



# COUNTY OF HUMBOLDT

For the meeting of: 11/6/2025

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File #: 25-1315

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**To:** Zoning Administrator

**From:** Planning and Building Department

**Agenda Section:** Consent

**SUBJECT:**

Two Trees Botanicals LLC, Special Permit  
Assessor Parcel Numbers (APN) 220-311-005-000  
Record No.: PLN-12451-SP  
Briceland area

A Special Permit for an existing 9,040 square feet of outdoor and a second Special Permit for a 2,250 square feet wholesale nursery for medical cannabis cultivation. Irrigation water is provided by an existing well and a spring, onsite. An existing large catchment pond storing 20,000 gallons is onsite. The Applicant estimates 46,000 gallons are required annually. There are an estimated 2 to 4 employees. Electricity is provided by generator power. Staff is recommending denial of the application due to inconsistency with Humboldt County Code, lack of adequate information to support making required findings for approval, and a generally unresponsive applicant.

**RECOMMENDATION(S):**

That the Zoning Administrator:

1. Adopt the resolution (Attachment 1), which does the following:
  - a. Finds the Two Trees Botanicals LLC project statutorily exempt from the California Environmental Quality Act (CEQA) per section 15270 (Projects Which Are Disapproved) of the State CEQA Guidelines; and
  - b. Finds the proposed project does not comply with the General Plan and Zoning Ordinance; and
  - c. Denies the Special Permit application (PLN-12451-SP).

**DISCUSSION:**

**Project Location:** The project is in the Briceland area, on the north side of Briceland Road,

approximately 0.6 mile northeast from the intersection of Elk Ridge Road and Briceland Road, on the property known as 1770 Perry Meadow Lane.

**Present General Plan Land Use Designation:** Residential Agriculture (RA); 2017 General Plan; Density: 40 acres per unit; Slope Stability: High Instability (3)

**Present Zoning:** Forestry Recreation (FR), Special Building Site B-5(40)

**Environmental Review:** The proposed project is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA) per section 15270 (Projects Which Are Disapproved) of the CEQA Guidelines.

**State Appeal:** The project is NOT appealable to the California Coastal Commission.

**Major Concerns:** Inconsistency with Humboldt County Code, lack of adequate information to support making required findings for approval, and a generally unresponsive applicant.

**Monitoring Required:**

Restoration Monitoring.

**Executive Summary:** For Zoning Administrator consideration is an application under the Commercial Medical Marijuana Land Use Ordinance (CMMLUO); application PLN-12451-SP, a Special Permit for an existing 9,040 square feet of outdoor and a second Special Permit for a 2,250 square feet wholesale nursery for medical cannabis cultivation. Irrigation water is provided by an existing well and a spring, onsite. An existing large catchment pond storing 20,000 gallons is onsite. The Applicant estimates 46,000 gallons are required annually. There are an estimated 2 to 4 employees. Electricity is provided by generator power.

The application was filed on December 23, 2016. In April of 2018 an Incomplete Letter was sent to the applicant indicating additional materials were required, and that if the materials were not submitted for review, the Interim Permit issued for the proposed project would expire. The requested information in its entirety was not received, and the Interim Permit expired on December 31, 2018. An additional letter was sent to the applicant on April 4, 2019 indicating additional materials were required to continue processing the permit application. The requested materials were not submitted. An additional letter was sent to the applicant on April 28, 2021 reiterating that additional materials were required to continue processing the permit application. The requested information has not been submitted to date.

On June 27, 2024, a notification letter was sent to the applicant indicating the project would be scheduled for a hearing with a recommendation of denial if the outstanding/past due Planning Department fees were not paid within 90 days. Invoices associated with this application have not

been paid since 2019. No response was received from the applicant.

No responses to the letters have been received within the prescribed deadlines, and the applicant has not contacted the Planning Department regarding outstanding issues to date. Additionally, information required to determine consistency with Humboldt County Code has been requested and is still outstanding, including but not limited to a Road Evaluation Report, water infrastructure information, location of wells and points of diversion, water rights for surface water diversions, well logs, and minor Site Plan and Operations Plan edits.

**OTHER AGENCY INVOLVEMENT:**

None

**ALTERNATIVES TO STAFF RECOMMENDATIONS:**

The Zoning Administrator could elect to direct staff to continue to work with the applicant to resolve the outstanding issues and continue processing the application in accordance with HCC Section 312-4.1 et seq. However, due to the extended amount of time that deficiencies have remained unresolved and the lack of responsiveness from the applicant, staff does not recommend this alternative.

**ATTACHMENTS:**

1. Draft Resolution
2. Plot Plan
3. Planning Department Correspondence

**Applicant:**

Two Trees Botanicals LLC  
C/O Eulenthius D Alexander  
PO Box 2343  
Redway CA, 95560

**Owner:**

Donald R and Hardy C Williams Trust  
5309 Brynhurst Ave  
Los Angeles CA, 90043

**Agent:**

N/A

Please contact Michael Holtermann, Planner, at mholtermann@co.humboldt.ca.us or 707-268-3737 if you have questions about this item.