



## Agriculture / Weights & Measures Community Services Group

**Brady Gergovich**  
Interim Agricultural  
Commissioner/Sealer

Dear San Bernardino County Restricted Materials Permit Holders/New Applicants and Pest Control Advisers,

### RE: IMPORTANT REQUIREMENTS FOR YOUR 2021 RESTRICTED MATERIALS PERMIT

As we enter into the 2022 pesticide permit season, the San Bernardino County Agricultural Commissioner's Office wants to make you aware of some new information that will be required to be provided prior to issuing you a 2022 restricted materials permit. Title 3, California Code of Regulations (3 CCR), § 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 (RMP) with the County Agricultural Commissioner (CAC). Title 3, California Code of Regulations § 6426(a) states that: "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." While this specific requirement is directed at agricultural use, the general requirement to consider alternatives applies to all permits. To determine compliance with this requirement, we are asking you, the permit applicant, to identify the alternatives that you have considered. Please complete the Alternatives Considered for Restricted Materials Worksheet on the following page and submit that to our office with your other 2022 permit application/renewal documents.

When determining pest control alternatives to restricted materials, please consider the following:

- Effectiveness (consider: broad control vs. selectivity, allowable applications per season, delivery mechanism, etc.)
- 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, likelihood of drift, etc.)
- Technological Factors (consider: delivery mechanism, type of sprayer available, acreage and topography, automation, etc.)

For any questions or concerns you may have regarding these requirements, please contact our office at (909) 387-2105 and ask to speak with a Pesticide Use Enforcement (PUE) Officer.

Sincerely,

Brady Gergovich  
Interim Agricultural Commissioner/Sealer

Handwritten signature of Hamp Conners in black ink.

By: Hamp Conners  
Deputy Agricultural Commissioner/Sealer

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Alternatives Considered for Restricted Materials Worksheet  
San Bernardino County Agricultural Commissioner

For all Restricted Materials Permit renewals, supplements and new applications, please complete the following. Include this information with your Restricted Materials Permit application/renewal documents. This information is necessary in order for your application to be deemed complete and able to be processed. For each restricted material (pesticide) requested, please list the feasible alternatives that you have considered, including:

1. Non-chemical pest management practice alternatives such as, but not limited to, hand weeding or mowing; orchard floor sanitation to remove mummy nuts or berries; timing pruning to minimize chance of fungal infection; or trapping, habitat modification, and use of predators for rodent control. (List all considered - attach additional pages if necessary).

2. 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. (List all considered - attach additional pages if necessary).

**Business Name of Restricted Materials Permit Holder/New Applicant:**

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**Name of Authorized Agent for Restricted Materials Permit:**

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**Signature of Authorized Agent:**

**Date signed:**

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For questions or assistance in completing this worksheet, please contact the San Bernardino County Agricultural Commissioner's Office at (909) 387-2105 and ask to speak with a Pesticide Use Enforcement (PUE) Officer.