



June 29, 2020

Adams County Board of County Commissioners
4430 S. Adams County Pkwy.
5th Floor, Suite C5000A
Brighton, CO 80601

CC: Adams County Community and Economic Development

Re: Marijuana Hospitality and Social Equity

Dear Adams County Board of Commissioners;

We are submitting comments regarding your upcoming Second Reading on the upcoming Marijuana Hospitality ordinance and in reference to the Study Session held on June 23rd. During that study session there was discussion on the recently passed HB 20-1424, *Social Equity Licensees in Regulated Marijuana*, and Commissioner Pinter asked if this bill would impact the Marijuana Hospitality regulations Adams County is currently considering. And while staff answered it would not, that is incorrect. The application of social equity would apply to all license classes as stated in the bill "A PERSON WHO QUALIFIES AS A SOCIAL EQUITY LICENSEE MAY APPLY FOR ANY REGULATED MARIJUANA BUSINESS LICENSE OR PERMIT" which includes the newly adopted licenses for marijuana hospitality and delivery. The Marijuana Enforcement Division still needs to conduct rulemaking around certain provisions of what defines a social equity applicant, however it would not preclude the County from adopting their own provisions around including a social equity designation for licensees who apply for a marijuana hospitality license, or a delivery license in the near future if the County so chooses to opt into that license class. Given the national conversations around restorative justice, we strongly encourage the County to consider social equity with these new license opportunities.

Another issue that was discussed around Social Equity by the board was a question of why social equity matters in marijuana but not in other industries. These questions were raised by Commissioners O'Dorisio and Tedesco and suggested that the issue of social equity in marijuana be pushed back to another discussion. We appreciate the Commissioners' concerns about social equity in other industries, but have to respectfully disagree with kicking the marijuana social equity can further down the road. Social Equity in marijuana presents a unique opportunity for people who have systemically barred from participation in an industry that, when it was criminalized, saw people and communities of color disproportionately punished and harmed. Right now, precious opportunities to enter this market are being seized by larger companies who are well financed while people of color are pushed out. Those systemic barriers to entry – through prohibitive background checks, high licensing fees, and intensive capital costs – are unique in an industry that is still brand new and emphasizes why a focus on social equity in marijuana now is critical. While social equity in all industries is important, entrepreneurs in those industries have fewer barriers to entry and equal, if not preferential, access to state and federal loan and grant programs and traditional banking. These advantages not available for those starting a cannabis business.

Finally, when the Board of Commissioners discusses this ordinance in your next public hearing, we again implore you to reconsider the provisions, that even without social equity considerations, create prohibitive access to this unique business opportunity. The 5 mile zoning and distancing is unnecessarily prohibitive and arbitrary as is a license cap and the lottery. We recommend these businesses be application and community driven with a lesser zoning distance that allows for more prospects. There are a wide variety of consumption models and that should be taken into consideration when communities welcome these businesses into their neighborhoods. Our state is approaching a massive recession and we need to provide as many opportunities for people – especially people of color – to create their own livelihoods. Additionally, we would like the Board of Commissioners to revisit the limitations on mobile premises. In the era of COVID, touring companies may require the use of multiple vehicles for tourism groups in order to maintain proper social distancing. A vehicle that could once transport 30 plus tourists, now must be divided into 2 or 3 for the same group.

We thank the board of Commissioners for this occasion to discuss these ventures and how we can be more inclusive in the marijuana industry.

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Colorado Cannabis Tours



Heidi Keyes
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Puff, Pass, and Paint



Samantha Walsh
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