



COUNTY OF SANTA CRUZ

OFFICE OF THE AGRICULTURAL COMMISSIONER

DAVID SANFORD

AGRICULTURAL COMMISSIONER
SEALER OF WEIGHTS AND MEASURES

SANTA CRUZ COUNTY PESTICIDE USE ENFORCEMENT WORK PLAN 2024-2026

Mission Statement

Our Mission is to serve the public's interest by ensuring equity in the marketplace, promoting and protecting agriculture, assuring environmental quality, and protecting the health, safety and welfare of Santa Cruz County's citizens.

COUNTY RESOURCES

PERSONNEL:

2021 - 2023

- 3 Agricultural/Weights & Measures Inspectors
- 1 Deputy Agricultural Commissioner
- 1 Agricultural Commissioner

SUPPORT STAFF:

Office Support: One clerical position provides assistance as necessary.

Data Entry: One clerical position provides data entry assistance as necessary.

During the course of the last work plan (2021-2023), our department underwent significant shifts in both staff and management which impacted programs throughout our office, including PUE.

Between February and December 2021, three of our Agricultural Inspectors departed for other job opportunities. Although none of these inspectors had worked directly or full-time in the PUE Division, their absence and periods between bringing on new staff meant that PUE inspectors were required to take on significant time covering other programs.

In March 2022, our most senior Agricultural Inspector accepted employment elsewhere, again necessitating that PUE staff cover work in other programs.

In June 2022, two Agricultural Inspectors from our PUE Division left our department. Both were top-level inspectors and were eventually replaced by entry-level inspectors in September 2022.

In February 2023, our Agricultural Commissioner resigned his position with our department to accept a job in another county. A new Commissioner was appointed by the County Board of Supervisors in June 2023.

In September 2023, a new Deputy Agricultural Commissioner overseeing the PUE Division was hired, replacing the outgoing Deputy (who had been formally appointed to the Commissioner position in June.)

RESTRICTED MATERIALS PERMITTING

1) PERMIT ISSUANCE:

Program Statistics			
Fiscal Year	2020-2021	2021-2022	2022-2023
Restricted Materials Permits			
Agricultural	269	300	181
Non-agricultural	4	4	4
Operator Identification Numbers	249	266	251

- Restricted Materials Permits and Operator Identification Numbers are issued by trained and licensed staff.
- Restricted Materials Permits are issued for periods of one to three years to property operators.
- The CalAgPermits program is used to issue all Restricted Materials Permits and Operator Identification Numbers.
- All permitted sites are evaluated prior to the issuance of the permit utilizing local knowledge of the sites and using aerial maps for reference. Each site is identified down to the field level using the mapping program built into CalAgPermits. Sensitive sites such as residential areas, schools and riparian areas are identified on site maps.
- CalAgPermits is also the program used for identifying impacted property operators and schoolsites and assisting permittees with the process of schoolsite annual notification (3 CCR 6690 – 6692).
- Inspectors ensure that permit applicants are qualified, typically through Private Applicator Certification, and applicants are aware of the hazards and requirements for the material(s) they propose to use.
- Before issuing a permit, the inspector reviews the applicant’s file for compliance history. Any recent violations are discussed with the applicant to ensure regulatory understanding and compliance in the future. CalAgPermits is also referenced by the inspector to ensure proper submittal of pesticide use reports (PURs).
- Permits are issued individually and require the scheduling of an appointment with an inspector of one to two hours. Inspectors discuss requirements of compliance with laws and regulations and help to answer any questions the permittee may have. Handouts are given to the applicant with further information regarding compliance with laws and regulations. Handouts of county-specific conditions for the use of specific restricted materials are also provided to the grower and discussed.
- Permittees are provided with the “Alternatives Considered – Restricted Materials Permit” form, which must be completed and submitted to our office for review prior to the permit being finally evaluated for issuance. Inspectors review the completed form once returned and follow-up with the permittee if questions or concerns are identified. The completed form is part of the permit, attached to the electronic version on CalAgPermits, and filed with the hardcopy of the signed permit.

- Notices of Intent (NOIs) for use of restricted materials are evaluated by a licensed inspector.
- Continuing education workshops on laws and regulations are provided to growers annually. The PUE staff also participates in providing regulatory updates at educational events organized by grower or industry groups.

Planned Improvements:

- Continue to update growers and permittees during the permit review and issuance process regarding frequent changes in laws, regulations, and conditions.
- Improve methods and means of communicating pertinent information with permittees throughout the year through email, text messaging, and updates to our department's website.
- Implement the relevant changes to the Private Applicator Certification and Training program, including outreach to growers regarding the requirements of the new examination and study guides, administer the new examinations and update certificate-holder information.
- Outreach focus and concerted efforts will be made to work with permittees who have not transitioned to submitting PURs and NOIs electronically through the CalAgPermits program to do so.
- The CalAgPermits program will be increasingly used as an electronic filing system for permits and permit-associated documents, in an effort to progressively move away from traditional office filing.

Goals and Projected Deliverables:

- Clear and effective updates to growers and permittees and their authorized representatives during the permit review and issuance process regarding pertinent changes to laws, regulations and/or conditions.
- Continue to effectively communicate with growers during the permit evaluation process on the necessity and importance of considering alternatives to restricted use materials and clearly outlining those on the required "Alternatives Considered – Restricted Materials Permit" form.
- Develop and modify field fumigant conditions that meet the needs of the permittee while fully accounting for all sensitive adjacent sites and potential environmental hazards, issue site-specific conditions on permits where necessary.
- Improvements to our information dissemination process to permittees and registrants throughout by utilizing email, text messaging and our department's website.
- Effectively implement the updated Private Applicator Certification and Training program processes, including administration of the new state exam as well as the supplemental exam (burrowing rodent pest fumigant use) where applicable, issuance and tracking of certificates, and outreach on continuing education requirements.
- Successfully communicate with and train permittees on the electronic submittal of PURs and NOIs through the CalAgPermits program.
- The CalAgPermits program will be increasingly used as an electronic filing system for permits and permit-associated documents, in an effort to progressively move away from traditional office filing.

- Work on department website updates and modifications in order to make information relevant to our PUE Division work easily available for review (and download) by permittees or the public.
- Ensure that inspectors attend regulatory training sessions presented by DPR.

Measures of Success:

- Permittees and their authorized representative understand the laws, regulations and/or conditions pertinent to their operations and this is reflected in reduced non-compliances during audits or inspections.
- Restricted materials evaluated for any issued permit are fully relevant for the operation and reflect the permittee and his/her authorized representatives having considered and documented alternative methods of pest control.
- Field fumigant use is properly evaluated and conditioned leading to safe and effective applications.
- Permittees, registrants, and the public receive relevant information from our department via direct outreach, email correspondence, text messaging and our department's website.
- The updated Private Applicator Certification and Training program is implemented and administered successfully.
- At an increasing rate, permittees submit PURs and NOIs through the CalAgPermits program.
- Reduced use of traditional (paper) filing methods for the Restricted Materials Permit (RMP) Program and movement to increased electronic filing of documents.
- Our department website is updated and modified to be more user-friendly and present improved interface options for both permittees and the public.

2) SITE EVALUATION:

Program Statistics

Fiscal Year	2020-2021	2021-2022	2022-2023
Notices of Intent	855	935	720
Pre-application inspections	87	176	126

- NOIs are received by fax, in person, through CalAgPermits; for field fumigants, NOIs are submitted to a specific department e-mail which is forwarded to all PUE inspectors.
- All NOIs are reviewed by a licensed inspector for accuracy, compliance with the permit, pesticide label and regulatory requirements, and environmental hazards. Denials of NOIs are documented and tracked.
- NOIs are required to be submitted for evaluation at least 24 hours before the application is intended to take place. NOIs for field fumigants are required to be submitted for evaluation at least 48 hours before the job is intended to take place. If a field fumigant will be used within one-quarter mile of any Pajaro Valley Unified School District campus, then the NOI must be submitted at least five days before the application in order for the school district to be notified by the CAC Office (per office policy).
- NOIs submitted for sites within ¼ mile of a schoolsite are evaluated for compliance with 3 CCR 6690 – 6692.

- Growers planning on using field fumigants containing chloropicrin, metam sodium/potassium, or methyl bromide (quarantine/pre-shipment exempted use only) are required to submit a Fumigation Work Plan (FWP) for evaluation before an NOI can be submitted. The FWP is evaluated by an inspector for compliance with County conditions specific to the material being used. The FWP must include a detailed map of the area to be treated including surrounding sensitive areas, a breakdown of the blocks that will be fumigated, the name of the material to be used, application rates, approximate dates of fumigation, buffer zone size for the proposed blocks, application method, brand of tarp to be used and proper determination of buffer zone credits when applicable. Evaluated plans are filed for future reference. Unclear or incomplete plans are returned for correction and re-evaluated by the inspector once the additional information has been provided.
- Emphasis is placed on the evaluation of Fumigation Work Plans (FWPs) for compliance with laws, regulations, conditions, and identification of sensitive areas. This is considered a high-priority activity. Thorough evaluation of FWPs can be time-consuming during the period of July through October, however essential site information captured on the FWP allows inspectors to prioritize available time for pre-application inspections of specific sites.
- Pre-application inspections are prioritized based on distance to sensitive areas, surrounding environment, application method, site history and pesticide hazard.
- For field fumigants that did not receive a phase 1 or phase 2 label change (e.g., Telone II), the required NOI must be submitted with an accurate map of the area to be treated and including distances to sensitive sites, occupied structures and potable wells near the application site.
- All field fumigant NOIs are carefully filed and tracked so that the office knows which sites are being treated on a daily basis. This helps to quickly identify sites that were not treated and will need to be rescheduled. This is also an effective way to get specific site information when responding to concerns from the public.

Planned Improvements:

- Ongoing review of existing sensitive sites adjacent to permitted agricultural properties and identification of new sensitive sites.
- Increased outreach efforts to encourage permittees to submit NOIs electronically through the CalAgPermits program. The submission of NOIs through CalAgPermits will become necessary once the state finalizes regulatory updates with respect to the statewide pesticide notification system.
- Maintain consistency among staff in the evaluation of NOIs and prioritizing pre-application inspections.
- Fumigation Work Plans are evaluated in a consistent manner among PUE inspection staff.

Goals and Projected Deliverables:

- Ensure that the CAC Office continues to maintain $\geq 5\%$ pre-application site inspection rate for submitted NOIs annually, as required by 3 CCR 6436.

- Continue to maintain a high level of quality and consistency on Fumigation Work Plan evaluations.
- Continue communicating with the local school district so that there is more awareness of the responsibilities of the Agricultural Commissioner's Office and requirements for use of restricted materials near schools.
- Work on training and outreach for permittees on the electronic submittal of NOIs.

Measures of Success:

- NOIs submitted by growers or their authorized representatives are clear, accurate and meet permit conditions.
- Pre-application site inspections occur at a rate of at least 5% annually.
- Increased awareness of sensitive areas near application sites, and increased grower awareness and compliance with laws and regulations.
- All Fumigation Work Plans submitted by permittees or their authorized representatives are reviewed and accurately evaluated in a consistent and timely manner.
- Field fumigant conditions are updated and modified to meet application safety requirements annually, and site-specific conditions are issued as necessary.
- Increased rate of permittees submitting NOIs electronically through CalAgPermits.
- Public understanding of the work of the Agricultural Commissioner's Office and increased confidence in the protections that are in place for the use of restricted materials near schools and sensitive sites.

COMPLIANCE MONITORING

1) Inspections:

Program Statistics

Fiscal Year	2020-2021	2021-2022	2022-2023
Inspections			
Applications	47	60	57
Mix/Load	3	11	8
Pre-application inspections	87	176	126
Records	5	13	10
Structural	10	2	2
Field worker	14	7	6

- Three licensed staff inspectors work in the department's PUE Division.
- New inspectors train with experienced staff and the PUE Program Deputy to gain experience and an understanding of the work.
- Inspectors consult with each other and the PUE Deputy to maintain consistency in interpreting and enforcing laws, regulations, and conditions.

- Staff conduct pesticide use monitoring inspections throughout the County; however, most agricultural pesticide use inspections take place in the South County area due to the predominance of production agriculture in the Watsonville-Pajaro Valley region and the high occurrence of agriculture-urban interface.
- Inspectors typically have assigned days to perform field monitoring activities. This provides for consistent field coverage and enforcement presence. Inspectors also conduct field activities on days when they are not assigned.
- Inspections are tracked so that staff are aware of the level of compliance found in the field and focus efforts on operators who have not been subject to recent inspection or have a history of non-compliance.
- Inspectors perform surveillance activities throughout the year to ensure random unannounced inspections of pesticide applications, pesticide mix/load operations, field fumigations and/or field worker pesticide safety.
- Prior to starting field surveillance activities, inspectors check at the office for any approved NOIs to determine where applications of restricted materials may take place.
- Inspection priority is given to applications near sensitive sites, applications of restricted or high toxicity pesticides and applications performed by operators who have a history of non-compliance.
- Pesticide use records/pesticide possession and storage inspections (headquarter audits) are typically performed during the off-season (late winter/early spring) and by appointment. Priority is given to permittees who have employees, operators who have not had an inspection in the past two years, and those with a history of non-compliance.
- Inspectors, the PUE Deputy, and the Agricultural Commissioner work closely with our assigned DPR Enforcement Branch Liaison to achieve program goals.
- The PUE Deputy attends the quarterly Coast Area Pesticide Enforcement Group meetings to share ideas and maintain consistency among Counties on enforcement of pesticide use laws and regulations.
- Since 2017, all inspection work has been conducted using the CalPEATS application with iPads in the field. Field inspection work is then synced with the primary CalPEATS program when inspectors return to the office.

Planned Improvements:

- Conduct additional pest control operation (PCO/PCB) headquarter audits (records and pesticide storage), licensed pest control advisor (PCA) and pest control dealer (PDM) records audits.
- Increase structural pest control inspection work where possible and have inspection staff gain additional experience in this area.
- Perform follow-up inspections where non-compliances have been found.
- Review field procedures, requirements, and program goals with staff periodically to ensure consistency in compliance monitoring activities.
- Use compliance inspection activities to conduct additional outreach to fieldworker employees and their supervisors regarding pesticide safety.
- Conduct additional headquarter audits on licensed commercial cannabis operators in possession of Operator Identification Numbers and with employee pesticide handlers.

Goals and Projected Deliverables:

- Continue to place the highest inspection priority on all pesticide applications that occur near schools and other sensitive sites.
- Focus inspection efforts on operators who have limited inspection history or have a history of non-compliance.
- Conduct compliance and outreach education to growers regarding new or updated state laws and regulations impacting pesticide applications.
- Educate growers on commonly found violations and measures that should be taken to mitigate these non-compliances.
- Perform operator headquarter/records inspections during off-season; focusing on the cannabis industry to ensure and understanding and compliance with laws and regulations.
- Ensure that inspections on the application of 1,3-dichloropropene field fumigants materials are performed in accordance with updated regulations.

Measures of Success:

- Grower/operator compliance with pesticide use laws and regulations.
- Reduced incidence of fieldworker pesticide application exposures.
- Reduced incidence of complaints relating to pesticide applications.
- Efficiency and consistency among staff in completion of inspection activities.
- Increased number of pesticide records and storage inspections.
- Increased number of structural pest control operation inspections.
- Increased number of inspections on licensed cannabis cultivation operations.

2) Investigations:

Program Statistics

Fiscal Year	2020-2021	2021-2022	2022-2023
Investigations			
Human Effects - Agricultural	2	2	7
Human Effects - Antimicrobial	5	7	1
Human Effects - Structural	0	1	2
Human Effects - Other	6	2	4
Environmental Effects	1	2	2
Property Loss Damage	1	0	0
Other	0	2	1

- Reports of possible pesticide illness are typically received from either the real-time or after-the-fact reporting of an incident to the CAC Office from an individual involved (supervisor, foreperson, worker, etc.); or information transmitted through DPR's Worker Health and Safety Branch (WHS). WHS investigation requests are transmitted to the CAC Office through secure notification on CalPEATS.

- Investigations of incidents that meet the criteria for a Priority episode as defined in US EPA/DPR/CACASA Cooperative Agreement are initiated within 3 working days of referral to the CAC Office.
- Currently all PUE staff inspectors are licensed to conduct investigations. Newer inspectors work closely with an experienced inspector or PUE Deputy for guidance on conducting investigations.
- Inspectors and the PUE Deputy consult with our assigned DPR Enforcement Branch Liaison when investigating Priority cases or certain other high-profile or complex cases.
- Inspectors follow the protocols outlined in the Department of Pesticide Regulation's Compendium Volume #5 – Investigation Procedures.
- The amount of time spent on an investigation can vary widely depending on the nature of the episode and the facts involved.
- Investigative reports are reviewed by the PUE Deputy; the Commissioner will also review reports on significant cases. These are submitted to WHS typically within required timelines, however when additional time is needed to complete the report an extension request is submitted to our Enforcement Branch Liaison.
- Complaints from the public and inquiries or concerns regarding pesticide use are received frequently. Often these are phone calls or emails and documented by the receiving inspector.

Planned Improvements:

- Monitor WHS investigation requests and ensure timely submittal of investigative reports to DPR.
- Ensure DPR form PR-ENF-127 (Pesticide Episode Investigation Report) is completed for all pesticide exposure cases, including episodes involving antimicrobial exposures.
- Provide guidance to newer inspectors to ensure investigative requirements are being met.
- Alert WHS in a timely manner of any possible illness reports submitted directly to the CAC Office from businesses or individuals.

Goals and Projected Deliverables:

- Complete effective and high-quality investigations and have corresponding reports submitted to DPR in a timely manner.
- For agricultural related illnesses, track and identify common scenarios and violations found during the investigation.
- Communicate information and findings of significant investigations to permittees and the regulated community with the goal of reducing potential future pesticide illnesses or exposures.

Measures of Success:

- Investigations are comprehensive and clearly identify any violations that were discovered.
- Completed investigative reports fully substantiate findings on which the Commissioner bases his decision to take or not take penalty actions.
- Inspectors are effective at completing investigations while prioritizing other program work which needs to be completed.

ENFORCEMENT RESPONSE

Program Statistics

Fiscal Year	2020-2021	2021-2022	2022-2023
Non-compliances	30	40	42
Warning Letters/Violation Notices	5	1	3
Agricultural Civil Penalties	8	10	5
Decision Reports	8	3	5
Referrals to DPR	0	0	0

- Inspections are performed by staff who are trained and licensed to complete pesticide use enforcement activities.
- Inspectors document all violations.
- Inspectors are consistent in enforcing pesticide laws and regulations. PUE meetings with the Deputy and staff are held regularly to discuss relevant issues and will often include the Commissioner. The PUE Deputy is available to answer questions, interpret regulations and provide guidance to inspectors.
- Violations are evaluated by the inspector for possible enforcement action using the Enforcement Response Regulation. Inspectors determine the class of the violation and review the operator's history to determine if there have been violations in the County during the previous two years. Inspectors, in consultation with the Deputy, determine the appropriate compliance or enforcement action according to the Enforcement Response Regulation.
- Written documentation on violations and their disposition is (e.g., Notices of Violation, Warning Letters, Decision Reports, Notices of Proposed Action) are reviewed and finalized by the PUE Deputy.
- Compliance interviews with an operator found in violation are done if it is assessed that such an interview is warranted.
- If the decision is to recommend an enforcement action, a Notice of Proposed Action (NOPA) is prepared. NOPAs are generated in a standard format which ensures efficiency and consistency. The format suggested by DPR is followed. NOPA outlines are produced by the inspector and finalized by the deputy. Completed NOPAs compiled along with the evidence in a case file and saved on the CalPEATS program.
- Once a NOPA case file is complete, it is reviewed by the deputy and subsequently reviewed by the Agricultural Commissioner prior to issuance. Upon issuance, the NOPA and any responses or other relevant documentation related to it are updated and managed in the CalPEATS program.
- NOPAs resulting from a Priority episode investigation are forwarded to DPR for review prior to issuance.
- An enforcement response is chosen that will most likely result in sustained compliance, with the most efficient use of resources. Special emphasis is placed on repeat violators. All appropriate enforcement options are considered before taking an action, including consultation with the District Attorney on Priority episode cases. If appropriate, cases may be referred to DPR for enforcement action.

Planned Improvements:

- Ensure PUE staff is consistent in following DPR guidance and timing requirements when preparing Decision Reports for cited violations.
- Continue to arrange for staff to receive DPR or CAC training related to enforcement and investigations, including administrative hearing preparation and hearing advocate training.
- In accordance with 3 CCR 6128(e), ensure that the District Attorney is notified of violations that may have occurred in relation to Priority pesticide incidents so that they can assess whether to participate in investigations and/or pursue a civil or criminal action.
- Pesticide use inspections on non-agricultural permit holders should try to be done once per year.

Goals and Projected Deliverables:

- Ensure all NOPAs issued are timely, appropriate, and consistent with the goals of the enforcement program.
- Track violation types and classes and share findings with growers and permittees in an effort to increase awareness of non-compliance trends.
- Periodically review the implementation of the enforcement program to ensure violations are being assigned to the proper class and appropriate penalties are being assessed.
- Ensure the Decision Reports are completed thoroughly and within the required timeline (60 days from initial citation of a violation) for submission to DPR.

Measures of Success:

- Timely completion of investigations and enforcement actions.
- Any Decision Reports issued meet the 60-day deadline for submittal to DPR.
- Non-compliances are closely evaluated and assigned to the proper violation class.
- Enforcement actions are appropriate and consistent with the goals of the program.
- Finalized NOPAs thoroughly cover all elements of the violation(s) being cited and provide the respondent the opportunity to read and fully understand the nature of the non-compliances.

PRIORITIES AND OTHER PESTICIDE REGULATORY ACTIVITIES

Soil Fumigants:

- Priority is placed on reviewing permitted agricultural sites that will have a field fumigant application (i.e., restricted fumigant materials containing active ingredients chloropicrin and/or 1,3-dichloropropene, or metam potassium). Growers or their authorized representatives are required to submit a field fumigation work plan for evaluation prior to submitting an NOI. Evaluation of fumigation work plans is a lengthy process that can require multiple communications between the inspector, the grower and licensed pest control advisers. Although the evaluation of fumigation work plans is a time-consuming process, it is essential in identifying sensitive areas where additional mitigation measures may be needed.
- DPR recommended conditions regarding soil fumigants are carefully evaluated and incorporated as part of county conditions after consideration of fumigant application methods in the county.
- County conditions for the use of soil fumigants are updated annually and whenever necessary. Revisions can occur before and/or during fumigation season.
- Growers and industry are informed of changes or updates to conditions and requirements for soil fumigants at annual meetings, and during permit issuance and/or registration process.
- The Agricultural Commissioner and PUE Deputy actively participate in meetings and conference calls with DPR and industry to discuss soil fumigant mitigation proposals.
- The PUE Deputy and staff participate in the annual Central Coast Pesticide Use Enforcement Roundtable meetings where information and ideas are shared between Counties on conditional requirements for use of agricultural soil fumigants.
- As additional conditions are implemented for straight 1,3-dichloropropene field fumigants beginning January 1, 2024, our office will work closely with growers and their authorized representatives to assure new requirements are understood and met.

Implementation of Additional 1,3-D Use Restrictions

- As of January 1, 2024, DPR's new 1,3-dichloropropene regulations pertaining to non-occupational exposure mitigation are effective and our office will be conducting outreach and communication to permittees and agricultural pest control businesses and advisors on these updates.
- Department staff have been reviewing the regulatory changes and the pertinent updates that may impact local agricultural operators. PUE Division staff will also be attending DPR hosted training on the new regulations to better understand implementation.
- The 1,3-D regulatory changes will lead to additional permit conditions issued by our office and an increase in field fumigation worksite plan and NOI review by staff, including potentially more time-consuming processes for pre-application site inspections.

Outreach to Public Schools:

- The Agricultural Commissioner's Office works closely with the local public-school districts to address concerns of pesticide use near schools.
- Any complaints received by school officials or members of the public regarding pesticide use near schools are high priority and quickly investigated.
- As of January 1, 2018, the regulatory requirements found in 3 CCR §6690-6692 have been fully enforced. The restrictions and notification requirements affect agricultural operators within 1/4 mile of schoolsites. CAC staff works with impacted permittees in ensuring that annual notification mandates are being met and enforces application restrictions.
- The CAC encourages communication between growers and officials of school properties that may be adjacent to production agricultural sites.
- The Pajaro Valley Unified School District (PVUSD) is notified at minimum five days in advance of any soil fumigations proposed within 1/4 mile of a district school. The information includes a summary of the application details, a copy of the NOI and a map of the area to be treated showing the approximate distance of the treatment site to the school.
- On multiple occasions the Commissioner has met with administrative officials of PVUSD, including the Superintendent and Safety Officer, and with representatives of the Teacher's Union to address concerns regarding the use of pesticides near schools and the use of soil fumigants.

Statewide Pesticide Notification System

- In 2022, Santa Cruz County was one of four counties that took part in DPR's pilot program for the implementation of the Statewide Pesticide Notification System which is currently in the latter stages of development and expected to be released by 2025.
- As the development of the statewide notification system continues and as the final version is released, our office will conduct outreach and education to the public and our permittees on how the system will operate.
- The release of the Statewide Pesticide Notification Systems is likely to prompt additional work among our PUE Division staff (e.g., answering questions from the public and growers; communicating with stakeholders and the public the function of the system and how it is used; inputting NOIs that may be submitted under exemption by methods other than CalAgPermits; etc.)

PUE and Cannabis Production

- Legalization of adult-use cannabis and the County ordinance allowing licensing and production has created the need for PUE activities and outreach to cannabis cultivation operations in the County.
- DPR considers cannabis to meet the definition of an "agricultural commodity" in 3 CCR § 6000, and therefore, any requirement placed on pesticide use on for the production of an agricultural commodity in Divisions 6 and 7 of the Food and Agricultural Code and its implementing regulations, applies to cannabis.

- Our office continues to do outreach and address questions from licensed cultivators in the county with respect to pesticide use issues and we aim to provide these growers with the most updated information on registered materials that have been assessed by DPR to be acceptable for use on cannabis.
- We have conducted joint outreach events in the past with the Santa Cruz County Cannabis Licensing Office, and plan to have additional trainings made available to licensed cultivators in the future with a focus on pesticide regulatory matters.
- The need for PUE enforcement activities for licensed cannabis cultivators, ranging from issuance of Operator Identification Numbers to field monitoring and compliance to records and safety inspections, has created an appreciable increase in staff workload. We remain committed to continue to work with cannabis cultivators and provide the information and education they need to successfully comply with agricultural pesticide use laws and regulations.

Continued Outreach and Communication

Participating in continuing education workshops and meeting with growers annually to renew their restricted materials permit or operator identification number are essential ways to communicate important information to growers. In addition, communication using email, text, and traditional mail correspondence are important methods of keeping our growers informed.

The CAC Office is continuing to upgrade our department webpage and views it as an essential tool for communication. Additional worksheets, forms, handouts, and links to relevant information have been made available on the webpage. We also continue our efforts for increased equity and inclusion by presenting information translated to Spanish on our website and in other communication methods such as email.

The Agricultural Commissioner's Office remains committed to continuing to meet with community groups to listen to their concerns regarding the use of pesticides. Meeting with community groups and organizations provides an opportunity to have open dialogue and inform the public about the role of the Agricultural Commissioner's Office and the pesticide use enforcement program.