



Alternatives Considered -- CA Restricted Materials

The County's restricted material permit program is a timely environmental evaluation of pesticide use. Key elements include evaluating and documenting local environmental impacts; consideration of feasible alternatives and mitigation measures; and consultation with other agencies.

A completed worksheet is required for each restricted material for the permit application to be deemed complete. 3 CCR sections 6426 and 6556 require growers and Pest Control Advisors (PCAs) to consider and adopt any feasible alternatives and mitigation measures for proposed California restricted material use which would substantially lessen any significant adverse environmental impact.

3 CCR section 6432 requires the County Agricultural Commissioner (CAC), when evaluating the permit application, to determine if there are feasible alternatives and feasible mitigation measures. If there are feasible alternatives the permit is denied, if there are feasible mitigation measures the permit is conditioned on the utilization of the mitigation measure(s).

The consideration of alternatives to restricted materials during the permit process is required in Public Resources Code (PRC) section 21080.5. The CAC must document a description of the proposed activity with alternatives to the activity and must document mitigation measures to minimize any significant adverse effect on the environment from the activity. The CAC must consider alternatives to the pesticide application, including a no project alternative of denying or postponing the requested application. The CAC may select this alternative if the CAC determines that there are no feasible mitigation measures that are capable of avoiding or minimizing any potentially substantial adverse impact of the pesticide application. The CAC may also condition permit approval on the inclusion of additional site-specific and binding permit conditions to lessen or avoid any potentially substantial adverse impacts of the pesticide application.

Feasible alternatives means other chemical or non-chemical procedures which can reasonably accomplish the same pest control function with comparable effectiveness and reliability, taking into account economic, environmental, social, and technological factors and timeliness of control. Feasible means capable of being accomplished in a successful manner.

Comparable effectiveness (consider: broad control vs. selectivity, allowable applications and rates per season, delivery mechanism, etc.)

Comparable reliability (consider: weather effects, resistance development, effects of other species such as Argentine ants when attempting to control mealybugs, etc.)

Economic factors (consider: cost-benefit of application, quality metrics, harvest timing, trade restrictions, etc.)

Environmental factors (consider: how alternative could avoid or substantially lessen any significant environmental effect)

Social factors (consider: nearby buildings or institutions, availability of labor and PPE, likeliness of drift, etc.)

Technological factors (consider: delivery mechanism, type of sprayer available, acreage and topography, automation, etc.)

Sensitive Site Definition - As described by labels and permit conditions, **sensitive sites** are areas frequented by non-occupational bystanders (especially children). These include residential lawns, pedestrian sidewalks, outdoor recreational areas such as school grounds, athletic fields, parks, and all property associated with buildings occupied by humans for residential or commercial purposes. **Sensitive sites** include homes, farmworker housing, certified producer and small specialty crop on-site structures, schools, daycare centers, nursing homes, and hospitals.

As noted above, your PCA is required to certify that all feasible alternatives have been considered, and so may have a list of alternatives that they considered for your review and assistance in completing in the Alternatives Worksheet. The University of California also maintains a list of Integrated Pest Management (IPM) practices at <http://ipm.ucanr.edu/>, which describes alternatives to using restricted use materials in the management of pests in multiple settings (including home, garden, turf, landscape, agricultural, and natural environment).

Restricted Materials Permit (RMP)

RMP Name	RMP Number	
Permittee Name (printed)	Permittee Signature	Date

1. Examples of non-chemical pest management practice alternatives:

- | | | | |
|--------------------|-----------------------|------------------|---------------------|
| Beneficial Insects | Irrigation Management | Plastic Mulch | Scouting/Monitoring |
| Crop Rotations | Mating Disruption | Pruning | Sticky Barriers |
| Discing | Mowing | Removing Fruit | Thinning |
| Habitat Disruption | Netting | Removing Mummies | Trapping |
| Hand Weeding | Owl Habitats | Sanitation | |

2. Reduced risk chemical alternatives such as, but not limited to, non-restricted pesticide products and certified organic or FIFRA section 25(b) exempt/minimum risk pesticide products. Some common reduced risk chemicals you may have tried are: *Glufosinate, Oxyfluorfen, Flumioxazin, Carfentrazone, Bromoxynil, Glyphosate, Pyraflufen, Carbon monoxide, Diphacinone, Bromethalin, Esfenvalerate, Gas cartridges/Sodium Nitrate, and organic pesticides, or mating disruption, plant growth regulators, and repellants.* List chemicals below:

3. To fill in this chart list why alternatives are not feasible. What sensitive sites are near your fields and how do you plan on reducing the risk (mitigating) to people, animals, and the environment of this California Restricted Use Materials (examples: wind direction, buffer zones, application timing)

Restricted Material:
Site Name(s) or commodity:
Alternatives Feasibility:
Sensitive Site(s) Mitigation:

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