City of Riverside Police Department

<u>RETAIL SALES OF CANNABIS – HEALTH AND SAFETY IMPACTS ON CITY OF</u> <u>RIVERSIDE COMMUNITIES</u>

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<u>Background</u>

During the discussion at the City Council meeting on Tuesday, January 7, 2025, regarding storefront retail commercial cannabis business permit procedure guidelines and application review, several council members had questions as to why the proposed locations were disproportionately located in the city, specifically, why 5 of the potential licensees submitted locations in Ward 5 when other wards had none. Three of the proposed locations were also located in the same business complex directly next to each other. As a result, additional discussion occurred regarding potential negative health and safety impacts on the community and to what extent, if any, would the concentration of cannabis businesses further impact the community. As a result, a motion was made by Councilman Perry and seconded by Councilman Conder to:

- Direct staff research for City Council consideration and study the effects of geographic density, proximity to sensitive receptors and other health and safety concerns in furtherance of the stated goals of the cannabis business activities ordinance and other related ordinances, including but not limited to retail access by residents and/or protection of health and safety of the residents from negative impacts.
 - a. Instituting a two Cannabis Permit per Ward limit.
 - b. Explore limiting cannabis uses to industrial/manufacturing zones.
 - c. Establishing minimum distance requirements between cannabis business storefronts.
 - d. Establishing new and/or additional sensitive use categories and associated minimum distance requirements.
 - e. Explore the number of cannabis business permits which are authorized for issuance to a number less than 14, pursuant to RMC 5.77.100.
 - f. Crime analysis of the aforementioned research for the health and safety of the residents.
- 2. Postpone and direct staff to return to the City Council within 90 days to receive a report and recommendations.
- 3. Review the permit transfer process.

The motion carried with Councilmembers Robillard, Mill, Conder and Perry voting aye and Councilmember Falcone, Cervantes and Hemenway voting no.

Considering the direction spelled out in the motion by the Council, the Police Department focused on the public health and safety topics and assigned the Vice Unit, which has been tasked with enforcing current laws regarding the illegal sales of cannabis as well as the enforcement of state and local regulations regarding retail sales of cannabis, to conduct the research. The research looked at nationwide studies and attempted to obtain data from local jurisdictions that currently allow the retail sales of cannabis. Unfortunately, the local jurisdictions were unable to accommodate our requests, so we relied on outside published studies, open-source material and internal crime stats from our Crime Analysis Unit (CAU).

Research Results:

- 1. California's Regulatory and Quality Control Measures are Inadequate.
- 2. No Clear Bright Line Division Between Legal and Illegal Cannabis Products/Sales.
- 3. Increase in Crime and Calls for Service in Neighborhoods Surrounding Businesses Selling Cannabis.
- 4. Use of Cannabis Leads to Adverse Health Effects.
- 5. Possible Negative Impact on ABC Licenses of Surrounding Businesses.
- 6. Cannabis Legalization Fuels the Black Market.
- 7. Marijuana Use Conflicts with the Stated Goals of the Blue Zone Project.

<u>Overview</u>

On December 30, 2024, Dr. Kevin Sabet, President of Smart Approaches to Marijuana (SAM) and three-time White House drug policy advisor, released the following statement in advance of the anniversary of commercial marijuana sales in California:

"Trends across the nation have universally shown that sales of today's highpotency marijuana and THC-infused drugs are resulting in more THC-related traffic crashes, more youth-use, more workplace accidents, a larger illicit market, and lower than expected tax revenue. For yet another year California has been no different. Lawmakers at the state and federal level – many of whom count pot profiteers among their donors – refuse to acknowledge the damage being done and have been resistant to advance policies that can save Californians from physical, psychological and economic clutches of this predatory industry.

Since THC drug sales started in 2018, California has seen:

- Significant instances of contaminated products being sold in state-legal dispensaries, with <u>one study</u> finding that almost 72% of the samples contained residual solvents, including isopentane, butane, and propane and one third of those samples also contained pesticide residues. This year, the <u>LA</u> <u>Times</u> reported that nearly 60% of legal marijuana products in California had pesticide levels above either state limits or federal tobacco standards. Lab results suggested that the state has 250,000 contaminated vapes and joints sold in dispensaries;
- <u>Notable increases</u> in hospitalizations and emergency department visits by children who had some sort of marijuana exposure. Researchers found that 43% of patients presented with complaints of suicidal ideation; and
- Little benefit to state coffers. Despite some of the highest taxes in the country, the FY21-22 marijuana <u>tax revenue</u> was only 0.49% of the state's entire budget.

The last year has demonstrated again that states cannot effectively regulate this industry. Big Marijuana will stop at nothing to hook a new generation of users on increasingly potent pot products. Significant reforms are needed, including requiring clear warning labels that spell out the harms associated with these dangerous psychoactive drugs. Those labels should make clear to the public that THC drugs are increasingly medically associated with depression, suicidality, IQ loss, psychosis and schizophrenia, especially for young people. Lawmakers should also advance strict potency caps, enact bans on advertising that can be seen by those under 21, and invest greater resources in prevention and treatment programs to help those who are bearing the consequences of the state's failed experiment with marijuana legalization."

California's Regulatory and Quality Control Measures are Inadequate

An independent investigation in San Diego found that 30% of marijuana samples purchased from licensed retailers in Southern California lab-tested positive for pesticides (Grover & Coral, 2019).

Also, the Los Angeles Times published an article on Friday, June 14, 2024, titled "The Dirty Secret of California's Legal Weed", describing the inadequate regulation and the lack of quality control for cannabis products sold in California. The following is a portion of that article:

An investigation by The Los Angeles Times, in conjunction with cannabis industry newsletter WeedWeek, found alarming levels of pesticides in cannabis products available on dispensary shelves across the state, including some of the most popular brands of vapes and pre-rolled weed.

Twenty-five of 42 legal cannabis products that The Times and WeedWeek purchased from retail stores and had tested at private labs showed concentrations of pesticides either above levels the state allows or at levels that exceed federal standards for tobacco. The contaminants include chemicals tied to cancer, liver failure, thyroid disease and genetic and neurologic harm to users and unborn children.

Vapes tested from five well-known brands had pesticide loads that exceeded federal Environmental Protection Agency risk thresholds for harm from a single exposure, The Times and WeedWeek found. Users might experience irritation to the lungs, eyes and throat as well as rash, headache, diarrhea and abdominal pain.

Some individual products contained as many as two dozen pesticides.

The findings dovetail with scores of complaints that two private cannabis testing labs have filed over the last eight months, reporting pesticides in products certified by other labs as safe. The results, the labs said, suggest some level of contamination in more than 250,000 vapes and pre-rolled joints on store shelves, about the number sold legally in California in a two-day period.

Independent lab tests found 79 toxic chemicals in California cannabis products, including 44 that state regulators don't monitor. Private lab tests show frequent pesticide contamination in cannabis, as well as the presence of synthetic THC and harmful dilution oils. Most products listed are vapes bought on the legal market.

Treating cannabis crops with prohibited chemicals such as pymetrozine has become so casual that The Times found farms including these applications in their monthly pesticide use reports to the state. There is no evidence that state regulators or county agriculture departments routinely take note or act on these reports.

Tests conducted for The Times and WeedWeek identified seven off-list pesticides in legal products on store shelves. One brand of vape contained fenvalerate, a fungicide proven to lower sperm counts and prohibited in the United States since 2008. Sixteen products contained pymetrozine, an insecticide known to cause liver cancer and to mimic human hormones, part of a chemical class known as endocrine disruptors, which over time cause reproductive disorders. Pymetrozine is approved for only limited use by the federal EPA, and is banned in the U.K., Canada and Norway.

A pink acai vape from STIIIZY, the state's top-selling cannabis brand, carried more than 60 times the maximum amount of pymetrozine allowed by federal regulators in cigarettes. But because California does not require testing for pymetrozine, the company that makes STIIIZY products said it is not in violation of state regulation. (LA Times, 2024)

STIIIZY has also started selling a product called "STIIIZY Hemp" to tobacco retail locations and advertising it as California legal so it can be sold at any tobacco retail location without a State Cannabis retail permit. One of these "hemp" vapes was recovered during an on-going investigation and submitted for testing. The results showed that it contained 11.638% THC compared to its advertised "less than 0.3% THC (the legal limit allowing it to be sold without a cannabis business permit).

In addition to the inadequate regulation and quality control of cannabis products being sold and consumed in California, there is also a lack of safeguards in place to regulate the operations of the cannabis businesses to ensure they are abiding by the law.

As part of the permitting process, RMC 5.77.080 requires Cannabis Business Owners to submit to a criminal background check for themselves and all persons in their

employment. Also, RMC 5.77.090 states any person is prohibited from holding or maintaining a cannabis business permit, or from being employed at a cannabis business if the applicant has been denied a cannabis license or permit or has had a cannabis license or permit suspended or revoked by any city, county, city and county or any other state cannabis licensing authority. While processing the background checks of the 14 potential cannabis business permittees, we contacted the state regulatory agency for cannabis businesses (the Department of Cannabis Control) inquiring as to whether any of the names listed as officers on the cannabis business permit applications had previously been denied a cannabis license or had a license revoked in the state. We were told they had no such database, and they were aware that it posed a problem regarding the ability to properly regulate the industry. They said individual cannabis businesses operate under a separate LLC from the parent company and the DCC doesn't have a database that tracks the parent companies and the LLCs or their officers/employees. They acknowledged that if a business lost its license or was denied a license for any reason, including unlawful operations, the business could simply dissolve the LLC and continue to operate under a new one.

No Clear Bright Line Division Between Legal and Illegal Cannabis Products/Sales

There are currently 232 licensed tobacco retailers operating in Riverside and no licensed cannabis businesses. Since July 2024 the Riverside PD Vice unit has conducted undercover operations confirming that 30 out of 42 tobacco retailers (71%) were illegally selling cannabis products. During the City Council meeting on January 7th, one of the individuals that addressed the Council during Public Comment (Damian Martin) identified himself as a lawyer for one of the cannabis dispensaries currently participating in the City's permitting process. He argued that the city should allow legal dispensaries because they provide safer cannabis products (free from pesticides and other hazardous chemicals) than the products sold at illegal dispensaries. He implied that legalizing the sales of cannabis will eliminate the illegal or Black Market. To make his point he said he visited 5 smoke/vape shops currently operating in the city on his way to the council chambers and purchased several cannabis products from each store. He dumped the bag of items on the podium along with the receipts showing the locations where they were purchased. He also stated the product he purchased and dumped on the podium was unsafe. He referred to it as "crap." Officer Montero was working security for the Council Meeting. He gathered the items and booked them into the property room at the police department.

A search of the websites of a few dispensaries operating legally (Planet Galaxy located just outside the northern city limits which has an advertisement mailer in the Greater Riverside Business Newspaper and Embarc located in Fontana) was conducted. Both legal dispensaries sold some of the same product that Mr. Martin referred to as being unsafe (Litto and Muha Meds). Also, as was already mentioned in the Los Angeles Times article, toxic chemicals, synthetic THC and harmful dilution oils have been found in cannabis products sold on the legal market.

To further illustrate the relationship between the legal and illegal Cannabis industry, commonly referred to as the "grey market", one of the leading companies in the industry, STIIIZY, is currently involved in several lawsuits alleging the company has been using cheaper, illegal cannabis to reduce its operating costs and increase its revenue, allowing it to have an advantage over its competitors. In 2024, the Founder and previous CEO of STIIIZY, Tony Huang, was arrested by LAPD for operating multiple illegal cannabis dispensaries and cultivation sites. (Abbott, 2024)

Increase in Crime and Calls for Service in Neighborhoods Surrounding Businesses Selling Cannabis

Studies have shown that crime increased in the neighborhoods surrounding cannabis dispensaries. One study looked at Denver, Colorado and Long Beach, California and found that both cities showed an increase in property crimes. The study showed mixed results regarding violent crime, with no increase in the city of Denver, however violent crime increased in the areas adjacent to marijuana dispensaries in the City of Long Beach (Freishler, Gaidus, Tam, Ponicki, & Gruenwald, 2017).

With no legal cannabis dispensaries operating in the city of Riverside, we chose to analyze the calls for service history within a 500-foot radius of five retail tobacco locations we know are acting as unpermitted cannabis dispensaries. We chose to look at one year of calls for service before and after the establishment first opened. We chose 500 feet because that is the distance outlined in RMC 904.230(F) *Restrictions on locations for business establishments where drug paraphernalia may be displayed or sold*. All 5 selected locations showed an increase in calls for service after the tobacco retail establishment opened. The increase ranged from 112% - 194%. The average increase across all five locations was 146%.

According to an article titled "Driving While Stoned Leads to More Traffic Accidents in a Country Where Marijuana is Legal", documented marijuana-related traffic accidents that required treatment in an emergency room rose 475% between 2010 and 2021 in Canada after marijuana was legalized in 2018. Car crashes due to drunk driving rose only 9.4% during the same period. According to Dr. Daniel Myran, assistant professor of family medicine at the University of Ottawa, "Because of the way that cannabis impacts driving performance - it reduces reaction time, decreases the ability to focus or pay attention to multiple events, and may increase risk-taking behavior – people who are cannabis-impaired while driving may be driving faster, noticing hazards later, and deaccelerating slower...a recipe for getting into more severe traffic collisions and requiring higher levels of care." According to the article, nearly 22% of accidents involving those driving while

under the influence of marijuana needed intensive care as opposed to less than 2% of crashes without alcohol or cannabis involvement.

A study in Washington State conducted jointly by the Washington Traffic Safety Commission and the National Highway Transportation Safety Administration following the passage in 2012 of a citizen initiative to legalize personal recreational use of Marijuana showed a statistically significant increase in daytime prevalence of THC-positive drivers who were tested before the implementation of legal sales (7.8%) and one year after implementation (18.9%).

In 2024 there were 14 fatal traffic collisions in the City of Riverside. In 5 of the 14 fatal collisions the drivers were impaired and 4 of those 5 were under the influence of marijuana. Only one involved alcohol. Also, the first fatal collision of this year (1/4/2025) involved a driver under the influence of marijuana that rear-ended a car driven by a 75-year-old woman, pushing her into the intersection. She sustained life-threatening injuries and later died at the hospital.

Use of Cannabis Leads to Adverse Health Effects

According to the Centers for Disease Control and Prevention (CDC), there are health risks associated with using cannabis regardless of the method of ingestion or whether it is used for "medicinal" purposes or recreational use. The following are some of the known adverse effects to our health:

Cannabis Use Disorder

People who use cannabis can struggle with physical dependency and controlling their use. This is concerning as there is evidence suggesting the use of highly concentrated THC products is associated with more severe cannabis use disorder symptoms. While approximately 3 in 10 persons who report using cannabis have a cannabis use disorder, this figure is rising. Some signs and symptoms of cannabis use disorder include trying but failing to quit using cannabis or giving up important activities with friends and family in favor of using cannabis. The risk of developing cannabis use disorder is stronger in people who start using cannabis during youth or adolescence and who use cannabis more frequently.

Brain Health

Cannabis use directly affects brain function—specifically the parts of the brain responsible for memory, learning, attention, decision making, coordination, emotions, and reaction time.

Direct associations have been made between the frequency of marijuana use and higher THC potency with the development of mental health issues (psychosis, depression,

anxiety, suicidality, reshaping of brain matter, and addiction) (Fisher et. Al., 2017; Pierre, Gandal, & Son, 2016).

<u>Heart Health</u>

Cannabis can make the heart beat faster and raise blood pressure immediately after use. It could also lead to increased risk of stroke, heart disease, and other vascular diseases such as hypertension, myocardial infarction, cardiomyopathy, arrhythmia and cardiac arrest (Pacher, Steffens, Hasko, Schindler, & Kunos, 2017; Bigay-Game, et. Al., 2018; Hall & Lynskey, 2016).

Driving

Cannabis, like alcohol, negatively affects several skills required for safe driving.

- It can slow reaction time and ability to make decisions.
- Cannabis can impair coordination and distort perception.
- The use of multiple substances (such as cannabis and alcohol) at the same time can increase impairment.

<u>Lung Health</u>

Smoked cannabis, regardless of how it is smoked, can harm lung tissues and cause scarring and damage to small blood vessels.

Mental Health

Cannabis use has been linked to social anxiety, depression, and schizophrenia (a type of mental illness where people might see or hear things that aren't there).

Toxicology reports from adolescent suicide victims in Colorado between 2011 and 2013 showed that 20.7% of suicide victims between the ages of 10 and 19 tested positive for marijuana compared to 12.7% that tested positive for alcohol. Between 2014 and 2016 that number rose to 22.4% who tested positive for marijuana as opposed to 9.3% for alcohol (Colorado Department of Public Health and Environment, 2019). In two cross sectional studies of Colorado youth in outpatient substance use treatment facilities, approximately one half to three quarters reported using diverted marijuana, which is marijuana accessed by the adolescents from adults for purported medical purposes with legal access to it (Wilkinson, Yarnell, Redhakrishnan, Ball, & D'Zouza, 2016)

Unintentional Poisoning

Edibles, or food and drink products infused with cannabis, have some different risks than smoked cannabis, including a greater risk of poisoning due to the higher concentration of THC. Some food and drink products including vapes can contain THC concentrations that

range from 30% to 99%. Also, some cannabis edibles have packaging designed to mimic the appearance of well-known branded snacks and candy that appeal to children, which increases the risk for unintentional ingestion. Children who consume THC-containing products can become very sick. Since legalization in 2014, calls to poison control centers in Colorado more than doubled and calls regarding 0–8-year-olds have increased by 230% (Colorado Department of Public Health and Environment, 2019).

Every state that legalized the sale of cannabis for recreational use showed an increase in emergency room visits and calls to poison control centers. For example, Oregon showed a 271% increase for children under 5-years-old between 2014 and 2017 (Oregon Poison Center, 2018) and Washington State showed a 70% increase between the three years before and after legalization (Washington State Office of Financial Management, 2017). According to the article "Driving While Stoned Leads to More Traffic Accidents in a Country Where Marijuana is Legal", right after Canada legalized marijuana in 2018 there was a 94% increase in emergency room visits when marijuana stores and product were limited. But as commercialization increased and marijuana was more readily available, visits to the emergency room grew 233% compared to the period before recreational marijuana was legalized.

This is mainly because the concentration of THC in marijuana grown today can be as high as 20% – 30% whereas several decades ago it was 4% – 8%. Also, the potency of the concentrated THC found in processed cannabis products (vapes and gummies) has become so high (40% - 99%) that users are experiencing serious medical complications including Cannabinoid Hyperemesis Syndrome (CHS) and as was mentioned above, mental health complications including Cannabis Use Disorder (CUD). The symptoms of CHS include extreme nausea and explosive vomiting. The only known treatment for CHS is prolonged cessation of all THC consumption. Cannabis use disorder (CUD) is a complex condition that involves a problematic pattern of cannabis use and can range from mild to severe (addiction) (Cleveland Clinic, 2024). About half of people who experience a mental health condition will also experience a substance use disorder (like CUD) and vice versa. This is known as a dual diagnosis. Substance Use Disorders and other mental health conditions happen because of overlapping factors.

The overall prevalence of cannabinoid hyperemesis syndrome (CHS) is 0.1% and is more common in young adults aged 18 to 39 years old. However, in patients with cannabis use disorder, the prevalence of CHS is up to 32%. Marijuana is the third most abused drug in the U.S. after alcohol and tobacco. (Kelsey Berry, MD, 2023)

Neither ETS (Emergency Treatment Services for Mental Health) or local medical hospitals in Riverside were willing to provide an analysis of patient intake information related to cannabis use, incorrectly citing HIPAA rules. However, a Kaiser Medical Center provider speaking under the condition of anonymity stated they see CHS patients at their location several times a month.

Possible Negative Impact on Surrounding Businesses

Besides the increase in crime as mentioned above, the proximity to dispensary locations may negatively impact businesses that are governed by other state permits.

For example, according to the Alcoholic Beverage Control (ABC), opening a dispensary next to an existing bar will not affect their existing ABC permit to sell alcoholic beverages, but an existing dispensary location may cause an issue for businesses in the area who do not yet have a permit to sell alcoholic beverages but are planning on requesting one in the future. As of now, there is no clear guidance on the issue. It is currently being analyzed on a case-by-case basis.

There are locations in the state where a single owner/operator runs a dispensary and an ABC licensed location next door to each other, but they cannot have any connecting interior doors and products cannot be carried between the locations.

Cannabis Legalization Fuels the Black Market

The Riverside Police Narcotics Unit works with surrounding agencies such as the Riverside Sheriff's Department regarding investigations involving the sales and cultivation of marijuana. Two types of illegal cultivation operations are prevalent - indoor grows and outdoor grows. Most of the outdoor grows occur in rural or forested areas as opposed to the indoor grows which frequently occur in warehouses or residential houses. Generally, the outdoor grows are conducted by Mexican Cartels whereas the indoor grows are conducted by Asian Organized crime, mostly Chinese. The Riverside Police Department has primarily been involved in indoor grows due to the fact we operate mostly in an urban environment. Most of the outdoor grows are in very remote areas so by the time Law Enforcement personnel can locate and arrive at the locations, sometimes by helicopter, the suspects tending the grows have fled. These grows are predominantly handled by the Riverside Sheriff's Department MET (Marijuana Eradication Team). They reported that although the individuals tending the grows have usually fled prior to their arrival, the items left behind indicate that the Mexican Cartels control the grows. Some of the items have included pictures or figurines of Jesus Malverde, the "Narco Saint" used by Mexican drug traffickers.

The Chinese Organized Crime Groups will commonly purchase houses in new housing tracts fraudulently, then gut the houses and turn each room into a grow room with specialized lighting, fertilizing and air filtering systems. The lights used to help the marijuana plants grow use a lot of electricity so the suspects who tend to the grow operation will commonly bypass the electric meter as to not have to pay what would be a very large electric bill and to hide their operations. They also use the air filtering systems

to stifle the smell of the marijuana plants since these operations are in residential neighborhoods. The Riverside Police Department has been involved in several of these investigations and have arrested several suspects of Chinese descent.

The marijuana harvested from cultivation operations such as those just described, make their way to the black market where it is sold for less than marijuana from legal cultivation businesses due to the absence of overhead expenses such as the cost of licenses and taxes and regulations. As a result, marijuana users will gravitate toward the black market where they can obtain product for less money. Also, dispensaries with permits to legally sell cannabis products will purchase their cannabis from these illegal cultivation operations to cut their overhead costs so they can make more profit. The former CEO of STIIIZY is an example of how the legal market boosts the profits of the illegal market and vice versa.

An article published November 19, 2024, and titled, "DEA Data Shows Drug Cartels Continue to Operate and Profit from Marijuana Sales in Legalized Markets" stated that Mexican Transnational Crime Organizations had not been adversely affected by marijuana legalization in numerous markets, noting instead, "that the effort of legalization had conversely brought new opportunities for illicit profits from marijuana sales."

Also, California's projected marijuana tax revenue for July 2019 was nearly half of what was originally expected when the state began retail sales in 2018, since most consumers continue to purchase marijuana from the black market to avoid high taxes (Blood, 2019; Fuller, 2019).

Marijuana Use Conflicts with the Stated Goals of the Blue Zone Project

During the City Council meeting on August 6, 2024, City Council adopted resolution No. 24150 supporting the Blue Zone Project "which will improve the well-being and Economic Vitality of the city residents." The Council adopted a resolution supporting the Blue Zones Certification Initiative and approved the city sponsorship portion of the Blue Zones Certification Initiative in the amount of \$208,300, or 1 percent of the total Blue Zones Certification program costs.

The stated goal of the Blue Zones Project is to help transform the community into one where healthy choices are easy and people live better longer lives. According to one of the stated goals, the Blue Zones Project will assist Riverside in identifying and implementing tobacco and alcohol policy changes to support the health and well-being of its residents. This stated goal goes on to explain that alcohol consumption leads to the disabilities and poor health of millions of people and excessive alcohol consumption can lead to injuries caused by motor vehicle crashes, homicide, suicide, intimate partner violence, high blood pressure, heart disease, cancer, and other serious health conditions. The Blue Zones Project lists a summary of recommendations to reduce excessive drinking, discourage excessive or underage drinking and enhance public safety. Similar

goals are stated for the use of tobacco. The Blue Zones Project does not address cannabis despite the fact that cannabis use leads to many of the same serious health conditions as well as other health concerns.

Allowing the retail sales of marijuana or a proliferation of dispensaries in the City of Riverside appears to conflict with the stated goal of the Blue Zones Project which is to help transform the community into one where healthy choices are easy and people live better longer lives.

Recommendations

Regarding the information contained in this report, additional resources will be needed from various city departments such as police, fire, code enforcement, the city attorney and finance to manage the legal cannabis market as well as the increased illegal Black Market activity that results with legalization.

In addition to the regulations already adopted under Title 5 – *Business Taxes, Licenses and Regulations*, Title 9 – *Peace, Safety and Morals* and Title 19 – *Zoning* of the Riverside Municipal Code, the following additions are recommended for the health and safety of Riverside residents and to minimize the extent of the additional city resources that will be required:

- 1. Limit the number of permitted dispensaries to no more than one per Ward.
- 2. Require cannabis products not to exceed 5 grams and 10% THC concentration.
- 3. Dispensaries must submit to random product testing for THC potency and quality control (pesticides and other harmful substances) not to exceed four per year, at their own expense, and by a qualified lab chosen by the city.
- 4. Universities and colleges should be added to the sensitive use category and be subject to the same distance requirements.
- 5. Due to the increase in crime in the surrounding neighborhoods, dispensaries should not be located within 1000 feet of each other.

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