



INFORMATION CALENDAR

January 28, 2020

To: Honorable Mayor and Members of the City Council
From: Dee Williams-Ridley, City Manager
Submitted by: Kelly Wallace, Interim Director, Department of Health, Housing and Community Services
Subject: Public Health Division's Recommendations on Cannabis

INTRODUCTION

The City of Berkeley's Public Health Division (PH) collaborates with community members and partners to achieve health equity and optimal health for all people in Berkeley through policy, institutional systems change and service provision. The City of Berkeley's Public Health Division believes it is imperative that cannabis ordinance amendments reflect and support ongoing efforts to ensure safe adult use of cannabis while reducing youth access and assuring safeguards to support air absent of carcinogenic secondhand smoke. The Public Health Division works to ensure the health and wellbeing of all Berkeley residents and believes that every person in Berkeley has the right to good health. To that end, PH has been an active participant in the ongoing staff working group in the City of Berkeley, and is pleased to have many of our concerns addressed in the proposed ordinances. Public Health Division staff also recognize that there are many competing interests in topics such as these, and is providing the attached report focused strictly on public health goals.

CURRENT SITUATION AND ITS EFFECTS

The City of Berkeley's Public Health Division has a responsibility to make recommendations that protect the health of Berkeley residents in regard to Proposition 64. PH recommendations have informed the City's current and proposed cannabis ordinances to date. This report is an opportunity for PH to identify some additional recommendations, some of which go beyond what other jurisdictions have adopted and that may face implementation challenges, but PH is committed to continued efforts to protect vulnerable populations. The following recommendations are safeguards: 1) Requiring Berkeley cannabis retailers to prominently display health warnings onsite to help inform cannabis consumers of the short and long term health effects, 2) Requiring enhanced health warning labeling in addition to the required state labeling for all flavored cannabis and cannabis products and include a safe consumption of cannabis fact sheet for all purchases of edible cannabis products due to their appeal to youth, 3) Prohibiting lounges for smoking and vaping cannabis and/ or cannabis products, and 4) Requiring authentication of legal age to purchase cannabis products at point of registration for all delivery purchases as well as in-person verification of buyer's identity and legal age to purchase at the time of delivery.

Recommendations containing the Public Health perspective is a Strategic Plan Priority Project, advancing our goal to:

- Create a resilient, safe, connected, and prepared city and
- Champion and demonstrate social and racial equity.

It also reaffirms the Public Health Division's concerns about the health impacts of cannabis shared with Council through a memo from the City Health Officer to Kelly from September 2018 and included in the agenda packet for the October 9, 2018 worksession on the Options for Cannabis Regulations and Cannabis Business Selection Process.

BACKGROUND

In November of 2016, the state of California passed Proposition 64 which gave California the right to control, regulate and tax adult use cannabis. Proposition 64 allows local city and county jurisdictions to adopt regulations in addition to state law.

The National Academies of Sciences, Engineering and Medicine (NASEM) study¹ released in January of 2017 reported on the health effects of cannabis and cannabis-derived products. This review of the available scientific evidence found "substantial evidence" to support the following conclusions:

- a) Initiation of use at an earlier age or more frequent use is a risk factor for the development of problem cannabis use;
- b) Maternal cannabis smoking during pregnancy is associated with low birth weight in offspring;
- c) Cannabis use is associated with increased risk of motor vehicle crashes;
- d) Cannabis use increases the risk of development of schizophrenia and other psychoses, with the highest risk among the most frequent users;
- e) Long-term cannabis smoking is associated with worse respiratory symptoms and more frequent chronic bronchitis episodes; and
- f) Increases in cannabis use frequency are associated with developing problem cannabis use

The California Department of Public Health's California Cannabis Health Information Initiative² also highlights the following negative health effects of cannabis:

¹ National Academies of Sciences, Engineering, and Medicine. 2017. *The health effects of cannabis and cannabinoids: The current state of evidence and recommendations for research*. Washington, DC: The National Academies Press. doi: 10.17226/24625

² <https://www.cdph.ca.gov/Programs/DO/letstalkcannabis/Pages/responsibleuse.aspx>

- Driving under the influence of cannabis is illegal and increases the risk of getting into a car crash.
- Edibles may have higher concentrations of tetrahydrocannabinol (THC, the active ingredient in cannabis) and may take between 30 minutes and two hours to feel the effect, increasing the risk of consuming greater concentrations of THC in shorter time period, therefore placing individuals at higher risk for poisoning. Cannabis affects children more strongly than adults. Children are also at higher risk for poisoning from cannabis, especially with edibles.
- Smoke from cannabis contains many of the same toxins and chemicals found in tobacco smoke and inhaling it can increase your risk of developing lung problems.
- Young people who use cannabis regularly can harm their memory and ability to learn. There is also a greater risk for depression, anxiety, and schizophrenia.
- The way cannabis plants are grown has changed over the past few decades. Many plants now contain higher amounts of THC. The higher the THC content, the stronger the effects on your brain and behavior.

ENVIRONMENTAL SUSTAINABILITY

Educational materials will need to be produced to build awareness of the dangers of consuming cannabis among customers. Paper products and signage will be required to facilitate these educational activities.

POSSIBLE FUTURE ACTION

The Public Health Division will continue to partner with the multidepartmental working group as well as provide information and recommendations to the City Council when appropriate as to the risks and health concerns around the consumption of cannabis and cannabis products. It is hoped that the City Council will consider these health risks and impacts on the Berkeley community in the development of ordinances that involve the sale and use of cannabis.

FISCAL IMPACTS OF POSSIBLE FUTURE ACTION

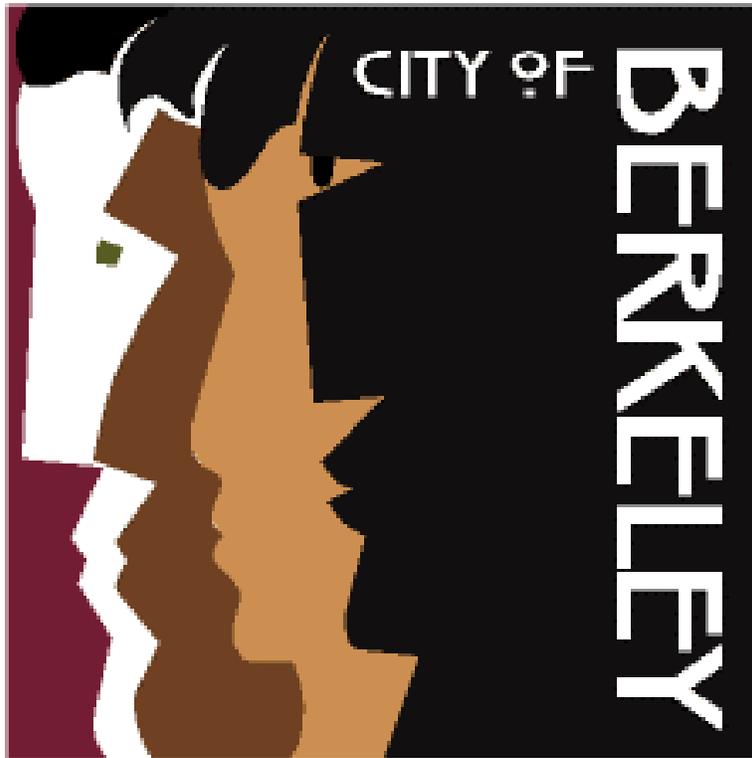
In order to offset the adverse health impacts and risks of consuming cannabis and cannabis products, funding for prevention education, particularly for youth, must be considered.

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Attachments:

- 1: City of Berkeley's Public Health Division Cannabis Ordinance Amendment Recommendations



Health, Housing & Community Services Department
Public Health Division

Cannabis Ordinance Amendment Recommendations

November 5, 2019

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Introduction

The Public Health Division works to ensure the health and wellbeing of everyone in Berkeley and believes that every person in Berkeley has the right to good health. We collaborate with community members and partners to achieve health equity and optimal health for all people in Berkeley through policy, institutional systems change and service provision. The Public Health Division believes it is imperative that cannabis ordinance amendments reflect and support ongoing safeguards to ensure safe adult use of cannabis while reducing the risk of youth access and continuing to support current safeguards that ensures air absent of carcinogenic second hand smoke exposure.

In November of 2016, the state of California passed Proposition 64 which gave California the right to control, regulate, and tax adult use cannabis. Proposition 64 allows local city and county jurisdictions to adopt regulations in addition to state law. The City of Berkeley's Public Health Division has a responsibility to make recommendations that protect the health of Berkeley residents in regards to Proposition 64. The following recommendations are safeguards: 1) Requiring Berkeley cannabis retailers to prominently display health warnings onsite to help inform cannabis consumers of the short and long term health effects, 2) Requiring health warning labeling for all flavored cannabis and cannabis products and include a safe consumption of cannabis fact sheet for all purchases of edible cannabis products due to their appeal to youth, 3) Prohibiting lounges for smoking and vaping cannabis and/ or cannabis products, and 4) Requiring authentication of legal age to purchase cannabis products at point of registration for all delivery purchases as well as in-person verification of buyer's identity and legal age to purchase at the time of delivery.

City of Berkeley's Public Health Division

Cannabis Ordinance Amendment Recommendations

1. Require Berkeley cannabis retailers to prominently display health warnings onsite to help inform cannabis consumers of the short and long term health effects of cannabis consumption.

It is important to provide accurate, science-based, up to date information about cannabis consumption to Berkeley residents. The City of Berkeley's Public Health Division has the responsibility of disseminating accurate health information and safeguards on cannabis consumption. The cultural norms of cannabis consumption is evolving and it is important to provide relevant and factual health information on cannabis consumption to Berkeley residents. The City of Berkeley's Public Health Division recommends requiring cannabis retailers to display prominent signs at the entrance of the retail space and at the every point-of-sale counter that include government warnings with safety precautions to:

- 1) Keep cannabis products out of reach from youth, children and animals,
- 2) Emphasize adult use 21 years of age or older unless the person is a qualified patient,
- 3) Highlight the effects of edible cannabis products,
- 4) State the harm of using cannabis products while pregnant and or breastfeeding, and
- 5) Stress how the use of cannabis products can impair one's ability to drive and operate machinery.

Other public health jurisdictions require similar signage including Contra Costa County, Mono County, City of Pasadena and City of Sacramento.¹

2. Require health warning labeling for all flavored cannabis and cannabis products including edibles and include a safe consumption of cannabis fact sheet for all purchases of edible cannabis products due to their appeal to youth.

Despite the State's efforts to limit access to cannabis to youth, youth are still able to obtain cannabis and cannabis products. In 2018, the City of Berkeley's Health Status Report noted "the initiation of substance use early in life contributes to higher levels of use and abuse later in life. Early onset is also associated with a host of negative health, social, and behavioral outcomes."² Limiting the availability of flavored cannabis products, including THC vaping products, will reduce youth appeal and access, reduce/prevent underage use, and reduce the risk of accidental exposure to /overdoses in children. The U.S Surgeon General August 2019 Advisory emphasized "*the importance*

of protecting our Nation from the health risks of marijuana use in adolescence and during pregnancy. Recent increases in access to marijuana and in its potency, along with misperceptions of safety of marijuana endanger our most precious resource, our nation's youth.”³

The increased potency of cannabis products combined with a decreased perceived risk in marijuana, can increase the risk of toxicity. Prior to the 1990s, THC content in products was less than 2%, but “between 1995 and 2015 there was a 212% increase in THC content in the marijuana flower.”⁵ In addition to the increased potency, cannabis products also vary in potency depending on the marijuana flower used and the manufacturer of the product. The increased potency in marijuana products and the varied potency depending on the product can potentially place individuals at an increased risk of adverse drug effects in which individuals may not be aware.

The 2014 Monitoring the Future Study found that the perceived risk of marijuana has steadily declined since the mid-2000s and the perceived availability has increased as 81% of 12th graders claimed it was easily or fairly easy to get marijuana.⁴ The 2017 Health Impact Assessment on cannabis legalization in San Francisco reported an increase in cannabis-related hospitalizations and emergency room visits from cannabis use disorder and poisoning.⁶ According to Illinois’ Department of Public Health, edibles are the most popular form of cannabis-infused products and most likely to result in overconsumption.⁷ Similarly, L.A. County stated that edibles are a common cause of cannabis poisoning especially for youth who can confuse them with food or candy. The County also reported that “after legalization [of cannabis], poison control centers experienced an increase in cannabis-related calls (with a high percentage of cannabis exposures being via edibles), particularly involving children ages 0-9 years old.”⁸

An added risk of cannabis poisoning is the delayed effects of edible cannabis products which can lead to overconsumption and result in adverse health effects. A 2016 publication examining research on edibles states that the oral ingestion of cannabis compared with the inhalation of cannabis is associated with a delayed onset of the drug’s effect.⁹ Edibles introduce cannabinoids through the gastrointestinal tract which are then metabolized in the liver into more potent metabolites. These metabolites produce a stronger and longer-lasting effect vis-à-vis similar doses of inhaled cannabis.

In light of this, ideally the sale of all flavored cannabis and cannabis products, including smoking, vaping and edible products, would be prohibited since they are appealing to youth and can cause cannabis toxicity. Since it would be near impossible to regulate, monitor, and enforce a ban of this nature, the Public Health Division recommends at a minimum, that labels clearly stating health warnings associated with the consumption of cannabis are placed on every flavored cannabis product and edible cannabis product including:

- 1) Keep cannabis products out of reach from youth, children and animals,
- 2) State the harm of using cannabis products while pregnant and or breastfeeding, and

- 3) Stress how the use of cannabis products can impair one's ability to drive and operate machinery.

Also, retailers must include a safe consumption of cannabis fact sheet, specifically addressing the risks of edible cannabis products, for every purchase (including delivery purchases) that includes an edible cannabis product.

3. Prohibit lounges for smoking and vaping cannabis and/or cannabis products

It is important to protect the right of all employees who work in Berkeley, as it supports equity in smoke free workplaces for all. In securing the right for a smoke free workplace, the City of Berkeley Municipal Code 12.70.040 states: "It shall be the responsibility of employers to provide a smoke-free workplace for all employees. Smoking shall be prohibited in all enclosed facilities within a place of employment without exception. This includes common work areas, auditoriums, classrooms, conference and meeting rooms, private offices, elevators, hallways, medical facilities, cafeterias, employee lounges, stairs, restrooms, vehicles, and all other enclosed facilities."¹⁰ The City of Berkeley defines smoke or smoking as "either (1) inhaling or exhaling upon, burning, or carrying any lighted smoking equipment for tobacco, nicotine or any other plant or product used for personal habit commonly known as smoking or (2) inhaling or exhaling upon, vaporizing, or otherwise using any electronic smoking device."¹⁰ When California passed Proposition 64, the Health & Safety Code, Section 11362.1, does not permit any person to "Smoke cannabis or cannabis products in a location where smoking tobacco is prohibited".¹¹ This applies to all smoke free laws established prior to June 2017 including 12.70.040. Due to this state law stipulation, local laws cannot create exceptions beyond those explicitly authorized by state law (e.g., on-site consumption lounges).

In alignment to the City of Berkeley's smoke free workplace ordinance (Municipal Code: 12.70.040) ensuring equity in smoke free workplaces for employees in Berkeley, the City of Berkeley's Public Health Division recommends prohibiting cannabis lounges to ensure a smoke and vape free workplace for all employees in Berkeley.

4. Require authentication of legal age to purchase cannabis products at point of registration for all delivery purchases as well as in-person verification of buyer's identity and legal age to purchase at the time of delivery.

When offering guidance on cannabis product delivery, it is important to require safeguards that will ensure delivery to cannabis customers who are 21 years of age or older and reduce access to underage consumers. The City of Berkeley's Public Health Division recommends that the delivery of all cannabis or cannabis products to customers within Berkeley require photo ID verification that matches the customer who ordered the product(s). All deliveries of cannabis or cannabis products must be to an address associated with a residential, street address (no P.O. Boxes).

All individuals that seek delivery service for cannabis products must actively attest to being of legal age to purchase cannabis or cannabis products prior to any making any

purchase for delivery. All cannabis retailers must ensure proof of identity and legal age to purchase via a valid photo identification and signature of recipient at the time of delivery. All delivered sales of cannabis to registered customers may only be made during the regular business hours of 8AM – 10PM.

Resources: Sample Legislation

Cannabis Retailer's Signage and Cannabis Consumption

Contra Costa County

A permittee that sells cannabis or cannabis products must comply with specific retail sale standards that includes:

- Within each building in which cannabis or cannabis products are sold, the permittee shall prominently display a sign including the following statement in bold print: displayed prominently in bold print (and all CAPS): "Government warning: Cannabis is a Schedule I Controlled Substance. Keep out of reach of children and animals. Cannabis may only be possessed or consumed by persons 21 years of age or older unless the person is a qualified patient. The intoxicating effects of cannabis may be delayed up to two hours. Cannabis use while pregnant or breastfeeding may be harmful. Consumption of cannabis impairs your ability to drive and operate machinery. Please use extreme caution." (413-4.608(a)) ¹²
- "The sale of any flavored cannabis product for which the primary use is human inhalation of the gases, particles, vapors, or byproducts released as a result of combustion, electrical ignition, or vaporization of the flavored cannabis product, is prohibited." (413-4.608(g)) ¹²

Mono County:

- Retailers must display a warning sign in a prominent location within the premises with letters of not less than one-half-inch in height, and must clearly state the following information: (5.60.140(P)).¹³
 - Are you pregnant or breastfeeding? According to the U.S. Centers for Disease Control (CDC), marijuana use during pregnancy can be harmful to your baby's health, including causing low birth weight and developmental problems.
 - Driving while high is a DUI. Marijuana use increases your risk of motor vehicle crashes.
 - Not for Kids or Teens! Starting marijuana use young or using frequently may lead to problem use and, according to the CDC, may harm the developing teen brain.

- Defines “attractive to youth and children” under their regulations for commercial cannabis activities.
- "Attractive to children or youth" refers to products, packaging or labeling or advertising that may especially encourage persons under age twenty-one to initiate cannabis consumption or otherwise to consume (accidentally or purposely) cannabis or cannabis products (Ch.5.60.030(9)).¹³

City of Pasadena:

- The City’s required in-store safety information for cannabis retail explains that “permitted retail cannabis facility shall display a health warning sign in a conspicuous location at eye height at the point-of-sale counter. The sign shall be approved by the department and in a font that it is easily readable to customers.” (8.11.050) ¹⁴
- Per the City’s regulations for commercial cannabis health permits: "Attractive to children or youth" refers to products, packaging, labeling, or advertising that may especially encourage persons under age 21 to initiate cannabis consumption or otherwise consume (accidentally or purposely) cannabis or cannabis products. The term includes: (Ch.8.10.020(D)).¹⁴

City of Sacramento:

- Per the city’s storefront cannabis dispensary regulations, each storefront cannabis dispensary must have a sign stating, “Smoking, ingesting, or consuming cannabis or cannabis products on this site or in a public place is prohibited” (Ch.5.150.480(A)).¹⁵

Prohibit Lounges for Smoking and Vaping Cannabis

Contra Costa County:

The County’s commercial cannabis activity standards state that a permittee engaged in commercial cannabis activity must comply with a given set of standards including “No Consumption on Premises. No cannabis or cannabis product may be smoked, ingested, or otherwise consumed on the premises” (413-4.604(c)).¹³

City of Hayward:

The “on-site consumption of cannabis and cannabis products by customers or employees is prohibited. Qualified patients are not allowed to consume medical cannabis at dispensary sites except as permitted in accordance with Chapter 5, Article 6 (Smoking Pollution Control) of the Hayward Municipal Code and state law and as approved by a conditional use permit” (10.1.3607(E)).¹⁶

City of Los Angeles:

Per the operational requirements and violations regulation no. 10 fir cannabis procedures, “A Licensee shall not allow the consumption of cannabis or the sale or consumption of alcohol on the Business Premises. No employee or agent of the

Licensee shall solicit or accept any cannabis or alcohol products from any customer or vendor while on the Business Premises” (Reg. 10(A)(18)).¹⁷

Mono County:

“No cannabis shall be smoked, ingested or otherwise consumed on the premises of any cannabis business” (Ch. 5.60.120(G)).¹³

Cannabis Delivery

San Francisco County:

Permitted Cannabis Businesses that receive authorization from the Director to engage in Deliveries must comply with such Delivery Standards as may be adopted by the Director, including but not limited to the following:

- (5) Delivery may only be made to the individual who placed the Bona Fide Order, and to individuals who are 21 years of age or older, unless the Customer provides verification that the Customer, or a patient for whom he or she is a Primary Caregiver, qualifies under California Health and Safety Code Section 11362.7 et seq. to use Medicinal Cannabis. (6) Upon Delivery, the employee performing the Delivery must: (A) Personally review the Bona Fide Proof of Age and Identity of the Customer to confirm that he or she is the same individual who submitted the Bona Fide Order, and is not underage, as set forth in Section 1619 of this Article 16;¹⁸
- (5) A Delivery-Only Cannabis Retailer must provide to all Delivery personnel a remote electronic age verification device to determine the age of any individual attempting to purchase Cannabis or Cannabis Products, which device shall be used upon the Delivery of the Cannabis or Cannabis Products to the Customer. The device shall be maintained in operational condition and all employees shall be instructed in its use. Cannabis and Cannabis products shall not be delivered to a Customer if the electronic age verification device is not functioning.¹⁸

Oakland:

A plan of operations that will describe how the dispensary or delivery only dispensary will operate consistent with State law and the provisions of this chapter, including but not limited to:

- Controls to ensure cannabis will be dispensed only to adults over 21 years of age, qualified patients and/or primary caregivers.¹⁹
- Controls to acquire, possess, transport and distribute cannabis to and from State licensed cannabis entities.¹⁹

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