

Date	Name & Contact Information	Written Comment Text
9/9/2024	Pisteo Kasala <a href="mailto:pisteok@gmail.com">pisteok@gmail.com</a>	<p>I wanted to comment on the CR 102 (Proposed Rule Making) on Social Equity Rulemaking since it's an issue that affects me personally. As someone who was previously affected by systemic discrimination and War on Drugs, I applied for a social equity retail license and was awarded a license opportunity in Cowlitz County. When I learned my application had been successful, I immediately started looking for a suitable location in that county. I did not restrict myself to any particular area, and searched for spots in Kelso, Longview, Kalama, and beyond. I contacted real estate agents for help as well, and we found a number of places.</p> <p>However, we found time and again that every spot we considered was not viable for one reason or another. Either it was within 1,000 feet of a restricted entity, did not meet local zoning requirements, or was owned by a landlord who refused to do business with cannabis entities. All the truly viable locations, it seemed, had already been taken by licensees who had gotten set up during the initial round of licensing – a round I was excluded from due to my past brushes with the law involving cannabis.</p> <p>My hopes were renewed, however, when I learned that three different social equity applicants like me were petitioning the Board for repeal of the rule limiting their potential locations to only one county, namely WAC 314-55-570(4)(d). The Board granted all three of these petitions. At least one of those petitions, from Casey Calhoun, further requested that the Board "[a]dopt no new rule that conflicts with the clear license mobility language of the current law contained in RCW 69.50.335(1)(e)" (from Casey Calhoun's petition, a copy of which is attached).</p> <p>When those petitions were granted, I started looking elsewhere for a viable location for my retail store, including in historically underserved communities in populous counties like Pierce, King, and Spokane counties. I invested considerable time and resources in researching available locations, contacting landlords, and even negotiating lease terms. I expected the CR 102 (Proposed Rule Making) on Social Equity Rulemaking to include updated rule language regarding social equity license mobility reflecting the fact that the Board had granted these petitions since the writing of the draft rules last year.</p> <p>Instead, the same language has carried over, as follows: "Effective 90 days after the license application window closes in 2025, social equity applicants, who applied under chapter 236, Laws of 2020, and are unable to secure a location in the county where the license is allocated,</p>

may locate the initial license location to any city, town, or county in the state of Washington."This rule directly contradicts Casey Calhoun's request in his petition that the Board "[a]dopt no new rule that conflicts with the clear license mobility language of the current law contained in RCW 69.50.335(1)(e)," which the Board granted without qualification.

As a social equity applicant, I applied for and was awarded \$141,729.00 with the condition that the entirety of those funds be used within a year of their awarding. The current rule language limiting social equity license mobility puts me and others like me in an impossible bind, where we can't move forward in our assigned counties due to a complete lack of viable locations, but we also can't afford to wait until 90 days after the license application window closes in 2025 without losing out entirely on the grant money we've been counting on to fund our business start-up in the absence of access to capital or substantial personal funds at our disposal.

Waiting as long as the current draft rule language requires also means losing out entirely on the consulting and mentorship services built into the social equity program, designed to help applicants like me who do not have previous experience in the cannabis business. These services won't be available after June 30, 2025 (or maybe even sooner if all 2,400 allocated hours are used up), which will leave me without any guidance specific to a potential new location, which is when it would be most valuable. I really appreciated the efforts to offer this program, and I'm disappointed to think that I wouldn't be able to use it—or any of the grant money I was relying on—if the rules go into effect as written.

It's therefore essential to me, my livelihood, and other social equity applicants in the exact same position that this rule be struck before these rules became final. Instead, the rules should simply align with RCW 69.50.335(1)(e), which states plainly that "all licenses issued under the social equity program under this section may be located in any city, town, or county in the state that allows cannabis retail, cannabis production, or cannabis processing business activities, as applicable, at the proposed location, regardless of: (A) Whether a cannabis retailer license, cannabis producer license, or cannabis processor license was originally allocated to or issued in another city, town, or county and (B) The maximum number of retail cannabis licenses established by the board for each county under RCW 69.50.345."

Thank You,  
Pisteo Kasala

		Attachment: Calhoun Rule petition
9/9/2024	shayla Curtis <a href="mailto:shaylacurtis@yahoo.com">shaylacurtis@yahoo.com</a>	<p>I wanted to comment on the CR 102 (Proposed Rule Making) on Social Equity Rulemaking since it's an issue that affects me personally. In partnership with another individual, Eric Upchurch, I applied for a social equity retail license and was awarded a license opportunity in Whatcom County. When I learned my application had been successful, I immediately started looking for a suitable location in that county. I contacted real estate agents for help as well, and searched all throughout Bellingham and the surrounding areas.</p> <p>However, we found time and again that every spot we considered was not viable for one reason or another. Either it was within 1,000 feet of a restricted entity, did not meet local zoning requirements, or was owned by a landlord who refused to do business with cannabis entities. All the truly viable locations, it seemed, had already been taken by licensees who had gotten set up during the initial round of licensing.</p> <p>My hopes were renewed, however, when I learned that three different social equity applicants like me were petitioning the Board for repeal of the rule limiting their potential locations to only one county, namely WAC 314-55-570(4)(d). The Board granted all three of these petitions. At least one of those petitions, from Casey Calhoun, further requested that the Board "[a]dopt no new rule that conflicts with the clear license mobility language of the current law contained in RCW 69.50.335(1)(e)" (from Casey Calhoun's petition, a copy of which is attached).</p> <p>When those petitions were granted, I started looking elsewhere for a viable location for my retail store, including in historically underserved communities in populous counties like Pierce, King, and Spokane counties. I invested considerable time and resources in researching available locations, contacting landlords, and even negotiating lease terms. I expected the CR 102 (Proposed Rule Making) on Social Equity Rulemaking to include updated rule language regarding social equity license mobility reflecting the fact that the Board had granted these petitions since the writing of the draft rules last year.</p> <p>Instead, the same language has carried over, as follows: "Effective 90 days after the license application window closes in 2025, social equity applicants, who applied under chapter 236, Laws of 2020, and are unable to secure a location in the county where the license is allocated, may locate the initial license location to any city, town, or county in the state of Washington." This rule directly contradicts Casey Calhoun's request in his petition that the Board "[a]dopt no</p>

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9/9/2024	<p>Chris Crew  <a href="mailto:chris.w.crew@gmail.com">chris.w.crew@gmail.com</a></p>	<p>I wanted to comment on the CR 102 (Proposed Rule Making) on Social Equity Rulemaking since it’s an issue that affects me personally. In partnership with another individual, Pisteo Kasala, I applied for a social equity retail license and was awarded a license opportunity in</p>

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9/9/2024	<p>Brett Walker  <a href="mailto:brettwalker1980@gmail.com">brettwalker1980@gmail.com</a></p>	<p>Hello,</p>

		<p>I wanted to comment on the CR 102 (Proposed Rule Making) on Social Equity Rulemaking since it's an issue that affects me personally. As someone whose life has been impacted by the War on Drugs, I applied for a social equity retail license and was awarded a license opportunity in Lewis County. When I learned my application had been successful, I immediately started looking for a suitable location in that county. I did not restrict myself to any particular area, and searched for spots in Centralia, Chehalis, Toledo, and beyond. I contacted real estate agents for help as well, and we found a number of places.</p> <p>However, we found time and again that every spot we considered was not viable for one reason or another. Either it was within 1,000 feet of a restricted entity, did not meet local zoning requirements, or was owned by a landlord who refused to do business with cannabis entities. All the truly viable locations, it seemed, had already been taken by licensees who had gotten set up during the initial round of licensing—a round I was excluded from due to my past brushes with the law involving cannabis.</p> <p>My hopes were renewed, however, when I learned that three different social equity applicants like me were petitioning the Board for repeal of the rule limiting their potential locations to only one county, namely WAC 314-55-570(4)(d). The Board granted all three of these petitions. At least one of those petitions, from Casey Calhoun, further requested that the Board "[a]dopt no new rule that conflicts with the clear license mobility language of the current law contained in RCW 69.50.335(1)(e)" (from Casey Calhoun's petition, a copy of which is attached).</p> <p>When those petitions were granted, I started looking elsewhere for a viable location for my retail store, including in historically underserved communities in populous counties like Pierce, King, and Spokane counties. I invested considerable time and resources in researching available locations, contacting landlords, and even negotiating lease terms. I expected the CR 102 (Proposed Rule Making) on Social Equity Rulemaking to include updated rule language regarding social equity license mobility reflecting the fact that the Board had granted these petitions since the writing of the draft rules last year.</p> <p>Instead, the same language has carried over, as follows: "Effective 90 days after the license application window closes in 2025, social equity applicants, who applied under chapter 236, Laws of 2020, and are unable to secure a location in the county where the license is allocated, may locate the initial license location to any city, town, or county in the state of Washington." This rule directly contradicts Casey Calhoun's request in his petition that the Board "[a]dopt no new</p>
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Thank you,



		Brett Walker
9/9/2024	<p>Arnar Olgeirsson  <a href="mailto:arnaro@greeenvaultsystems.com">arnaro@greeenvaultsystems.com</a></p>	<p>To Washington State Liquor and Cannabis Board (LCB)</p> <p>Good afternoon,</p> <p>My name is Arnar Olgeirsson, I am Vice President and Co-founder of a local WA company, GreenVault Systems (GVS).</p> <p>GVS provides automated dried flower batching and packing solutions for many Producer/Processors in WA State and across the country.</p> <p>I am writing you today to submit public comments in support of license mobility for all social equity applicants. Many of us in the legal cannabis industry remember the height of the War on Drugs and have been personally or know someone who has been impacted by it. I wholeheartedly support the social equity program being rolled out by the LCB.</p> <p>In working with WA State Producer/Processors, helping bring their products to market, I know what a competitive space retail cannabis has become. Giving license mobility to all social equity program participants will help these applicants have equal opportunity for success entering late into a market that has been operating now in the state for 12 years.</p> <p>Thank you for your time.</p> <p>Best regards,  Arnar Olgeirsson</p>
9/9/2024	Chris Crew	<p>I wanted to comment on the CR 102 (Proposed Rule Making) on Social Equity Rulemaking since it's an issue that affects me personally. In partnership with another individual, Pisteo Kasala, I applied</p>

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9/9/2024	<p>Marguerite Crew <a href="mailto:marguerite.crew@gmail.com">marguerite.crew@gmail.com</a></p>	<p>I wanted to comment on the CR 102 (Proposed Rule Making) on Social Equity Rulemaking since it's an issue that affects me personally. In partnership with another individual, Brett Walker, I applied for a social equity retail license and was awarded a license opportunity in Lewis County. When I learned my application had been successful, I immediately started looking for a suitable location in that county. I did not restrict myself to any particular area, and searched for spots in Centralia, Chehalis, Toledo, and beyond. I contacted real estate agents for help as well, and we found a number of places.</p> <p>However, we found time and again that every spot we considered was not viable for one reason or another. Either it was within 1,000 feet of a restricted entity, did not meet local zoning requirements, or was owned by a landlord who refused to do business with cannabis entities. All the truly viable locations, it seemed, had already been taken by licensees who had gotten set up during the initial round of licensing.</p> <p>My hopes were renewed, however, when I learned that three different social equity applicants like me were petitioning the Board for repeal of the rule limiting their potential locations to only one county, namely WAC 314-55-570(4)(d). The Board granted all three of these petitions. At least one of those petitions, from Casey Calhoun, further requested that the Board "[a]dopt no</p>

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<p>9/10/2024</p>	<p>Casey Calhoun  <a href="mailto:caseydean003@gmail.com">caseydean003@gmail.com</a></p>	<p>Casey Calhoun, Owner, Canna Craft  September 8, 2024  7357 30th AVE S.W.  Seattle, WA 98126  Email: caseydean003@gmail.com  Cell: 907-617-0673</p> <p>To the Honorable WSLCB Chair, David Postman,  the Honorable WSLCB Member, Ollie Garrett,  the Honorable WSLCB Member, Jim Vollendroff, and  the Honorable Policy and Rules Manager, Cassidy West  PO Box 43080  Olympia, WA 98504</p> <p>Subject: Written public comment on WSR 24-16-130, CR-102, support for License Mobility</p> <p>Thank you for the opportunity to submit written testimony for your consideration. My name is Casey Calhoun, I am a recipient of a preliminary letter of approval for a Social Equity retail license in Klickitat County. I am writing you to offer my comments on WSR 24-16-130 CR-102, specifically in support of the State Wide License Mobility rule change that is currently written in WSR 24-16-130, CR-102.</p> <p>Thank you to the LCB for listening to stakeholder feedback and writing draft language to include license mobility for all Social Equity licensees. I urge the board to adopt the draft language of license mobility, contained in CR-102, into CR-103 for implementation.</p>

I believe full state wide license mobility is the clear intent of the Social Equity Task Force's Final Report and the change in mobility allowance is further supported in law by the expansion of the Social Equity program with SB 5080. I previously submitted a Petition for Rule Change to the LCB that was accepted for consideration, thank you for considering that petition. I have attached my previous petition to this comment, as it contains my reasoning, belief, and facts regarding this proposed change for license mobility for all Social Equity Applicants.

Page 1

Myself, and other Social Equity applicants, are facing multiple obstacles in securing a location in our respective counties. For my current license location restriction some of my obstacles for securing a location in my allotted county are listed below:

- Klickitat County's population of 22,000, as of the 2020 Census, doesn't have the population to support an additional retail store in the county.]
- The Whitney Economics Report sites on Page 19 that up to the year 2035 only two (2) retail stores are economically viable in Klickitat County, which are already currently operating. The limited opportunity for two retail stores is also reiterated on Page 5 of LCB's "Key Takeaways: Whitney Economics Report".
- The Klickitat County Board of Commissioners has placed a moratorium ban in the county on cannabis retail stores, leaving only three small towns, Goldendale, Bingen, and White Salmon.
- These towns have extremely limited access to commercial retail spaces for lease, combined with distance setbacks, securing a location in the county is extremely challenging.
- A third store was in operation, "Bud Hut" centrally located in Klickitat County on HWY 14 but closed in approximately 2021, after producing low gross monthly sales, which did not make it financially viable.

Adopting the License Mobility language currently contained in CR-102 would greatly benefit all Social Equity applicants, adding more economic viability, with more location options. This mobility will allow all Social Equity applicants a greater chance of success in the well-established and highly competitive retail market.

		<p>Furthermore, I believe granting license mobility to all Social Equity Applicants will satisfy the change in statute from SB 5080, now codified in RCW 69.50.335(1)(e), as well as, meeting the recommendations from the Social Equity Task Force's Final Report.</p> <p>I would like to thank the LCB, board members and staff, who throughout the creation and implementation of this new Social Equity Program, have engaged with the public through numerous comment periods, surveys, and board meetings, with exemplary patience and dedication to stakeholder feedback and the creation of the Social Equity Program. Thank you.</p> <p>Respectfully, Casey Calhoun Owner, Canna Craft</p> <p>Page 2</p> <p>Attached below:</p> <p>Calhoun Petition for Adoption and Repeal Comments</p>
9/10/2024	<p>Goliath Pines <a href="mailto:goliathpines@gmail.com">goliathpines@gmail.com</a></p>	<p>I wanted to comment on the CR 102 (Proposed Rulemaking) on Social Equity Rulemaking since it's an issue that affects me personally. As someone who was previously affected by systemic discrimination and War on Drugs, I applied for a social equity retail license and was awarded a license opportunity in Clark County.</p> <p>I then learned that three different social equity applicants like me were petitioning the Board for repeal of the rule limiting their potential locations to only one county, namely WAC 314-55-570(4)(d). The Board granted all three of these petitions. At least one of those petitions, from Casey Calhoun, further requested that the Board "[a]dopt no new rule that conflicts with the clear license mobility language of the current law contained in RCW 69.50.335(1)(e)" (from Casey Calhoun's petition, a copy of which is attached).</p> <p>When those petitions were granted, I didn't give up on finding a spot in Clark County, but I also started looking elsewhere for a viable location for my retail store, including in historically underserved communities in populous counties like Pierce, King, and Spokane counties. I</p>



		<p>invested considerable time and resources in researching available locations and contacting landlords. I expected the CR 102 (Proposed Rulemaking) on Social Equity Rulemaking to include updated rule language regarding social equity license mobility reflecting the fact that the Board had granted these petitions since the writing of the draft rules last year.</p> <p>Instead, the same language has carried over, as follows: "Effective 90 days after the license application window closes in 2025, social equity applicants, who applied under chapter 236, Laws of 2020, and are unable to secure a location in the county where the license is allocated, may locate the initial license location to any city, town, or county in the state of Washington." This rule directly contradicts Casey Calhoun's request in his petition that the Board "[a]dopt no new rule that conflicts with the clear license mobility language of the current law contained in RCW 69.50.335(1)(e)," which the Board granted without qualification.</p> <p>As a social equity applicant, I applied for and was awarded \$141,729.00 with the condition that the entirety of those funds be used within a year of their awarding. The current rule language limiting social equity license mobility puts me and others like me in an impossible bind, where we can't move forward in our assigned counties due to a complete lack of viable locations, but we also can't afford to wait until 90 days after the license application window closes in 2025 without losing out entirely on the grant money we've been counting on to fund our business start-up in the absence of access to capital or substantial personal funds at our disposal.</p> <p>Waiting as long as the current draft rule language requires also means losing out entirely on the consulting and mentorship services built into the social equity program, designed to help applicants like me who do not have previous experience in the cannabis business. These services won't be available after June 30, 2025 (or maybe even sooner if all 2,400 allocated hours are used up), which will leave me without any guidance specific to a potential new location, which is when it would be most valuable. I really appreciated the efforts to offer this program, and I'm disappointed to think that I wouldn't be able to use it—or any of the grant money I was relying on—if the rules go into effect as written.</p> <p>It's therefore essential to me, my livelihood, and other social equity applicants in the exact same position that this rule be struck before these rules become final. Instead, the rules should simply align with RCW 69.50.335(1)(e), which states plainly that "all licenses issued under the social equity program under this section may be located in any city, town, or county in the state that allows cannabis retail, cannabis production, or cannabis processing business activities, as applicable, at the proposed location, regardless of: (A) Whether a cannabis retailer license, cannabis producer license, or cannabis processor license was originally allocated to or issued in another city, town, or county and (B) The maximum number of retail cannabis licenses established by the board for each county under RCW <a href="#">69.50.345</a>."</p>
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		Attachment: Calhoun petition
9/10/2024	David Sanders <a href="mailto:david@thclawfirm.com">david@thclawfirm.com</a>	<p>I wanted to comment on the CR 102 (Proposed Rulemaking) on Social Equity Rulemaking since it's an issue that affects me personally. In partnership with another individual, Sonereka Dupree, I applied for a social equity retail license and was awarded a license opportunity in Clark County.</p> <p>I then learned that three different social equity applicants like me were petitioning the Board for repeal of the rule limiting their potential locations to only one county, namely WAC 314-55-570(4)(d). The Board granted all three of these petitions. At least one of those petitions, from Casey Calhoun, further requested that the Board "[a]dopt no new rule that conflicts with the clear license mobility language of the current law contained in RCW 69.50.335(1)(e)" (from Casey Calhoun's petition, a copy of which is attached).</p> <p>When those petitions were granted, I didn't give up on finding a spot in Clark County, but I also started looking elsewhere for a viable location for my retail store, including in historically underserved communities in populous counties like Pierce, King, and Spokane counties. I invested considerable time and resources in researching available locations and contacting landlords. I expected the CR 102 (Proposed Rulemaking) on Social Equity Rulemaking to include updated rule language regarding social equity license mobility reflecting the fact that the Board had granted these petitions since the writing of the draft rules last year.</p> <p>Instead, the same language has carried over, as follows: "Effective 90 days after the license application window closes in 2025, social equity applicants, who applied under chapter 236, Laws of 2020, and are unable to secure a location in the county where the license is allocated, may locate the initial license location to any city, town, or county in the state of Washington." This rule directly contradicts Casey Calhoun's request in his petition that the Board "[a]dopt no new rule that conflicts with the clear license mobility language of the current law contained in RCW 69.50.335(1)(e)," which the Board granted without qualification.</p> <p>As a social equity applicant, I applied for and was awarded \$141,729.00 with the condition that the entirety of those funds be used within a year of their awarding. The current rule language limiting social equity license mobility puts me and others like me in an impossible bind, where we can't move forward in our assigned counties due to a complete lack of viable locations, but we also can't afford to wait until 90 days after the license application window closes in 2025 without losing out entirely on the grant money we've been counting on to fund our business start-up in the absence of access to capital or substantial personal funds at our disposal.</p> <p>Waiting as long as the current draft rule language requires also means losing out entirely on the consulting and mentorship services built into the social equity program, designed to help applicants like me who do not have previous experience in the cannabis business. These services won't be available after June 30, 2025 (or maybe even sooner if all 2,400 allocated</p>

		<p>hours are used up), which will leave me without any guidance specific to a potential new location, which is when it would be most valuable. I really appreciated the efforts to offer this program, and I'm disappointed to think that I wouldn't be able to use it—or any of the grant money I was relying on—if the rules go into effect as written.</p> <p>It's therefore essential to me, my livelihood, and other social equity applicants in the exact same position that this rule be struck before these rules become final. Instead, the rules should simply align with RCW 69.50.335(1)(e), which states plainly that “all licenses issued under the social equity program under this section may be located in any city, town, or county in the state that allows cannabis retail, cannabis production, or cannabis processing business activities, as applicable, at the proposed location, regardless of: (A) Whether a cannabis retailer license, cannabis producer license, or cannabis processor license was originally allocated to or issued in another city, town, or county and (B) The maximum number of retail cannabis licenses established by the board for each county under RCW <a href="#">69.50.345</a>.”</p>
9/11/2024	Paul Brice <a href="mailto:pbrice168@gmail.com">pbrice168@gmail.com</a>	<p>My comment is on rubric scoring. The misuse and abuse of attorneys filing for multiple participants pairing them with little to no true ownership of the license. This needs to be addressed and additional points need to be awarded to a sole proprietor/single individual has to have more merit value than piecing together people to misuse misrepresent ownership to obtain licenses.</p> <p>Paul Brice</p>