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October 4, 2023

Ms. Heidi Hall, Chairperson
Nevada County Board of Supervisors
c/o Clerk of The Board
950 Maidu Avenue, Suite 200
Nevada City, CA 95959

VIA HAND DELIVERY

Re: Objection to Permit relative to 14120 Thoroughbred Loop, Grass Valley, CA 95949

Dear Ms. Hall:

My office has been retained by certain neighbors affected by the application PLN20-0042; ADP20-2012. Please consider this their formal objection to the approval of same, on the following grounds.

The administrative approval process has disregarded vital prerequisites in the approval process resulting in a violation of personal property rights for my clients, Court and Megan Worden, and the entire 6B Ranch Estates community.

If the appeal process does not lead to the denial of the aforementioned commercial cannabis permit as a result of the requirements below not being satisfied, my clients have authorized me to explore litigation to protect their property rights.

One such failure is the granting of the above-referenced permit, despite:

- The absence of a permitted residence located on the parcel. A permitted, occupied, legally established residence is required for commercial cannabis cultivation pursuant to Land Use and Development Code Section L-II 3.30.
- The applicants have submitted a flawed construction timeline for the horse barn and proposed living quarters in order to expedite the permitting process, however previous property owners, who built the barns in question, have submitted multiple affidavits and pictures to Nevada County staff to debunk the false timeline and apartment addition. The previous owners, who sold the

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property in December of 2018 also attest to the lack of living quarters in the horse barn.

- Driveway parameters have not been met without the use of my client's property. My clients own a portion of the shared driveway and are entitled to 20' of the neighboring parcel by way of an easement prescribed on grant deed, V362 Pg74. The adjacent parcel, owned by Mr. Karim Mazu, does not have rights nor an easement to ingress/egress via the Worden parcel. Consequently, the approval of a commercial cannabis cultivation on this parcel violates federal criminal law when drug transportation occurs along the shared driveway.

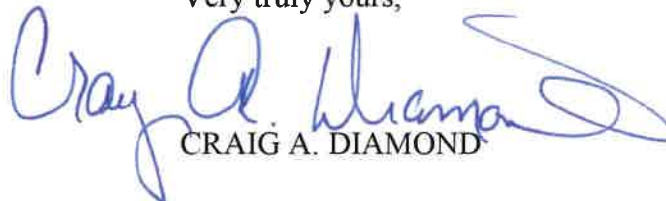
- The environmental impact of this project is egregious and deserves a full review under the California Environmental Review Act (CARE). The conditional approval of this project proposes a 10,000sq/ft commercial cannabis cultivation site at the confluence of two perennial waterways. Additionally, the project will include a septic line across one of the perennial waterways upstream from a popular swimming hole.

- We are informed and believe, the owner of the parcel for the approved commercial cannabis license owes in excess of \$30,000 to Nevada County. To add insult to injury, as a result of this 'Approval' the neighborhood taxpayers are required to pay \$1,803.61 to appeal to the Board of Supervisors to readdress the inaccuracies relied upon by the administrative agency associated with the recommendation for approval..

There is a long list of additional inconsistencies which require an immediate denial of this commercial cannabis permit. It is my hope litigation will not be necessary.

Thank you for your kind consideration of this matter.

Very truly yours,



CRAIG A. DIAMOND

CAD:dew
cc: Courtney Worden