



## Public Comments and DPH responses on Proposed Rules and Regulations for Cannabis Consumption Permits<sup>i</sup>

### Sec. 3. Applicability of Article

1. The proposed regulations allows an existing MCD that was never denied a consumption permit to apply for a Type C without having a Designated Cannabis Smoking Room so long as (1) they prove adequate ventilation and (2) apply within in 30 days of your department making the application available. This would mean that the sections describing all the details about DCSR also not be applicable. Am I missing anything? If I have that correct, how does one go about demonstrating adequate ventilation? Are there particular standards in mind, or would a report from a certain type of professional consultant suffice?
2. The rules state that only a current Article 16 permit holder can apply. Since those won't be issued for some time, does this mean that MCD has to wait until the Article 16 license is issued, or would they still apply within the first 30 days of your permit being available? If the later, would the consumption permit not be processed until after the Article 16 permit is issued?
3. The Ordinance needs a section addressing how the permit applies to microbusinesses. The proposed ordinance provides, "Cannabis Microbusiness' means a fixed place of business where Cannabis and/or Cannabis Products are Cultivated, Manufactured, Distributed, and Sold to Customers." (Section 2.) The proposed ordinance also provides for all onsite consumption permits that permittees "may not cook, compound, blend, infuse, extract, or prepare cannabis products. Section 21(b). "Preparation' means the heating, re-heating, or serving of Cannabis Products." Section 2. Generally, a microbusiness licensed and permitted to conduct manufacturing activity is allowed to infuse, blend, extract, etc. Therefore, clarity is needed to address microbusinesses engaged in manufacturing activity who wish to obtain an onsite consumption permit.
4. Micro businesses that do not have a storefront retail should be allowed to have onsite consumption. State law does not specify a particular microbiz structure in order to also have onsite consumption. The goal of a microbiz is to allow patrons to sample products that were made by the operator. If a microbiz permittee can meet the requirements outlined in the city's regulation pertaining to ventilation, etc., they should be able to provide a la carte products for sale and consumption within the designated smoking room.
5. Can a business that doesn't sell cannabis apply for a consumption permit?

### DPH Response:

- *This is incorrect. Article 8 A indicates that an existing MCD that was not prohibited, as in allowed or approved to smoke cannabis on the premise may continue to exist, this includes one MCD that is currently re-opening after being forced to shut down by threat federal prosecution. The existing locations were "grandfathered" in by the Board of Supervisors to allow for the smoking of*

*cannabis. All new cannabis consumption locations will need to follow the new standards developed under Article 8 A.*

- *The City and County of San Francisco requires that you first receive a Store Front Cannabis Retail Permit from the Office of Cannabis and a Store Front Cannabis Retail License from the California Bureau of Cannabis Control, before you receive a Cannabis Consumption Permit by the Department of Public Health. The health department is working closely with the Office of Cannabis to align Plan Check review to reduce duplicated processes. However, while the timeline may coincide with the Article 16 permit process, final approval of a Consumption permit will need to occur after the Office of Cannabis and the State of California approve the Cannabis Storefront.*
- *California law requires all sales of cannabis goods to customers must take place within the retail area of the Cannabis retailer's licensed premises, except for cannabis goods sold through delivery. A non-storefront retailer licensee shall be authorized to conduct retail sales exclusively by delivery. The licensed premises of a non-storefront retailer licensee shall be closed to the public.*
- *California law considers the preparation of Cannabis edible goods for consumption "manufacturing", please refer to the State Regulations on Manufacturing. <https://www.cdph.ca.gov/Programs/CEH/DFDCS/MCSB/Pages/MCSB.aspx>*
- *California law requires that a microbusiness have separate and distinct areas for manufacturing and retail sales. Blend, infusing, and extracting cannot occur in the retail area of a cannabis microbusiness.*

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## **Section 5. Cannabis Consumption Permit Types**

1. Hello, it is imperative that we allow permits for on-site cannabis consumption.
2. The state of CA has made a choice to legalize recreational cannabis. Just as we provide them the choice to consume alcohol in a public setting. Furthermore, many medical patients are unable to consume in their living spaces for various reasons, it is absolutely critical that we give patients a SAFE place to consume their medicine.
3. There should be a fourth type, allowing a non cannabis business to offer on-site consumption for "pre-packaged" cannabis goods (ie. a licenced delivery service can drop off cannabis goods to a non-cannabis place and the consumer has the right to consume them there)
4. I would like to bring an issue to your attention that threatens the survival of the onsite cannabis lounges currently operating in San Francisco. As drafted, the proposed rules for Cannabis Consumption Permits unintentionally endanger existing consumption lounges. As you know, cannabis lounges are a treasured resource in the community as they provide a place for low income residents to consume safely and find community. Many who frequent these lounges live in federally subsidized housing where they cannot consume cannabis. The loss of any existing consumption lounges would force this underserved community to look elsewhere for safe spaces to consume cannabis.

In the proposed regulations for Cannabis Consumption Permits, DPH suggests allowing existing, grandfathered consumption establishments to continue as-is provided there is no change in ownership. However, if a dispensary changes ownership, the regulations require the construction of a separate consumption room, and other extensive building requirements. We believe this is

reasonable if there is otherwise new construction, as new and remodeled facilities can be designed to accommodate a separate smoking room. However, these requirements pose significant challenge for existing facilities as these have limited space and may not be able to accommodate such a room.

As the cannabis market continues to develop and new operators open, many existing businesses will change hands. As currently written, the ordinance would require a smoking room to be built in the event of any transfer, eliminating these grandfathered consumption establishments that serve a community in need. Furthermore, it is not standard or usual to require that building code upgrades be made when owners transfer businesses.

Typically, this is only the case when a building is upgraded or modified, not for a simple re-tenanting. I ask that you support the grandfathered status of these lounges even when the underlying business is transferred.

5. Hi, my name is Kimberly Belle and I am the cofounder of the Crop-to-Kitchen community, a cross-pollinated volunteer organization of individuals from both the cannabis and hospitality industries who are committed to legalizing a pathway to cook, serve and sell cannabis cuisine in California. Together with city and state officials, we hope to lift ingredient prohibitions on packaged edibles, develop responsible food safety practices we can employ to safely permit made-to-order cannabis cuisine prepared with fresh, healthy foods, and advocate for more (and more broadly regulated) consumption lounges (and other retail venues) to usher in a new era of canna dining experiences in California. At Crop-to-Kitchen, we believe that when voters voted to legalize adult use cannabis in California they assumed they'd be able to enjoy this magnificent plant, this farm grown ingredient, in its full culinary expression. The proposed permits do help us recognize this right to eat freshly prepared infused meals in a dining setting. At C2K we also believe San Francisco is poised to ride the farm-to-table movement's coattails to become the dining capital of Crop-to-Kitchen cannabis cuisine. There are other cities vying for this title and the tax revenue this new industry segment will bring, but we believe only San Francisco has the historic civil rights legacy, the culture of innovation, the culinary esteem and the bounty of the best sun grown cannabis in the country, to steward this movement with integrity, equity and sustainability. We hope that you will work with us to grow beyond the scope of the proposed permits and lean into innovating and responsibly regulating the "budding" cannabis cuisine industry.
6. One more license type for stand-alone consumption facilities (Café, yogo studios, etc)
7. 2 stand-alone harm reduction facilities. Municipal gardens.
8. Want to be able to cook cannabis cuisine in San Francisco. Made with fresh health foods. Wants more cannabis consumption facilities that allow for active food prep as well as utilizing PHFs. Wants SF to be the leader of crop to kitchen cuisine.
9. More location leniency. IE Fisherman's Warf. Separate permit for facility that does not have an active retail storefront.
10. Pro Stand-alone permits away from a retail location. Safe locations will prevent people from seeing it on the street.
11. More permit types.

12. Microbusiness can extract onsite, but 8a says that can't happen onsite. Clarify.
13. The consumption ordinance seems to only want to allow pre-packaged cannabis goods. For examples, for Type B (Limited Preparation) permits, "[p]ermittees may **heat**, reheat or dispense a prepackaged cannabis product only." Section 21(a). Emphasis added. However, Type B permits do not allow "cooking." Section 21(b). There is contradiction here illustrated by the following example: a cannabis business has pre-packaged brownie batter (cannabis infused) and the cannabis business would like to bake it for their customers to serve them pot brownies; would this baking be considered "cooking," which is prohibited, or "heating," which is allowed?
14. As we all may already know, San Francisco has a long history of being a tolerant and socially progressive city. SF has set trends and has paved the way for cannabis culture, cultivars, and industry all over the world. From the days of Brownie Mary and Dennis Peron's Cannabis Buyers Club where they highlighted the impacts of social interaction on the healing of individuals with cancer and AIDS, to today's cultural experience of Hippy Hill, to the prioritization of people who have suffered the impacts of cannabis prohibition: SF can continue to create a cannabis landscape that honors its legacy of social awareness and cultural and business innovation.

Social cannabis consumption is an issue of social equity, because cannabis consumption in public is still illegal and, according to the Equity Report, the policing trends show disproportionate cannabis arrests of black and brown San Franciscans. Thus it's important that there be more options for social consumption in neighborhoods with a history of heavy policing. Presently, the viable business models for "Equity Applicants" are limited. The start-up capital required for storefront cannabis retail is over \$1.5 million. Stand-alone consumption spaces will create an opportunity for more individuals to creatively contribute to the cannabis ecosystem and could help preserve SF's compassionate legacy around the healing that happens when people are in community with one another.

On a business level, tourism is a huge part of SF's economic fabric, we receive roughly 28 million visitors annually. Many visitors order from our delivery services, not from a storefront retailer, because they prefer discretion. Where will they consume? Because there is a diverse need, stand-alone consumption would help to address several of the issues created by having only 3 consumption permit types. Stand-alone consumption spaces could:

- Provide spaces for vulnerable communities to safely consume
  - Those who reside in public housing are not allowed to consume, and if they do, they put their housing at risk and are subject to a fine.
  - Legal residents and undocumented peoples are particularly at risk when consuming because cannabis is still a Schedule 1 substance at the Federal level.
  - Most rental housing, as well as university campuses have also included language in their leases, meaning that safe consumption is currently only being limited to retail and homeowners. It is likely that racial disparities will remain when enforcing these consumption restrictions.
- Provide spaces for tourists to safely consume
  - Cannabis already brings a large tourist population, and now that new businesses are emerging offering tours to visitors curious about the adult use market, there

- needs to be more safe spaces for them to be able to consume, so that they are not a public nuisance on our streets and parks. This, in turn, also ensures that visitors are not placing themselves at risk for any racially biased interactions.
- Medical patients with disabilities and the elderly require accessible, ADA compliant spaces to safely consume.
  - Fulfill the demand for spaces that host Cannabis Events
    - The temporary events license and cannabis event organizer license has created a new demand for a unique use. Since they both require spaces that fall under the 600ft buffer, there will only be a handful of spaces that they will actually be able to approach.
    - Often, nonprofits in cannabis require these spaces for fundraising events.
    - As the regulation currently stands, only retail would be able to financially benefit from this unique demand. Allow for more equitable social consumption models
    - Social consumption spaces should be modeled after public spaces that provide resources to the local community.
    - Can be used as spaces that provide educational resources to the public about cannabis use to address the stigma behind it.
    - Can be used as physical spaces for equity applicants to study, work on their business paperwork, and receive or complete any technical assistance that would have otherwise only been an interaction online, which may not be accessible to all.
    - Can serve as healing spaces for those most impacted by the war on drugs
  - Provides an opportunity local economic development
    - A stand alone business model provides entrepreneurs with another avenue for generating more local tax revenue. Through event rental fees, memberships, and any sale of non-alcoholic drinks or food, stand alone social consumption spaces allow for more business development opportunities in the City of San Francisco.
16. Add another license type that allows for extended business hours. San Francisco has a bar culture. When professionals finish with work or want to go out on the weekends, they usually go to bars to socialize and drink. Bars are generally open until 2:00 AM. To address issue of onsite consumption patrons decamping to bars, I recommend offering a cannabis bar license where a cannabis retailer can operate as a cannabis “bar” similar to a regular bar. The cannabis business would be allowed to remain open until 2:00 AM to create the similar social atmosphere as a bar, which would reduce likelihood of patrons combining cannabis and alcohol consumption.

**DPH Response:**

- *California law requires all sales of cannabis goods to customers must take place within the retail area of the Cannabis retailer’s licensed premises, except for cannabis goods sold through delivery. A non-storefront retailer licensee shall be authorized to conduct retail sales exclusively by delivery. The licensed premises of a non-storefront retailer licensee shall be closed to the public.*
- *The City and County of San Francisco requires that you first receive a Store Front Cannabis Retail Permit from the Office of Cannabis and a Store Front Cannabis Retail License from the California*

*Bureau of Cannabis Control, before you receive a Cannabis Consumption Permit by the Department of Public Health.*

- *California law considers the preparation of Cannabis edible goods for consumption “manufacturing”, please refer to the State Regulations on Manufacturing. <https://www.cdph.ca.gov/Programs/CEH/DFDCS/MCSB/Pages/MCSB.aspx>*
- *Microbusiness with a State Manufacturing License of Type 7 or Type 6 can extract onsite. The portion of the Manufacturing space in a Microbusiness must be separate and distinct from a space where a Microbusiness has their storefront retail location. A Microbusiness cannot extract or infuse cannabis products in their retail space.*
- *The City and County of San Francisco will release Application for Cannabis Consumption Permits at the end of 2018.*
- *The Board of Supervisors passed Article 8 A allowing existing MCD that were not prohibited, as in allowed or approved to smoke cannabis on the premise may continue to exist, this includes one MCD that is currently re-opening after being forced to shut down by threat federal prosecution. The existing locations were “grandfathered” in by the Board of Supervisors to allow for the smoking of cannabis. Many do not meet the new standards for a Designated Smoking Room or do not have the required health and safety standards for allowing the consumption of edible products on the premises. The law allowed for the benefit of allowing for the smoking of cannabis onsite, while creating a transition process for phasing out of locations that do not meet the new health and safety standards.*
- *California law and local ordinance require that any materially or substantially alteration that would the Premises from the diagram of the premises on file be submitted to the permitting authorities, and that the proposed changes be made without approval. A new owner requesting a Consumption Permit would need to meet the new operating standards, therefore would require a modification to the premise design. This is ethically no different from requiring current MCDs who sell or transfer there ownership, as the new owner would need to comply with the new standards if they want to receive a Consumption Permit.*

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### **Section 7. Application Fee, Section 10 Plan Check Fees, and Section 11 Payment of Annual Fee**

- The onsite consumption permit fee for a cannabis business is extremely expensive. (Section 7: \$341+; Section 10: \$1146+; and Section 11: \$800+.) I recommend providing fee waivers for equity businesses that are seeking a consumption permit.

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### **Section 10. Plan Check Fees**

- These fees seems very high, please consider lowering

#### **DPH Response:**

- *This is the standard Plan Fee for other businesses.*

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### **Section 11. Payment of Annual Fee**

- These fees seem high, please consider lowering

**DPH Response:**

- *Fees are standard for comparable businesses in SF.*

**Section 13. Additional Requirements for the Designated Smoking Room**

1. Sec 13-1 exception for security personnel or other “once in a while” instances (something broke, assistance, etc.). Also what if they want servers (2<sup>nd</sup> point)
2. Employees will obviously have to enter to clean and maintain this seems like an un-due rule. Forcing separation will limit the number of dispensaries who can participate. Please consider amending this rule. Also please consider adding non-cannabis dispensaries to have this permit type. Many businesses (cigar shops) already have this type of infrastructure and desire to let people smoke cannabis
3. Harder for existing locations who were not grandfathered in. Against sealed smoking rooms and thinks ventilation requirements are a little extreme.
4. A security guard may need to enter the smoking room to remove an “impaired patron.” Since a security guard’s duties generally require removal of “impaired patrons,” the cannabis retailer would be violating this regulation. I recommend creating a security guard exception to Section 13(a)(1).
5. Additionally, some cannabis consumption can be dangerous when patrons are unsupervised. For example, a concentrated cannabis called “shatter” or “dabs” can require the substance to be burned with a small handheld blow torch. It would be much safer to have a professional budtender burn the substance for the patron, as is seen throughout Colorado at dab bars and cannabis clubs. I recommend amending Section 13(a)(1) to allow employees to enter and even work in the smoke rooms.

**DPH Response:**

- *The City and County of San Francisco law does not allow for an employer who hold a Cannabis Consumption permit to require as condition of their employment to enter the Designated Smoking Room. The health department can consider exempting security personal from this requirement for the purpose of health and safety of the customers. Employers will also need to pay attention to the Rules and Regulations issued by the California Division of Occupational Safety and Health (DOSH).*
- *Article 8 A provides the Director of Health to adopt rules, regulations, and/or guidelines to establish the health and safety standards that businesses must maintain to be eligible to receive and maintain a Cannabis Consumption permit. For the purpose of health and safety, the health department can limit the type of devices used to smoke cannabis in the Designated Smoking Room.*

**Section. 16. All Permittees shall be Required to Provide the Following Amenities and Services**

1. Against the bathroom requirement.

**DPH Response:**

- *Article 8 A requires that a Cannabis Consumption Permittee comply with the California Retail Food Code and Article 8 of the Health Code. California Health and Safety Code (Section 114105) requires*

*new Buildings and any building constructed after January 1, 2004 must have restrooms for customers or guests, if; (a) It contains a food establishment that provides space for food consumption on the premises, or (b) It contains a food establishment 20,000 square feet or more in size.1 Existing Buildings Any building constructed between July 1, 1984 and January 1, 2004, that contains a food establishment more than 20,000 square feet in size must have restrooms available for customers (at least one for men and one for women). Buildings constructed before July 1, 1984 that contain a food establishment greater than 20,000 square feet in size, but do not have space for on-site food consumption, are not required, by this legislation, to provide restrooms for patrons, guests, or invitees (check local codes.) (When determining the size of a food establishment that is part of a service station, do not use the gas pump area of the property.) Any building constructed before January 1, 2004 that contains a food establishment that provides space designated for on-site food consumption must have at least one restroom for customers or guests on the property or in the food establishment with the following exception: Operators of food establishments in buildings constructed before January 1, 2004 that are less than 20,000 square feet in size and that have space designated for food consumption, but do not have restrooms for patrons, guests, or invitees, must post a sign in a public area stating that restrooms are not available. Toilet facilities constructed after January 1, 1985 that are accessible only from food preparation or storage areas shall not be used by customers.*

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**Section 17. Structural Requirements for a Type A and B Licenses**

1. Is shatter-proof lighting required at restaurants? If not, do not put un-due regulations on cannabis just for the sake of it.

**DPH Response:**

- Yes

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**Section 18. Additional Structural Requirements for a Type B License**

1. If any of this is over and above what a normal kitchen would have to endure, please consider why you are being harsher on cannabis businesses than regular businesses.

**DPH Response:**

- Yes

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**Section. 19. Operating Standards**

1. If any of these requirements are over and above what would be required by any bar/pub in San Francisco, I would ask you to consider why.
2. Café Flore “we never had problems during the 8 months served cannabis beer”
3. Sec 19-9 can we go into detail as into what is an “impaired person”
4. Add a definition for “impaired patrons” under the definitions section of the ordinance. A person that inhales a single puff of cannabis or takes a bite of a pot brownie is technically considered



impaired. A definition is needed to clarify what level of impairment would require a service refusal.

**DPH Response:**

- *Yes where applicable, since consumption of cannabis products is not legal in any bar/pub in California.*
- *California law requires all sales of cannabis goods to customers must take place within the retail area of the Cannabis retailer's licensed premises, except for cannabis goods sold through delivery. A non-storefront retailer licensee shall be authorized to conduct retail sales exclusively by delivery. The licensed premises of a non-storefront retailer licensee shall be closed to the public.*
- *The City and County of San Francisco requires that you first receive a Store Front Cannabis Retail Permit from the Office of Cannabis and a Store Front Cannabis Retail License from the California Bureau of Cannabis Control, before you receive a Cannabis Consumption Permit by the Department of Public Health.*
- *California bill AB-2914 was signed into law that prohibits a Cannabis licensee from selling, offering, or providing a cannabis product that is an alcoholic beverage, including, but not limited to, an infusion of cannabis or cannabinoids derived from industrial hemp into an alcoholic beverage. The bill also prohibits a business with a an alcoholic beverage licensee from, at its licensed premises, selling, offering, or providing cannabis or cannabis products, including an alcoholic beverage that contains cannabis or cannabis products, and would provide that no alcoholic beverage shall be manufactured, sold, or offered for sale if it contains tetrahydrocannabinol or cannabinoids, regardless of source. The bill would require the department to take disciplinary action against a licensee who does so, including, but not limited to, suspension or revocation of the license. The health department will clarify the definition of impaired person in the final version of the rules and regulations.*

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**Section 21. Additional Operating Standards for Type B: Cannabis Consumption - Limited Preparation of Cannabis Products**

1. To earn the title that we believe is San Francisco's birthright as the Capital of Crop-to-Kitchen Cannabis Cuisine, the city must lead. We must think outside the box of prepackaged foods we'll permit retailers to "heat, reheat or dispense." We must push the on-premise consumption conversation forward beyond the current scope of the Type A, B + C limited use permits because they are, frankly, exactly that...limited. The proposed permits LIMIT dining experiences and promote an unregulated underground cottage industry. They LIMIT onsite consumption to pre-packaged, processed food products, instead of chef-driven fresh foods. Note that I said food "products" not freshly prepared, made-to-order whole foods and beverages, the like of which the public is hungry for. The proposed permits LIMIT our creative capacity to prepare chef-driven cuisine, prohibiting chefs from safely cooking, compounding, blending, infusing, extracting, or preparing cannabis products...there's that word again..."products". The proposed permits LIMIT dining experiences to be held in cloistered, non-visible consumption lounges where an air of shame wafts out from behind the counter where a proper kitchen and enticing scents of culinary creation belong. The proposed permits LIMIT the hospitality experience that is possible and

necessary to attract locals and tourists to San Francisco. These permits treat cuisine as commodities, cooking as manufacturing, ingredients as illicit drugs. We can do better. And we have lots of ideas for how San Francisco can lead onsite consumption to earn our birthright as the capital of Crop-to-Kitchen cannabis cuisine.

2. Why wouldn't this type be able to make cannabis infusions via cooking (ie. brownies, ice cream, etc) ??

**DPH Response:**

- *California law considers the preparation (including infusion) of Cannabis edible goods for consumption “manufacturing”, please refer to the State Regulations on Manufacturing. <https://www.cdph.ca.gov/Programs/CEH/DFDCS/MCSB/Pages/MCSB.aspx>*

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**Section 23. Sale of Non-Cannabis Products on Premises**

1. We can do better. We find ourselves in the midst of an experience economy that requires retailers of all stripes to innovate and challenge old norms of what a store or lounge or restaurant or events venue must offer to get folks out from behind their screens and through their doors. We can draft code for certified cannabis kitchens; we can develop HACCP style food safety plans and employee training programs; we can we can follow the model of the kosher kitchen and common food allergens to prevent cross-contamination; we can enforce affordable code requirements that are not out of reach for small businesses and equity applicants; we can issue consumption limitations and testing controls to safely administer precise dosing of infused fare, AND THEN, we can lead this industry segment to earn our birthright and become the capital of Crop-to-Kitchen cannabis cuisine. We are grateful that San Francisco has opened up this meeting for public comment and given our community an opportunity to be heard. Chefs and restaurateurs did not have a seat at the table when ingredient prohibitions and onsite consumption conversations first began, but it is not too late. We have organized our voices, and we are ready to work with city officials to find solutions, ideate and create the next wave in the experience economy. Let’s dig in, together! Thank you.

**DPH Response:**

- *California law only allows for the sale cannabis goods, cannabis accessories, and the licensee’s branded merchandise. Locally, businesses are allowed to sell prepackaged, non-potentially hazardous food items items shall be limited to less than 25 square feet including back stock of prepackaged, non-potentially hazardous food items.*

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**Section 25. Change of Ownership**

1. Alcohol licenses can be transferred. Why not cannabis licenses?

**DPH Response:**

- *Please see the California Rules and Regulations for the transfer of a State License and the Office of Cannabis Rule and Regulations for the local transfer a local permit. Cannabis Consumptions permit*

*do not automatically transfer to a new owner. The owner new owner must reapply and for the permit to ensure proper understand and maintenance of the operating standards.*

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**Other Comments**

1. Jerry Brown, three years in a row vetoed a bill to prohibit smoking at CA Beaches and other open spaces. Requests for fair and sensible rules. More locations to allow for sociable locations.
2. Wants to extend permits to outside events, not just in cannabis retail locations. Basically temp event permits for cannabis.
3. Does not want young people to be around cannabis. Anywhere kids can find it is bad as it sparks curiosity.
4. Against anymore cannabis businesses.
5. Does not want to limit small or startup consumption locations. Pro Small Business.
6. Against edible products as they are appealing to kids and “addictive”. Minimize exposure to kids. Made link to homelessness to drug/cannabis abuse. Against cannabis advertisement.
7. Cannabis is part of SF history and we should not try to limit it. City is expensive. Wants more consumption locations and more diverse locations.
8. Against cannabis edibles. Against cannabis smoke. Against cannabis and youth.
9. Pro consumption facilities for large demographics. Feels like the permit is too restrictive and easier to obtain. Accessibility. Against smoking rooms as they are segregated in the sense that only those wealthy enough to buy at the facility can enter.
10. Does not want cannabis infused alcohol or food. Wants to ban cannabis. Increase in vehicular accidents.
11. “When I go into adult entertainment location, I’ve never seen kids in there...” (He was trying to make a point as to how kids won’t get easy access into cannabis facilities either. I hope.)
12. Veteran services and getting off opioids. Cheaper products/permits/locations for veterans.
13. Better treatment of lower income individuals. Separate from the industry. Compassionate care facilities.
14. Stand-alone compassion sites. Separate from opioid users.
15. VA does not allow any cannabis for veterans. Need help to assist with opioid addiction. Need compassionate care location separate from industry.

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<sup>i</sup> Version and Author Notes: This Version 3 includes comments from (1) public comment meeting October 3, 2018, (2) online public comment period September 21, 2018 through October 21, 2018; and (3) comments submitted in writing. November 6, 2018, notes compiled by Doug Obana, Senior Environmental Health Inspector, Cannabis Program and responses. October 26, 2018 drafted by Israel Nieves-Rivera, PHD Policy Director, Population Health Division, SFDPH