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August 6, 2026

Via Email and Regular Post:

Director John Ford
County of Humboldt
Planning and Building Department
3015 H Street
Eureka, California 95501
jford@co.humboldt.ca.us

Re: Response to Notice of Permit Suspension CUP-02-09, CDP-02-21 on APN
201-191-004 and 201-191-013

Dear John:

Thank you for our discussion regarding your letter of July 30, 2026. I value the fact that I can be candid with you on all matters. Mr. Miranda will be complying. However, I write to memorialize some issues going forward.

1. Issue #1: You have indicated that no dogs should be on the 002 parcel. This is to confirm that there are none now, and this will remain the case. I verified this yesterday afternoon after our teleconference. All dogs are now on the correct 008 parcel.
2. Issue #2: There is a modular trailer unit on the 008 parcel, which was purchased and moved there to be used as a new office, and the old trailer was to be completely removed. The unit has not been permanently placed and is not in use. Either a "permit" to place it will be pulled within the next two weeks, or an "after the fact permit" will be pulled if your staff believes that an after the fact is more appropriate for the modular unit for its prospective future use, *or* the modular will be removed within a relatively short amount of time. I believe that either of these options shall take place within 30 days. I am working on a smaller time frame, but I believe 2 weeks for the permit option and 30 days for the removal option seems reasonable.

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3. Issue #3: Euthanasia: You stated that no euthanasia may occur on site per the project description. We briefly discussed your staff's reasoning. First, the CUP does not state this. Second, the project description states that there will be no "euthanasia facilities" or "veterinarian facilities" on site, and there are *neither* on site. A "euthanasia facility" is a defined term; "veterinarian facility" is also a defined term and euthanasia is quite different from a "euthanasia facility." Third, it is simply not remotely reasonable to try to interpret the "facility" qualification in the description to mean that no animal will ever be euthanized on site because: the adoption of staff's unique definition would mean that no veterinarian could even visit the site; euthanasia of animals is permitted on *any* parcel in this county (whether Residential, Mixed Use or Resource and Ag zones) and occurs daily, and there is no legal justification to treat this parcel *differently* than every other parcel in the county, especially since it is not in the CUP and is not prohibited in the project description. The definition you provided me from your staff is not a commonplace understanding of very precise terms and would bring about the absurd result of even banning a vet from coming out to the property. *Let me be clear*, while I do not foresee this type of action in the near future given the fact that the Rescue has not been accepting animals since the first week of May and is only operational for adoptions of existing animals, euthanasia is simply not prohibited by the express terms of the project description you sent me. Quite frankly, euthanasia on any property (and visiting veterinarians) is/are allowed, and this has *nothing* to do with any CUP; it is right on all properties in all zones.
4. Issue #4: Animal Burial: Your staff has submitted that no animal burial can occur on private property because it is considered "solid waste." I disagree with your staff, and so do other county offices. There are precise rules in the County Code ("HCC") dealing with animal burial. Burial is permitted on *any* parcel in this county (whether Residential, Mixed Use or Resource and Ag zones) and occurs daily, and there is no legal justification to treat this parcel differently than every other parcel in the county especially since it is not in the CUP and is not prohibited in the project description. The HCC requires dead animals to be disposed of safely within 24 hours of death to protect public health and water quality. Per an official letter from the Humboldt County Department of Agriculture, dated August 1, 2012, and penned by the agricultural commissioner:

"It is permissible for individuals to bury animal carcasses on their property, or property they rent or lease, provided these guidelines are

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followed. Following these guidelines does not grant permission to violate any laws. 1. Carcasses may not be infectious or otherwise contaminated. 2. Carcasses should be buried a minimum of 100 feet from any well, spring or other drinking water source. Increase the distance to 200 feet if the source serves a public water supply. 3. Burial should be a minimum of 150 feet from the high-water mark of any watercourse or body of surface water. 4. Carcasses should be buried at least 5 feet above the seasonally highest level of groundwater. In other words, locate the burial site on the highest ground available. Shallow burial is preferred, with a 3 foot cover of soil. 5. Locate away from homes, residential development and public areas such as roads and parks, to avoid potential problems with flies, odors, or other nuisances....”

Letter Jeff Dolf, Agricultural Commissioner, and Yana Valochvic, UC Extension County Director, Forester, August 1, 2012.

I have included a copy of the letter as an attachment to this letter.

While I am not anticipating right now any future burials of animals, animals are frequently buried on each and every parcel in the county and on most if not all AG parcels as well as residential properties. As long as any animal burial meets the above minimum requirements, I am puzzled by your staff’s assertion that a deceased animal is simply waste and must be taken to the landfill. Neither the HCC nor the Agricultural Commissioner agrees with this analysis. *But, let me reiterate*, I am not anticipating at this point any future burials. If one occurs, then any animal will be buried under the HCC guidelines and Agricultural Commissioner’s guidelines and consistent with all aspects of the HCC. I ask that you forgive my frankness in advance, but it is unreasonable to apply your staff’s unique interpretation to the Rescue when no other person/parcel is subjected to that unique interpretation.

Please get back to me as soon as possible regarding addressing the problems in your letter. I need to know if Items #1 and #2 are satisfactorily addressed. I also need to know whether your response to items #3 and #4 after my comments are consistent with my legal analysis. I have always sought to be both reasonable and legally sound in my analysis. This Rescue has not taken in any animals since May and has been actively working to have the less than 30 remaining dogs adopted as soon as reputable new owners can be had. I would greatly appreciate your confirmation that the above response is compliant with your letter and that all adoptions can continue. I was told last week by another agency that Mr. Miranda would have code enforcement problems, which was

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confusing given the earlier compliance agreement. I understand that this is complaint-driven, but I am still at a loss as to why this action was shared with others before it was addressed to the Rescue, especially in the context that I received the information. I appreciate the ability to be frank with you on these issues.

Please do not hesitate to call if you have questions or comments.

Sincerely,



Allison G. Jackson

Enclosure as specified.

cc: Client



DEPARTMENT OF AGRICULTURE
COUNTY OF HUMBOLDT
5630 SOUTH BROADWAY EUREKA, CALIFORNIA 95503

UC
CE

Cooperative Extension
Humboldt - Del Norte

August 1, 2012

Guidelines for the Disposal of Dead Animals

It is permissible for individuals to bury animal carcasses on their property, or property they rent or lease, provided these guidelines are followed. Following these guidelines does not grant permission to violate any laws.

1. Carcasses may not be infectious or otherwise contaminated.
2. Carcasses should be buried a minimum of 100 feet from any well, spring or other drinking water source. Increase the distance to 200 feet if the source serves a public water supply.
3. Burial should be a minimum of 150 feet from the high-water mark of any watercourse or body of surface water.
4. Carcasses should be buried at least 5 feet above the seasonally highest level of groundwater. In other words, locate the burial site on the highest ground available. Shallow burial is preferred, with a 3 foot cover of soil.
5. Locate away from homes, residential development and public areas such as roads and parks, to avoid potential problems with flies, odors, or other nuisances.
6. If a person proposes to operate a common burial site for others to use, regulatory approval by several state and local agencies will be required. Please consult Humboldt County Division of Environmental Health for more information.

Jeff M. Dolf

Agricultural Commissioner/
Sealer of Weights & Measures

Yana Valachovic

University of California Cooperative Extension
County Director/Forestry Advisor