



**WOODLAND HILLS-WARNER CENTER NEIGHBORHOOD COUNCIL
Community Impact Statement**

DRAFT 7/09/17– NOT YET APPROVED- SUBJECT TO REVISION

To: LA City Council President Herb Wesson, Jr and Members of the REIGN Committee

Re: Council File 14-0366-S5 and the Draft of Proposed Commercial Cannabis Regulations in the City of Los Angeles

Date of NC Board Action:

Update to Previous Input: NO

The Woodland Hills-Warner Center Neighborhood Council (WHWC) respectfully submits the following Community Impact Statement:

While there is a diversity of opinion within the NC and the community in regard to commercial cannabis sales, we recognize that legalization as reflected by Proposition 64 and LA City Measure M is the current state of the law in California and Los Angeles. While we have strong concerns about over-proliferation and unintended consequences, we appreciate the hard work and thoughtfulness of city councilmembers and staff reflected in the drafting of the proposed city legislation. The following are the WHWC comments:

1. We strongly support the City’s efforts to coordinate with Los Angeles County Office of Cannabis Management, and other departments; as well as neighboring cities to create a coordinated approach for regulation, planning, enforcement, and monitoring PRIOR to licensing commercial operations.
2. Whereas Proposition 64 mandates that marijuana products shall be “(1) *Not designed to be appealing to children or easily confused with commercially sold candy or foods that do not contain marijuana;* We ask that the city create a clear and consistent mechanism for regular enforcement.
3. In light of the following:
 - a. *Colorado and Washington State experienced substantial increases in calls to Poison Control Centers related to marijuana use in the initial year(s) following legalization.
 - b. Colorado experienced an average 49% increase in ER “likely marijuana related” visits during the 2013-14 two year period following legalization.
 - c. Colorado’s Marijuana-related traffic deaths increased 48 percent in the three-year average (2013-2015) since recreational marijuana was legalized compared to the three-year average (2010-2012) prior to legalization; and

there has been a 67 percent increase of operators testing positive for marijuana involved in a fatal traffic accident since recreational marijuana legalization in 2013.

- d. In Colorado all traffic deaths increased 11 percent during the 2013-2015 period and reversed what had been a downward trend in both total** and fatal accidents prior to legalization; while in Washington State the downward trend in traffic fatalities abated after legalization.
- e. Los Angeles City is already on track to experience two year-to-year increases in traffic deaths.

We strongly feel that a portion of revenue from taxes and other fees generated by cannabis production and sales should be earmarked for expanded first responder response and enforcement resources throughout the city to mitigate the potential public safety related effects of commercial cannabis.

4. In light of the issues mentioned in Item 3 above, we suggest the city commission a first-responder public impact report within 6 months of the opening of commercial retail establishments to analyze trends related to legalization and the impacts on first-responder services. We hope the city and county can cooperate in this reporting. The information tracked should be regularly updated as part of future annual reports government agencies may prepare on the issue.
5. We suggest the establishment of a mechanism for tracking and reporting fires and other property damage related to cannabis activity – and distinguishing between commercial and residential and legal versus illegal operations. This information would be included in first-responder and other reports on cannabis activity.
6. In light of the potential for fire or other structural/mechanical issues related to improperly built home grow rooms, and while we understand the risks are minimal for home growers who remain within the legal 6 plant limit, we suggest the city and/or county produce a public education pamphlet providing guidance on safe home cultivation.

Regarding specific provisions in the draft, we suggest:

7. Re: Page 27 – Item 20 – Signage: We suggest an addition to also restrict public consumption of Cannabis products – and not just “smoking” as the proposed signage currently reads.
8. Re: Page 33 – Item 18 – Electronic Age Verification: Please define more clearly whether sales (retail and delivery) can occur if the retailer’s age verification system equipment fails or is unable to operate due to connectivity or remote server issues. We would suggest that sales might need to be halted in some or all instances depending on the conditions of the failure.

9. Re: Page 35 – Item 9 – Delivery Employee Consumption: We suggest that in addition to not consuming while delivering, the following rule be added: a delivery employee shall not consume cannabis goods at least 24 hours prior to delivering cannabis goods.
10. We request that the ordinance include an automatic review provision so that it may be amended or otherwise modified – if needed, and that this review take place beginning in no less than six months and no greater than two years from the issuance of the first license under the legislation.
11. Finally, we ask that city officials and staff withhold issuing commercial licenses until the city can ensure that the necessary staff, training and resources for inspections, first-responders and others are in place so as not to create a drain on existing city services.

Thank you for your consideration. Please feel free to contact us with any questions.

* Sources: Rocky Mountain High Intensity Drug Trafficking Area report, “The Legalization of Marijuana in Colorado –The Impact” (Vol 4, Sept 2016) and March 2017 Supplement; Washington State Office of Financial Management “Monitoring Impacts of Recreational Marijuana Legalization” 2015 Update Report
**Colorado Department of Transportation Reports (Historical Fatality, Total Crashes, County specific)

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Cc: