

April 15, 2019

Dear City Council Members,

As Denver's accredited local public health authority, Denver Public Health & Environment (DDPHE) is writing to present our position on potentially relaxing the location and proximity standards for marijuana consumption sites and points of sale.

DDPHE is committed to ensuring marijuana social consumption sites and retailers are a safe distance from where children tend to gather, as reflected in the final permit proximity restrictions that "no permit shall be issued within 1,000 feet of any school, child care establishment, city-owned recreation center, or city-owned outdoor pool."

Maintaining this safe distance is central to preventing the socialization of marijuana into our youth and, more broadly, our communities. "Socializing" in terms of marijuana use is defined as a process of incorporating marijuana social consumption areas and retail marijuana outlets into the expected landscape of daily activity. Locating marijuana retailers and social consumption areas in close proximity to where children gather "socializes" the idea of marijuana use with parents, young children and their older siblings, and will ultimately lead to normalizing marijuana use in the minds and lives of families and children.

Without mandated distance restrictions of marijuana consumption sites and points of sale, marijuana use will eventually become normalized in all sectors of society. Adults and adolescents increasingly view cannabis as harmless and having no location restrictions on marijuana social consumption areas and retailers further normalizes the presence of these establishments as part of the expected fabric of our city.

However, proven potential health problems that can occur from marijuana use include harms from prenatal exposure and unintentional childhood exposure; decline in educational or occupational functioning after early adolescent use, and in adulthood, impaired driving and vehicle crashes. Greater access through lifting location restrictions increases easy availability, thus normalizing the idea of use and reducing perceived harm. All this at a time when marijuana potency is increasing as a result of advances in technology, making it more critical than ever for us to maintain some key controls over an industry that is rapidly changing and growing.

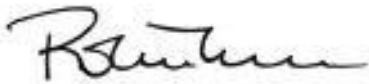
Other concerns with lifting the distance restrictions for marijuana social consumption areas and retailers include the risk impaired drivers may pose to children, the possibility of a child finding and ingesting edible marijuana inadvertently left behind by a customer, and teens having convenient opportunities to access marijuana. The current distance requirements were reached through a fair and

balanced stakeholder process that included careful compromise and were intended to create consistency in the local marijuana marketplace.

Denver has significantly increased our knowledge of cannabis, its use, and its consequences over the last 10 years. However, as marijuana laws and attitudes evolve, much remains to be learned in order to advance public health and to guide personal and societal decisions regarding the use of cannabis.

DDPHE is advocating for the preservation of the entirety of the existing rule package, including location and proximity standards for marijuana consumption areas and retailers. This position has received support from city leaders and partners whose departments will likely be impacted by changes to the rule package. Our position also aligns with that of the American Academy of Pediatrics Colorado Chapter, Children's Hospital Colorado, Colorado Children's Campaign, Illuminate Colorado, The Kempe Foundation, Denver Public Schools, Denver Public Health, Smart Colorado and Mothers Against Drunk Driving, and more.

DDPHE welcomes the opportunity to provide more information, answer questions, and address concerns about our position. Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Robert McDonald". The signature is fluid and cursive, with the first letter "R" being particularly large and stylized.

Robert McDonald, Executive Director  
Department of Public Health & Environment