

ATTACHMENT F

Agency Comments Received

1	Yolo County Ag Commissioner	August 19, 2024 and May 28, 2024
2	Central Valley Regional Water Quality Control Board	November 4, 2025

From: [David Guerrero](#)
To: [Jeff Anderson](#)
Cc: [Humberto Izquierdo](#)
Subject: FW: White Wolf, Miranda Gardens, Till Land Cannabis Use Permit
Date: Monday, August 19, 2024 9:17:10 AM
Attachments: [RFC ZF2023-043 White Wolf Miranda Gardens Till Land.pdf](#)
[RFC Packet ZF2023-043 White Wolf Miranda Gardens Till Land \(002\).pdf](#)

Hi Jeff,

Humberto and I met with Paul Long the land owner for the above proposed cannabis permit for Till Land, LLC and specifically the expansion of cannabis North of CR 12A

After discussion with Mr. Long Humberto and I are amenable to this permit moving forward if the changes that Mr. Long specified in our meeting are incorporated into the project. Those changes are as follows:

1. That a hedge/tree buffer be planted on the East side of the site North of CR 12 to provide a buffer to the Samara almond orchard
2. That all future growth on this site is in hoop houses
3. That a representative from Till Land, LLC develop a good neighbor policy with the Samara's and to explain their plan for cannabis growth on this particular site.

If those things are achieved then Humberto and I are fine with this proposal moving forward.

Dave Guerrero
AG

From: David Guerrero
Sent: Tuesday, May 28, 2024 9:55 AM
To: Jeff Anderson <Jeff.Anderson@yolocounty.org>
Cc: Humberto Izquierdo <Humberto.Izquierdo@yolocounty.org>; Molly Mathews <Molly.Mathews@yolocounty.org>
Subject: White Wolf, Miranda Gardens, Till Land Cannabis Use Permit

Hello Jeff,

Ag's comments are below for the proposed Cannabis Use Permit for White Wolf, Miranda Gardens and Till Land.

CLUO Sec.8-2.1406 (L)(11): Compatibility and Violations

The Yolo County Department of Agriculture opposes the **expansion of the proposed Till Land operation located to the North of CR 12** due to lack of buffers to the Almond Orchard owned by Samara Ranches. After speaking to the owner she is highly concerned about allowing a cannabis operation in such close proximity to her orchard as it could prevent her from conducting pesticide applications. Without these pesticide applications (mostly conducted using an orchard blast sprayer)

comes a loss of revenue to the owner and effectively could affect her “right to farm.”

CLUO Sec.8-2.1408 (B): Ag Maintenance Component:

No Concerns

CLUO Sec.8.2-1408(A): Pesticide Management Plan

Based on Section O of this plan all applicants are required to obtain an Operator ID through the department of agriculture prior to any application of pesticides. Pesticide use reports are required to be submitted by the 10th day of the month following the month of the pesticide application. Any employee who conducts pesticide applications is required to be trained and all records of this training must be kept on file by the applicant for a headquarters inspection by the Yolo County Ag Department. Employee pesticide handlers as well as fieldworkers are required to be trained by a certified applicator. Certified Applicators include private applicator certificates (PAC), Qualified Applicator Certificates (QAC), and Qualified Applicator License (QAL) holders. A PAC can be obtained through the Yolo County Department of Agriculture. Fieldworkers include employees that enter a treated area; which is defined as 30 days after a pesticide application. Any company hired to supply farm labor is required to be licensed as a Farm Labor Contractor and registered with the County Agricultural Commissioner’s office. All pesticides must be kept in a locked storage and the storage is required to be posted. Pesticides must be registered for use in California. You can verify that the product is registered on the Department of Pesticide Regulation’s website: <https://apps.cdpr.ca.gov/docs/label/prodnam.cfm> or by contacting the Yolo County Department of Agriculture. All pest control applications must comply with pesticide label instructions including: personal protective equipment, rate, and restricted entry intervals. Grandevo, listed in the pest management plan, requires respiratory protection. Employees that handle products requiring respiratory protection will need to be medically evaluated, fit tested, and trained on proper respirator use. All pesticide worker health and safety laws and regulations are required to be followed. Contact the Yolo County Department of Agriculture for further guidance.

CLUO Sec.8-2.1408 (KK) (3): Fencing/Screening

No Concerns

Dave Guerrero
Assistant Ag Commissioner
Yolo County

Humberto Izquierdo
Ag Commissioner/Sealer
Yolo County

From: [Anderson, Cole@Waterboards](mailto:Anderson_Cole@Waterboards)
To: longranches@yahoo.com; viviana.a.salas@gmail.com; djostrach@gmail.com; kokyou@yahoo.com; ericfliang522@icloud.com
Cc: Fried, Janae@Waterboards; Stoner, Kyle@Wildlife; Bosenko, Marissa L.@Waterboards; Jeff Anderson
Subject: Gaining Compliance (WDID 5S57CC402319)
Date: Tuesday, November 4, 2025 2:54:48 PM

CAUTION: External Sender. Please do not click on links or open attachments from senders you do not trust.

Hello,

My name is Cole Anderson, an Engineering Geologist at the Central Valley Regional Water Quality Control Board.

I've recently been in communications with Jeff Anderson from Yolo County, copied on this email, regarding the site covered by the [Cannabis General Order](#) enrollment, 5S57CC402319. This site is out of compliance with the requirements of your enrollment. Please see bullet list of items to correct below and the associated instructions and attachments in this email. Once the items have been corrected, I will inform Jeff that the site has been returned to compliance. Please let me know if you have any questions on how to complete these processes.

For clarification, it is our understanding that cannabis cultivation is only occurring on the southern portion (south of County Road 12A) of Assessor's Parcel Number (APN 054-100-017). For the purposes of this message, this southern portion will be referred to as 'Site' during the remainder of this message.

Items to Correct:

- From a review of aerial imagery of the Site, there appears to have been a Class III watercourse that intersected the property on the southern border and passed through the center of the Site headed north. This Class III watercourse has since been diverted via a ditch along the southern border of the parcel. Additionally, recent drone imagery provided by Yolo County shows what appears to be burn scar surrounding the southern ditch and irrigation channel to the west of the property. The burn scar within the riparian area poses an increased threat of sediment discharge to Oat Creek, a Class II watercourse that is hydrologically connected to both the southern ditch and western irrigation channel. The diversion of a watercourse without a Lake and Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW) is considered disturbance within the setback of a watercourse. Sites with items of disturbance within the setback are usually designated as High Risk until the disturbed areas have been remediated. High risk sites require the submission of a Disturbed Area Stabilization Plan (DASP) to be completed by a qualified professional that describes what measures will be implemented to stabilize the disturbed areas and comply with setback requirements ([see DASP guidance here](#)). Additionally, High Risk sites are invoiced at higher rates than low or moderate risk sites ([see Fee Schedule here](#)).
- **Please provide proof of consultation with CDFW for the diversion of this**

watercourse. CDFW Scientist, Kyle Stoner, is CCd on this email.

- A Site Management Plan (SMP) for this Site was submitted to us on 12/28/2018. This SMP is no longer accurate and will need to be updated. An updated SMP will be due 90 days from today (2 February 2025). Please also add erosion and sediment control measures to your site plans for the burn scar area and submit to me by email.
- A Nitrogen Management Plan (NMP) was submitted to us on 12/31/2018. Because the site's cultivation area will be increasing to 174,240 SF, an updated NMP will also need to be submitted, due 90 days from today (2 February 2025).
 - **See Technical Report instructions here ([SMP Guidance](#)) ([NMP Guidance](#)) and submit an updated SMP and NMP.**
- This Site is enrolled as a Tier 2, low risk site; Cultivation Area covered: 87,120 SF.; Disturbed Area covered: 120,000 SF;
 - **Please submit a Change Of Information Form (COI) ([See COI Form here](#)) to update cultivation and disturbed areas *before* Site development begins.**
- Paul Long (landowner), David Ostrach (White Wolf Farms), and Viviana Salas (Miranda Gardens) are the responsible parties we have on file. “White Wolf” and “Miranda Gardens” are listed as the Operator organizations for this enrollment. If landownership or operating parties have changed, please use the same COI form as described above to update the responsible parties. It is our understanding that a third party “Till Land” will be an additional operator on this property. This addition of a new operator must be indicated on the COI form described above.
 - **See COI instructions below.**
- No Annual Reports for this Site have ever been submitted. 2019, 2020, 2021, 2022, 2023, and 2024 Annual Reports are missing.
 - **See Annual Monitoring Report instructions below.**

Technical Report Instructions

The Site Management Plan (SMP) and Nitrogen Management Plan (NMP) should demonstrate

that your site will meet the requirements listed in [Attachment A](#) of the [Cultivation Policy](#). I have linked our SMP and NMP guidance documents; these can also be found in Attachment D of the [Cannabis General Order](#). You do not need to hire a professional to complete these reports, although you are certainly welcome to do so.

There is a mostly-multiple-choice survey in the Cannabis Cultivation Program Application Portal (link on our [Program Website](#)) to complete the SMP and NMP online. Once you've logged into the Portal, click "Create New Survey" and select the survey for "General Order Technical Reporting". This survey will take you through all the necessary questions to give us the information we need about your site.

Please let me know if you have any further questions and submit the SMP and NMP ASAP to return your site to compliance with the [Cannabis General Order](#) and [Cultivation Policy](#) of which you are enrolled.

COI Instructions

I have linked our [Change of Information \(COI\) Request form](#) to this email. Please check all boxes that apply for changes on the top of the first page and follow the instructions for which subsequent sections to complete. You will have to use page 2 twice if you are changing both operator and landowner parties. If changing parties, make sure both the former and the new parties sign in Section V. If changing the cultivation area or disturbed area, please also submit a map showing how you obtained the new numbers.

Marissa Bosenko, copied on this email, will be helping to process your COI once received, and may have additional questions or clarifications required. If you think your request may not be clear, feel free to add your own page to the document to clarify. Or clarify in an email by replying-**all** to this message. Please let us know if you have any further questions and submit the filled out and signed PDF back to us by replying-**all** to this email.

Annual Monitoring Report Instructions

Every year between January 1st and March 1st, you will need to complete an annual monitoring report about the previous calendar year. You can create a new account or log in with the original account to submit the annual reports. Please go to <https://public2.waterboards.ca.gov/>, and either Log In or click on "Register" and create a new account. Then you will "Create New Survey" for "Online Cannabis Water Quality Monitoring & Reporting Program". This is a multiple-choice survey about your site, the BMPs you've installed, and any issues you may have encountered during the *previous* year. You will need to know the WDID for your site. This can be found on the top right of your Notice of Applicability (NOA) and in the subject line of this email.