



HUMBOLDT COUNTY
 PLANNING AND BUILDING DEPARTMENT
 CURRENT PLANNING DIVISION
 3015 H STREET, EUREKA, CA 95501 ~ PHONE (707) 445-7541



11/20/2018

PROJECT REFERRAL TO: Redwood National Park

Project Referred To The Following Agencies:

Building Inspection Division, Public Works Land Use Division, Health and Human Services Environmental Health Division, County Counsel, CalFire, California Department of Fish And Wildlife, Northwest Information Center, Yurok Tribe, Regional Water Quality Control Board, Humboldt County District Attorney, Humboldt County Agriculture Commissioner, NCUR Air Quality Control Board, SWRCB, Division of Water Rights, Humboldt County Sheriff, Klamath-Trinity Joint Unified School District, Redwood National Park

Applicant Name Circle G Farms, LLC **Key Parcel Number** 532-056-009-000

Application (APPS#) 12939 **Assigned Planner** Caitlin Castellano (707) 268-3731 **Case Number(s)** ZCC16-639
 SP17-086

Please review the above project and provide comments with any recommended conditions of approval. To help us log your response accurately, please include a copy of this form with your correspondence.

Questions concerning this project may be directed to the assigned planner for this project between 8:30am and 5:30pm Monday through Friday.

County Zoning Ordinance allows up to 15 calendar days for a response. If no response or extension request is received by the response date, processing will proceed as proposed.

If this box is checked, please return large format maps with your response.

Return Response No Later Than 12/5/2018 Planning Commission Clerk
 County of Humboldt Planning and Building Department
 3015 H Street
 Eureka, CA 95501
E-mail: PlanningClerk@co.humboldt.ca.us **Fax:** (707) 268-3792

We have reviewed the above application and recommend the following (please check one):

Recommend Approval. The Department has no comment at this time.

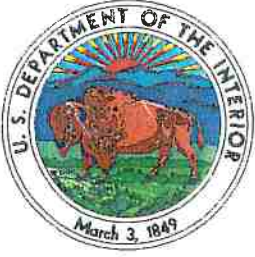
Recommend Conditional Approval. Suggested Conditions Attached.

Applicant needs to submit additional information. List of items attached.

Recommend Denial. Attach reasons for recommended denial.

Other Comments: _____

DATE: 11/28/18 PRINT NAME: Steven Mietz



United States Department of the Interior

Redwood National Park
South Operations Center
P. O. Box 7
Orick, California 95555



L7621

November 27, 2018

John H. Ford, Director
Attn: Caitlin Castellano
Humboldt County Planning and Building Department
3015 H Street
Eureka, California 95501

RE: Permit Application No. Apps # 12957, APN: 532-055-009, CUP16-933 AND Apps # 12939, APN: 532-056-009, ZCC16-639

Director Ford:

Redwood National Park's primary concern is the operation and transportation of cannabis within or adjacent to the jurisdictional boundary of the park. Additionally, the park has concerns related to potential impacts to the Lyons Ranches Historic District and Bald Hills Archeological District from the cannabis operation the County is currently in the process of permitting.

After discussing with the US Attorney's Office, the activities described in the permit would be in violation of Federal law or regulation including the Controlled Substances Act of 1970. The National Park Service (NPS) cannot allow the cultivation, production, transportation, or distribution of a controlled substance as defined in Title 21 of the United States Code Chapter 13 on federal lands. There is a strong federal interest to prosecute federal crimes on federal land within the jurisdictional boundary of Redwood National and State Parks, which include portions of Highway 101 and Bald Hills Road.

Furthermore, the Lyons Ranches Historic District was listed on the National Register of Historic Places earlier this year as a significant example of a family sheep ranching operation that spanned the nineteenth and mid-twentieth century. As stated in the National Register Nomination, the district is "largely devoid of modern intrusions" and has a high degree of historic integrity both within the district and in the surrounding setting. It was also found to be significant for its association to the Native American communities for the roles they played in

developing the ranch, as well as the role the ranches played in continuing Native American cultural practices. Any modern adjacent development visible from the historic district that is incongruous to the current setting would diminish the setting of the district and therefore could cause substantial adverse change to a historical resource under California Environmental Quality Act Law section 21084.1.

In addition, in 2017 the National Park Service documented the valuable and unique scenic resources of the Bald Hills in a report entitled Enjoy the View —Visual Resources Inventory Report: Redwood National and State Parks, Natural Resource Report. This report documented and rated the importance of twelve viewpoints along Bald Hills Road in 2014. The twelve surveyed points were analyzed for scenic quality and how important the view is to the park, with four points found to be “high” value and two points found to be “very high” value - the highest rating. Several of these viewpoints could be negatively impacted by increased development from cannabis operations, potentially deteriorating the scenic resources of Redwood National Park.

The park is concerned with the impact this proposed cultivation site will have on wildlife that make their home in the Bald Hills area. Cannabis cultivation, as proposed in this permit, attracts multiple species of wildlife, from herbivores to predators. Cultivators use various types of pesticides to produce marketable product. Poisons used to control small mammals or to protect product from grazing by larger mammals can sicken or kill wildlife directly. If these poisoned animals are preyed upon or eaten as carrion by other wildlife, the poisons can sicken or kill these animals as well. In addition, the park has proposed a condor release site in the Bald Hills to aid in the recovery of this highly endangered species, which could be impacted by this operation. Redwood National Park is also in the process of applying to become a designated Dark-sky Park with the International Dark-Sky Association in order to better preserve nighttime habitat for wildlife. A mixed light operation could have impacts on both nocturnal wildlife and Redwood National Park’s application to become a dark sky park.

Redwood National and State Parks attract millions of visitors a year expecting a safe and peaceful national park experience commensurate with the parks’ UNESCO World Heritage Site status. Currently, the National Park Service manages the backcountry regions accessed by Bald Hills Road as an area of the park for visitors to pull off the road to safely enjoy spectacular vistas and hiking. The activities outlined in the permits could have significant impacts upon visitor enjoyment and safety of the redwoods. The proposed permit includes the growing, drying, and processing of product on-site which will produce strong odors. The odors from this operation will impact visitors recreating in this area. In addition, cultivation sites may have a significant impact on visitor recreation and safety. Heavily armed guards provide security to these sites. The impact to the visitors who observe or may encounter these armed guards is a serious safety concern. Yurok tribal members who use park lands for traditional cultural purposes within their ancestral territory in the Bald Hills have expressed concerns about the guards this operation currently employs.

Given these concerns, we request the County deny approval of these permits for a cannabis operation. If you have questions or concerns, please call (707) 465-7743 to schedule a time to discuss this further.

Respectfully,

A handwritten signature in cursive script that reads "Steven Mietz".

Steven Mietz
Superintendent

Cc: (electronic) Steve Madrone, Incoming 5th District Supervisor, Humboldt County
Elly Hoopes, Associate General Counsel, Yurok Tribe
Michael Green, Acting Forest Supervisor, Six Rivers National Forest
Molly Brown, Field Manager, Bureau of Land Management, Arcata Field Office