

# County of Santa Clara

Department of Agriculture and Environmental Management  
Agriculture Division



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<http://www.sccagriculture.org>

TO: 2023 Users of Agricultural Pesticides  
FROM: Joseph C. Deviney, Agricultural Commissioner/Sealer  
SUBJECT: Year 2024 Operator Identification Number/Restricted Materials Permit

Your Operator Identification Number for pesticide purchase and use will expire on December 31, 2023. Restricted Materials Permits will also expire on this date. Agricultural pesticides cannot be used by your business in 2024 until a new Operator Identification Number or Permit is obtained.

If you wish to renew a Restricted Materials Permit, please note you must be a certified applicator. If you are currently certified and your last name begins with the letter:

- “A” through “H”-- your certification expires on December 31, 2024. *Must take new examination by January 1, 2025. Cannot renew for 2025 using continuing education hours after your card expires.*
- “I” through “Q”-- your certification expires on December 31, 2025. *Must take new examination by January 1, 2026. Cannot renew for 2026 using continuing education hours after your card expires.*
- “R” through “Z”-- your certification expires on December 31, 2023. *Must take new examination by January 1, 2024. Cannot renew for 2024 using continuing education hours after your card expires.*

Permits & OpIDs will begin to be issued in November. Enclosed is an application for issuance of your 2024 Operator Identification Number/Restricted Materials Permit.

- If you plan to use agricultural pesticides in 2024, complete the application as promptly as possible. You may find it helpful to use your previous permit as a guide in completing the application. If you need a restricted materials permit, please be sure to fill out Section IV and the accompanying DPR “Alternatives Considered” worksheet.
- You may contact your district biologist to schedule a time and place to issue your Operator ID Number/Restricted Materials Permit, or you may be contacted by someone in our office.
- If you have any questions regarding this procedure, or to speak directly to a biologist, please contact our office at (408) 201-0640 (San Martin) or (408) 918-4610 (San Jose).

2024 PRIVATE APPLICATOR APPLICATION  
FOR AN OPERATOR IDENTIFICATION NUMBER OR  
RESTRICTED MATERIALS PERMIT

**SECTION I**

Business or Farm Name: \_\_\_\_\_

If applicable, last year's Permit / Operator Identification Number: 43- 23 - \_\_\_\_\_

Name of Authorized Person / Agent: \_\_\_\_\_

Private Applicator Card Number (If applicable): \_\_\_\_\_ Expires: \_\_\_\_\_

Address: \_\_\_\_\_

Phone Number(s): (\_\_\_\_) \_\_\_\_\_ (\_\_\_\_) \_\_\_\_\_

E-mail address: \_\_\_\_\_

**SECTION II**

Where do you store pesticides in Santa Clara County? \_\_\_\_\_

Do you utilize chemigation as an application method? YES  NO

Do you plan on applying pesticides by air? YES  NO

Do you use a pest control operator to apply your pesticides? YES  NO

If YES, name of PCO: \_\_\_\_\_

Do your employees apply any pesticides? YES  NO

Are any pesticides applied by you, the Farm Owner? YES  NO

Are any of your production sites within a ¼ mile of a school or daycare? Do you need an annual school notification form? YES  NO  I DON'T KNOW

Are you planning to use a farm labor contractor? YES  NO

When are you planning to start using pesticides in 2024? \_\_\_\_\_

**SECTION III**

Please list below each location and crop upon which you plan to use any pesticides. Be sure to include each growing location and acreage.

Site	Growing Location & APN #	Acres / Units	Commodity / Crop

**SECTION IV– RESTRICTED PESTICIDES**

Please complete this section listing each RESTRICTED PESTICIDE you wish to use:

Site	Target Pest	Crop	Restricted Material	Alternatives Considered	Mitigation Measures

**Alternatives** are things such as less toxic materials, trapping, crop rotation, solarization, no treatment, etc.

**Mitigation Measures** are things like the timing of the application, buffer zones, nozzle size, adjuvant use, type of application equipment, etc.

## **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).

### Alternatives Considered - Restricted Materials Permit

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.*

Please complete the following, and include this information with your restricted material permit application. This information is necessary in order for your application to be deemed complete. The CAC's office will not process incomplete permit applications. For each restricted material requested, please list the feasible alternatives that you considered before applying for a restricted material permit, 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. **[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. **[Attach additional pages if necessary].**