

19 January 2022

To: Humboldt County Planning Commission
3015 H Street
Eureka, CA 95501

From: Thomas Crandall
1322 Kenwood Road
Santa Barbara, CA 93109

Subject: Record number PLN-12812-CUP; Ambiguity Farms; APN 223-011-009

Reference: Planning Commission Notice of 01/20/22 Public Hearing

Attachments: (a)hillshade map, (a1)hillshade map detail, (b)photo-SMP pg.45,
(c)photo-SMP pg.46, (c1)Streamside Mgmt Area map, (d)Cup map w/watershed

To the Humboldt County Planning Commission:

I own the land along the entire north boundary of the subject PLN-12812-CUP parcel. My land (as well as the subject parcel) is located entirely within the Tooby Ranch Agricultural Preserve and the Squaw Creek Watershed. This 3000-acre-watershed contains extensive dry-land-grazing resource lands (see attached hillshade map). My land (500 acres) is commercially-grazed as required by the Tooby Preserve/Contract.

Ambiguity Farms Williamson Act issues:

The Ambiguity-Farms-property (182 acres) is also under contract within the Tooby Preserve, but none of the land is used for commercial grazing. Ambiguity Farms is exclusively a cannabis farm: cannabis is the only agricultural commodity produced for commercial purposes. Under the Williamson Act Guidelines (Resolution 16-144), a cannabis farm is not allowed within a Class B preserve unless the majority of the land is used for commercial grazing. Ambiguity Farms' does not qualify for a cannabis Conditional Use Permit within this Class B preserve because cannabis is the sole agricultural commodity produced for commercial purposes.

I disagree with the *Executive Summary* statement that the "approval of this project will not conflict with the Land Conservation Contract"; this project directly conflicts with Resolution 16-144.

Available remedies for an owner who does not use the majority of the land for commercial grazing:

- Ambiguity Farms may qualify for a new contract for a Class A or C preserve under WA Guidelines 16-144, Section 1-Classes of Preserves, Paragraph F(4)-General Provisions.
- Ambiguity Farms may qualify for contract cancellation under WA Guidelines 16-144, Section 14-Termination of Contracts, Paragraph B-Cancellation.
- Ambiguity Farms can wait until the Tooby Contract terminates on 02/01/2026.

Ambiguity Farms Conditional Use Permit (CUP) issues:

The entire Squaw Creek watershed is under a Class-B-contract, either within the Tooby Ranch Preserve or Kinsey Ranch Preserve (see attached hillshade map). All the landowners within the Squaw Creek Watershed commercially graze their land, except Ambiguity Farms. There are no residents in the upper Squaw Creek Watershed, except at Ambiguity Farms. There is no development, ancillary use, or other activity within the entire Squaw Creek Watershed, except the haphazard substandard/unpermitted development at Ambiguity Farms (see attached photo, SMP pg.45).

The Squaw Creek Watershed is a relatively pristine drainage area which should be protected and preserved. Ambiguity Farms contains the convergence-point of the upper-basin-waters (see attached hillshade detail map). Parcel development and residential/farm activity are located primarily on the east bank of Squaw Creek and drain west-southwest toward Squaw Creek (see attached hillshade map). The sole source of pollutants within this watershed is the fertilizers, chemicals, petroleum, and sewage located at Ambiguity Farms; any CUP needs to minimize if not eliminate this environmental hazard.

On behalf of the Squaw Creek Watershed landowners, the following recommendations and/or restrictions are suggested for any eventual Ambiguity Farms cannabis CUP:

- Require an adequate renewable energy infrastructure to eliminate typical generator usage; ban diesel generators outright.
- Organic cannabis cultivation far away from the convergence-point is more appropriate. Cultivation site A/B/E is located directly above the Upper Squaw Creek convergence-point. This site is inappropriate to cultivate cannabis (or farm anything) as it drains directly into the gorge on all sides (see attached photo, SMP pg.46). This 182-acre parcel surely contains more suitable cultivation sites.
- Mixed-light greenhouse production is inappropriate (requires more soil, fertilizer, chemicals, energy, plastic, etc.). These intense multiple-cultivation-cycles generate multiple effluent/pollutant-cycles at the production site.
- Require residential development be brought up to code, especially sanitation (septic systems). Sanitation facilities are required for people involved in cannabis production. Per the *Cultivation and Operations Plan dated February 2018*, the Ambiguity Farms cannabis production workers include: the residents of the site (5+), daily employees (2), harvest employees (2-4). Sanitation facilities are therefore required in all residences and a workplace facility is required for up to six employees.
- No cannabis CUP approval without the required cannabis-worker sanitation facilities, inspected and certified by the County.

To summarize, this CUP property is located within a functioning agricultural preserve where commercial grazing is a contract-required land-use. In addition, this property is located deep within the pristine Squaw Creek Watershed (at the convergence point of the upper-basin-waters) and land stewardship is needed to protect the extensive waters flowing through the parcel.

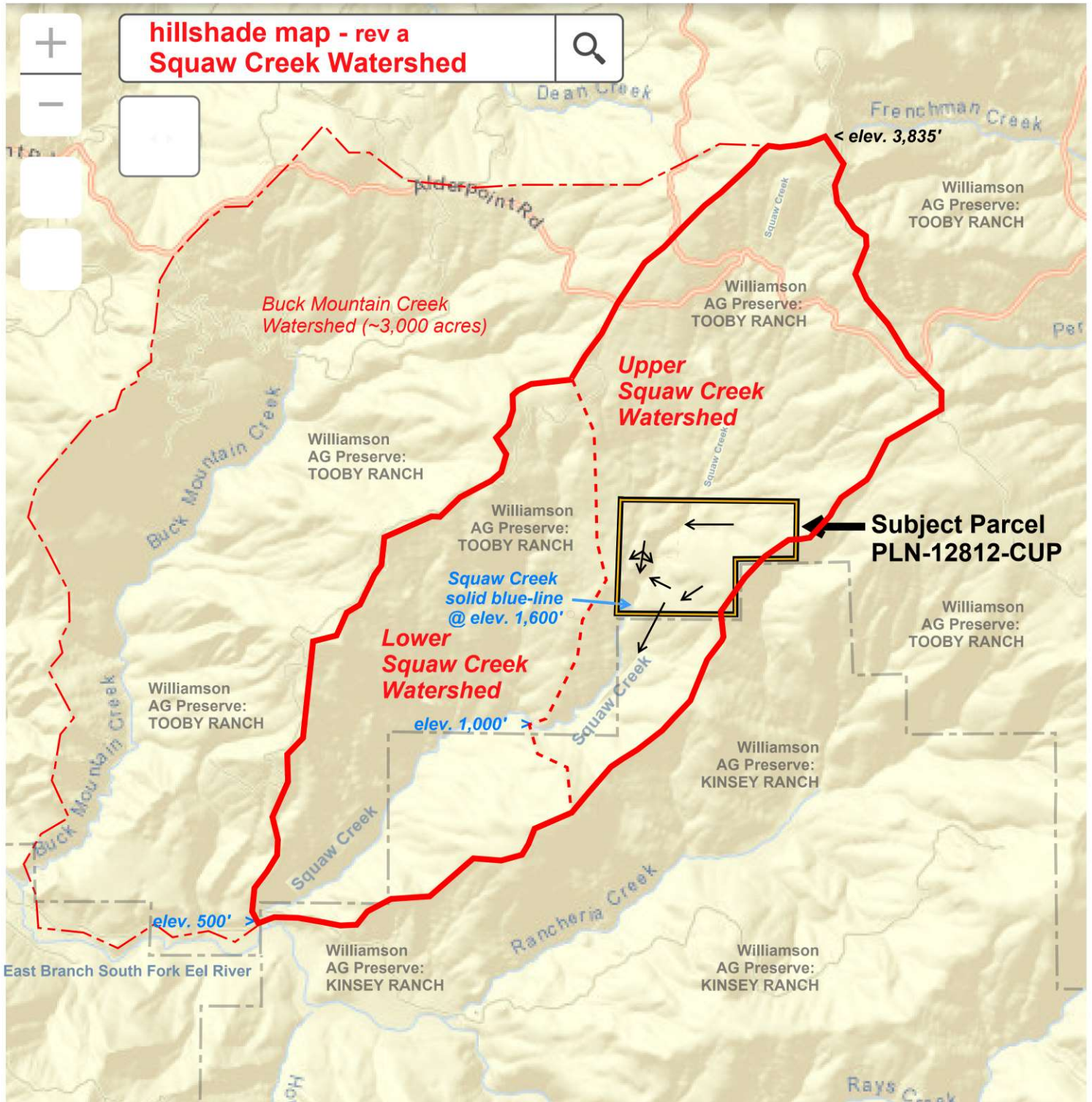
The other landowners within this grazing watershed rely on the County to protect this resource-land by enforcing the land conservation contract and by restricting inappropriate development. This Ambiguity Farms CUP for cannabis-only-Ag-production within the Tooby Preserve is barred by contract. In addition, the current cultivation plan is not a good fit considering this parcel's key location within the relatively pristine Squaw Creek Watershed.

Thank you for your consideration.

Respectfully,



Thomas P. Crandall, Tooby Ranch landowner

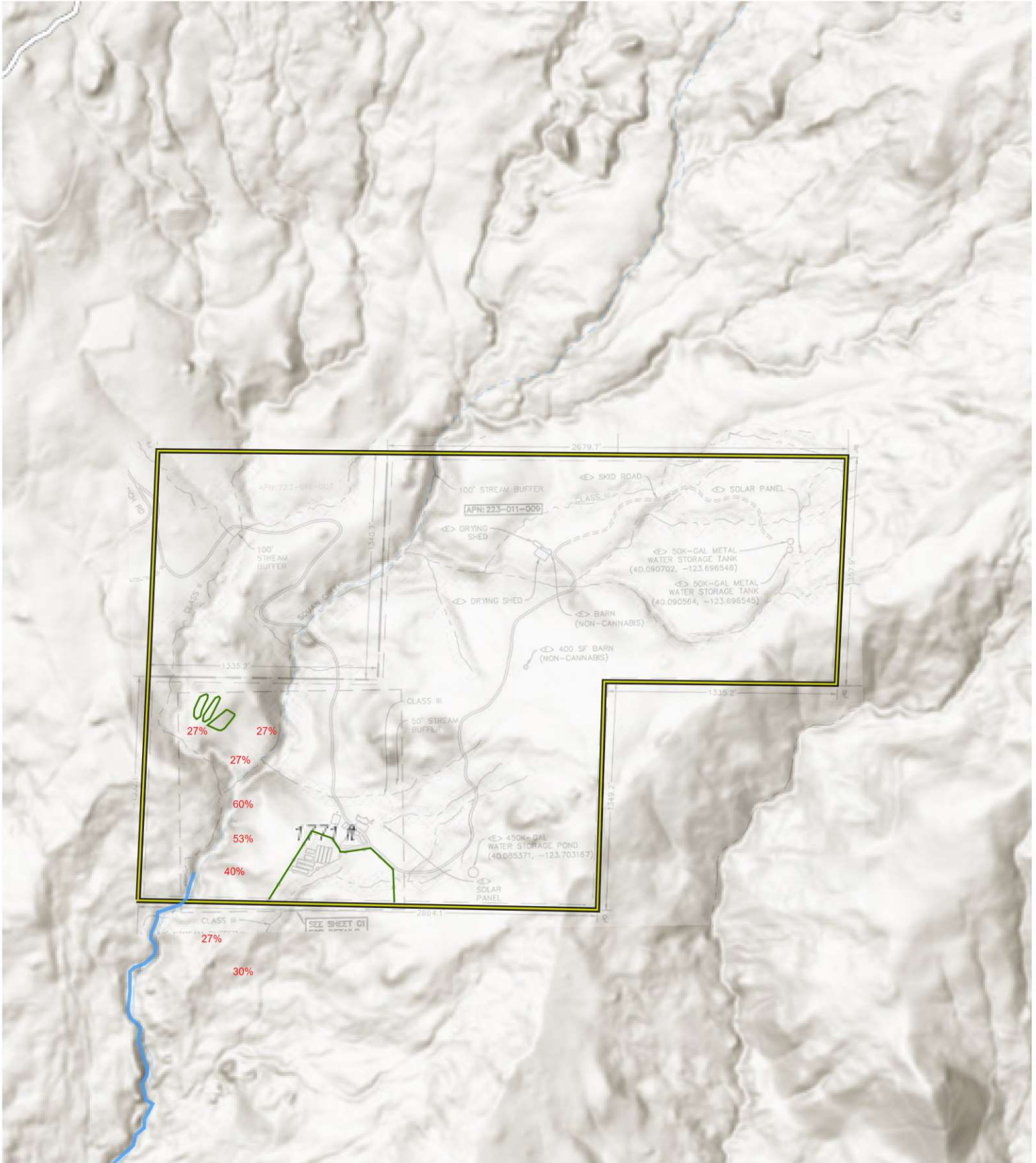


Squaw Creek Watershed corridor: ———
 Δ elevation: 3,835' - 500' = 3,335 ft
 ~ 4 miles long x ~ 1.5 miles wide
Watershed acres: ~3,000 acres (no TPZ)
 Upper Squaw Creek: ~1,600 acres
 Lower Squaw Creek: ~1,400 acres



-123.652 40.089 Degrees

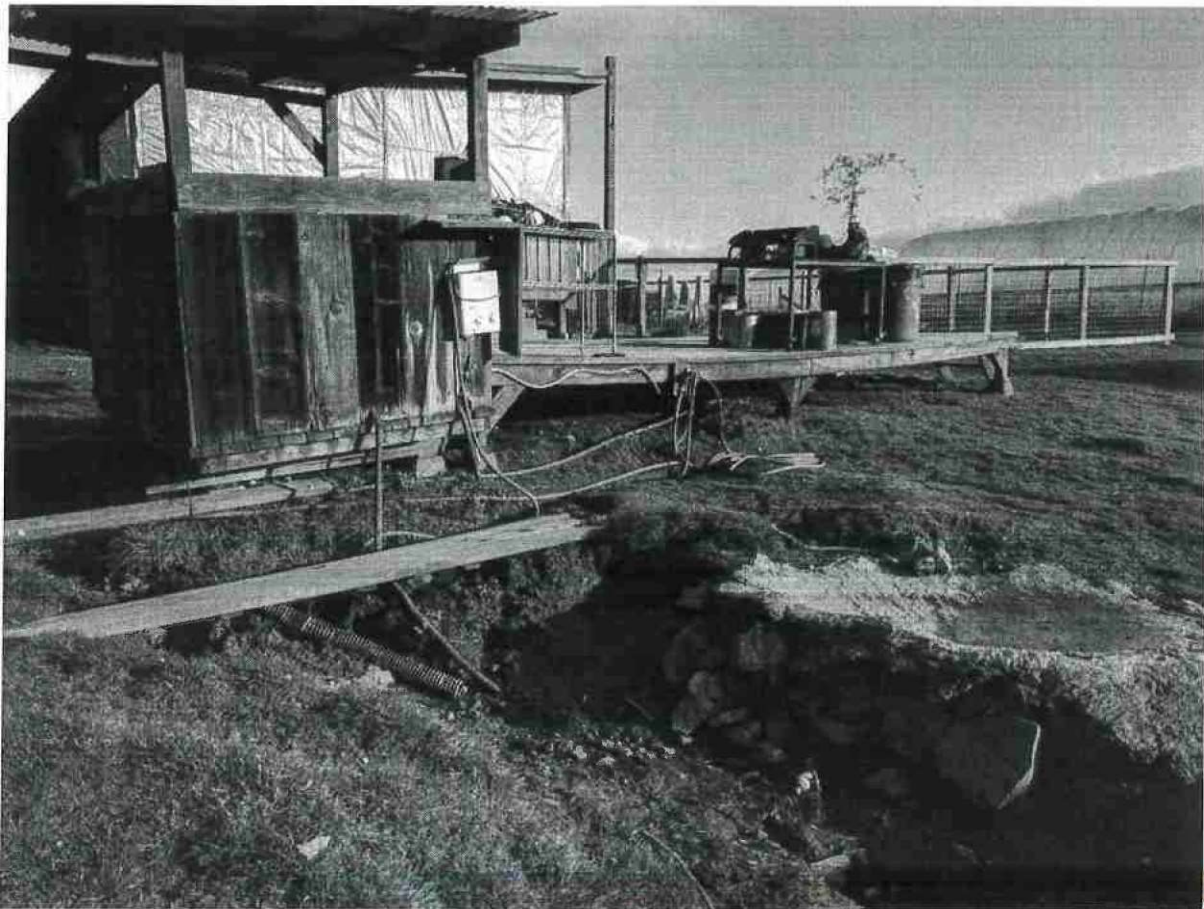
hillshade map detail: PLN-12812-CUP



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SMP pg. 45
Unpermitted Development
unsanitary waste water disposal

Photographs – Continued



Photograph #45– Structure within Class III watercourse riparian area; Upstream of SC8; Further consultation with county and state agencies to determine variance options

**SMP pg. 46
Cultivation Sites A, B, E
view south into Squaw Creek Gorge**

46

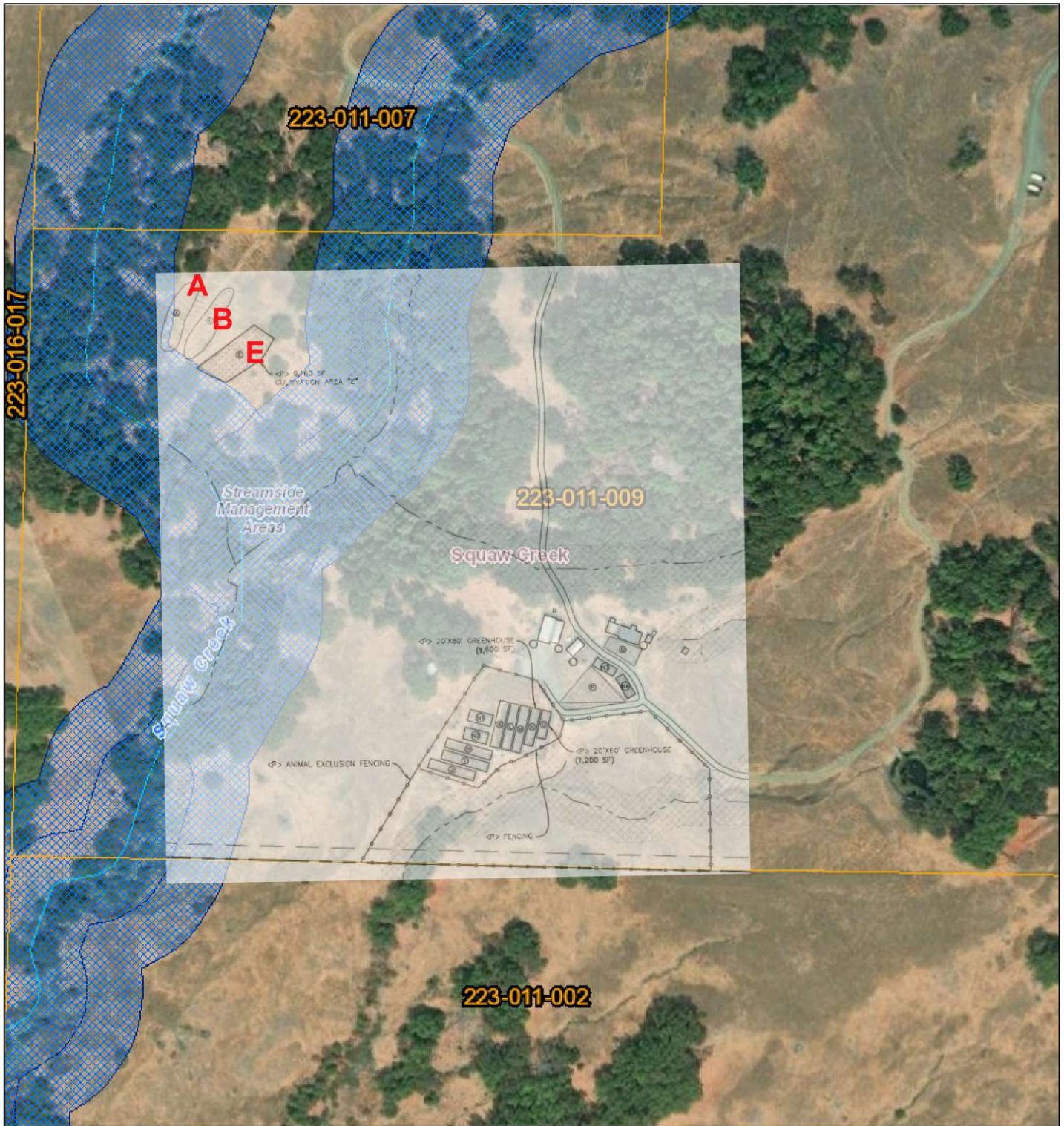
Photographs – Continued



Photograph #46– Outdoor cultivation area out beyond season road where SC11 is located



Streamside Management Areas: PLN-12812-CUP



ArcGIS Web Map

Humboldt County Planning and Building Department



- | | | |
|---------------------------|---------------------------|-------------------------------|
| Highways and Roads | — Private or Unclassified | — Intermittent |
| Principal Arterials | — Major River or Stream | — Subsurface |
| — Minor Arterials | Blue Line Streams | — City Boundary |
| — Major Collectors | — Perennial 1-3 | — Counties |
| — Minor Collectors | — Perennial >4 | — Parcels |
| — Local Roads | | — Streamside Management Areas |

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Web AppBuilder 2.0 for ArcGIS

Map Disclaimer:

While every effort has been made to assure the accuracy of this information, it should be understood that it does not have the force & effect of law, rule, or regulation. Should any difference or error occur, the law will take precedence.

Source: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, NRCS, Humboldt County GIS

CUP map with Squaw Creek Watershed overlay

