



California Regional Water Quality Control Board, Central Coast Region

Esta carta es un aviso de infracción y **REQUIERE UNA ACCIÓN INMEDIATA.**
Para obtener ayuda en español, llame al: (916) 341-5254.

February 3, 2026

9500 Cultivators LLC
William Terry, Responsible Party
5156 McGrath Street, Suite 103
Ventura, CA 93005
Email: william@venterrafarms.com

**VIA CERTIFIED MAIL and
ELECTRONIC MAIL
7019 1640 0000 7909 6566**

FF 9500 LLC
William Terry
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Ventura, CA 93003

**VIA CERTIFIED MAIL
7019 1640 0000 7909 6559**

Farming First Holdings LLC
William Terry
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Ventura, CA 93003

**VIA CERTIFIED MAIL
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9500 Cultivators LLC, FF 9500 LLC, Farming First
Holdings LLC
Eric S. Jones, Agent for Service of Process
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Westlake Village, CA 91361

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Stone Blossom Capital LLC
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FF 9500 LLC, 9451 Cultivators LLC, and 9500
Cultivators LLC
William Terry
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**ENFORCEMENT PROGRAM: 9500 CULTIVATORS LLC, 9500 BATCHELDER
ROAD, LOS ALAMOS, SANTA BARBARA COUNTY, WDID 3_42CC428992 –
NOTICE OF VIOLATION OF THE CANNABIS GENERAL ORDER, TRANSMITTAL**

OF INSPECTION REPORT, AND REQUIREMENT TO SUBMIT A DISTURBED AREA STABILIZATION PLAN.

Site:	Farming First, LLC
Site Address:	9500 Batchelder Road
Site APN(s):	099-010-060

The purpose of this letter is to notify the recipients of this letter of alleged violations of the Cannabis General Order and actions required to resolve the alleged violations.

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with the responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board regulates discharges from cannabis cultivation activities in the Central Coast region to protect surface water and groundwater by requiring enrollment in the State Water Resources Control Board (State Water Board) Order No. WQ-2019-0001-DWQ, *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (Cannabis General Order).¹ The Central Coast Water Board has authority to require submission of information, direct discharger actions, levy penalties, and bring legal action when necessary to protect water quality.

Cannabis cultivation and associated activities are subject to regulation by the Central Coast Water Board, pursuant to the California Water Code and, unless exempted, must be permitted under the Cannabis General Order. Cultivators and landowners of land used for cannabis cultivation are required to comply with the terms and conditions of the Cannabis General Order and Attachment A: *Cultivation Cannabis Policy Principles and Guidelines for Cannabis Cultivation* ([Cannabis Cultivation Policy](#)),² so that waste discharges from cannabis cultivation do not cause or contribute to pollution to waters of the state. Landowners and/or cultivators are responsible for any water quality degradation that occurs on, or emanates from, their property.³

Pursuant to California Water Code section 13350, the Central Coast Water Board may impose administrative civil liability of up to \$5,000 for each day a violation occurs. The Central Coast Water Board reserves the right to take any enforcement action authorized by law.

¹ The Cannabis Order is available at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2023/wqo2023-0102-dwq.pdf

² The Cannabis Cultivation Policy is available at:

https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/policy/final_cannabis_policy_wit_h_attach_a.pdf

³ See Cannabis Policy, Attachment A, Section 1, Term 36.

The following table includes a summary of the alleged violations of the Cannabis General Order and corrective actions required to abate the alleged violations.

Requirement	Timeline	Action
If any contact information in this letter is incorrect	Within 10 business days of the date of this letter	<ul style="list-style-type: none"> Send email to the following contacts and provide current contact information for all landowners and cultivators: aaron.katona@waterboards.ca.gov and CentralCoast.Cannabis@waterboards.ca.gov
Cease unauthorized activities (alleged violations). Address and document each of the alleged violations listed below	Immediately	<ul style="list-style-type: none"> Cease unauthorized activities (see alleged violations listed below). Submit documentation and evidence showing that the Discharger addressed the alleged violations listed below to: aaron.katona@waterboards.ca.gov and CentralCoast.Cannabis@waterboards.ca.gov
Develop and submit a Disturbed Area Stabilization Plan (DASP)	Within 60 calendar days of the date of this letter	<ul style="list-style-type: none"> Submit the Disturbed Area Stabilization Plan (DASP) to: aaron.katona@waterboards.ca.gov and CentralCoast.Cannabis@waterboards.ca.gov Implement DASP immediately upon approval by the Central Coast Water Board.

Requirement to Provide Correct Site Contact Information

Pursuant to the Central Coast Water Board's April 19, 2021 Notice of Applicability, 9451 Cultivators LLC and 9500 Cultivators LLC, are cannabis cultivators and responsible parties for compliance with the requirements and terms of the Cannabis General Order and were assigned waste discharge identification (WDID) 3_42CC428992. Additionally, pursuant to the California Water Code any person or entity who has discharged or discharges waste into waters of the state in violation of any waste discharge requirement or board order, or who has caused or permitted, causes or permits, or threatens to cause or permit waste to be discharged or deposited where it is, or probably will be discharged into waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall take remedial action to cleanup and abate the effects of the discharge.

Based on records available to the Central Coast Water Board, the recipients included in this Notice of Violation have the legal authority and responsibility to correct the alleged violations at the Site and abate the discharges and threatened discharges identified in this Notice of Violation. The Central Coast Water Board reserves its right to subsequently add additional responsible parties if/when those parties are identified.

If any contact information included in this letter is incorrect, you must contact the Central Coast Water Board, Cannabis Program **within ten business days of the date of this letter** via email at aaron.katona@waterboards.ca.gov and

CentralCoast.Cannabis@waterboards.ca.gov. In the email include the following email subject heading: “*Incorrect Contact Information – WDID 3_42CC428992*”. If the Cannabis Program does not receive a response regarding incorrect contact information, the contact information in this letter is assumed to be accurate.

Inspection Report Transmittal

On June 19, 2025, Central Coast Water Board staff, with California Department of Fish and Wildlife scientific staff and Department of Cannabis Control staff conducted an inspection of the Site. Central Coast Water Board staff’s observations are documented in the Inspection Report (Attachment 1 to this letter).

Alleged Violations

During the June 19, 2025 Site inspection of 9500 Batchelder Road, Central Coast Water Board staff observed the following alleged violations of the Cannabis General Order, and the requirements for cannabis cultivation (terms listed in the Cannabis Policy). Details of the alleged violations are described below.

Violation 1 – Violation of the Cannabis Policy, Attachment A, Section 1, Term 26: Except as allowed and authorized in the Cannabis Policy, cannabis cultivators shall not discharge: irrigation runoff, tailwater, sediment, plant waste, or chemicals to surface water or via surface runoff.

The Central Coast Water Board finds that based on the Site conditions, surface runoff containing irrigation runoff, sediment, plant waste, and/or chemicals originating from the cannabis cultivation area has been discharged and has the potential to continue to be discharged to waters of the state (i.e., the riparian setback and a watercourse, which is a tributary to San Antonio Creek). (Attachment 1 to this letter - Site Map and photos 6-18).

Violation 2 – Violation of the Cannabis Policy, Attachment A, Section 1, Term 27: Unless authorized by separate waste discharge requirements, the following discharges are prohibited: any waste that could affect the quality of waters of the state.

The Central Coast Water Board finds that based on the Site conditions, surface runoff containing waste from the cannabis cultivation activities that could affect the quality of waters of the state has been discharged and has the potential to continue to be discharged in a manner that could affect the quality of waters of the state.

Violation 3 – Violation of the Cannabis Policy, Attachment A, Section 1, Term 37: Cannabis cultivators shall comply with the minimum riparian setbacks described for Watercourse Classes⁴ for all land disturbance, cannabis cultivation activities, and facilities (e.g., material or vehicle storage, petroleum powered pump

⁴ **Watercourse** is defined in in Attachment A of the Cannabis Policy (Definition 100) as “a natural or artificial channel through which water flows and defined riparian setback width based on the type (Class category) of the watercourses.”

locations, off-stream water storage areas, and chemical toilet placement). If the cannabis cultivation site cannot be managed to protect water quality, the Executive Officer of the applicable Regional Water Board may revoke authorization for cannabis cultivation activities at the cannabis cultivation site.

The Central Coast Water Board has determined, based on the Cannabis Policy definition, that the watercourse on the Site (a tributary to San Antonio Creek) is a Class II intermittent watercourse.⁵ The Cannabis Policy, Section 2 (Term 37), establishes 100 feet as the minimum riparian setback for a Class II intermittent watercourse.⁶ The Central Coast Water Board finds that based on the Site conditions, Dischargers are in violation of the minimum riparian setback requirement of 100 feet for a Class II intermittent watercourse.

Violation 4 – Violation of Cannabis Policy, Attachment A, Section 2, Term 8: Cannabis cultivators shall use appropriate erosion control measures to minimize erosion of disturbed areas, potting soil, or bulk soil amendments to prevent discharges of waste.

The Central Coast Water Board finds that based on the Site conditions, appropriate erosion control measures are **not** being used to minimize erosion of disturbed areas which caused surface runoff containing irrigation runoff, sediment, plant waste, and/or chemicals originating from the cannabis cultivation area has been discharged and has the potential to continue to be discharged the riparian setback⁷ (Attachment 1 to this letter - Site Map and photos 6-17).

Violation 5 – Violation of the Cannabis Policy, Attachment A, Section 2, Term 10: Cannabis cultivators shall incorporate erosion control and sediment detention devices and materials into the design, work schedule, and implementation of the cannabis cultivation activities. The erosion prevention and sediment capture measures shall be effective in protecting water quality. Maintenance of all erosion protection and sediment capture measures is required year-round.

The Central Coast Water Board finds that based on the Site conditions, erosion control measures are **not** incorporated to effectively minimize erosion and/or capture sediment and monitoring, either has not occurred or did not inform the Dischargers' management decisions and maintenance of all erosion protection and sediment capture measures has **not** occurred year-round. (Attachment 1 to this letter, photos 10-14 and 17).

Violation 6 – Violation of Cannabis Policy, Attachment A, Section 2, Condition 63: Cannabis cultivators shall not disturb aquatic or riparian habitat, unless

⁵ **Intermittent watercourse (Class II)** is defined in in Attachment A of the Cannabis Policy (Definition 100) as a condition where "... water is flowing less than three months during a typical year and the stream supports riparian vegetation."

⁶ See Cannabis Policy, Attachment A, Section 1, Term 37. Riparian setbacks are measured in feet from the watercourse's bankfull stage (high flow water levels that occur every 1.5 to 2 years) or from the top edge of the watercourse bank in incised channels.

⁷ See Cannabis Policy, Attachment A, Section 2, Terms 63 and 64: Riparian and Wetland Protection and Management.

authorized under a Clean Water Act (CWA) section 404 permit, CWA section 401 certification, Regional Water Board Waste Discharge Requirements (when applicable), or a CDFW Lake and Streambed Alteration Agreement.

The Central Coast Water Board finds that based on the Site conditions, erosion caused by surface runoff originating from the cannabis cultivation area is occurring, has the potential to continue to occur, and is disturbing and has the potential to continue to disturb aquatic and riparian habitat. (Attachment 1, photos 12, 14, 16-17).

Violation 7 – Violation of Cannabis Policy, Attachment A, Section 2, Condition 131: Cannabis cultivators shall stabilize all disturbed areas to control erosion and sediment discharges from land disturbance.

The Central Coast Water Board finds that based on the Site conditions, all disturbed areas are not stabilized to control erosion and sediment discharges from land disturbances created by channelizing surface runoff from the cannabis cultivation area. (Attachment 1 to this letter- Site Map and photos 8-10).

Actions to Resolve the Alleged Violations

The Discharger must immediately cease all unauthorized activities, address the alleged violations of the Cannabis General Order, and respond to the Central Coast Water Board with documentation and evidence showing that the alleged violations described above have been addressed.

Email all documentation and evidence to: aaron.katona@waterboards.ca.gov and CentralCoast.Cannabis@waterboards.ca.gov

High Risk Designation

The Cannabis General Order classifies Tier 1 and Tier 2 sites as High Risk if any part of the disturbed area exists within the riparian setback limits of a watercourse.⁸ The Cannabis Cultivation Policy defines Land Disturbance as “Land areas where natural conditions have been modified in a way that may result in an increase in turbidity in water discharged from the site.”⁹ Disturbed land includes areas where natural plant growth has been removed whether by physical, animal, or chemical means, or natural grade has been modified for any purpose. Land disturbance includes all activities whatsoever associated with developing or modifying land for cannabis cultivation related activities or access.

Based on the Site conditions, the Central Coast Water Board designates the Site as High Risk because natural conditions have been modified by land disturbance activities associated with cannabis cultivation within the 100 foot riparian setback of an

⁸ See Cannabis General Order, condition 10.c, page 5 and Cannabis Policy, Risk Determination (pages 18-22).

⁹ Land Disturbance is defined the Cannabis Policy, Attachment A (Definition 51).

intermittent watercourse.¹⁰ The Central Coast Water Board makes this determination after inspecting the Site on October 10, 2024, and June 19, 2025.

High risk site classification is a temporary condition that exists until the Dischargers stabilize the disturbed area located within the setback. Once the area is stabilized and the Central Coast Water Board approves the work, the Dischargers can petition the Central Coast Water Board to reclassify the site as either low or moderate risk, depending upon the site conditions.

Requirement to Submit a Disturbed Area Stabilization Plan

The Cannabis General Order requires that Tier 1 or 2 cannabis cultivators with any portion of the disturbed area existing within a setback shall submit a Disturbed Area Stabilization Plan (DASP) to the Regional Water Board Executive Officer.¹¹

Pursuant to the Dischargers enrollment in the Cannabis General Order, **within 60 calendar days of the date of this letter**, submit a DASP describing how compliance with the Class II intermittent watercourse setback requirements will be achieved. The DASP must be submitted to the Central Coast Water Board and approved by the Central Coast Water Board's Executive Officer¹² prior to its implementation. The DASP must meet the minimum requirements for a DASP as described in the Cannabis General Order, Attachment D (pages D-13 to D.15) which defines the minimum requirements of a DASP.

The DSAP must be submitted electronically to the Central Coast Water Board, Cannabis Program to:

aaron.katona@waterboards.ca.gov and
CentralCoast.Cannabis@waterboards.ca.gov

¹⁰ See Cannabis Order, condition 10.c, page 5 and Cannabis Policy, Risk Determination (pages.18-22).

¹¹ See Cannabis Policy, Attachment A, Section 5, pages 72-73.

¹² See Cannabis Policy, Attachment A, Section 1, Term 32.

If you have any questions, please contact Central Coast Water Board staff, Aaron Katona at aaron.katona@waterboards.ca.gov or (805) 542-4649.

Sincerely,

**Angela
Schroeter**

Angela Schroeter
Assistant Executive Officer

 Digitally signed by Angela
Schroeter
Date: 2026.02.03 11:33:17
-08'00'
Water Boards

Attachment

Attachment 1: Cannabis Water Quality Inspection Report - dated June 19, 2025, for Farming First LLC at 9451 and 9500 Batchelder Road

Resources

For general information about the State Water Board's Cannabis Cultivation Regulatory Program, including enrollment and program information and resources, please visit: https://www.waterboards.ca.gov/water_issues/programs/cannabis/.

For more information about the Central Coast Water Board's Cannabis Cultivation Regulatory Program, including guidance on submitting technical reports, please visit https://www.waterboards.ca.gov/centralcoast/water_issues/programs/cannabis_cultivation/.

cc (via electronic mail only):

California Department of Fish and Wildlife

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Randy Rodriguez, Randy.Rodriguez@wildlife.ca.gov

Santa Barbara County

Petra Leyva, Petra@countyofsb.org

Department of Cannabis Control

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State Water Board Office of Enforcement

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Central Coast Water Board

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CIWQS Place ID: 868902

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