



July 31, 2013

Rules Coordinator
Liquor Control Board
P.O. Box 43080
Olympia, WA 98504-3080

Re: Urge Board Consideration of Tobacco/Alcohol Lessons to Prevent Youth Access to Marijuana

Dear Rules Coordinator:

We are writing to urge the Liquor Control Board to take a fresh look at its proposed marijuana licensing rules (CR-102) with a view towards strengthening the final rules to prevent youth access and early initiation, consistent with Initiative 502's direction. We believe that the Board should do this through applying the lessons learned from years of evidence and experience in alcohol and tobacco control.

While there is more to learn about the effects of marijuana use, we believe that a strongly preventive approach to protect youth is appropriate at this stage. Because the teen brain is still developing, teens are at higher risk for harm from marijuana use than adults. The availability of legal marijuana may put teens and young children at increasing risk for injury and adverse health outcomes. In the most recent Healthy Youth Survey conducted by the State of Washington, more teens reported using marijuana than cigarettes. The survey also revealed that increasingly, our state's youth believe that using marijuana once or twice a week is not risky and that marijuana is easier to get than beer, wine or hard liquor. Some studies suggest that regular use can cause problems with memory, learning and attention, school completion and behavior problems.

The Board can strengthen the draft rules and protect teens and young children by:

- Banning sales of tobacco-infused and alcohol-infused marijuana products.
- Requiring evidence-based messages that have been recommended by a group of health experts and rotating health warnings on packaging.
- Requiring educational signage with health warnings at point of sale.
- Restrict packaging that is appealing to youth or young kids. We agree with your general direction to restrict advertising, but the regulations should match precedential WAC language for alcohol and these limits should also be applied to packaging.
- Requiring the legally-mandated educational 'accompanying materials' to be produced by health experts, not industry, and contain evidence-based messages that can also be translated into multiple languages for our diverse communities.
- Requiring retailers to post point-of-sale age/birthdate stickers (E.g., "To purchase marijuana, a person must be 21 years of age, born on or before today's date in 1993").

I-502 furthers the goal of protecting teens and young children by requiring licensed marijuana facilities not to locate near youth-serving entities (meeting the required 1,000 foot limit from schools, child care centers, parks, libraries, bus transfer points and arcades). In order to ensure consistency in application of this requirement across the state, the Board should require applicants to demonstrate that they meet the requirement and the Board should verify these claims before it issues any licenses.

Making these changes now would strengthen the draft rules to create an effective system for curbing youth access from the onset of legal sales. We refer the Board to King County's technical comments for additional information on model rule language and rationale.

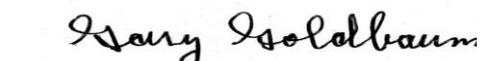
Thank you for your consideration.

Sincerely,


Dow Constantine, King County Executive


David Fleming, MD, Director and Health Officer, Public Health – Seattle & King County


Mark Ericks, Snohomish County Deputy Executive


Gary Goldbaum, MD, MPH, Health Officer and Director, Snohomish Health District


Pat McCarthy, Pierce County Executive


Anthony Chen, MD, MPH, Director of Health, Snohomish-Pierce County Health Department