



# Seattle City Council

October 7, 2013

Rules Coordinator  
Washington State Liquor Control Board  
PO Box 43080  
Olympia, WA 98504-3080

Dear Rules Coordinator:

Thank you for your diligent work to create rules to implement Initiative 502. We appreciate your thoughtful consideration of the myriad issues involved in creating these rules, as you work toward the adoption of rules, currently scheduled for October 16.

The Liquor Control Board may not issue licenses for the sale of marijuana to businesses located less than 1,000 feet from an elementary or secondary school, playground, recreation center, child care center, public park, public transit center, library, or game arcade where admission is not restricted to persons age 21 or older. These restrictions result in limited areas of Seattle being available for retail sales.

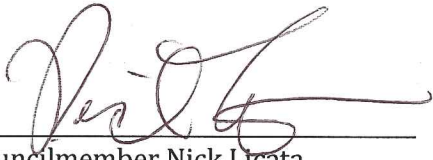
We are concerned with how these restrictions could interact with the proposed rules for marijuana retail licenses. New section WAC 314-55-081 (1) of the proposed rules for marijuana retail licenses states that should the number of eligible applications exceed the allotted amount of retail locations in a city (21 in Seattle), licenses will be granted by lottery.

Should there be more than 21 eligible retail applications in Seattle, and the licenses are granted by lottery, this could potentially result in clustering of retail sales in a few areas, and other eligible areas having no retail locations.

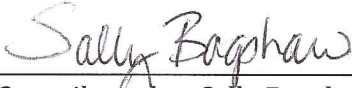
Should a lottery result in a lack of geographic dispersion of retail locations within Seattle, this could make fulfilling the goals of I-502 more difficult.

We encourage you to incorporate consideration of geographic dispersion of retail licenses into your rules.

Sincerely,



Councilmember Nick Licata



Councilmember Sally Bagshaw



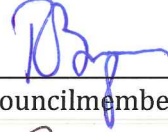
Councilmember Richard Conlin



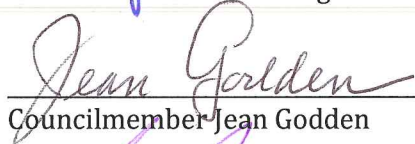
Councilmember Bruce Harrell



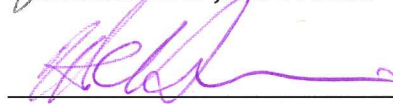
Council President Sally Clark



Councilmember Tim Burgess



Councilmember Jean Godden



Councilmember Mike O'Brien



Councilmember Tom Rasmussen