



Preserving Hookah Culture & Protecting Hookah Tradition across the USA

October 26, 2021

Councilmember Jolon Clark
Denver City Council
Denver City and County Building
1437 Bannock Street, Room 451
Denver, CO 80202

Dear Councilmember Clark,

The National Hookah Community Association (NHCA) brings together, and serves as the voice of, hookah producers, distributors, sellers, lounge owners, consumers, and community members who support the preservation of hookah's cultural traditions. We write to express our support for your amendment to the proposed Denver flavored tobacco ban to allow hookah to remain available in Denver while also enacting important new measures to further prevent youth access to hookah. We appreciate your efforts to protect public health, while also preserving the nearly 1,000 year cultural tradition of hookah.

The NHCA agrees with the Denver City Council that every reasonable measure should be taken to prevent youth access and usage of tobacco products. Councilmember Clark's proposed ordinance addresses flavored tobacco products that are frequently used by youth but exempts hookah which according to the Center for Disease Control¹ and Food and Drug Administration² has a low prevalence amongst youth.

Hookah is a cultural tradition practiced by Middle Eastern, Armenian, Turkish, Indian, Persian and North African minority communities and is the centerpiece for social and celebratory events. A hookah is a waterpipe that is traditionally three feet tall, making it very difficult to conceal, and requires ten parts and components to operate, which can cost more than \$200. A hookah takes between 15 – 20 minutes to set up because it requires hot coals that take a long time to get up to temperature. Only hookah tobacco can be used in a hookah, which is moist and viscous because it is made with molasses or honey which imparts a characterizing flavor, as has been the case for hundreds of years.

In order to preserve these minority communities' right to practice their cultural tradition, we support your amendment to remove hookah from the proposed flavored tobacco ban provided Denver retail locations do not

¹ https://www.cdc.gov/tobacco/data_statistics/fact_sheets/youth_data/tobacco_use/

² <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/enforcement-priorities-electronic-nicotine-delivery-system-ends-and-other-deemed-products-market>



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permit any person under twenty-one (21) years of age to be present at the store at any time, they operate in accordance with all local and state laws, including license requirements relating to the sale of tobacco products, and that Denver hookah lounges operate on the premises, any day of the week, except the hours of 2 a.m. and 7 a.m. which mirrors the operating times of Colorado bars and restaurants.

We also recognize that new limits on hookah lounges operating hours are important to address local challenges and align hookah lounges' operating status with similar businesses. We support your efforts to address this in separate legislation. We believe both your amendment and this separate legislation will address youth tobacco access and allow the rich cultural tradition of hookah to survive.

NHCA thanks you for working with minority businesses and communities in Denver while also achieving the city's goals to protect the youth.

Sincerely,

National Hookah Community Association

The Clouds Hookah – 2238 S. Colorado Blvd., Denver CO 80222

Hookah Palace – 2246 S. Colorado Blvd., Denver CO 80222

Highland Hookah Lounge – 2201 W 32nd Ave., Denver CO 80211

Nara Hookah Lounge – 2280 S. Quebec St., Denver CO 80231