

**RESOLUTION OF THE ZONING ADMINISTRATOR  
OF THE COUNTY OF HUMBOLDT**

**Resolution Number: 24-013**

**Record Numbers: PLN-12939-SP, PLN-12957-CUP, and PLN-12952-CUP  
Assessor's Parcel Numbers: 532-056-009, 532-055-009, 532-054-001, 532-052-003,  
532-053-003, 532-055-002, and 532-055-003**

**Resolution by the Zoning Administrator of the County of Humboldt certifying compliance with the California Environmental Quality Act and denying the Circle G Farms, LLC Zoning Clearance Certificate, Special Permit, Conditional Use Permits, and Notice of Merger.**

**WHEREAS, Circle G Farms, LLC**, submitted three applications on December 29<sup>th</sup>, 2016, for a Zoning Clearance Certificate (ZCC) for an existing 3,500 square foot (SF) cannabis cultivation operation in two greenhouses, a Conditional Use Permit (CUP) for an existing 14,835 SF cannabis cultivation operation, five Conditional Use Permits (CUP) for 108,900 SF of new cannabis cultivation, a Notice of Merger (NOM), and a Special Permit (SP) for a setback of less than 600 feet to Redwood National Park; and

**WHEREAS**, the applicant was generally unresponsive to requests for information necessary to review and analyze the proposed application; and

**WHEREAS**, the project is statutorily exempt from environmental review pursuant to Section 15270 of the State CEQA Guidelines (projects which are disapproved); and

**WHEREAS**, the Humboldt County Zoning Administrator held a duly-noticed public hearing on March 21, 2024, and reviewed, considered, and discussed the application for a Zoning Clearance Certificate, Special Permit, Conditional Use Permits, and Notice of Merger, and reviewed and considered all evidence and testimony presented at the hearing.

**Now, THEREFORE BE IT RESOLVED**, that the Zoning Administrator makes all the following findings:

- 1. FINDING:**                    **Project Description:** A Zoning Clearance Certificate (ZCC) for an existing 3,500 square foot (SF) cannabis cultivation operation in two greenhouses, a Special Permit (SP) for a setback of less than 600 feet to Redwood National Park, a Conditional Use Permit (CUP) for an existing 14,835 SF cannabis cultivation operation, five Conditional Use Permits (CUP) for 108,900 SF of new cannabis cultivation, and a Notice of Merger (NOM).

**EVIDENCE:** a) Project Files: PLN-12939-SP, PLN-12957-CUP, and PLN-12952-CUP

b) **FINDING:** **CEQA.** The requirements of the California Environmental Quality Act have been complied with. The project is statutorily exempt from CEQA as it is a project which is not approved.

**EVIDENCE:** a) Section 15270 of the CEQA Guidelines

**FINDINGS FOR ZONING CLEARANCE  
CERTIFICATE, SPECIAL PERMIT, CONDITIONAL  
USE PERMITS, AND NOTICE OF MERGER.**

c) **FINDING:** The proposed development is not consistent with the requirements of the CMMLUO Provisions of the Zoning Ordinance.

**EVIDENCE:** a) PLN-12939-SP and PLN-12957-CUP were filed December 29, 2016. The applications were deemed incomplete and additional information was requested by the Planning and Building Department on February 9, 2017. Additional information was received, and the projects were sent to referral agencies on August 31, 2017. Initial referral responses indicated additional information was required.

On November 20, 2018, a Deficiency Letter was sent to the applicant identifying additional information required to continue processing the permits, including to address prior referral responses requesting additional information. The documents requested in the letter included but were not limited to a Wetland Delineation, Site Plan revisions, Operations Plan revisions, a Biological Survey Report, and a Cultural Resources Survey. The letter also noted that if a good faith effort to produce these documents was not shown, the Planning Department would be forced to schedule the applications for hearing with a recommendation of denial. To date, none of the requested materials have been received.

An additional referral response was received from the Redwood National Park on November 28, 2018, citing concerns including cannabis operations and transportation of cannabis within or adjacent to the jurisdictional boundary of the park, potential impacts to Lyons Ranches Historic District and Bald Hills Archaeological District, potential impacts to unique scenic resources, wildlife concerns, and impacts on visitors and Yurok tribal members who utilize park lands for traditional cultural purposes. On January 9, 2023 Planning Department staff sent a letter to the applicant requesting that the applicant withdraw the application, citing unresponsiveness of the applicant, and the desire of the property owner for cannabis operations to close on

the property. No response to this communication was received.

PLN-12952-CUP was filed on December 29, 2016. A Deficiency Letter was sent to the applicant on October 22, 2018, identifying additional information to continue permit processing. Information requested included an Initial Study prepared by a qualified professional, a revised prime agricultural soils report, documentation of cultivation area slopes, Site Plan and Operations Plan updates, a route map, and a road evaluation report. The letter noted that if the requested materials were not received, or if a request for a hearing was not received, within 180 days from the date of the letter (April 22, 2019), the project would be scheduled for a hearing, which could result in permit denial. No requested documents have been received to date. On January 9, 2023 Planning Department staff sent a letter to the applicant requesting that the applicant withdraw the application, citing unresponsiveness of the applicant, and the desire of the property owner for cannabis operations to close on the property. No response to this communication was received.

Outstanding informational items necessary to determine consistency with the CMMLUO for PLN-12939-SP and PLN-12957-CUP include but are not limited to a Wetland Delineation, Site Plan revisions, Operations Plans revisions, a Biological Survey Report, and a Cultural Resources Survey.

Outstanding informational items necessary to determine consistency with the CMMLUO for PLN-12952-CUP include but are not limited to an Initial Study prepared by a qualified professional, a revised prime agricultural soils report, documentation of cultivation area slopes, Site Plan and Operations Plan updates, a route map, and a road evaluation report. The referenced documents do not include any additional documents that may be required to address concerns or issues raised by referral responses.

## DECISION

**NOW, THEREFORE**, based on the above findings and evidence, the Humboldt County Zoning Administrator does hereby:

- Adopt the findings set forth in this resolution; and
- Deny the Circle G Farms, LLC Zoning Clearance Certificate, Special Permit, Conditional Use Permits, and Notice of Merger based upon the Findings and Evidence; and

Adopted after review and consideration of all the evidence on **March 21, 2024**.

I, John Ford, Zoning Administrator of the County of Humboldt, do hereby certify the foregoing to be a true and correct record of the action taken on the above-entitled matter by said Zoning Administrator at a meeting held on the date noted above.



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John H. Ford, Zoning Administrator,  
Planning and Building Department