

From: McCall, Karen J
To: [McCall, Karen J](mailto:Karen.J.McCall@awcnet.org)
Date: Aug 12, 2013, 9:49 AM
Subject: FW: Comments from AWC on 502 Rules

-----Original Message-----

From: Candice Bock [mailto:candiceb@awcnet.org]
Sent: Friday, August 02, 2013 2:14 PM
To: McCall, Karen J
Subject: RE: Comments from AWC on 502 Rules

Strange

Lets try this....

July 31, 2013

Board of Directors

Liquor Control Board

PO Box 43080

Olympia, WA 98504

RE: Proposed WAC 314-55 Marijuana Licenses, Application Process, Requirements and Reporting

Dear Liquor Control Board Members;

I am writing once again on behalf of our 281 member cities with comments on the proposed rules regarding implementation of legalization of marijuana under Initiative 502. Our organization and members are thankful for the Board's assistance in communicating the processes and potential impacts to our local communities. Many cities are waiting for the final rules before taking action. Additionally, recent activities by the federal government with local medical marijuana locations has added to the unease about how marijuana related businesses will operate in our communities.

AWC received a variety of specific comments from cities on the proposed rules that we shared with the Board during the previous comment period. These addressed correcting definitions, specifying the number of retail licenses, and restricting the hours of operation. We continue to ask that you address these important issues in the final version of the rules.

We appreciate the steps the Board has taken to direct potential applicants to work with local jurisdictions. We also appreciate the language in WAS

314-55-020 that clarifies that a state license is not grounds for violation of local regulations. However, we would still advocate for including a clear requirement that all applicants and licensees must comply with all applicable local laws and regulations including but not limited to those related to licensing, taxation, health and safety, zoning and land use, environmental regulations, and permitting. This clarification would insure that licensees are accountable not just to the state, but to the local jurisdiction and there is no excuse for flouting local laws and regulations.

We remain concerned about the provision in WAC 314-55-165 regarding objections to license renewals that would direct members of the public who have objections to the local jurisdiction. As cities have no authority over the issuance of a state license, it is highly inappropriate for the Board to defer citizen objections to the local jurisdiction. It is the Board's responsibility to address the concerns of citizens prior to renewing a license and it is not a responsibility that can be delegated.

It is important for the Liquor Control Board's focus to be on enforcement and compliance in order to alleviate the burden on our local resources. Cities agree with the assessment that the legal market will only work if there are adequate controls in place and effective enforcement against the illicit market. To that end, we believe there will be a need for financial resources provided to the local jurisdictions to help with that enforcement. We will work with the Board and the Legislature to secure that financial support.

AWC is grateful for the Board's willingness to work with and engage cities on this issue. We appreciate the LCB's staff and their participation in a number of meetings with city officials. We look forward to continuing to work together on this issue. If you have any questions about these comments, please feel free to contact Candice Bock (candiceb@awcnet.org) in our office. Thank you for the opportunity to share our comments.

Sincerely,

Mike McCarty sig

Mike McCarty

CEO

Attachment: AWC June 4, 2013 Comment Letter <<http://www.awcnet.org/portals/0/documents/legislative/AWC060413CommentLtrLCBI502.pdf>>

Candice Bock

Government Relations Advocate

Association of Washington Cities

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-----Original Message-----

From: McCall, Karen J [mailto:KJM@LIQ.WA.GOV]
Sent: Friday, August 02, 2013 1:43 PM
To: Candice Bock
Subject: FW: Comments from AWC on 502 Rules

Candice,

Your attachments are being blocked from my email. I don't know why, but is there any way you could send it as part of the language of the email?

Thanks, Karen

-----Original Message-----

From: Candice Bock [mailto:candiceb@awcnet.org
<mailto:candiceb@awcnet.org>]

Sent: Friday, August 02, 2013 9:29 AM

To: McCall, Karen J

Subject: RE: Comments from AWC on 502 Rules

Sure, sorry about that.

Candice Bock

Government Relations Advocate

Association of Washington Cities

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-----Original Message-----

From: McCall, Karen J [mailto:KJM@LIQ.WA.GOV <mailto:KJM@LIQ.WA.GOV>]

Sent: Friday, August 02, 2013 8:52 AM

To: Candice Bock

Subject: RE: Comments from AWC on 502 Rules

Candice,

Could you please resend the attachment. I am unable to view it.

Thanks, Karen

-----Original Message-----

From: McCall, Karen J

Sent: Friday, August 02, 2013 8:51 AM

To: McCall, Karen J

Subject: FW: Comments from AWC on 502 Rules

-----Original Message-----

From: Candice Bock [mailto:candiceb@awcnet.org
<mailto:candiceb@awcnet.org>]

Sent: Wednesday, July 31, 2013 1:22 PM

To: rules

Cc: Brittany Sill

Subject: Comments from AWC on 502 Rules

Thank you again for the opportunity to comment. Attached is our letter as well as the letter we submitted in June.

Candice Bock

Government Relations Advocate

Association of Washington Cities

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