



Mothers Against Drunk Driving
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Denver City Council
Special Issues Marijuana Committee
1437 Bannock Street
Denver, CO 80202

Re: Initiative 300 - Neighborhood Supported Social Use Task Force Draft Report

Dear Chairwoman Ms. Black, Committee Councilmembers Mr. Clark, Mr. Flynn, Mr. Herndon, Mr. Kashmann, Mr. New and Ms. Susman:

On behalf of MADD Colorado, I am writing to the Special Issues Committee to express our concerns with the Initiative 300 - Neighborhood Supported Social Use Task Force Draft Report.

First, as a participating member of the Social Consumption Advisory Committee (SCAC), I am concerned that a second group was convened to revisit these issues. The SCAC involved a broad array of stakeholders and featured robust debate over many of the recommendations. As this is a pilot project, it is reasonable to expect that challenges would arise with the launch of the program. The appropriate response would be to reconvene the SCAC to discuss these challenges and seek solutions. At best, convening a second group to make recommendations without community, public health, and public safety representatives appears to be an incomplete response. At worst, it appears to be an attempt to circumvent a thorough and transparent public policy process.

Second, the draft report asks "Should the state reconsider the Liquor Enforcement Division rule prohibiting marijuana use in business with a liquor license?" Based on the available research, the answer should be no.

MADD believes that rule 47-900 is a positive step toward protecting our roadways from drug-impaired driving by prohibiting marijuana consumption in establishments where alcohol is sold. While MADD does not take a position on the legalization of recreational marijuana, in this particular case the research does not indicate that the expansion of marijuana consumption to bars and restaurants can be done safely at this point.

When both alcohol and marijuana are consumed at the same time, it is likely to result in greater impairment than either one alone:

- A June 2015 study conducted at the University of Iowa's National Advanced Driving Simulator has found drivers who use alcohol and marijuana together weave more on a virtual roadway than drivers who use either substance independently.
- A May 2015 study published in Clinical Chemistry, the journal of the American Association for Clinical Chemistry, found that the simultaneous use of alcohol and cannabis produces significantly higher blood concentrations of cannabis's main psychoactive constituent, Δ^9 -tetrahydrocannabinol (THC), as well as THC's primary active metabolite, 11-hydroxy-THC (11-OH-THC), than cannabis use alone.

In practice, detecting the combined impairment from marijuana and alcohol would be very difficult for servers at bars and restaurants. Law enforcement officers receive advanced training to detect this type of impairment. It's just not reasonable to expect that servers could effectively identify the combined impairment from alcohol and marijuana and prevent impaired customers from driving.

Unfortunately, impaired driving from the combined use of alcohol and marijuana is an emerging public safety threat. We hear this from the Colorado law enforcement agencies working to keep our roads safe as well as from law enforcement officials in Washington and Oregon. In Oregon, fatalities from crashes involving both alcohol and marijuana now outnumber alcohol-only and marijuana-only crashes.

This field of research is rapidly evolving as are technology and law enforcement techniques. Right now, the evidence we have indicates that allowing marijuana consumption in establishments where alcohol is sold would be a public safety risk.

In closing, the current rules for Designated Consumption Areas were proposed, debated and adopted after a fair and balanced process with significant majority support at a public hearing. These rules should be maintained by the Special Issues Committee and City Council. If they are to be revisited, MADD would recommend reconvening the Social Consumption Advisory Committee. We would gladly participate.

Sincerely,

A handwritten signature in blue ink, appearing to read 'FL', with a long horizontal line extending to the right.

Fran Lanzer
MADD Colorado Executive Director