

ALTERNATIVES CONSIDERED

A NEWLY **STANDARDIZED** REQUIREMENT FOR ALL
RESTRICTED MATERIALS PERMITS
(not Operator IDs).

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2020 Grower CE Class

CALIFORNIA ENVIRONMENTAL QUALITY ACT


- ▶ The California Environmental Quality Act (CEQA) became law in 1970.
- ▶ The purpose of CEQA is preventing environmental damage. The process of achieving this goal is through environmental review.
- ▶ The environmental review process is typically documented in an Environmental Impact Report

COSTS IN 1990

CEQA REFORM: ISSUES AND OPTIONS (BARBOUR AND TEITZ, 2005)

- ▶ **The median cost for an Environmental Impact Report was \$47,333.**
- ▶ **10 percent of EIRs exceeded a price of \$125,000.**

RESTRICTED MATERIALS PERMITS

- ▶ CEQA provides a mechanism to allow government agencies to implement our own CEQA procedures, under a **Certified Regulatory Program**.
 - ▶ The result of this is our Department does not have to draft an **Environmental Impact Report** for each Restricted Materials Permit application/renewal.
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I understand this operator identification number does not relieve me from liability for any damage to persons or property caused by the use of pesticides. I acknowledge that duly authorized representatives from the County Department of Agriculture or the Department of Pesticide Regulation may, at reasonable times, enter and inspect fields, areas, structures, greenhouses and equipment (including protective clothing and equipment) where pesticides are handled, stored or applied (ref. 3 CCR 6140).

[Form PR-ENF-125 (Rev 11/06) Pesticide Enforcement Branch]

Applicant:

(Name & Title)

Applicant Signature:

Date:

Issuing Officer:

Date:

OPERATOR IDENTIFICATION NUMBER

I understand that this permit does not relieve me from liability for any damages to any persons or property caused by the use of these pesticides. I waive any claims of liability for damages against the County Department of Agriculture based on the issuance of this permit. I further understand that this permit may be revoked when pesticides are used in conflict with the manufacturer's labeling or in violation of applicable laws, regulations, and specific conditions of this permit. I authorize inspection at all reasonable times and whenever an emergency exists by the Department of Pesticide Regulation or the County Department of Agriculture of all areas treated or to be treated, storage facilities for pesticides or emptied containers and equipment used or to be used in the treatment. I have considered alternative and mitigation measures pursuant to Title 3, California Code of Regulations, section 6426. Taking into account economic, environmental, social, and technological factors, I have adopted those that are feasible and would substantially lessen any significant adverse impact on the environment.

[Form PR-ENF-125 (Rev 11/06) Pesticide Enforcement Branch]

Applicant: _____

(Name & Title)

Applicant Signature: _____


Date: _____

Issuing Officer: _____

Date: _____

RESTRICTED MATERIALS PERMIT

THE ALTERNATIVES WORKSHEET IS **NOT** A NEW REQUIREMENT

- ▶ Our Department has already had this conversation with growers and have noted your consideration of alternatives in prior years.
 - ▶ Adoption of the Department of Pesticide Regulation's documentation helps to ensure that the Department's program is implemented consistently across all 58 counties.
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A blurred photograph of a subway tunnel. The tracks run down the center, flanked by concrete walls. Overhead lights illuminate the scene, creating a sense of motion and depth. The text is overlaid on the top half of the image.


THE ALTERNATIVES WORKSHEET IS **NOT** AN UNDERGROUND REGULATION

- ▶ All relevant requirements are already part of the adopted Certified Regulatory Program and are reflected in Title 3 of the California Code of Regulations.


CONSIDERING THE FEASIBILITY OF ALTERNATIVES



EFFECTIVENESS

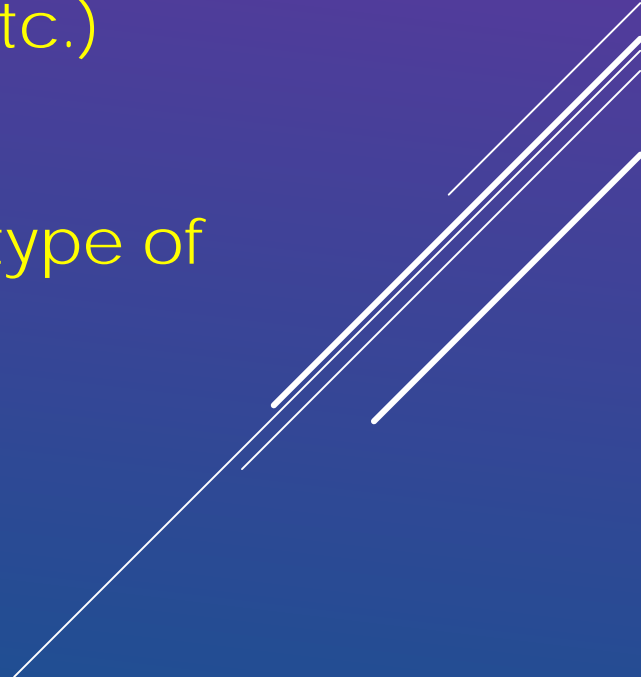
- ▶ Broad control vs. selective
 - ▶ Allowable applications per season
 - ▶ Delivery mechanism
 - ▶ Etc.
- 
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RELIABILITY

- ▶ Weather effects
 - ▶ Resistance development
 - ▶ Effects of other species (such as argentine ants when attempting to control mealybugs)
 - ▶ Etc.
- 
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And you should take into account the following:

- ▶ **Economic Factors** (consider: cost-benefit of application, harvest timing, trade restrictions, etc.)
- ▶ **Environmental Factors** (consider: how an alternative could avoid or substantially lessen any significant environmental effect)

- ▶ **Social Factors** (consider: nearby schools, availability of labor and personal protective equipment, likeliness of drift, etc.)
 - ▶ **Technological Factors** (consider: delivery mechanism, type of sprayer available, automation, etc.)
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- A decorative graphic consisting of several parallel white lines of varying lengths, slanted diagonally from the bottom right towards the top right, set against a dark blue background.

WHERE CAN APPLICANTS GET ASSISTANCE IN DESCRIBING THE ALTERNATIVES?

- ▶ An applicant's **pest control advisor** is required to certify that all feasible alternatives have been considered, and so may have a list of alternatives that they considered for the applicant's review.
- ▶ The University of California also maintains a list of Integrated Pest Management practices at the **UCIPM** website. This list describes alternatives to the use of restricted use materials.



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Solve your pest problems with UC's best science

What's New

- **Pest Alert!**
Agriculture: Peach Root-Knot Nematode Pest Alert. New nematode to California.
- Green Bulletin: Fall 2020
- Pest Notes: Pokeweed, Houseplant Problems and Armillaria Root Rot added, Spiders, Sooty Mold, Itching and Infestation: What's Attacking Me? revised
- Ag Pest Management: Citrus and Asparagus updated
- Weed Photo Gallery: Italian thistle and slenderflower thistle added.
- [More...](#)

QUICK LINKS

[Newsletters](#)

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[Online training](#)

[Weather, models,](#)

MAKE A GIFT

Support UC IPM's mission to make integrated pest management the way to manage pests

Home, Garden, Turf & Landscape Pests



Agricultural Pests



Natural Environment Pests



Exotic & Invasive Pests





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[Pest Management Guidelines](#)

Agricultural Pests

Information about managing pests, including University of California's official guidelines for monitoring pests and using pesticides and nonpesticide alternatives for managing insect, mite, nematode, weed, and disease pests.

Crops

[Alfalfa](#)

[Almond](#)

[Apple](#)

[Apricot](#)

[Artichoke](#)

[Asparagus](#)

[Avocado](#)

[Barley \(see \[Small Grains\]\(#\)\)](#)

[Beans \(see \[Dry Beans\]\(#\)\)](#)

[Bermudagrass Seed Production](#)

[Blackberry \(see \[Caneberries\]\(#\)\)](#)

[Blueberry](#)

[Broccoli \(see \[Cole Crops\]\(#\)\)](#)

[Brussels Sprouts \(see \[Cole Crops\]\(#\)\)](#)

[Cabbage \(see \[Cole Crops\]\(#\)\)](#)

[Caneberries](#)

[Carrot](#)

[Cauliflower \(see \[Cole Crops\]\(#\)\)](#)

[Celery](#)

[Kiwifruit](#)

[Lemon \(see \[Citrus\]\(#\)\)](#)

[Lettuce](#)

[Melon \(see \[Cucurbits\]\(#\)\)](#)

[Nectarine](#)

[Oats \(see \[Small Grains\]\(#\)\)](#)

[Olive](#)

[Onion](#)

[Orange \(see \[Citrus\]\(#\)\)](#)

[Ornamental Nurseries \(see \[Floriculture\]\(#\)\)](#)

[Parsley \(see \[Cilantro\]\(#\)\)](#)

[Peach](#)

[Pear](#)

[Pecan](#)

[Peppermint](#)

[Peppers](#)

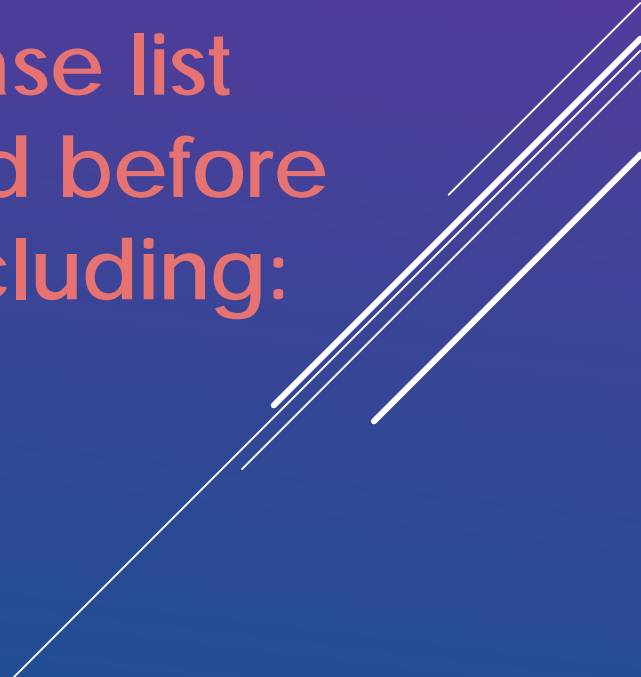
[Pistachio](#)

[Plum](#)


[Pomegranate](#)

ALTERNATIVES CONSIDERED – RESTRICTED MATERIALS PERMIT WORKSHEET


For each restricted material requested, please list the feasible alternatives that you considered before applying for a restricted material permit, including:



NON-CHEMICAL PEST MANAGEMENT PRACTICE ALTERNATIVES SUCH AS, BUT NOT LIMITED TO:

- ▶ Weeding or mowing
 - ▶ Orchard floor sanitation
 - ▶ Timing pruning to minimize chance of fungal infection
 - ▶ Trapping
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REDUCED RISK CHEMICAL ALTERNATIVES SUCH AS, BUT NOT LIMITED TO,

- ▶ Non-restricted pesticide products
 - ▶ Certified organic or FIFRA section 25(b) exempt/minimum risk pesticide products.
- 
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- ▶ Consider the alternatives
- ▶ Complete your worksheet
- ▶ We will consider the information you provided in an independent review of your permit application/renewal.

PLEASE DON'T START CONSIDERING ALTERNATIVES FOR RESTRICTED MATERIALS THE SAME DAY YOU NEED YOUR PERMIT.

Completing the worksheet is necessary in order for your application/renewal to be deemed complete.

Our office can not process incomplete permit applications/renewals.

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We know that for some of you this documentation will create an added step to your Restricted Materials Permit renewal.

We pledge to do our best to work with you to ensure that you can continue to protect your crops while maintaining compliance with California's pesticide laws and regulations.



QUESTIONS?