



TRINITY COUNTY LOCAL EQUITY PROGRAM MANUAL

Section 1. Purpose

In 2021 Trinity County contracted with Cal Poly Humboldt's California Center for Rural Policy (CCRP) to perform a comprehensive analysis of the impact of cannabis criminalization and poverty on the County of Trinity. This analysis, known as the Trinity County Cannabis Equity Assessment (CEA) (2022) established that certain persons in the county have been substantially and adversely affected by poverty and the criminalization of cannabis.

Many rural communities in California have a history of entrenched local poverty and economic hardship.¹ These communities were impacted significantly by the criminalization of cannabis, including Trinity County communities as illustrated by the CEA. According to the Trinity County Cannabis Equity Assessment (2022), Local Equity Programs can provide significant assistance to communities impacted by cannabis criminalization and the war on drugs, especially those that are struggling to transition to the regulated market.

The purpose of this manual is to describe program participation qualifications for the Trinity County Local Equity Program (LEP). The LEP is informed by findings in the CEA, which itself will be revised and updated periodically as the program matures in alignment with program participation and outcomes achieved.

Section 2. Program Eligibility

The Governor's Office of Business and Economic Development's (GO-Biz) Cannabis Equity Grant (CEG) outlines that local jurisdictions will be aiding equity applicants and licensees to build a business in the regulated market. Accordingly, individuals and not business entities are the only ones eligible to apply to the Local Equity Program. Equity applicants are required to have at least 50% ownership of their business. Eligibility criteria for the program is:



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Program Eligibility	
Eligibility Criteria	
<p>Those who meet one or more of the below eligibility criteria will be considered for Equity Program Eligibility.</p>	
<p>Nonviolent conviction history</p>	<p>Any individual seeking support or services to participate in the legal cannabis industry in Trinity County who was arrested and/or convicted of a nonviolent sale, possession, use, manufacture, or cultivation of cannabis offense (including as a juvenile) or been subject to asset forfeiture between 1996 and 2016.</p> <p>The owner was convicted of or arrested for a cannabis offense before November 8, 2016. You can show proof of conviction or arrest using any of the following:</p> <ul style="list-style-type: none"> • Copies of federal or state court records that show the outcome of the case • Records showing dismissal or expungement • Any other court or law enforcement record that show proof of conviction or arrest
<p>Neighborhood & Family conviction</p>	<p>Any individual seeking support or services to participate in the legal cannabis industry in Trinity County, with a parent, sibling, child, or a guardian/member of immediate household who was arrested for or convicted of the sale, possession, use, manufacture, or cultivation of cannabis (including as a juvenile).</p> <p>The owner lived for at least five years between 1980 and 2016 in a county disproportionately impacted by past criminal justice policies implementing cannabis prohibition. In addition to having lived in a disproportionately impacted county, the owner must have resided in a census tract that is among the top 25 percent for civilian unemployment and poverty in the state based on the U.S. Census Bureau's 2013-2017 American Community Survey or has an immediate family member who was convicted or arrested for a cannabis offense before November 8, 2016. Use our map tool to see if you lived in a qualifying area. Qualifying counties are outlined in black and qualifying census tracts are shaded in green.</p>



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<p>Low income status</p>	<p>Any individual seeking support or services to participate in the legal cannabis industry in Trinity County whose household income is at or below the “Low Income” level based on the California Department of Housing and Community Development (HCD) State Income Limits for Trinity County.²</p> <p>The owner's household income is less than or equal to 60 percent of the area median income for the local jurisdiction in which they live.</p> <p>You can show proof of income using any of the following:</p> <ul style="list-style-type: none"> • Individual federal tax returns, state tax returns, or W-2s • At least two consecutive paystubs • Proof of eligibility for a program that provides financial aid to adults without enough income or resources, such as CalFresh, MediCal, CalWORKS, supplemental security income, or social security disability <p>The records must include the individual’s name and be dated within two years of the date of the fee waiver request. Income documentation must be submitted to demonstrate the equity owner's income as well as each earner in the equity owner's household.</p>
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Trinity County’s income limits for 2023 are as follows:

Number of Persons in Household:		1	2	3	4	5	6	7	8
Trinity County Area Median Income: \$83,800	Acutely Low	8800	10050	11300	12550	13550	14550	15550	16550
	Extremely Low	17350	19800	24860	30000	35140	40280	45420	50560
	Very Low Income	28900	33000	37150	41250	44550	47850	51150	54450
	Low Income	46200	52800	59400	65950	71250	76550	81800	87100
	Median Income	58650	67050	75400	83800	90500	97200	103900	110600
	Moderate Income	70400	80450	90500	100550	108600	116650	124700	132750

Access the FULL income report at: <https://www.hcd.ca.gov/sites/default/files/docs/grants-and-funding/income-limits-2023.pdf>



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Details for multiple owners:

At least 50% of the business must be owned by individuals who meet the equity criteria. **See the breakdown below for more ownership detail:**

The individual has an ownership interest in a cannabis business, such as cultivation, distribution, manufacturing, retail, testing, laboratory, or micro-business that is at least:

- 50% if there are no other individuals with an ownership interest in the cannabis business who meet the local equity program criteria.
- 25% if there is only one other individual with an ownership interest in the cannabis business who meets the local equity program criteria.
- 20% if there are two or more other individuals with an ownership interest in the cannabis business who meet the local equity program criteria.

In order to determine and categorize which individual applicants are most in need of support, a score will be determined for each equity applicant based on the number of eligibility criteria the applicant meets. Each qualification will have an assigned value that will be determined by how direct the impact was. Tier A criteria will be scored at two points each. A fee waiver request form is included as **Attachment A**. The county reserves the right to adjust eligibility criteria and scoring method as needed to reflect current needs and trends in the county. The score will support prioritization of services for equity applicants. The goal of the applicant scoring system is to ensure that those most impacted by cannabis criminalization and poverty have priority access to local equity program funding.

The County of Trinity will prioritize fee waivers for local Equity Program Participants. If it is determined that there is funding available and an existing need from equity applicants and equity licensees, the County of Trinity may explore the additional services such as direct grants for infrastructure improvements for inclusion in the Local Equity Program through a future program revision.

Trinity County will take into consideration the following applicant types when determining available services:

- Applicants that have already received their license
- Applicants that are facing barriers to entry in receiving their license
- Applicants that are not yet in the permitting process but are planning to start

Section 3. Program Access

To ensure that applicants who are eligible for the Trinity County Local Equity Program have adequate opportunity to benefit from the program, options to foster ongoing support may include:



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Program Access	
Prioritization	Consider a prioritized permit process for equity applicants. Equity Businesses can receive priority application review, allowing them to move quicker through the application process.
Ratios	Consider mandating that 50% of future licenses be provided to equity licensees.
Incubation Program	Consider a robust incubation program for equity applicants to learn from more experienced cannabis businesses. Incubators can help equity applicants/licensees become independent and successful at the end of their incubation period. Service examples include providing physical space, administrative support, capital, links to potential investors and funding sources, and access to training, expert advisors, coaching, mentorship, and networking.
Equity Applicant Incentives	Consider providing additional scoring for equity applicants who cultivate other crops and/or participate in recognized sustainable certification programs.
Untaxed Compassionate Products	Consider not taxing products that are donated to Compassionate Access Programs.

Trinity County will notify the community about the Local Equity Program and all information pertaining to it through the following avenues:

- Information on the Trinity County’s Cannabis Division website.³
- News releases and other media outreach.
- Social media campaigns.
- Local industry groups such as the Trinity County Agricultural Alliance.
- Through community partners selected by the county.

Trinity County may determine other avenues to ensure that the community is aware of the Local Equity Program and is able to access information about becoming eligible for funds. The county would like to encourage diversifying license types for cannabis businesses/operations for added value to local operators.

Trinity County will address feedback from communities and populations eligible for the Local Equity Program in the following ways:

- Written e-comment.
- Opportunities to speak with Cannabis Division staff.
- Listening sessions.



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- Surveys.

Section 4. Services

Services to be provided by the Trinity County Cannabis Local Equity Program may include one or more of the services listed in the below tables. The availability and scope of services will depend on need and the availability of funds from grants or other sources.

Based on the amount of funding received, The County of Trinity intends to provide fee waivers for equity applicants and licensees to assist them in entering and succeeding in the regulated cannabis industry.⁴ If sufficient Grant funds are received, the County of Trinity will explore how to best facilitate direct grants to equity applicants for additional services such as regulatory compliance and infrastructure improvements. Wherever possible, Trinity County will align services with funding requirements and recommendations from the State of California.

Beginning with services that address and mitigate Trinity County specific barriers of entering the regulated market, the following assistance will be offered. (The subsequent categories reflect general services to support cannabis businesses adapted from peer jurisdictions):

³ <https://www.trinitycounty.org/Commercial-Cannabis>

⁴ Any and all financial assistance relevant to the Trinity County Cannabis Equity Program is made available through grant funding provided by the State of California. Grant funding will only be available until funds are exhausted, or until the State mandated expiration of the equity grant program, whichever occurs sooner.



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Financial	
	<p>Direct grants to applicants for purposes of assuring compliance with regulatory requirements of the County or California permits or licenses that mitigate adverse environmental effects of cannabis cultivation or other activities including, but not limited to:</p> <ul style="list-style-type: none"> ● Water storage for irrigation during forbearance periods of surface water diversion required by state or local regulations. ● Installation of solar electrical systems to replace diesel or gasoline generator power for off-grid cannabis facilities where connecting to the grid is economically infeasible. ● Rent for said facilities where the above activity is occurring and when cultivation of cannabis activities are permitted by the owner. ● Funds to cover fire suppression and compliance, such as water tanks. ● Funds to cover trainings and certifications for best management practices such as pesticide use, etc.
	Direct payment of fees related to meetings with Cannabis Division staff.
	Assistance with application fees for a Zoning, Minor Use, and Conditional Use Permit application.
	Assistance with fees for studies required as part of the land use application such as cultural studies, hydrology reports, biology reports, etc.
	Assistance to cover costs of agencies and/or professionals who offer cannabis business support including but not limited to business planning, loan application preparation, site location services, human resource management, legal assistance, capital procurement services, bookkeeping and accounting practices and systems, for Trinity-based cannabis businesses.
	Direct grants to applicants for the purpose of complying with permits or license requirements for any local jurisdiction in Trinity County and/or the State of California.

Language	
	Provide interpretation services for every aspect of the cannabis program.
	Provide application and review materials in Hmong language.



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Infrastructure	
	Prioritize grants that increase onsite water storage.
	Culvert creation or repair.
	Assistance with code-compliance issues related to required onsite housing.
	Roadwork associated with compliance.

The following services are anticipated to address and mitigate administrative or technical barriers of entry into the legal cannabis market:

Administrative/Technical	
	Assistance to cover fees to agencies and/or professionals who provide technical assistance for the formation of an incorporated cooperative composed of members that are cannabis equity program applicants or licensees.
	Provide technical assistance to assist equity applicants with the state licensing process.

These next services help equity applicants with establishing trust and confidence with participating in the legal cannabis market:

Outreach and Education	
	Conduct outreach and education efforts for potential equity applicants (including Hmong-American individuals) to encourage those individuals to apply for licenses and enter the legal industry. An example of outreach may include hosting listening sessions.
	Provide technical assistance grants for training in sustainable and regenerative cannabis cultivation best practices.
	Conduct outreach and education efforts regarding the Department of Cannabis Control’s disaster relief programs so that cannabis operators in Trinity County know of opportunities to receive assistance from the State. ⁵

The last collection of services will be focused on assisting equity applicants with developing adequate business acumen for thriving in the legal cannabis market:



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Business Acumen	
	Training for equity participants and their employees in licensed cannabis operations in Trinity County.
	Provide training/support for business owners to understand workforce rules and regulations (view section below).

⁵ <https://cannabis.ca.gov/resources/disaster-relief-programs/>

Section 5. Additional Services for Cannabis Businesses

If it is determined that there is funding available and an existing need from equity applicants and equity licensees, the County of Trinity may explore the following additional services for inclusion in the Local Equity Program through a future program revision.

Recommendations are divided into the following categories listed in priority order: Manufacturing/Productions, Agriculture/Cultivation, and Retail.

Additional Services	
Manufacturing/Production	
	Access to business planning (business startup strategy: how to build and manage a detailed startup business plan that can scale up and include facilities, marketing, tax and regulation, payroll, human resources hiring and supervision, and teamwork).
	Access to incubator programs such as manufacturing hubs that can hire, cross train and job share positions between small entrepreneurs. Incubation hubs will provide (1) mentorship in business skills; (2) technical assistance; (3) a reporting system to monitor and ensure neither equity licensee nor business mistreat the other; and (4) a system that allows equity licensees and businesses to anonymously provide suggestions and complaints about the existing program.
	Training to learn how to use METRC, the state’s track and trace system used to track commercial cannabis activity and movement across the distribution chain.



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Additional Services

Agriculture/Cultivation

	Access to business planning, low-cost loans or investment sources that can assist smaller, often multi-generational family farmers with the costs of legalization, so that income can be spent on hiring, training, growing wages and benefits of a variety of jobs-from farm management to bookkeeping.
	Support for reasonable regulations and zoning that promote and incentivize employers to build good business and workforce development practices.
	Access to standard human resource methods: hiring and orientation, training in proper and regulated land use for farm and field workers, hiring and supervision processes, setting job benchmarks and performance standards, evaluating performance for promotion or wage scale increases.
	Access to business and HR tools: developing HR manuals and procedures, how to frame up a request for a consultant scope, interview and select the right consultant or consultant firm, how to manage a consultant scope.
	Developing, securing, and increasing farm management skills in agricultural, biology, and land management.
	Access to agricultural extension services to help with the science of plant biology from a medicinal and commercial standpoint, and help feed local graduates in biology and environmental sciences into the industry-much like the timber industry has done.
	Training on Occupational Safety and Health Administration (OSHA) regulations and standards.

Additional Services

Retail

	Access to comprehensive business and marketing strategies that connect cannabis retail to tourism, related workforce development (hiring, training, presentation, customer service, job readiness, and supervisory skills).
	Access, training, or mentorship in general business supervisory, customer service, workplace norms, and software skills.
	Evaluate the specific need and content for a program that certifies front line positions (bud tending, security, track and trace, manufacturing, and packaging personnel).



Section 6. Program Administration

Trinity County intends to seek available funding from the State of California for the Local Equity Program as is outlined in Senate Bill 1294 (Bradford), referred to as the California Cannabis Equity Act. SB 1294 created a fund for local jurisdictions with cannabis equity programs to apply for funding to assist local equity applicants and local equity licensees gain entry to and successfully operate in the state’s regulated cannabis marketplace

The use of local funding for the Local Equity Program will remain at the discretion of the County.

Program Administration	
	No more than ten percent (10%) of any funding from the California Governor’s Office of Business and Economic Development (GO-Biz) Local Equity Program Grant Funds may be utilized for program administration.
	Principal administration and coordination of services shall be performed by the Cannabis Division or other designated entity determined by the Board of Supervisors.
	The Cannabis Division or other designated entity determined by the Board of Supervisors shall receive and process all applications to determine eligibility of equity program participants.
	The Cannabis Division or other designated entity determined by the Board of Supervisors shall monitor and report on all program services provided through the LEP, at least annually and more frequently as directed by the Board of Supervisors, state law, or regulation.

Local jurisdictions that have been previously awarded a Cannabis Equity Grant from GO-Biz are eligible to apply for a subsequent grant only if:

- The jurisdiction has expended at least 50 percent (50%) of any grant funds awarded more than 12 months ago and;
- Expended at least 80 percent (80%) of any grant funds awarded more than 18 months ago.

Section 7. Provision of Services

Staff in the Cannabis Division serve as the liaison between equity licensees/permitted operators who receive grant funding and the selected agency that provides an eligible service.



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Provision of Services	
Involved agencies may include but are not limited to:	
1.	Small business development organizations
2.	Planning Department
3.	Department of Health Services
4.	Workforce development agencies
5.	Law Enforcement Agencies
6.	County Counsel

Section 8. Program Monitoring and Evaluation

For the purposes of understanding the impacts of the adult-use cannabis industry, Trinity County will track data on general and equity applicants. The purpose of collecting data on an ongoing basis is to measure the success of the local cannabis equity program.

Completion of an annual demographic questionnaire will be voluntary and will be aligned with the demographic questionnaire developed by the State of California. Applicants and existing operators will be encouraged to participate so that the County can assure that equity funding is being awarded to populations of highest need. Recommended metrics are as follows and conform to the County’s discretion:

Program Monitoring and Evaluation	
Recommended Metrics	
Number of equity applicants to apply	1. Types of drug-related offenses 2. Income status 3. Race Ethnicity 4. Gender 5. Sexual Identity 6. Residency Status 7. Ownership Structure
Workforce characteristics	1. Total number of employees 2. Number of local employees



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	3. Employment status (full-time, part-time, etc.)
Equity program-specific data	<ol style="list-style-type: none"> 1. Number of applicants eligible for equity program 2. Associated permit types 3. Number and types of services provided to equity applicants 4. Number of equity program applicants to receive licenses/permits. 5. Number of equity program applicants starting ancillary businesses 6. Feedback from participants to understand the impact of receiving funds on their socioeconomic status or ability to stay in Sonoma



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For County Purpose Only

CCL: _____

Equity Application #: _____

EPP #: _____

Trinity County Cannabis Division Equity Program Application and Eligibility

APPLICANT CONTACT INFORMATION

This will be the mail contact for any questions regarding this application. This name must be the same applicant as the current or future County Cultivation License (CCL) holder and cannot be a business entity.

Legal Name:	Phone Number:	Email:
Mailing Address (P.O. Box or St., City, State, Zip code):		

COUNTY CULTIVATION LICENSE INFORMATION

CCL - _____ License Type: _____

Site Address(es):
Parcel Number(s):

CANNABIS BUSINESS INFORMATION

- Sole Proprietorship Limited Liability Company
 General Partnership Limited Partnership Limited Liability Partnership

Legal Business Name:	Doing Business As (DBA):
Fictitious Business Name (If Applicable):	Percent Ownership:



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****Attach evidence of eligibility, as described below, for each owner who is applying for a locally-verified equity applicant or licensee. Please redact ALL confidential information on submitted documents...e.g. social security numbers, etc.**

Eligible Equity Owner Criteria and Required Evidence

Qualified equity applicants or licensees, either individually or in combination with other qualified equity applicants or licensees, who meet equity criteria must own 50% or more of the cannabis business. Business owners can show they were impacted by past cannabis criminalization in a number of ways. You only need to meet one of the following criteria to qualify.

Conviction or Arrest

The owner was convicted of or arrested for a cannabis offense before November 8, 2016.

You can show proof of conviction or arrest using **any** of the following:

- Copies of federal or state court records that show the outcome of the case
- Records showing dismissal or expungement
- Any other court or law enforcement record that show proof of conviction or arrest

Income

The owner's household income is less than or equal to 60 percent of the area median income for the local jurisdiction in which they live.

You can show proof of income using **any** of the following:

- Individual federal tax returns, state tax returns, or W-2s
- At least two consecutive paystubs
- Proof of eligibility for a program that provides financial aid to adults without enough income or resources, such as CalFresh, MediCal, CalWORKS, supplemental security income, or social security disability

The records must include the individual's name and be dated within two years of the date of the fee waiver request. Income documentation must be submitted to demonstrate the equity owner's income as well as each earner in the equity owner's household.

SAMPLE



Neighborhood and family member conviction or arrest

The owner lived for at least five years between 1980 and 2016 in a county disproportionately impacted by past criminal justice policies implementing cannabis prohibition. In addition to having lived in a disproportionately impacted county, the owner must have resided in a census tract that is among the top 25 percent for civilian unemployment and poverty in the state based on the U.S. Census Bureau's 2013-2017 American Community Survey or has an immediate family member who was convicted or arrested for a cannabis offense before November 8, 2016.

Use our [map tool](#) to see if you lived in a qualifying area. Qualifying counties are outlined in black and qualifying census tracts are shaded in green.

You can show proof of residence using any **two** of the following (proof must show **five** years of residency):

- California Driver's License or State Identification Card
- Property tax bill or payment, or evidence that the owner is exempt from property tax payment
- Signed rental agreement, or deed or title to residential property
- Copies of state or federal tax returns
- School records
- Banking or credit card records
- Voter registration
- Credit reports
- Utility, cable, or internet billing or payment records
- Vehicle titles or proof of vehicle registration

The records must include proof of relationship with immediate family member, show an address in the jurisdiction, and be dated between 1980 and 2016.

An immediate family member may include a child, stepchild, parent, stepparent, brother, sister, half-brother, half-sister, stepsibling, legal guardian, grandparent, or great grandparent. You can show proof of conviction or arrest using **any** of the following:

- Copies of federal or state court records that show the outcome of the case
- Records showing dismissal or expungement
- Any other court or law enforcement record that show proof of conviction or arrest



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Equity Applicant Fee Waiver Request Form

Cannabis equity applicants in Trinity County may be eligible for license fee waiver from the Trinity County Cannabis Division if they meet certain criteria.

Use this form to request a fee waiver grant. TC Cannabis Division staff will process fee waiver requests in the order in which the license application or renewal is approved.

Description of Fee Waiver

A **Fee Waiver** provides an opportunity for qualified and approved equity applicants/licensees to have either their initial or renewal license fee waived.

- Note: Applicants with more than one license **can only obtain ONE fee waiver per calendar year.**

Applicant Information

Applicant name: _____

Type of Request (Select all that apply)

Fee Waiver – Fill out all applicable fields below and include preferred application or license number for one waiver.

License fee waiver is requested for: Initial license fee Renewal fee

Application or license number:

License Type: Expiration Date (for existing licenses):

Local jurisdiction: **TRINITY COUNTY**

Attestation

With this signature, under penalty of perjury under the State of California, I hereby declare that the information contained within and submitted with the application is complete, true, and accurate. I also attest that the qualified equity applicant(s) or licensee(s), either individually or in combination, own no less than 50 percent of the commercial cannabis business that is applying for licensure or is licensed.

Applicant/licensee name: _____ Applicant/licensee Signature: _____



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Equity Ownership Information

Identify each owner of the cannabis business who meet the equity criteria (each “equity owner”). At least 50% of the business must be owned by individuals who meet the equity criteria. *****See the breakdown below for more ownership detail.**

***The individual has an ownership interest in a cannabis business, such as cultivation, distribution, manufacturing, retail, testing, laboratory, or micro-business that is at least:

- 50% if there are no other individuals with an ownership interest in the cannabis business who meet the minimum local equity program criteria.
- 25% if there is only one other individual with an ownership interest in the cannabis business who meets the minimum local equity program criteria.
- 20% if there are two or more other individuals with an ownership interest in the cannabis business who meet the minimum local equity program criteria.

****Attach evidence of eligibility, as described below, for each owner who is applying for equity grant funds.**

Owner Name: Ownership %:

Job title:

Email:

Phone:

Equity eligibility:

Owner Arrest

Owner conviction

Income

Number of earners in the household:

Disproportionately impacted county

County Name:

And one of the following:

Unemployment and poverty census tract

Immediate family member arrest

Immediate family member conviction



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Owner Name: Ownership %:
Job title: Email
Phone:

Equity eligibility:

- Owner Arrest
- Owner conviction
- Income

Number of earners in the household:

- Disproportionately impacted county
County Name:

And one of the following:

- Unemployment and poverty census tract
- Immediate family member arrest
- Immediate family member conviction

Owner Name: Ownership %:
Job title: Email
Phone:

Equity eligibility:

- Owner Arrest
- Owner conviction
- Income

Number of earners in the household:

- Disproportionately impacted county
County Name:

And one of the following:

- Unemployment and poverty census tract
- Immediate family member arrest
- Immediate family member conviction