

# HUMBOLDT COUNTY GROWERS ALLIANCE

August 6, 2020

Humboldt County Board of Supervisors  
825 5th St. Eureka, CA 95501

RE: Approve Honeydew Ranch LLC, Humboldt County Planning Application #12256.

Dear Supervisors,

On behalf of the Humboldt County Growers Alliance (HCGA), we are writing to ask you to approve the Conditional Use Permit for Honeydew Ranch LLC, Application #12256, and deny the appeal.

HCGA represents nearly 275 permitted cannabis operations in Humboldt County, including the applicant, and several of the RRR applicants who are part of the project. I have personally met with the applicant, the agents for the project, and been to the site to see firsthand the land's current configuration and assess what is proposed.

The reasons HCGA supports the Honeydew Ranch LLC (the project) are:

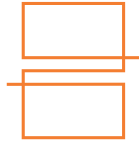
1. The project is located on land zoned Agriculture Exclusive.
2. Exemplifies the intent of the Retirement, Relocation and Remediation (RRR) program.
3. Meets and exceeds environmental conditions for approval under the CMMLUO.
4. Generates much needed tax revenue for the county.

Approving the Honeydew Ranch Project would authorize the applicant to continue existing cannabis operations, build necessary infrastructure—including a 3,000,000-gallon rainwater catchment pond, and become the receiving site for nine currently submitted RRR applications. The project, as currently envisioned, would allow for up to 4.73 acres of cultivation on Agriculture Exclusive lands in Honeydew, California. The project site would generate \$344,121 per year in Measure S tax revenue, as well as increased property taxes to the county as the land is improved.

## **Zoned Agriculture Exclusive**

The Honeydew Ranch Project is located on lands zoned Agriculture Exclusive (AE). The Humboldt County General Plan states,

"AE applies to bottomland farms and lands that can be irrigated; also used in upland areas to retain agricultural character. Typical uses include dairy, row crops, orchards, specialty agriculture, and horticulture. Residential subdivision is not supported. Residential uses must support agricultural operation. Allowable uses include General Agriculture, Intensive Agriculture, Agriculture & Timber Products, and residential accessory uses."



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The project's very nature is to reinvigorate agricultural lands that were allowed to go fallow for decades, thus returning the property to its original purpose—commercial agriculture. It is understandable that rural neighbors got used to the sleepy, fallow fields, and maybe concerned that cannabis cultivation will change the character of the area. That being said, cannabis is now legal and regulated in California. The land in question is private property, it was sold on the open market, it is zoned for commercial agriculture, it had existing cannabis cultivation on-site, and several licensed cannabis operations surround it. The applicant's project, located at APN 107-272-005 is what the county intended to facilitate cannabis cultivation.

## **Out of the Forests and Onto the Farms—Retirement, Relocation, and Remediation (RRR)**

In 2015 and 2017, as the two Humboldt County land-use ordinances underwent public process and stakeholder participation, key themes surfaced. Specifically, the need to protect the forests, fish, and wildlife from inappropriately sited cannabis operations and incentivized the retirement, relocation, and remediation of those sites to relatively flat areas, zoned for commercial agriculture, and with prime ag soils. Humboldt County's RRR program serves to protect the environment; however, sometimes it comes with the cost of social conflict as cannabis operations become concentrated in areas that previously—due to prohibition—were not viable.

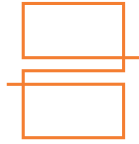
Honeydew Ranch would become the receiving site for nine RRR applications that total 180,000ft<sup>2</sup> (4.73 acres) of operations from Salmon Creek, Harris Ranch, Dutyville, and Sprowel Creek—all of which are designated as "threatened and impaired" watersheds by the Department of Fish and Wildlife.

Honeydew Ranch, LLC, and all RRR sites associated with the project entered the application process with Humboldt County Planning in 2015. Since then, restoration plans, grading plans, biological studies, wetland delineation, replanting plans, northern spotted owl studies, and a CEQA Study at the receiving site were completed. The restoration of three of the RRR locations has been finalized. One of these projects removed a total of seven abandoned vehicles, which were disposed of correctly. Hundreds of thousands of dollars spent to improve the environment, including miles of sediment delivering roadways, are decommissioned and stream crossings and points of diversions removed.

Honeydew Ranch is a group of farms coming together who would otherwise no longer be able to cultivate. This project is what the RRR portion of the County Ordinance CMMLUO was written to facilitate.

## **Environmental Protections**

The Honeydew Ranch Project has gone above and beyond, complying with the CMMLUO, CEQA, and all applicable state environmental and cannabis laws. The project applicant and the agents for the project understand what it means to be a good neighbor—which is why



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they continue to modify the plan and suggest additional mitigations further to reduce the impacts of the project on the community—while still allowing the project to move forward.

On October 3, 2019, Honeydew Ranch received County approval for a Conditional Use Permit (CUP) from the Humboldt County Planning Commission, authorizing up to six acres of cultivation. Since the Planning Commission's approval, the applicant has further reduced the footprint of the project from 6-acres to 4.73-acres (>25% reduction). The project's footprint uses less than 10% of the 40.2 acres of prime ag soils within the 49-acre parcel.

The applicant has submitted grading plans to Humboldt County Building Department for a 3,000,000-gallon rain catchment pond to achieve full forbearance from summertime diversions as a condition of approval. An Initial Statement of Water Diversion and Use was filed with the State Water Resources Control Board (SWRCB) and a signed Lake and Streambed Alteration (LSAA #1600-2016-0353-R1) was received from the California Department of Fish and Wildlife.

Electricity is provided by PG&E with plans to build a full solar system.

A Road Association for Old Hindley Ranch Road has been developed and will be maintained by local Honeydew contractor Bill Etters.

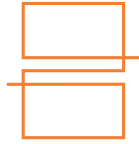
A non-profit organization has been developed for the Honeydew area for local fire suppression, stream and salmon restoration, and youth development with an endowment of \$20,000 deposited for local grants. Already \$5,000 has been donated to the Mattole Resource Center and \$5,000 to the Honeydew Volunteer Fire Department.

A native planting plan is being developed by Local Restoration Expert Hugh Mcgee to reduce the noise and create visual aesthetics for neighboring properties.

If any other commercial agriculture type was proposed for this land, it would be principally permitted—with fewer environmental protections than apply to cannabis operations in California. Authorizing cannabis cultivation will be the most environmentally mitigated and responsible commercial agriculture the land allows.

## Tax Revenue

Cannabis is one of Humboldt County's most significant industries for providing consistent tax revenue back to the county. The Honeydew Ranch project would provide \$344,124 per year into Measure S. Additionally, as the property is developed, increased property taxes will be assessed—generating new funds for roads, schools, and social services to the community. Given the state and county's economic realities since Covid-19, it makes financial sense to support and approve a project like the Honeydew Ranch Project.



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## In Conclusion

HCGA supports our members Honeydew Ranch, Mossy Stone Creek Farms, Mattola Farms, Mattole Meadows, Salmon Creek Farm, Lina Farms, Natural Ascent, SoHum Gardens, Big River Farm, and Hallowed Ground Farms in the advancement of their project. We commend the work of the County Planning Department, the Planning Commissioners, and the various state agencies that have weighed in to make this project functional for the environment and community. Approving a project such as this honors the development of two land use ordinances that include Retirement, Relocation, and Remediation program. The Honeydew Ranch LLC project is appropriately sited, has complied with all applicable laws, was approved by the Planning Commission, and now respectfully asks for your approval. Thank you for the opportunity to weigh in on this project.

Sincerely,

Natalynne DeLapp  
Operations Director  
Humboldt County Growers Alliance