



**TRINITY COUNTY  
COMMUNITY DEVELOPMENT DEPARTMENT  
PLANNING DIVISION**

530 MAIN ST., PO BOX 2819  
PHONE – 530-623-1351  
WEAVERVILLE, CALIFORNIA 96093

**Ed Prestley, Deputy Director**

**MEMORANDUM**

DATE: November 16, 2023

TO: Members of the Trinity County Planning Commission

FROM: Bear Banonis, Administrative Coordinator-Cannabis

SUBJECT: Agenda Item: 1 DEV-23-04 Zoning Text Amendment Trinity County  
Code (§) Chapter 17.43

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Additional comments received as of November 16, 2023.

Trinity County Planning Division  
530 Main St.  
Weaverville, CA 96093

11/10/2023

Comments on Cannabis Ordinance Update

Dear Trinity County Planning Staff and Planning Commission,

Double Down Farms has a 320-acre Qualified Parcel with a fully permitted and active 10,000 sq. ft. farm. Previous Trinity County staff indicated that an acre would be allowed under this ordinance update, however, we are excluded from the current proposal because we do not have an existing Type 3 license. The changes to the ordinance are a great effort, but the elimination of existing cultivators with smaller licenses like us is baseless and exclusionary. It seems like this ordinance only favors the already-operating medium license holders and leaves the rest of us smaller, legal cultivators in the dust. This does not fairly give all Trinity County cultivators an opportunity. Please consider revising the Ordinance updates to allow cultivators with an existing Type 1 or Type 2 license to apply for multiple stacked licenses on Qualified Parcels.

Additionally, this ordinance update does not appear to allow for *consolidation* of stacked licenses. For example, if a cultivator has a large ranch made up of multiple Qualified Parcels and they want to consolidate the allowable canopy area onto one single parcel, they would not be allowed under the currently proposed ordinance changes. It is more environmentally friendly to consolidate allowable square footage in a single area on a single parcel, rather than spreading it on many individual parcels. Multiple other counties, including Lake County and Humboldt County, have this option. Please consider this change.

Thank you,

Bob Puga and Shelley Rodgers, Double Down Farms