

# Herbicides are Applied to Sites: What Does that Even Mean?

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Mention of any product is for informational purposes only, and is not an endorsement or recommendation of that product.

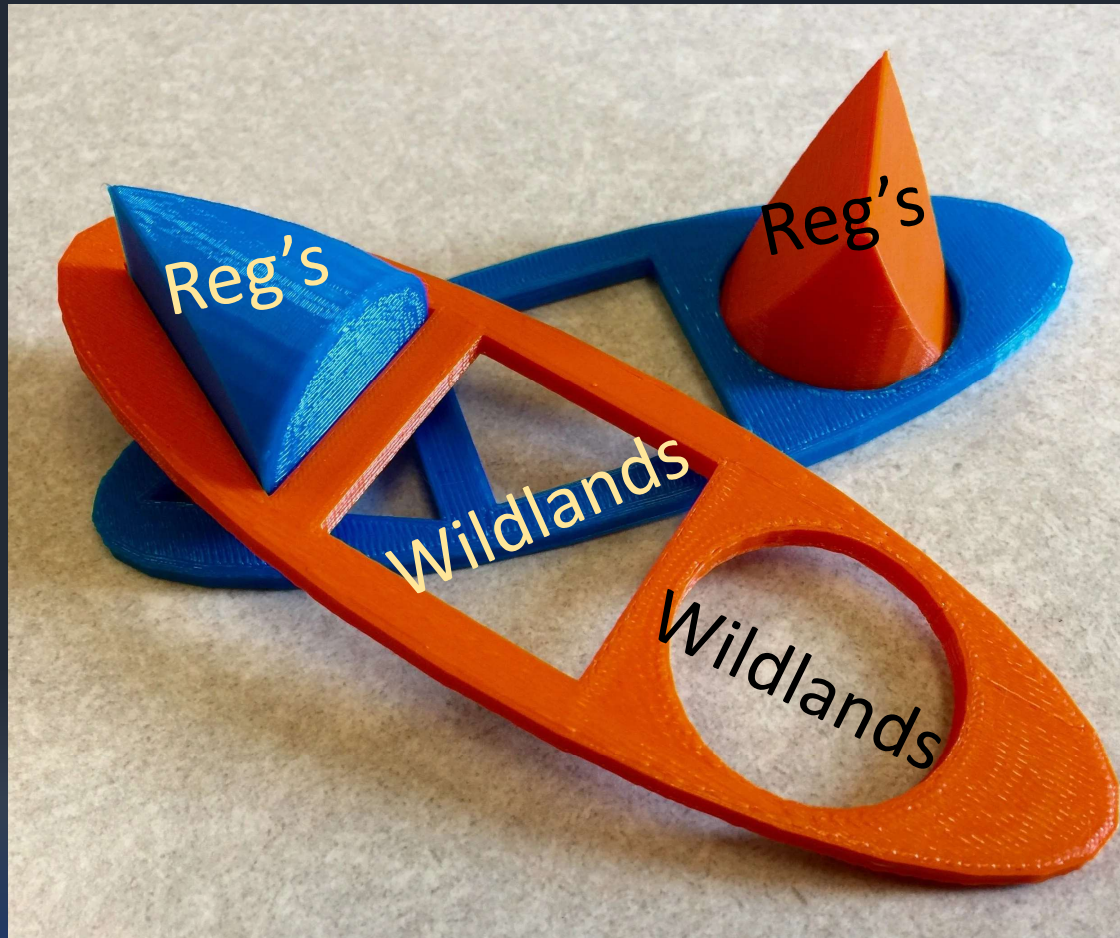
# Disclaimers

- The agricultural commissioner is the local authority on uses of pesticides, even in non-agricultural settings. They can issue citations for violations in non-crop settings.
- The University of California is not a regulating authority and provides education for informational purposes
- Consult with your local agricultural commissioner for official guidance on pesticide issues
- Mention of any product is for informational purposes only, and is not an endorsement or recommendation of that product.

# Our Theme for this Presentation



# Multiple Pegs All Different Shapes and Sizes



# Let's Start at the Beginning

- Follow the yellow brick regulated road...



# Let's Start at the Beginning

- The product label is your first place to go
- Most (but not all!) answers are on the label
- The label is the law, the label cannot be violated



## Specimen Label

AMINOPYRALID GROUP 4 HERBICIDE



# Milestone®

HERBICIDE

™® Trademarks of Corteva Agriscience and its affiliated companies

- For control of annual and perennial broadleaf weeds including invasive and noxious weeds, certain annual grasses, and certain woody plants and vines on:
  - rangeland, permanent grass pastures (including grasses grown for hay\*), Conservation Reserve Program (CRP);
  - non-crop areas for example, airports, borrow ditches, communication transmission lines, electric power and utility rights-of-way, fencerows, gravel pits, industrial sites, military sites, mining and drilling areas, oil and gas pads, non-irrigation ditch banks, parking lots, petroleum tank farms, pipelines, roadsides, railroads, storage areas, dry storm water retention areas, substations, unimproved rough turf grasses;
  - natural areas (open space) for example, campgrounds, parks, prairie management, trailheads and trails, recreation areas, wildlife openings, and wildlife habitat and management areas including seasonally dry flood plains, deltas, marshes, prairie potholes, or vernal pools;
  - including grazed areas in and around these sites.

\*Hay from grass treated with Milestone within the preceding 18 months can only be used on the farm or ranch where the product is applied unless allowed by supplemental labeling.

### IMPORTANT USE PRECAUTIONS AND RESTRICTIONS TO PREVENT INJURY TO DESIRABLE PLANTS

- Carefully read the section "Restrictions in Hay or Manure Use."
- It is mandatory to follow the "Use Precautions and Restrictions" section of this label.
- Manure and urine from animals consuming grass or hay treated with

### Forage and Manure Management



# The Regulation Hierarchy


- Pesticides and labels are registered by US EPA
  - US Environmental Protection Agency
- Tribal EPA Department
- Ca Dept. of Pesticide Regulation (DPR) is the state level authority on pesticides and their uses
  - DPR does not enforce pesticide regulations at the local level
- County Agricultural Commissioner (CAC or Ag. Comm.) enforces pesticide regulations locally
- If in doubt, ask the local CAC for help, preferably before you buy product



US EPA  
Tribal Gov't  
CA DPR  
County Ag. Comm  
Your Org  
You

# Herbicide Labels

- The herbicide label contains important instructions for the use of the product
- You must read the label before using any pesticide
- You must read the ENTIRE label before using this product



Read the entire label before using this product.  
Use only according to label instructions.



# Use Conflicts

- When using a pesticide, the applicator must use the pesticide in a manner that does not conflict with the label or conflict with other limitations
- FAC 12973 “The use of any pesticide shall not conflict with labeling registered pursuant to this chapter which is delivered with the pesticide or with any additional limitations applicable to the conditions of any permit issued by the director or commissioner.”

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## **Directions for Use**

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It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read all Directions for Use carefully before applying.

# Use Conflicts

- What is inconsistent?
- In general, if a label restricts something, you obviously can't do that
  - Can't use more herbicide than maximum amount listed on the label
- In general, if a label has no limit, then can go as far possible, as long it does not conflict with language somewhere else
  - Can use a minimum amount herbicide including a fraction of a drop

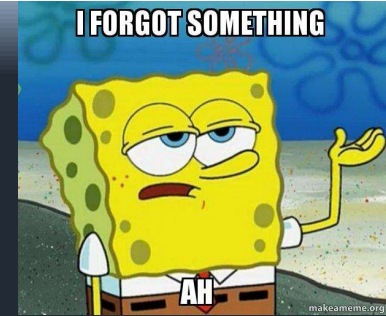
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## **Directions for Use**

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It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

# Label On Site



- In addition, you must have the label at the field site when applying pesticides
- Either via paper or on an electronic device (and don't run out of power)
- CCR 6602

## **6602. Availability of Labeling.**

**A copy of the registered labeling that allows the manner in which the pesticide is being used shall be available at each use site.**

**NOTE: Authority cited: Sections 11456 and 12976, Food and Agricultural Code.**

**Reference: Section 11501 and 12973, Food and Agricultural Code.**

# Labels and Weeds

- Labels often do not have language that restricts applications only to those weeds on the label
- As long as there is no restriction on the label, herbicides can be applied to any weed, whether that weed is on the label or not

Unless otherwise specified, applications may be made to control any weeds listed in the **WEEDS CONTROLLED** section of this label.

# Why is this Important?

- Labels do not list all weed species the herbicide can control, only those species the product is known to work on
- For example, if the labels says it controls controls “black mustard” and “annual grasses”, you can spray the product on black mustard and any annual grass species and it should work
- It can also be applied to and may work on other mustards
- As long as, all those uses do not conflict with other label language

# What Language Restricts Weed Applications?

- Some labels may restrict herbicide applications on certain weeds in California
- Some labels will say 'Herbicide X controls these weeds:

Baddie weedus

Coverus alltheplantsees

Grassus spreadicus\*

...

(then at bottom of table)

\* Not for use in California

*\*Not for use in California.*

These are fictional weed names, but you knew that already

# Common Violations

- One common violation CAC's encounter is the herbicide is not registered for the use site of the application



# Common Violations

- One common violation CAC's encounter is the herbicide is not registered for the use site of the application
- What does that even mean?



Claire W.



# Use Sites

- In regulatory world, pesticides are applied to “use sites”
- While we spray herbicides on weeds
- Those weeds occupy a site
- The name of the site has to be on the label to use that herbicide there



# What Sites Do We Work On?

- What are the sites we work on typically called?
- Wildlands, natural areas, open spaces, nature preserves, rangelands, pasture, hiking trails, rights of way, parks, forests, riparian, ...
- As long as a similar use site name is on the label we are good

**8.5 Habitat Management**

Habitat Restoration and Management

**8.11 Roadsides**

**8.12 Rangelands**

# Labels

- Ok, great, so now all we need is for herbicide labels to use consistent and clear language when they refer to use sites and we are good to go!
- [Narrator – They do not use consistent language]



# Use Sites on Labels

- Let's walk through the inconsistencies and language issues
- First problem to solve, where does the label list "Use Sites"?
- There are multiple places where use sites may be listed on the label
  - On the front page
  - Near the front in general directions section
  - Directions for use or product information sections
  - Specific crop or use site sections

# Front Page News

# SUPPRESS®

**HERBICIDE EC**

 FOR ORGANIC

**A Contact, Post-Emergent  
Non-Selective Herbicide  
for Use in Agricultural  
Food and Non-Food Crops**

**Active Ingredients**  
Caprylic Acid...  
Capric Acid.....  
**Other Ingredients**  
**Total**.....



# ESPLANADE®

200 SC

**KEEP OUT OF REACH OF CHILDREN  
WARNING/AVISO**

**Herbicide**

**Suspension Concentrate  
Preemergence Herbicide for the Control of Annual Grasses and Broadleaf Weeds in  
Non-Crop Areas, Conifer and Hardwood Production Areas, and Field Grown Christmas  
Trees.**

- But be careful, other label sections may clarify or restrict what is meant by these broad categories



# Use Sites Listed in General Directions

- Typically on or near front page



- For control of annual and perennial broadleaf weeds including invasive and noxious weeds, certain annual grasses, and certain woody plants and vines on:
  - rangeland, permanent grass pastures (including grasses grown for hay\*), Conservation Reserve Program (CRP);
  - non-crop areas for example, airports, barrow ditches, communication transmission lines, electric power and utility rights-of-way, fencerows, gravel pits, industrial sites, military sites, mining and drilling areas, oil and gas pads, non-irrigation ditch banks, parking lots, petroleum tank farms, pipelines, roadsides, railroads, storage areas, dry storm water retention areas, substations, unimproved rough turf grasses;
  - natural areas (open space) for example, campgrounds, parks, prairie management, trailheads and trails, recreation areas, wildlife openings, and wildlife habitat and management areas including seasonally dry flood plains, deltas, marshes, prairie potholes, or vernal pools;
  - including grazed areas in and around these sites.

# Directions for Use or Product Information

- These sections may be near the front of the label
- For some products it can be towards the middle of the label



## **PRODUCT INFORMATION**

Esplanade 200 SC is a selective, preemergence, alkylazine herbicide for control of many annual grasses and broadleaf weeds in railroads, railyards, roadsides, hardscapes, industrial areas, airports, government and military installations, municipal sites, petroleum tank farms, pipelines, power plants, wind farms, solar farms, communication towers, pumping stations, storage areas, rail rights-of-way, utility rights-of-way, managed areas surrounding canals and aqueducts, utility substations, lumberyards, farmstead areas, nonirrigation ditch banks, fence rows, manufacturing sites, office buildings, parks, educational facilities, parking lots, gravel/stone yards, under asphalt or concrete as part of site preparation, conifer and hardwood production areas, and field grown Christmas trees including grazed areas in and around these sites.

# Specific Section "Use Sites"



For control of burndown of a broad spectrum of weeds on contact

## Use Sites

Care must be exercised to avoid contact of spray with foliage of desirable turfgrasses, trees, shrubs, or other desirable vegetation since damage can result. Best results are obtained when applications are made to young succulent weeds and when spray solutions cover all leaf surfaces. Mature, woody weeds are less susceptible. Repeat applications as needed to give desirable levels of weed control.

Select nozzles/pressure combinations that deliver large coarse droplets such as solid cones or flat fans at low pressures, and avoid nozzle/pressure combinations that generate fine particles or mist. If spraying areas adjacent to desirable plants, use a shield to help prevent spray from contacting foliage of desirable plants. Reseeding or transplanting can occur in treated areas as soon as desirable levels of weed control are obtained.

### Crop Uses and Use Methods

Use Methods: See the corresponding numbers in the "Use Methods" section under "General Information" for use descriptions and precautions.

### Non-Crop Use Sites and Use Methods

Use Methods: See the corresponding numbers in the "Use Methods" section under "General Information" for use descriptions and precautions.

Non-Crop Group	Non-Crop Use Sites	Use Methods
Turf, Flowers, Bedding and Landscape Plants	Turfgrass (maintenance, sod or seed production), bedding plant, flowers, and ornamentals	1,2,3,4,5,6
Trees and Shrubs	Christmas trees, forest and commercial trees, landscape trees, nursery trees or shrubs, and fiber farms	1,2,5
Greenhouse and Indoor Use	All crops, plants, and structures	1,2,3,7
Non-Crop, Industrial, and Public Areas	Farmstead, homestead, fallow land, storage areas, schools, paved areas, rights-of-way (e.g., road, railroad, utilities), parking lots, recreation areas (e.g., athletic fields, campgrounds, golf courses, playgrounds), walks, industrial sites (e.g., lumberyard, tank farms, buildings).	1,2,7
Structures, Buildings, and Walkways	Bench, deck, equipment, floor, roof, wall, walks, and evaporative cooling pads.	7
Dry Aquatic Sites, Dry Drainage Systems and Around Aquatic Sites	Applications must be made 72 hours prior to reflooding of dry aquatic sites. Dry ditches, dry canals, ditch banks, and for use above the water line or after drawdown of agricultural irrigation water and ditch systems, industrial ponds and disposal systems, and impounded water areas.	1,7

- Use sites section is usually in middle or back of label, may be site specific

(Highlights added)





# And in More than One Section!

- In this case use sites in 3 sections
- On pages 1, 2 and 15!

**Gallery<sup>®</sup> SC**

**SPECIALTY HERBICIDE**

**A preemergence herbicide for control of certain broadleaf weeds in:**

- **Established Turfgrass**
- **Landscape Ornamentals**
- **Container Grown Ornamentals**
- **Field Grown Ornamentals**
- **Groundcovers/Perennials**
- **Non-Cropland**
- **Ornamental Bulbs**
- **Christmas Tree/Conifer Plantations**
- **Non-Bearing Fruit and Nut Trees and Non-Bearing Vineyards**

## **Product Information**

Gallery<sup>®</sup> SC specialty herbicide is a preemergence product for control of certain broadleaf weeds in established turfgrass, landscape ornamentals, container grown ornamentals, field grown ornamentals, groundcovers/perennials, ornamental bulbs, non-bearing fruit and nut trees and non-bearing vineyards, Christmas tree/conifer plantations and non-cropland areas for example, airports, dry non-irrigation ditchbanks, and dry storm water retention areas, utility rights-of-way, industrial sites, military sites, parking lots, roadsides, storage areas, vacant lots and other non-crop residential areas.

## **Non-Cropland Areas**

Use Gallery SC as a preemergence herbicide for control of listed broadleaf weeds in non-cropland areas such as airports, communication transmission lines, dry barrow ditches, dry non-irrigation ditchbanks, and dry storm water retention areas, electrical power and utility rights-of-way, fencerows, gravel pits, industrial sites, military sites, mining and drilling areas, oil and gas pads, parking lots, petroleum tank farms, oil and gas pipelines, railroads, roadsides, storage areas, substations, vacant lots and other non-crop residential areas where maintenance of bare ground is desired.

It is permissible to treat non-irrigation ditch banks and transitional areas between upland and lowland sites only when dry. Do not apply directly to water. Note: Consult with local water control authorities before applying this product around public water. Permits may be required

Apply Gallery SC any time prior to germination of target weeds. Areas to be treated should be free of established weeds or existing weeds should be controlled with postemergence herbicides.

Refer to the Product Information section prior to using this product on non-cropland areas.

# Don't Forget Restrictions

- Restriction statements can also limit which sites the herbicide is used

## ENVIRONMENTAL HAZARDS

This product is toxic to fish, aquatic invertebrates, and plants. **Do not apply directly to water**, or to areas where surface water is present or to intertidal areas below the mean watermark. Do not contaminate water when disposing of rinsate or washwater.

- **Do not use on** newly seeded turf, residential lawns or commercial lawns, and nurseries, greenhouse production sites, production or landscape ornamentals,

- Many herbicides have grazing restrictions, sometimes the label will be explicit in the restriction other times it will omit grazed areas as an allowable site

- Sites have to be on the label

Livestock, grazing, pasture or rangeland uses not listed, and thus not permitted



### A preemergence herbicide for control of certain broadleaf weeds in:

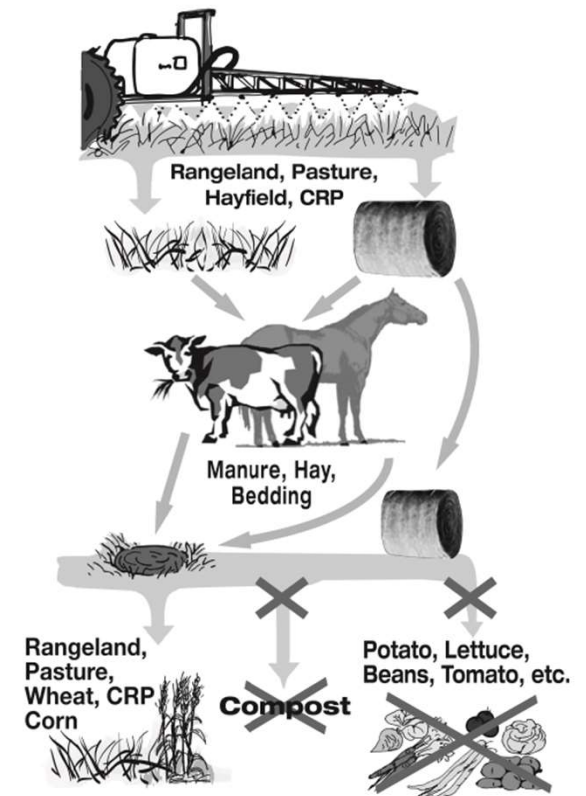
- Established Turfgrass
- Landscape Ornamentals
- Container Grown Ornamentals
- Field Grown Ornamentals
- Groundcovers/Perennials
- Non-Cropland
- Ornamental Bulbs
- Christmas Tree/Conifer Plantations
- Non-Bearing Fruit and Nut Trees and Non-Bearing Vineyards

# Grazing Restrictions

- Grazing may be called out specifically
- But other restrictions may still apply (lactating cows, different annual rates with grazing, or hay or manure restrictions , ...)

- For control of annual and perennial broadleaf weeds including certain woody plants and vines on:
  - **rangeland, permanent grass pastures (including grasses gr**
  - **non-crop areas for example, airports, barrow ditches, com**
  - **rights-of-way, fencerows, gravel pits, industrial sites, milita**
  - **irrigation ditch banks, parking lots, petroleum tank farms, p**
  - **retention areas, substations, unimproved rough turf grasse**
  - **natural areas (open space) for example, campgrounds, par**
  - **areas, wildlife openings, and wildlife habitat and managem**
  - **marshes, prairie potholes, or vernal pools;**
  - **including grazed areas in and around these sites.**

## Forage and Manure Management



- Carefully read the section ***“Restrictions in Hay or Manure Use.”***

# Language Specifying Types of Use Sites

- Now that we have a general understanding where to find this information, let's look at a few examples of how clear the use site description is for wildland applications
- We'll go through five examples from easiest to most difficult

(highlights added)



# Example #1: A Clear Label

- First page of label

**The complete broad-spectrum postemergence professional herbicide for non-crop, industrial, turf and ornamental weed control.**

- In middle of label, sec. 8 clarifies non-crop use sites, “natural areas”, “rangeland”, “wildlife refuges”

## 8.5 Habitat Management

### Habitat Restoration and Management

This product may be used to control exotic and other undesirable vegetation in habitat management and natural areas, including rangeland and wildlife refuges. Applications can be made to allow recovery of native plant species, prior to planting desirable native species, and for similar broad-spectrum vegetation control requirements. Spot treatments can be made to selectively remove unwanted plants for habitat management and enhancement.

## 8.0 SITE AND USE INSTRUCTIONS

This product may be used in non-crop areas such as airports, apartment complexes, commercial sites, ditch banks, driveways, dry ditches, dry canals, fencerows, golf courses, greenhouses, industrial sites, landscape areas, lumber yards, manufacturing sites, municipal sites, natural areas, office complexes, ornamentals, parks, parking areas, pastures, petroleum tank farms and pumping installations, public areas, railroads, rangeland, recreation areas, residential areas, rights-of-way, roadsides, schools, shadehouses, sports complexes, storage areas, substations, turfgrass areas, utility sites, warehouse areas and wildlife management areas.

This product may also be used in non-food crop sites such as Christmas tree farms, plant nurseries, sod or turf seed farms.

Unless otherwise specified, applications may be made to control any weeds listed in the **WEEDS CONTROLLED** section of this label.

## Example #2: Another Clear Label

- On the front page “rangelands”, “natural areas”
- “Non-crop areas for example” (a non-comprehensive list)

**Milestone**<sup>®</sup>

HERBICIDE

<sup>TM</sup> Trademarks of Corteva Agriscience and its affiliated companies

- For control of annual and perennial broadleaf weeds including invasive and noxious weeds, certain annual grasses, and certain woody plants and vines on:
  - **rangeland**, permanent grass pastures (including grasses grown for hay\*), Conservation Reserve Program (CRP);
  - **non-crop areas for example**, airports, barrow ditches, communication transmission lines, electric power and utility rights-of-way, fencerows, gravel pits, industrial sites, military sites, mining and drilling areas, oil and gas pads, non-irrigation ditch banks, parking lots, petroleum tank farms, pipelines, roadsides, railroads, storage areas, dry storm water retention areas, substations, unimproved rough turf grasses;
  - **natural areas (open space)** for example, campgrounds, **parks**, prairie management, trailheads and trails, recreation areas, **wildlife openings**, and **wildlife habitat and management areas** including seasonally dry flood plains, deltas, marshes, prairie potholes, or vernal pools;
  - **including grazed areas in and around these sites.**

(Highlights added)

## Example #3: A Less Clear Label



- First page of label has general, unspecified “non-crop areas”
- Then product information does not further specify nor restricts wildlands or natural areas, and has generic “parks”

**Suspension Concentrate  
Preemergence Herbicide for the Control of Annual Grasses and Broadleaf Weeds in  
Non-Crop Areas, Conifer and Hardwood Production Areas, and Field Grown Christmas  
Trees.**

### **PRODUCT INFORMATION**

Esplanade 200 SC is a selective, preemergence, alkylazine herbicide for control of many annual grasses and broadleaf weeds in railroads, railyards, roadsides, hardscapes, industrial areas, airports, government and military installations, municipal sites, petroleum tank farms, pipelines, power plants, wind farms, solar farms, communication towers, pumping stations, storage areas, rail rights-of-way, utility rights-of-way, managed areas surrounding canals and aqueducts, utility substations, lumberyards, farmstead areas, nonirrigation ditch banks, fence rows, manufacturing sites, office buildings, parks, educational facilities, parking lots, gravel/stone yards, under asphalt or concrete as part of site preparation, conifer and hardwood production areas, and field grown Christmas trees including grazed areas in and around these sites.

## Example #3 Cont'd: Different Brands

- Envu, maker of Esplanade, also sells Rejuvra, which has more clear language around wildland use sites, and is marketed to wildlands, rangelands
- Both contain same amount of active ingredient (indaziflam 19.05%)

### **Suspension Concentrate**

**Preemergence Herbicide for the restoration and protection of Rangeland, Conservation Reserve Program (CRP) lands, Natural Areas e.g., Parks and Open Space, Wildlife Management Areas, Recreational Areas, Fire Rehabilitation Areas, Prairies and Fire Breaks and including any of these sites that are grazed or cut for grass hay.**

### **PRODUCT INFORMATION**

Rejuvra® is a selective, preemergence, alkylazine herbicide for control of many annual grasses and broadleaf weeds in rangeland, CRP land, and natural areas.



**REJUVRA®**



# Example #4: Even Less Clear

## Use Methods

See the “Use Sites” section of this label to match the method of use with the crop or use situation.

- Vegetative Burndown:** General control of weeds for seedbed or site preparation, non-crop and around aquatic sites. may be used in crop and pasture situations.

The “Use Methods” has language, “General control... non-crop...sites”

## Use Sites

Care must be exercised to avoid contact of spray with foliage of desirable turfgrasses, trees, shrubs, or other desirable vegetation since damage can result. Best results are obtained when applications are made to young succulent weeds and when spray solutions cover all leaf

### Non-Crop Use Sites and Use Methods

**Use Methods:** See the corresponding numbers in the “Use Methods” section under “General Information” for use descriptions and precautions.

Non-Crop Group	Non-Crop Use Sites	Use Methods
Non-Crop, Industrial, and Public Areas	Farmstead, homestead, fallow land, storage areas, schools, paved areas, rights-of-way (e.g., road, railroad, utilities), parking lots, recreation areas (e.g., athletic fields, campgrounds, golf courses, playgrounds), walks, industrial sites (e.g., lumberyard, tank farms, buildings).	1,2,7

## Example #4: Even Less Clear

### Use Sites

Care must be exercised to avoid contact of spray with foliage of desirable turfgrasses, trees, shrubs, or other desirable vegetation since damage can result. Best results are obtained when applications are made to young succulent weeds and when spray solutions cover all leaf

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- No specific language whether this list is all inclusive or general, it could be improved with statements like "for example" or "including, but not limited to"
- "e.g." (~for example) specifies types of ROW or recreation areas
- But we have broad bucket of "non-crop" sites in Use Methods section

# Example #5: Level Difficult

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## GENERAL INFORMATION

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**FOR USE ON:** Conifer Trees, Non-Bearing Food Crops, Non-Crop or Non-Planted Areas and Ornamentals.



**Envoy Plus™**  
HERBICIDE



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## NON-CROP OR NON-PLANTED AREAS

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The following areas are considered non-crop or non-planted areas:

Rights-of-way including railroads, highways, roads, dividers, medians, pipelines, public utility lines, pumping stations, transformer stations and substations. Around airports, electric utilities, commercial buildings, manufacturing plants, storage yards, rail yards, fence lines, parkways and post-harvest croplands. Also, beneath greenhouse benches and around golf courses.

## Example #5: Level Difficult

### **NON-CROP OR NON-PLANTED AREAS**

The following areas are considered non-crop or non-planted areas:

- The interpretation (as I understand it) of this sentence is that this is the inclusive list of all non-crop areas allowed on the label
- This language limits the uses and the current list does not include wildlands, natural areas or open spaces
- This label could be improved with language suggesting it is only a partial list (“such as” or “including, but not limited to” or “for example”)
- Arrow 2EC, another clethodim product has same label language



**Envoy Plus™**  
H E R B I C I D E



# Wildland Site Names

- The site name for wildlands, open spaces, nature preserve, or natural areas can vary or be covered in specifics or in general
- “Natural areas”
- “Rangeland” (livestock present)
- “Non-crop”
- “Non-crop areas for example”
- “Non-crop areas such as”
- Adding qualifiers “such as” or “for example”, “including” can provide for more flexibility

# Wildland Site Names

- Non-crop land areas – sites which are not intended to be used for food, feed, fiber, or pasture
- Non-crop is a huge category covering roadways, railroads, utilities, vacant lots, and wildlands.

## Non-crop Land Areas

**Interprets FAC section 12973; 3 CCR section 6000**

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**Interpretation** The use site "non-crop land areas" refers to areas which will not in the foreseeable future be used to grow food, feed, or fiber crops, or to pasture animals. Examples of non-crop land include railroad beds, lumberyards, highway shoulders, driveways, roadsides, vacant lots, etc. This could include areas in a residential or farmstead setting.

See also Fallow land.

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DPR Program  
Standards  
Compendium  
Vol. 8 Ch. 4

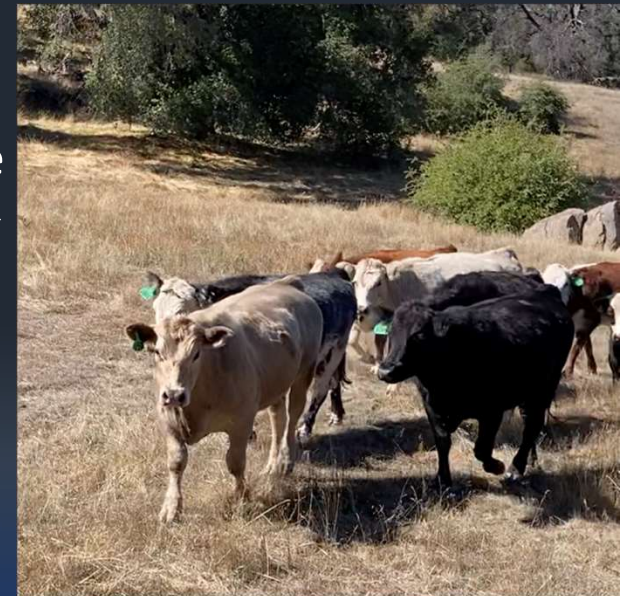
# Helpful Tips

- Adding cows or livestock to the area changes things!
- Pasture – refers to an area that is grazed and agricultural practices are performed (irrigation, fertilization, cultivation, ...)
- Rangeland – refers to areas that are grazed but do not have agricultural practices



← Irrigation = pasture

Cows grazing in non-irrigated fenced in pasture = Rangeland →



# Discrepancies in Interpretation

- Given these difficulties in interpretation and that there is often not a specific natural areas or wildlands use site on label, local interpretation by CAC staff can be mixed
- There are cases where applicators who work in multiple counties have been told different answers by CACs whether the same herbicide is allowed to be used on the same cross boundary sites



# Where do we report use sites

- Use sites are reported in pesticide use reporting (PUR) and monthly PUR
- CCR 6624 and 6627

(b) The records shall include the following information for each pest control operation:

- (1) Date and time of the application;
- (2) Name of the operator of the property treated;
- (3) Location of property treated;
- (4) Crop commodity, or site treated;
- (5) Total acreage or units treated at the site; and
- (6) Pesticide, including the U.S. Environmental Protection Agency (U.S. EPA) or State registration number which is on the pesticide label, and amount used.

STATE OF CALIFORNIA

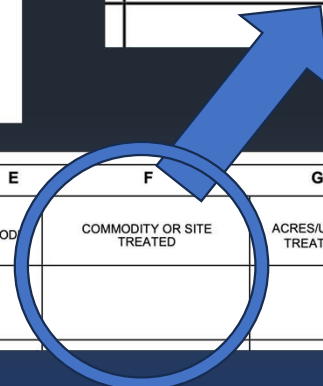
## MONTHLY SUMMARY PESTICIDE USE REPORT

DPR-PML-060 (REV. 1/18) PAGE 1 OF 2

**INSTRUCTIONS FOR COMPLETING THIS FORM ARE INDICATED BELOW AND ON THE REVERSE SIDE**

<b>F</b>
COMMODITY OR SITE TREATED

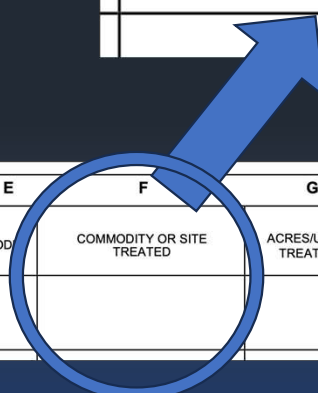
A	B	C	D	E	F	G
MANUFACTURER AND NAME OF PRODUCT APPLIED	EPA/CALIFORNIA REGISTRATION NUMBER FROM LABEL INCLUDE ALPHA CODE	TOTAL PRODUCT USED (Check One Unit of Measure)	NUMBER OF APPLICATIONS	COD	COMMODITY OR SITE TREATED	ACRES/UNITS TREATED
		<input type="radio"/> LB <input type="radio"/> OZ <input type="radio"/> PT <input type="radio"/> QT <input type="radio"/> GA				



# Where do we report use sites

- Use sites are reported in pesticide use reporting (PUR) and monthly PUR
- CCR 6624 and 6627
- If in doubt, ask the CAC for site name they prefer on PUR

A		B		C		D		E		F		G	
MANUFACTURER AND NAME OF PRODUCT APPLIED		EPA/CALIFORNIA REGISTRATION NUMBER FROM LABEL INCLUDE ALPHA CODE		TOTAL PRODUCT USED (Check One Unit of Measure)		NUMBER OF APPLICATIONS		COD		COMMODITY OR SITE TREATED		ACRES/UNITS TREATED	
				<input type="radio"/> LB <input type="radio"/> OZ <input type="radio"/> PT <input type="radio"/> QT <input type="radio"/> GA									



F	
COMMODITY OR SITE TREATED	

# If Working on Agricultural Crops

- Do not confuse the “site identification number” for a site name, like “open space”
- CCR 6623
- If an operator is working on an agricultural commodity a site identification number needs to be obtained before a pesticide application

# Let's Review

- Let's look at one final (complicated) site and see how these principles apply

How many use sites are in this picture?

- Assume the riparian in the NE corner is wet
- Also assume no livestock



# 7 Use Sites!

- We could have had an 8<sup>th</sup> if livestock are present on part of the site!



# 7 Use Sites!

- Of these 7 use sites only a few herbicides could be used in all 7 (e.g. Roundup Custom)
- Most herbicides cannot be used on all sites b/c many are not aquatically approved (Milestone, Gallery, Esplanade, Suppress, Scythe)



# 7 Use Sites!

- Or some are not approved near buildings (Milestone)
- Or some have specific site restrictions (Only spot spray Esplanade in hardscapes or parking lots)





# 7 Use Sites!

- Make sure the herbicide you are using can be used on the different sites
- Or switch products throughout the project
- This is where applicators may get cited



# Summary

- The label is the law, the applicator must follow all instructions on the label
- Herbicides are applied to weeds, and in order to spray an area, the 'use site' must be on the herbicide label
- The use site may be listed in multiple places on the label
- Use site language for wildlands can vary: natural areas, rangeland, open space, non-crop lands, ...
- Broad terms like "non-crop areas" can cover many wildland sites

## Summary Continued

- Watch out for restrictions: “Do not use on...”
- Watch out for omissions: if site not listed, can’t use herbicide there
- Applicators may need to use multiple products to cover all use sites on complicated projects (ROW, parking lots, natural areas, rangeland, aquatic, native plant landscapes, ...)
- Ask your local Ag. Comm. if you need any help, before you buy a product

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