

Alternatives Worksheet

Applicant Information & Instructions

Title 3 of the California Code of Regulations (CCR), section 6426 requires a permit applicant (grower) and their pest control adviser to consider feasible alternatives to the use of restricted materials before applying for a restricted material permit with the county agricultural commissioner (CAC). This section provides:

6426 (a) *Each licensed agricultural pest control adviser and grower, when determining if and when to use a pesticide that requires a permit, shall consider, and if feasible, adopt any reasonable, effective and practical mitigation measure or use any feasible alternative which would substantially lessen any significant adverse impact on the environment.*

The consideration of alternatives to restricted materials during the permit process fulfills one of the requirements of the California Environmental Quality Act (CEQA) (Pub. Resources Code, §§ 21000 et seq.; 21080.5.) To document compliance, we are asking you, the permit applicant, to identify the alternative pest management practices (feasible alternatives) that you considered before submitting your restricted material permit application.

A feasible alternative is defined in Title 3, CCR section 6000 as:

6000 *Other chemical or non-chemical procedure 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.*

Therefore, when determining the feasibility of alternatives you should consider the following:

- a. Effectiveness (consider: broad control vs. selectivity, allowable applications per season, delivery mechanism, etc.)
- b. Reliability (consider: weather effects, resistance development, effects of other species such as argentine ants when attempting to control mealybugs, etc.)

And you should take into account the following:

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

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

The CAC will consider the information you provided above in its independent review of your permit application and in the CAC's consideration of feasible alternatives and mitigation measures, per Title 3, CCR section 6432. That section provides:

6432 (a) *Each commissioner, prior to issuing any permit to use a pesticide and when evaluating a notice of intent, shall determine if a substantial adverse environmental impact may result from the use of such pesticide. If the commissioner determines that a substantial adverse environmental impact will likely occur from the use of the pesticide, the commissioner shall determine if there is a feasible alternative, including the alternative of no pesticide application, or feasible mitigation measure that would substantially reduce the adverse impact. If the commissioner determines that there is a feasible alternative or feasible mitigation measure which significantly reduces the environmental impact, the permit or intended pesticide application shall be denied or conditioned on the utilization of the mitigation measure.*

As noted above, 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 specific and binding permit conditions in order to lessen or avoid any potentially substantial adverse impacts of the pesticide application.

Where can I get further assistance in filling out the Alternatives Worksheet and describing the alternatives that I considered? As noted above, your pest control advisor is required to certify that all feasible alternatives have been considered, and so may have a list of alternatives that he or she 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).