# ERRATA SHEET FOR ITEM 9

## TOTAL MAXIMUM DAILY LOAD (TMDL) FOR DIAZINON IN CHOLLAS CREEK WATERSHED SAN DIEGO COUNTY

Attachment 5 - **Response to Public Comments**

Attachment 7 – **Resolution** No. R9-2002-0123 Total Maximum Daily Load (TMDL) for Diazinon in Chollas Creek Watershed, San Diego County

Attachment 8 - **Technical Report** (Resolution No. R9-2002-0123 Basin Plan Amendment and Technical Report for Total Maximum Daily Load for Diazinon in Chollas Creek Watershed , San Diego County, Public Review Draft)

Attachment 10 - Channel 10 **Interview**

Attachment 12 – Attachment F **Best Management Practices**

**1. Correct spelling—Attachment 5, page 2, paragraph 4, as follows:**
When the causative pollutant(s) is known, the TMDL is simply written to reduce that pollutant and the first step in TMDL development is to refine one's understanding of the pollutant in the water body. In the case of Rainbow Creek for example, which is impaired for eutrophic~~i~~ation, the proposed TMDL is written to reduce nitrogen and phos~~o~~phorus because nitrogen and phosphoru~~r~~s are the known causes of eutrophication in Rainbow Creek. If however the pollutant(s) causing the listed impairment is unknown, as in the case of Chollas Creek, the first step in TMDL development must be identification of the underlying cause(s). In fact, the first step in any evaluation of toxicity is always to identify the pollu~~a~~tant(s) causing the ~~e~~toxicity and then to direct reduction efforts towards that pollutant(s).

**2. Strikeout the symbol at end of sentence—Attachment 5, page 3, paragraph 1, last sentence as follows:**
When the reduction of diazinon and metals mandated by these TMDLs has been achieved, toxicity in Chollas Creek will also be reduced and likely eliminated as a cause of impairment. ~~†~~

**3. Clarify text—Attachment 5, page 5, paragraph 4, first sentence as follows:**
USEPA's nationwide diazinon phase-out prohibits the manufacture and sale of diazinon for home uses over time.

**4. Clarify text—Attachment 5, page 5, paragraph 5, last two sentences as follows:**

The activities required by this TMDL are intended to reduce diazinon discharges during and immediately following USEPA's diazinon phase-out for home uses. For example the City of San Diego and the County of San Diego recently informed the RWQCB of their plans to initiate a countywide pesticide education program in late summer of 2002.

**5. Correct spelling—Attachment 5, page 6, paragraph 1, sentence 2, as follows:**
An increase in the use of alternative pesticsides is a potential unwanted consequence of the diazinon phase-out.

**6. Revise text—Attachment 5, page 9, paragraph 2, sentence 2, as follows:**
This species is native to southern California and is a good ~~representative of the aquatic wildlife present~~ indicator organism with which to measure aquatic toxicity in Chollas Creek.

**7. Correct spelling—Attachment 5, page 15, paragraph 4, header, as follows:**
**Diazinon Degraedates**

**8. Revise text—Attachment 7, page 5, section c Activities by Municipal Copermittees to MS4 Permit and CWC Section 13267, as follows:**
Pursuant to the MS4 Permit and under the authority of Water Code Section 13267, the Regional Board will direct the municipal Copermittees in the Chollas Creek watershed to 1) enforce existing local ordinances and adopt new legal authority as needed; 2) implement a "Diazinon Toxicity Control Plan"; and 3) conduct a focused Public Outreach / Education program.~~; and 4) conduct an in-depth comprehensive analysis of diazinon sources in the Chollas Creek watershed.~~

**9. Add map A-3 entitled, "Attachment A-3. Map of Chollas Creek Hydrologic Sub Area (HSA 908.22) Containing Delineation of Switzer Creek Watershed". Correct text to exclude Switzer Creek—Attachment 8, page 12, Section 2.2 Creek and Watershed Description, last paragraph as follows, inserting the new sentence between existing sentences 2 and 3:**
The Chollas Creek watershed is located in the County of San Diego in the San Diego region as shown in the vicinity map contained in Attachment A-1. A more detailed map of the Chollas Creek watershed is described in Attachment A-2. For the purposes of this TMDL, the Chollas Creek watershed includes only those lands draining to Chollas Creek (i.e., those lands draining to Switzer Creek are not included in this TMDL). The watershed of Chollas Creek encompasses 16,273 acres. (Note: This acreage excludes Switzer Creek). The area of the north fork of the watershed (9,276 acres) is somewhat larger than that of the south fork (6,997 acres).

**10. Clarify text—Attachment 8, page 13, paragraph 1 as follows:**
A small portion of the watershed consists of "tidelands" immediately adjacent to San Diego Bay. ~~Some of this tideland area is~~ Tidelands under the jurisdiction of the San Diego Unified Port District is **also** less than 1% **of the watershed**; the remainder is under the jurisdiction of the United States Navy.

**11. Remove citation—Attachment 8, page 62, Section 15.0 References:**
~~Alameda County Flood Control and Water Conservation District. 1997.~~

**12. Correct spelling—Attachment 10, page 1, paragraph 5 as follows:**
WHERE TO GET MORE INFORMATION ON LESS TOXIC ALTERNATIVES?
On the Internet, go to www.pesticides.org or www.pesticidesinfo.org. Click on "less toxic alternatives". Then click on the target pest (e.g., ants, cockroaches, etc.).

**13. Revise text—Attachment 12, page F-1, paragraph 1 as follows:**

## Attachment F Best Management Practices

***Community Education, Outreach and Training Program***

The storm water management education, outreach and training program should develop best management practices which gets the Integrated Pest Management (IPM) message out to the target audience – the people who buy and use pesticides. The focus of the educational outreach should be providing information about pesticide-related toxicity, and how to protect water quality and the environment. The IPM framework should be prioritized in the following order: (1) Prevention of indoor and outdoor pests; (2) Use of nontoxic and less toxic alternatives; and (3) Minimize hazards of pest control products used. ~~reducing diazinon use, targeting the manner in which diazinon is used to eliminate significant pathways of water contamination, and utilizing less-toxic and non-toxic methods for pest control (IPM).~~ Also the educational program should disburse educational materials to the community so as to prevent the improper disposal of pesticides, including diazinon. Steps should be taken to provide the community with information on how to dispose of pesticides legally (e.g., a diazinon return center).

**14. Clarify text—Attachment 12, page F-4, paragraph 1, insert the following:**
The agencies decided to pool their resources and create a campaign that packaged these behaviors as "natural lawn care" and later invited other local agencies to join the campaign and contribute to the funding effort. The Seattle natural lawn care campaign is a good model for agencies to use in pooling resources to do an effective public educational campaign that includes mass media and more interactive approaches.

At first, the information was designed to be motivational and communicate "why" natural lawn care practices are important.

**15. Add table number—Attachment 12, page F-5, paragraph 1, as follows:**
…The results of the survey indicate that public knowledge is increasing, and that there is need for further education (Table F-1). The "Think Blue" campaign could be encouraged to expand and thereby increase public awareness of how to improve water quality and remedy stormwater pollution.

**Table F-1. "Think Blue Survey"**

| Think Blue Survey Question | 9/99 | 3/00 |
|---|---|---|
| Knowledgeable about where water goes once it enters a storm drain. | 56% | 69% |
| Aware that storm water flows untreated from storm drain to bays, creeks and beaches. | 63% | 69% |
| Aware of the Think Blue campaign | 13% | 31% |

**16. Revise text—Attachment 12, page F-8, bullet 7, as follows:**

- Provide IPM marketing workshop to Pest Control Advisors, Pest Control Operators, Pest Control Applicators, and pest control businesses (e.g., workshop by the Central Contra Costa Sanitary District and the Contra Costa Clean Water Program entitled "IPM- You know how to do it, now how do you make money at it?"). This would include information on how to explain the benefits of IPM, how to make IPM a reasonable and viable option for customers, how to make money without applying pesticides (e.g., development of contracts for inspection and monitoring services and sanitation and repair recommendations to avoid pest problems), how to explain the benefits of IPM, and how to explain the consequences of using pesticides. The idea is to make IPM alternatives a viable option for control of pests so that customers of pest control businesses have available the choice of non-toxic and less-toxic pest control methods.

**17. Revise text—Attachment 12, page F-9, paragraph 1, as follows:**
Educating these people about pesticides (i.e., diazinon) will help get the message out that the city wishes to encourage the use of non-toxic pest control alternatives and/or environmentally friendly pest control application methods/products to control pests. The education should cover non-toxic pest control alternatives and environmental concerns with pesticides; information about non-toxic landscape maintenance and how to choose landscape plants suited to southern California soils, weather and climate, including how to design landscapes and/or choose landscape plants with low maintenance needs for pest control.

Facilities managers need sample contracts to hire pest control services that charge for prevention of pest problems rather than application of pesticides. If a pest control

applicator must be utilized, the education should explain how to use common sense in choosing an pest control business and/or applicator which utilizes proper IPM measures, reduces risk to public health, and utilizes proper measures to protect to the environment.