



White Paper: Case Studies in Local Adult-Use and Medical Marijuana Regulation

Introduction

In 2016, California voters passed Proposition 64, the Adult Use of Marijuana Act (AUMA), which legalized marijuana use and possession for adults in the State. The San Luis Obispo City Council passed Ordinance No. 1633 in March 2017 banning marijuana uses to give City staff time to develop a well-informed regulatory approach in response to AUMA (now referred to as the Medicinal and Adult-Use Cannabis Regulation and Safety Act, or MAUCRSA).¹ Ordinance No. 1633 reaffirmed the City's prohibition of all commercial and industrial recreational marijuana uses, activities, and operations, except as permitted under state laws. The City Council also directed staff to return to Council with recommended changes to the City's Municipal Code after monitoring state and federal developments and conducting public outreach.²

The states of Colorado, Washington, and Oregon legalized nonmedical adult use and possession of marijuana in 2012, 2012, and 2014, respectively. As in California, these state laws allow local jurisdictions to decide what is allowed in their municipalities. Within these states, the cities of Denver, Seattle, and Portland have enacted relatively more permissive local marijuana legislation than other cities in their states. This paper examines how these cities—from a zoning perspective—have regulated adult use and medical marijuana since legalization, the impacts of these regulations, and lessons learned. While Denver has extensively analyzed the impacts of its land use regulations (among other impacts), Seattle and Portland have not (in part because Washington only recently legalized adult-use marijuana); this paper addresses all three cities to the extent information is available. Implications of these types of regulations as they may apply to the City's zoning regulations and considerations for San Luis Obispo are presented at the end of this paper.

While Colorado, Washington, and Oregon can provide important lessons for California cities, it is important to reiterate that legalizing adult-use marijuana at the state level is still too new to the United States to draw any lasting or concrete conclusions from. This paper also does not consider the

¹ While the State now officially uses the term cannabis, this paper will continue to use the term marijuana since that is the term used in current City regulations.

² City of San Luis Obispo. March, 14 2017. "Council Agenda Report: Marijuana Regulation."

sustainability, enforcement/inspections, public education and communication, and taxes and local revenue implications of legalization, although these are important considerations for San Luis Obispo when considering modifying marijuana-related regulations moving forward.

California Regulatory Framework

The City of San Luis Obispo has a variety of options for regulating adult-use of marijuana based on state law. Local jurisdictions have complete flexibility to decide whether to allow any type of commercial marijuana business and outdoor personal cultivation. These can be regulated through local land use, types of business licenses, environmental regulation, etc. Local jurisdictions cannot ban outright indoor personal cultivation nor use in private locations. Under state law, cannabis businesses are not allowed to locate within 600 feet of a school, day care center, or youth center; local jurisdictions can establish greater distancing requirements. A more detailed explanation of what MAUCRSA makes legal and what cities are allowed and not allowed to regulate are included in the March 14, 2017 Council Agenda Report: Marijuana Regulation prepared by City staff.

Two major changes to state regulation in relation to adult-use of marijuana have occurred since staff prepared the March 2017 Council Agenda Report. On June 27, 2017, Governor Brown signed Senate Bill No. 94, which repeals the Medical Cannabis Regulation and Safety Act (MCRSA) and includes certain provisions of MCRSA in the licensing provisions of AUMA, all together called the Medicinal and Adult-Use Cannabis Regulation and Safety Act (as noted above, MAUCRSA). The bill lays out 20 types of business licenses which fall into six categories: cultivation, manufacturing, laboratory testing, deliveries, retail sales, and distribution. In addition, microbusiness that vertically integrate one or more activities are permitted. Each category is either A, for adult-use, or M, for medical cannabis activity. MAUCRSA also changes building and fire safety standards for marijuana cultivators and how the state determines whether an application is compliant with local authorization.³

Assembly Bill 133, signed September 16, 2017, allows marijuana businesses with different license types to operate at a single location. The bill also changes some marijuana business definitions and again how the State determines whether an application is compliant with local authorization.⁴

³ California Senate Bill 94 Cannabis: medicinal and adult use. 2017.
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB94

⁴ California Assembly Bill 133, Committee on Budget. Cannabis Regulation. 2017.
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB133.

Case Study: Denver, Colorado

Colorado Regulatory Framework

Colorado voters legalized medical marijuana in 2000, but it was not widely commercially available until 2010. In 2012, Amendment 64 legalized adult (21 and older) use and possession of marijuana, as well as the retail sale, cultivation, and testing of marijuana. As in California, Colorado law allows local jurisdictions to decide what marijuana businesses to allow in their jurisdictions. In addition, they can impose place/time and land use restrictions on marijuana businesses.⁵ As of October 2016, only 21% of local jurisdictions in Colorado allowed both medical and retail marijuana facilities.⁶

Denver Regulatory Framework

The City of Denver primarily regulates marijuana businesses using licensing laws. Marijuana businesses are not specifically addressed in zoning regulations. Instead, zoning regulations align the business type with a land use category (see Figure 1). Denver requires marijuana business owners to get a zoning use permit when submitting an application for a license.

| Licensed MJ Business Type | Corresponding Zoning Land Use |
|--|---|
| MJ optional premises cultivation (<i>growing</i>) | Plant husbandry |
| MIPs – MJ infused products manufacturing license (<i>making</i>) | (1) Commercial Food Preparation & Sales; (2) General Manufacturing; or (3) Heavy Manufacturing |
| MMJ centers and MJ retail store (<i>selling</i>) | Retail Sales, Service & Repair, all others |
| Retail MJ Testing Facility (<i>testing</i>) | Laboratory, Research, Development and Technological Services |

Figure 1: Denver’s marijuana business license types and corresponding zoning land uses.

Impacts

In general, recreational marijuana stores in Colorado are concentrated in Denver. The stores in Denver account for 37% of stores statewide even though Denver houses only 12% of the state’s population.⁷ As of October 2016, 1,091 marijuana business licenses had been issued for 481 locations, with medical

⁵ Pramuk, Clare. December 2016. “Issue Brief: Marijuana Regulation in Colorado.” A Legislative Council Staff Publication. https://leg.colorado.gov/sites/default/files/16-36_issue_brief_on_marijuana_law.pdf

⁶ City and County of Denver. October 2016. “Marijuana Licensing, Legal and Land Use.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Licensing-Legal-Land-Use.pdf>

⁷ Denver Office of Children’s Affairs. October 2016. “Youth Prevention and Education.” Presentation for the Denver Marijuana Management Symposium.

grow making up the highest proportion at 35% and retail grow and medical storefront coming in close in second place at close to 18% (see Figure 2).⁸

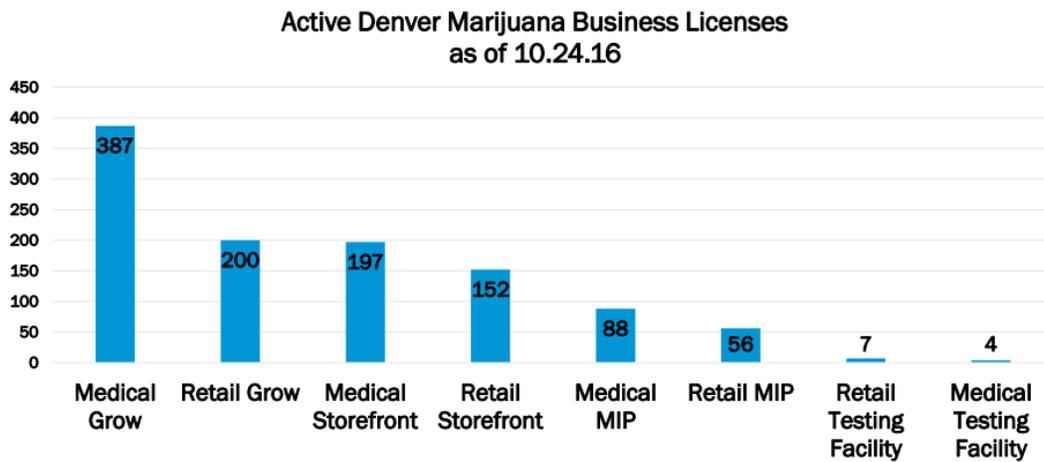


Figure 2: Active Denver marijuana business licenses by type, October 2016

Impact: Geographic Distribution

In October 2016, the Denver Office of Economic Development identified two major geographic patterns in marijuana business locations: 1) a significant portion of marijuana retail businesses are located in low-to moderate-income neighborhoods and 2) marijuana cultivation business “grows” are concentrated in industrial/warehouse districts⁹ in the northern and western portions of the City, possibly because of existing zoning restrictions and where warehouses in the City are available.¹⁰ **Error! Reference source not found.** shows a map of marijuana businesses as of October 2016.

Because of these concentrations of marijuana businesses and because few new medical marijuana cards were being issued, the Denver City Council adopted Bill 16-0912, “The Cap Bill,” in April 2016. The Cap Bill set an upper limit on the number of distinct marijuana cultivation and sales locations, halted all new medical marijuana and sales licenses, and prohibited marijuana businesses within 1,000 feet of a school or residential district. In addition to other procedural recommendations, the bill also requires marijuana license applicants to notify neighborhoods if they are moving to or locating in a “saturated” neighborhood.¹¹

⁸ City and County of Denver. October 2016. “Marijuana Licensing, Legal and Land Use.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Licensing-Legal-Land-Use.pdf>

⁹ City and County of Denver. October 2016. “Marijuana Licensing, Legal and Land Use.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Licensing-Legal-Land-Use.pdf>

¹⁰ Denver Office of Economic Development. October 2016. “Economic Impacts & Outcomes.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Financial-Impacts-Employee-Safety.pdf>.

¹¹ City and County of Denver. April 18, 2016. “Ordinance No. 16-0291.”

<https://www.denvergov.org/content/dam/denvergov/Portals/723/documents/ORD%2016-0291%2005.01.16.pdf>; City and

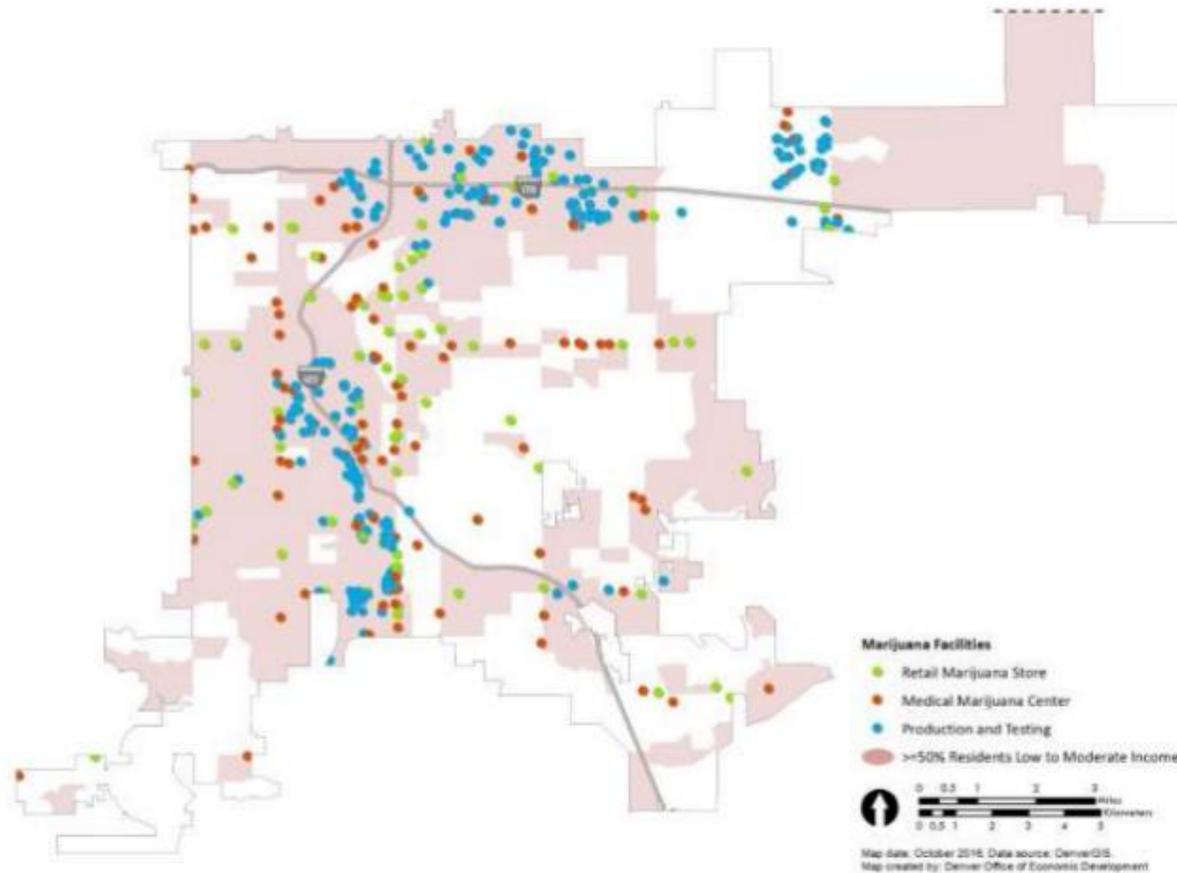


Figure 3: Map of Denver marijuana facilities and low to moderate income residential areas, October 2016.

Impact: Real Estate Market

While several factors have influenced the Denver real estate market since recreational marijuana use legalization, including a recovering economy and urban revitalization, the Denver Office of Economic Development believes that marijuana businesses have represented a “significant share of new commercial leases since legalization.” Since legalization, commercial lease values have doubled and leases have increased at least 50% or more. The properties used by marijuana businesses are typically Class “B” and “C” buildings.¹²

County of Denver. October 2016. “Marijuana Licensing, Legal and Land Use.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Licensing-Legal-Land-Use.pdf>; City and County of Denver. October 2016. “Marijuana Licensing, Legal and Land Use.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Licensing-Legal-Land-Use.pdf>

¹² Denver Office of Economic Development. October 2016. “Economic Impacts & Outcomes.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Financial-Impacts-Employee-Safety.pdf>.

Impact: Economic Outcomes

As of October 2016, marijuana businesses accounted for less than 1% of Denver’s employment. Average annual wages in the cannabis industry are a little less than half of Denver’s average as a whole (\$34,000 compared to \$65,200). In 2016, annual cannabis sales in the City were approximately \$500 million, which on average is \$125,000 per employee. Retail marijuana sales make up 55% of total and 70% of tax revenue from marijuana.¹³

| Denver | 2014 | 2015 | 2016 |
|--------------|-----------------|-----------------|-----------------|
| Retail | \$148.8M | \$218.7M | \$288.3M |
| Medical | \$178.2M | \$191.7M | \$211.8M |
| Total | \$327.0M | \$410.4M | \$500.1M |

Figure 4: Marijuana sale revenue in Denver, 2014 – 2016.¹⁴

Impact: Crime

Overall, while marijuana-related and marijuana industry-related crimes in Denver increased slightly between 2012 and 2016, these crimes as a percentage of crime overall in the City decreased. In 2016, these crimes made up less than 1% of crime overall in the City. Burglaries or attempted burglaries made up the largest portion of marijuana industry-related crimes at 78% in 2016. Only three reported violent crimes out of 209 crimes were related to the licensed marijuana industry in 2016.¹⁵

The City of Denver issued more tickets for public consumption and fewer for possession of marijuana between 2012 and 2016, although combined these tickets have decreased (see Figure 5). Driving under the influence of marijuana has more than doubled since 2013, but only from 33 to 73, but still makes up less than 3% of DUI and DUIDs in Denver in 2015.¹⁶

¹³ Denver Office of Economic Development. October 2016. “Economic Impacts & Outcomes.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Financial-Impacts-Employee-Safety.pdf>.

¹⁴ City and County of Denver. 2017. “The Denver Collaborative Approach: Leading the Way in Municipal Marijuana Management.” https://www.denvergov.org/content/dam/denvergov/Portals/782/documents/Collaborative_Approach_PDF.pdf.

¹⁵ City and County of Denver. 2017. “The Denver Collaborative Approach: Leading the Way in Municipal Marijuana Management.” https://www.denvergov.org/content/dam/denvergov/Portals/782/documents/Collaborative_Approach_PDF.pdf.

¹⁶ City and County of Denver. October 2016. “Measuring the Impacts.” <https://www.dmms2017.org/wp-content/uploads/2016/11/Measuring-the-Impacts.pdf>.

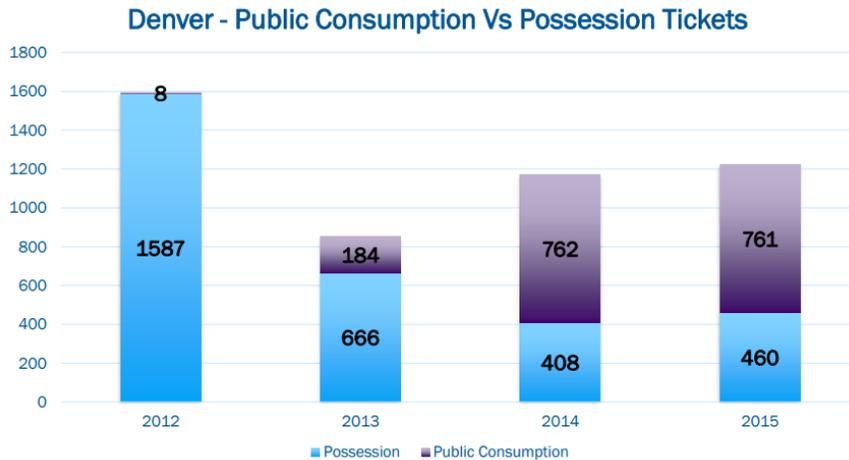


Figure 5: Public consumption and possession tickets issued from 2012 to 2016 in Denver.

Impact: Environment

The primary environmental impacts of marijuana businesses in Denver have been an increase in electricity use, especially used for marijuana cultivation, and complaints of odor from cultivation and manufacturing facilities. Because cultivation and manufacturing facilities are concentrated in the north and west areas of the City, the odor issue is more prominent in those areas. Marijuana is the fourth most complained about odor in Denver (see Figure 6).

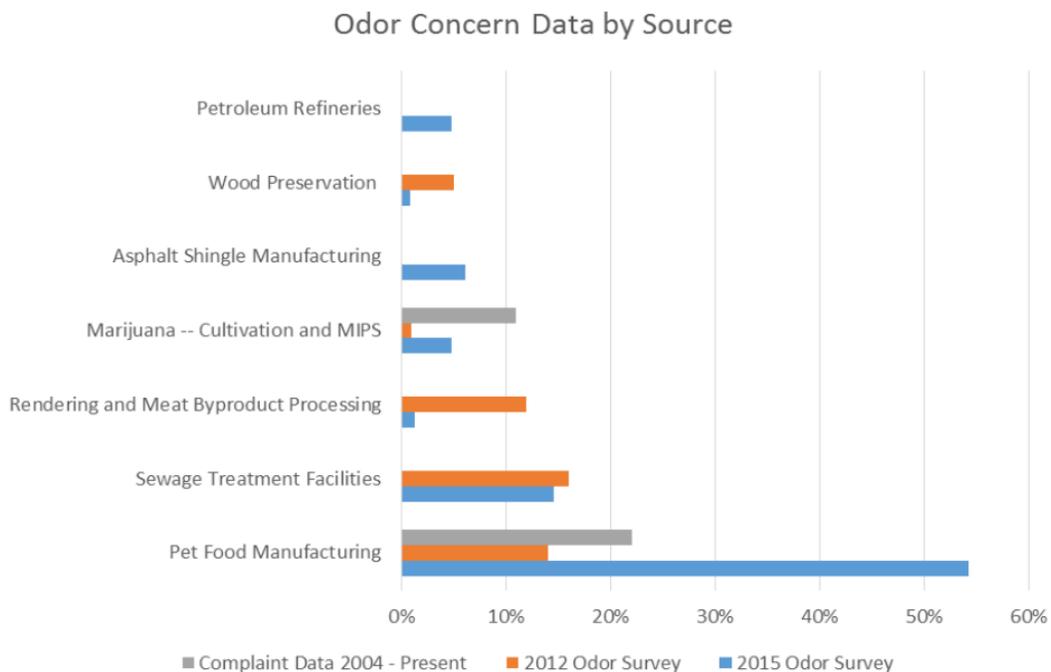


Figure 6: Denver odor concerns by source

To address these odor complaints, in May 2016 Denver passed an odor ordinance that considers odor to be a public health nuisance under air pollution regulations. It requires the industry types that generate the most odor complaints—which includes marijuana cultivation and manufacturing businesses—as well as businesses/households that receive a certain number of complaints, to adopt an “Odor Control Plan.”¹⁷

Lessons Learned

1. Be aware of possible regulatory gaps. Some marijuana uses are not a commercial business but may need additional regulation, such as caregiver grows, home grows, collectives, and home extractions.
2. Consider that the marijuana industry, relatively new in the U.S., is evolving. Zoning code policies or interpretations can be used to fill gaps in policies until more comprehensive approaches are adopted.
3. Consider possible unintended consequences of impact in low-income neighborhoods or similar locations where barriers to entry are low.
4. Consider implementing stricter regulations first, then loosening as time goes on.
5. Be aware of potential over-concentration of marijuana-related uses, similar to concerns associated with liquor establishments.
6. Regulating marijuana uses strictly by business license and not specific zoning regulatory controls can lead to the over-concentration and odor concerns experienced in Denver. Also, unless a control procedure is in place, the burden of ensuring adequate distance from schools and parks (and other identified sensitive uses) might fall to the Finance Department rather than the Community Development Department.

Case Study: Seattle, Washington

Washington Regulatory Framework

In 2011, the state of Washington legalized use, cultivation, and processing of medical marijuana. In 2012, the state legalized recreational marijuana, requiring all businesses to locate outside of a 1,000-foot buffer around schools, recreation areas, and public transit centers, and restricting advertising and signage. In 2015, the state combined the recreational and medical marijuana legislation and allowed local regulators to reduce buffer zones to between 100 and 1,000 feet.¹⁸

¹⁷ Denver Department of Environmental Health. October 2016. “Community Health & Safety.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Community-Health-Safety.pdf>

¹⁸ City of Seattle, Mayor’s Office of Policy and Innovation. October 2016. “National Roundtable: City of Seattle Cannabis Legislation.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/National-Roundtable.pdf>.

Seattle Regulatory Framework

The City of Seattle primarily regulates marijuana businesses using zoning, categorizing the businesses as retail sales and services, urban farms, food processing, or light manufacturing. All marijuana businesses are prohibited from the majority of residential and mixed-use zones. In some zones where marijuana businesses are permitted, they are restricted to 10,000 square feet or 25,000 square feet, depending on the category in which the business falls.¹⁹ Seattle also prohibits marijuana-related businesses from locating within 1,000 of schools and playgrounds, and between 250 and 500 feet of other recreational areas, depending on whether the business is a retail or other establishment; lower distances apply in downtown zones. See Figure 7 for more information.²⁰ In addition, while two retail stores can locate within 1,000 feet of each other, a third retail store must be more than 1,000 feet from the other two.²¹

Buffer and Dispersion Requirements

Certain marijuana-related businesses must be separated by a minimum distance from each other and from other types of uses. Those separations are:

| Applicable Uses* | Buffer/Dispersion Requirement** |
|--|--|
| New or expanding major marijuana activity must be separated from: <ul style="list-style-type: none"> ■ Elementary schools ■ Secondary schools ■ Playgrounds | 1,000 feet |
| New or expanding major marijuana activity that includes retail sales must be separated from: <ul style="list-style-type: none"> ■ Child care centers ■ Game arcades ■ Libraries ■ Public parks ■ Public transit centers ■ Recreation centers or facilities | 500 feet in all zones, except as provided below: 250 feet in portions of the DMR and DMC zones*** |

| Applicable Uses* | Buffer/Dispersion Requirement** |
|--|--|
| New or expanding major marijuana activity that does not include retail sales must be separated from: <ul style="list-style-type: none"> ■ Child care centers ■ Game arcades ■ Libraries ■ Public parks ■ Public transit centers ■ Recreation centers or facilities | 250 feet |
| New or expanding major marijuana activity involving retail transactions must be separated from any other major marijuana activity involving retail transactions. | No more than two major marijuana activities involving retail transactions may be located within 1,000 feet of each other. Where two major marijuana activities that include retail transactions exist within 1,000 feet of each other, any new marijuana activity involving retail transactions must be 1,000 feet or more from the two existing uses. |

Figure 7: Seattle marijuana business buffer and dispersion requirements

Impacts

The City of Seattle has 146 licensed marijuana businesses within its boundaries, which represents 11% of the state’s retail locations and 8% of the state’s producers and processors. Seattle currently does not have publicly available data on the land use impacts of marijuana legalization.

¹⁹ See slide 39 of City of Seattle, Finance and Administrative Services. October 2016. “Marijuana Regulation through Land Use and Licensing.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Licensing-Legal-Land-Use.pdf> for more information.

²⁰ City of Seattle, Finance and Administrative Services. October 2016. “Marijuana Regulation through Land Use and Licensing.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Licensing-Legal-Land-Use.pdf>.

²¹ City of Seattle, Mayor’s Office of Policy and Innovation. October 2016. “National Roundtable: City of Seattle Cannabis Legislation.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/National-Roundtable.pdf>.

Lessons Learned

1. Consider a variety of marijuana and marijuana-related businesses when creating regulations (including retailers including delivery services, vending machine operators, testing labs, transporters, use lounges both private and public, and temporary events).
2. As noted above, anticipate the unexpected, as the industry is new and changing.²²

Case Study: Portland, Oregon

Oregon Regulatory Framework

In 1998, Oregon legalized medical marijuana cultivation, possession, and use by doctors, but the state did not create legalized medical dispensaries and a marijuana registry until 2013. In 2014, the state legalized the recreational use of marijuana. Since that time, Oregon has been slowly phasing in recreational marijuana. The state first allowed the sale of recreational marijuana at medical dispensaries in August 2015. Not until October 2016 did the state began licensing recreational marijuana stores. Under Oregon law, local regulators have control over marijuana sales. According to state law, marijuana facilities cannot be at the same address as a liquor store, in an area zoned only for residential use (excepting private producers), or located within 1,000 feet of a public or secondary school.

Portland Regulatory Framework

The City of Portland regulates marijuana facilities through a series of licensing requirements which fall into the categories of minimum standards, regulatory compliance, and safety and livability. Each category of marijuana facilities falls into a distinct Portland zoning code category (see Figure 8). In addition, marijuana dispensaries and retailers must be outside of a 1,000-foot radius around other dispensaries and retailers and primary and secondary schools, although there are no restrictions relative to other marijuana facilities.²³ To address community concerns about the possible concentration or saturation of medical marijuana business, the City put in place the following restrictions to regulate recreational marijuana:

- Restricts marijuana businesses from some zones that are not exclusively residential
- Requires security system for marijuana businesses
- Requires proof of an air filtration system for marijuana businesses to reduce odors²⁴

²² City of Seattle, Finance and Administrative Services. October 2016. "Marijuana Regulation through Land Use and Licensing." Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Licensing-Legal-Land-Use.pdf>.

²³ City of Portland. "Marijuana Policy Program." <https://www.portlandoregon.gov/oni/article/619136>

²⁴ City of Portland. "Cannabis Policy Center: Portland Cannabis Business Regulations." <https://www.portlandoregon.gov/oni/article/622978>

| State categorization | Portland Zoning Code use categorization |
|----------------------|---|
| Production | Agriculture |
| Processing | Manufacturing and Production |
| Dispensary/Retailer | Retail Sales and Service |
| Wholesale | Wholesale Sales |
| Labs and Research | Industrial Service |

Figure 8: Portland zoning code use categorization for marijuana facilities

As an aside, the cities of Eugene and Corvallis, both of which are college towns, have virtually no land use regulations for marijuana facilities. They have focused instead on taxation and revenue generation. Corvallis prohibit use in public and prohibits homegrown marijuana in public view.

Impacts

As of October 2016, Portland had 80 medical marijuana dispensaries and 16 recreational businesses. The majority (11) of these recreational businesses are retailers, with two wholesalers and three producers.²⁵ Portland decision-makers have stated their commitment to changing policies based on a changing marijuana industry and as informed by the City’s Marijuana Policy Oversight Team.²⁶ As legalization is relatively new in Portland, the land use impacts have not been identified.

Considerations for the Updated Zoning Regulations

- The City of San Luis Obispo has wide discretion for allowing various types of marijuana businesses. Through the public engagement process, staff and decision-makers will learn of community desires regarding marijuana regulation. From a land use regulatory perspective, the City will need to determine which types of uses will be permitted in which zones (if at all), and whether uses will be allowed by right or require a Director-level or Planning Commission-level Use Permit.
- It may be appropriate and probably necessary to have detailed regulations in Title 5 (Licenses, Permits, and Regulations) of the Municipal Code that complement the Zoning Regulations. In effect, marijuana-related businesses might have regulations akin to massage establishments in terms of land use restrictions and business licensing requirements.
- Consideration should be given to over-concentration, if this is a community concern.
- The City may elect to include buffering requirements from schools, parks, and other defined sensitive uses that are greater than the 600-foot standard established by MAUCRSA.

²⁵ City of Portland. October 2016. “Marijuana Policy Program.” Presentation for the Denver Marijuana Management Symposium. <https://www.dmms2017.org/wp-content/uploads/2016/11/Licensing-Legal-Land-Use.pdf>

²⁶ City of Portland. “Marijuana Policy Program.” <https://www.portlandoregon.gov/oni/article/619136>

- Given the cash nature of marijuana businesses due to financial institutions' unwillingness to engage in transactions with these businesses, the Police Department may want to weigh in on security requirements included in the Zoning Regulations. Alternatively, such requirements could be included in Title 5.
- If the City is concerned about on-site consumption at marijuana businesses and patrons leaving the businesses under the influence, consider prohibiting on-site consumption at sales locations.
- An October 1, 2017 editorial in the *Los Angeles Times* opined that it is disingenuous for cities to allow marijuana businesses but then severely limit where smoking can occur (e.g., not in public places, not in cars, not in multifamily housing developments). Given that San Luis Obispo has well-defined smoking restrictions for tobacco products, the same might apply to marijuana. (Note that this is not a land use/zoning issue.)
- Understand that some marijuana processing/manufacturing activities involve the use of explosive materials. This needs to be considered when determining where such businesses can locate.
- The City currently prohibits uses or activities that cause persistent offensive odors to emanate across property or parcel lines in Chapter 8.22 of the Municipal Code. If the City is interested in allowing commercial marijuana cultivation or manufacturing, it could consider emulating Denver's odor ordinance requiring industries that create odor to create an "Odor Control Plan." In addition, require an Odor Control Plan for any cultivation or manufacturing, personal or commercial, that receives more than five odor complaints in a month.
- With regard to personal cultivation, if allowed outdoors, the Zoning Regulations need to be clear regarding location, plant height, etc. so that they can easily be enforced.

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