



Creating safe and healthy communities
through the prevention of substance abuse and violence
in Washington State.

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Liquor Cannabis Board
3000 Pacific Avenue SE
Olympia, WA 98504

October 10, 2017

To Whom It May Concern:

I am writing to you to express opposition to establishing an option for homegrown marijuana. Marijuana is a drug that has been proven to be harmful to physiological and social/emotional development of youth. It is our responsibility as stewards of good public policy that protects youth from harm to ensure that access to marijuana is regulated and limited.

We are concerned that considering the option for home grow operations is another sign that there is a relaxed attitude that marijuana is safe because it is a natural plant or derived from a natural plant. Dr. Alex Garrard, clinical managing director of the Washington Poison Center states, "But this is still a drug. You wouldn't leave Oxycontin lying around on a countertop with kids around, or at least you shouldn't." Our points presented herein seek to educate you on the variety of threats that the home grow option presents to the safety, health and well-being of our communities and our youth.

The concerns of the Board of Directors of the Washington Association for Substance Abuse and Violence Prevention (WASAVP) were discussed at our September 22, 2017 board meeting. The result of our discussion is presented here to register our opposition to establishing an option for homegrown marijuana.

1. Subsequent to the passage of I-502 over 500 retail outlets have been established. These shops are the result of careful review by the LCB so that effective regulatory rules could be put in place. Providing the opportunity for home grown marijuana would open up the opportunity to feed the black market thereby violating the Federal Enforcement Guidelines presented in the Cole Memo that states we must prevent revenue from going to criminal enterprises, gangs and cartels. The temptation to sell home grown product is great and the profit motive would be a big incentive to grow.
2. We believe that the costs of monitoring home grow operations with LCB enforcement agents would be unmanageable. Sustaining an effective enforcement process would be very costly and could not be sustained. Such an

unregulated environment would provide numerous ongoing opportunities for home grown product to end up in the hands of youth.

3. Again the Federal Enforcement Guidelines calls for prevention of marijuana distribution to minors. Prevention was a major “selling” point in I-502 – “get marijuana out of the black market and out of the hands of gangs and regulate the market to protect our youth.” Home grow operations would provide greater exposure of marijuana to youth as it would be grown in family homes where youth reside and bring their friends. This manner of ongoing exposure to marijuana would lead to a further erosion of perception of harm to youth.
4. The research is clear that youth use is harmful to developing brains and bodies and has been shown to reduce IQ permanently. Greater exposure to marijuana in homes and neighborhoods would provide the opportunity for greater youth access to the drug.
5. Home grow operations would surely be conducted in neighborhood settings. In most urban areas homes are close together. The smell of marijuana grow operations has already been proven to be offensive to neighbors. Neighbors in communities have complained that their rights to live in a safe, clean and healthy community is disrespected and should not be allowed. Additionally, youth in the neighborhood would once again be exposed to grow operations that are basically unregulated. Having home grow operations throughout the community could lead to increased property crime, with marijuana from home grows being the target.
6. There is a danger of increased manufacturing of concentrates with home grow operations. Manufacturing of concentrates has already been shown to contribute to child endangerment. The Washington Poison Control Center has reported that marijuana exposures jumped by more than half from 158 in 2013 to 246 in 2016. The availability of edibles is also especially concerning as reported by Public Health Experts. In 2016 calls involving children nearly doubled for children under 12 (48 cases reported).
7. We also are very concerned that home grow operations have a clear “value” in the market place where home brews do not. The argument that, “people get to make their own wine and beer so why can’t we”, does not hold up in this instance. Home brews and home-made wine are made for personal consumption and since the alcohol market is so well regulated, getting those products into the general market place is not possible. However, experience shows us that home grow operations can have value in the marketplace and would likely be an enterprise opportunity for individual growers. Allowing home grow options would surely interfere with the regulated marketplace at the grow point and at the retail point.
8. With home grows people would not be buying their marijuana from a regulated source thereby undermining the tax base for marijuana sales.
9. There should also be concern for landlords who rent to those who might grow marijuana. Not only would landlords not be able to control such activity they would also suffer negative economic impacts to their properties. Indoor marijuana grow operations (which would be a necessity in the northwest weather) would damage the dry wall with moisture and the smell of the marijuana plant would become embedded in the walls, rugs and ceilings of buildings. Landlords would be saddled with the costs of clean-up and mitigation.
10. Finally we also believe that real estate values would go down in those areas where home grow operations proliferate.

We hope that these points are help you to make the right decision which is to select option #3
– No Home Grow operations!

Sincerely,



Priscilla Lisicich