<p>A Countywide survey was conducted in September 2003 to evaluate the success of the WE&O campaign. The final evaluation report was included in the Program's FY 03-04 Annual Report. Some of the survey questions tracked the publics' knowledge about various pollutants, including pesticides, affecting the water quality in the Bay. 19% of the respondents in 2003 say that pesticides affect the water quality of the Bay compared to 7% in 1991. About 23% of residents say that they use less –toxic ways to control pests in their home and garden.</p> <p>The BASMAA Regional IPM Committee conducted a customer intercept survey in September and October 2004 to evaluate the Store Partnership Project. Five stores from Santa Clara County were included in this survey. The survey indicates that about 23% of Santa Clara County residents are aware of the Our Water Our World promotion. The final survey report was included with the FY 04-05 Annual Report.</p>
II.B.1 Continue to fund and participate in the BASMAA Regional IPM Partnership.	Ongoing	The Program annually funds this program as part of its BASMAA baseline dues. These funds cover the Program's

**Table 5-1, continued
Status of SCVURPPP Pesticide Management Plan Tasks**

<u>Action</u>	<u>Status</u>	<u>Notes</u>
		supply of IPM Fact Sheets. Program staff participates in meetings of the work group and review draft products.
II.B.2 Continue to implement cost-effective elements of the IPM Store Partnership Program. Create and provide fact sheets and other materials to pesticide retailers to facilitate point-of-purchase outreach. Visit stores as necessary to ensure ongoing participation.	Ongoing	The IPM store partnership program expanded in FY 02-03 to include 29 stores in the Santa Clara Valley. Program staff routinely visits the stores and ensure that they are well stocked with fact sheets and shelf talkers. In addition, the Program provides trainings to store employees on selling less-toxic products.
II.B.3 Offer IPM training opportunities to pesticide retailer employees through coordination with Master Gardener-taught educational programs.	Task Eliminated (covered under Action Item II.A.12.)	It was not possible to arrange for Master Gardeners to train store employees due to staff shortages within the Master Gardener program. The Program has contracted with Annie Joseph to provide training to pesticide retailers, as she has been successful in getting store participation. The Community Gardeners project has been a successful way to work with the Master Gardener program and may be repeated if there is sufficient demand and resources available.
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	Ongoing	Data on number of participating stores, materials distributed and employees trained is documented and reported in the Annual Report each year. Evaluation of other work plan tasks is also reported.
<u>III. Pest Control Operators (PCOs)</u>		
III.A.1 Develop a database of licensed structural and landscape maintenance PCOs.	Done	The list was obtained from the County Agricultural Commissioner's office prior to the PCO workshop of November 4, 2003
III.A.2. Identify active PCO and landscape maintenance organizations in the South Bay and conduct awareness-raising presentations at their meetings	Done	The Program contracted with Bart Brandenburg, consultant, to plan and conduct a PCO Workshop. To increase attendance, awareness-raising presentations were made at the two local PCO associations prior to the PCO workshop.

**Table 5-1, continued
Status of SCVURPPP Pesticide Management Plan Tasks**

<u>Action</u>	<u>Status</u>	<u>Notes</u>
III.A.3. Develop and conduct accredited workshops for PCOs that focus on IPM techniques.	Done	The workshop was conducted on November 4, 2003. Approximately 30 PCOs from 19 companies attended this workshop. The workshop was very well received by attendees.
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).	Program Guidance Done	Guidance was completed in December 2001 as part of the Pest Management Performance Standard. Co-permittees are beginning or continuing to implement the guidance. The IPM workshop on March 20, 2002 included a section on contracting for IPM services from professional pest control businesses.
Monitoring Mechanism III.A.1. Document the number of PCOs receiving presentations and/or training and pesticide use by PCOs on municipal property.	Done/ Ongoing	Approximately 30 PCOs from 19 companies attended the Program's PCO workshop. Co-Permittees track their own trainings and report results in Annual Reports.
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.	Complete June 2006	Standards are being developed for IPM certification for structural pests as part of the PCO IPM Partnership project being implemented by the Bio Integral Research Center (BIRC). The first IPM Certification Workshop for PCOs was held on January 24, 2006.
<u>IV. Commercial Businesses</u>		
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.	Done/Ongoing	Program staff surveyed Co-permittees, BASMAA members, and Monterey County programs for IPM materials specific to restaurants. Very little IPM restaurant outreach material was found. Several programs reported using San Francisco's "Don't Set a Table for Pests" poster. In FY 02-03 County Health Inspectors began distributing this poster to restaurants during routine inspections. The poster was reprinted in FY 03-04. The number of posters distributed by County Health Inspectors is reported in the Annual Report each year.
IV.A.2. Develop and implement education programs that target	Ongoing	See Action Item IV.A.1.

**Table 5-1, continued
Status of SCVURPPP Pesticide Management Plan Tasks**

<u>Action</u>	<u>Status</u>	<u>Notes</u>
commercial businesses, per recommendations from Action IV.A.1.		
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.	Ongoing	The number of posters distributed and the number of businesses receiving them is documented and reported in the Annual Report each year.
<u>V. Household Hazardous Waste Collection</u>		
V.A.3 Work with HHW collection agencies to support, enhance, and help publicize programs for proper pesticide disposal (PS #7).	Ongoing	The Program is working closely with the HHW Program to publicize proper pesticide disposal. The Program's "Got Paint" advertising campaign focused on the proper disposal of paints, pesticides and other hazardous wastes.
Monitoring Mechanism V.A.2. Document quantities of pesticide disposal at household hazardous waste collection facilities (only possible on a county-wide basis at present)	Ongoing	Reported in the Annual Report each year
<u>VI. County Agricultural Commissioners</u>		
VI.A.1 Keep County Agricultural Commissioners informed of Program goals and activities and regional water quality issues through periodic meetings.	Ongoing	County Agricultural commissioners were involved in the development and review of the pest management performance standards. Contact is ongoing.
VI.A.2 Involve County Agricultural Commissioners in education and outreach efforts targeting PCOs.	Done	Program staff worked with County Agricultural Commissioners for planning and conducting the PCO workshop.
Monitoring Mechanism VI.A.2 Document meetings with County Agricultural Commissioner and staff involvement in outreach efforts	Done	Program staff met with County Agricultural Commissioners to plan the PCO workshop. Workshop information was published in their newsletters. Outreach staff from the Ag. Commissioner's office made a presentation at the PCO workshop.

**Table 5-1, continued
Status of SCVURPPP Pesticide Management Plan Tasks**

<u>Action</u>	<u>Status</u>	<u>Notes</u>
<u>VII. New Development</u>		
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.	Done	Program completed model conditions of approval, a landscape maintenance fact sheet, guidance on landscaping techniques for stormwater treatment, and a draft pest-resistant plant list. The plant list proved not to be a useful tool, as plant resistance depends highly on local planting conditions.
VII.A.2. Assist Co-permittees to consider pest-resistant landscaping and design features in the design, landscaping, and environmental reviews of proposed development projects.	Done	Model conditions of approval provided to Co-permittees, and a form developed to track projects for which education or conditions of approval were required.
VII.A.3. Assist Co-permittees to 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.	Done	The topic was presented at the December 11, 2002 New Development workshop.
VII.A.4. Develop and propose enhanced reporting format for documenting use of pesticide reduction measures at development sites.	Done	A section for documenting pesticide reduction measures required of project applicants is included in the Program's model data collection form for collecting other development project data prior to implementing C.3. (i.e., impervious surface area) and the Planning Procedures PS Reporting Form.
<u>VIII. Monitoring and Science</u>		
VIII.A.1. Continue financial support of the Regional Monitoring Program (RMP). Continue to actively participate in the RMP advisory and technical committees to focus RMP resources on 303(d) problem pollutants, including OP pesticides.	Ongoing	The Program annually contributes its share to the RMP. Program staff attends the RMP Technical Review Committee meetings and prepare meeting summaries for Management Committee.

Table 5-1, continued
Status of SCVURPPP Pesticide Management Plan Tasks

<u>Action</u>	<u>Status</u>	<u>Notes</u>
VIII.A.2. Work with Water Board staff to refine the problem statement for the diazinon TMDL and determine data needs.	Ongoing	Program staff attends the Urban Pesticide Committee meetings, at which the diazinon TMDL has been discussed. Staff is also working on the TMDL with Water Board staff as part of the Clean Estuary Program (CEP).
VIII.A.3. Participate in a coordinated regional plan to collect data for the diazinon TMDL.	Ongoing	The Program participates in and annually contributes to the CEP, which includes data collection for the diazinon TMDL.
<u>IX. Regional, State, and Federal Coordination</u>		
IX.A.1. Support actions by the California Stormwater Quality Association (CASQA) Pesticide Work Group 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.	Ongoing; Case study TBD	The Program provides funding to the CASQA's consultant contract, which funded Geoff Brosseau and Kelly Moran's efforts to review risk assessments and provide comments on behalf of the CASQA member agencies. The EPA case study has not yet been planned or discussed.
IX.A.2. Through participation in the UPC and CASQA, 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.*	Ongoing	Program staff regularly participates in the UPC and CASQA, and support efforts to eliminate uses of pesticides that cause risk to water quality.
IX.B.1. Participate in the activities of BASMAA, CASQA, and UPC, and communicate Program efforts.	Ongoing	Program staff regularly attends BASMAA, the CASQA and its Executive Committee, and the UPC and communicate Program efforts.
IX.B.2. Collaborate in technical studies to support TMDL development and implementation. (See Action VIII.A.3.)	Ongoing	The Program participates in and annually contributes to the CEP, which includes data collection for the diazinon TMDL.
IX.B.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.	Task Eliminated	The BASMAA Pesticide Work Group is no longer active, as each municipal stormwater program has its own pesticide plan in place of the Pesticide Strategy.

Table 5-1, continued
Status of SCVURPPP Pesticide Management Plan Tasks

<u>Action</u>	<u>Status</u>	<u>Notes</u>
<u>X. Review and Revision of Work Plan</u>		
X.A.1. Review and continuously improve the goals, actions, and monitoring mechanisms of the work plan considering results of self-evaluations, comments from Water Board staff and other interested parties, and results of local performance review meetings if any.	Ongoing (Annually)	The Pesticide Plan was revised twice in FY 01-02 based on comments from Water Board staff and interested parties (specifically RWQCB letters dated 8/15/01 and 12/21/01) and submitted to the RWQCB on October 15, 2001 and March 1, 2002, respectively. The Plan will continue to be evaluated and improved each year.