1406 Northwest Lane SE

Lacey WA 98503

March 19, 2015

Dear Liquor Control Board Members:

Thank you for considering the City of Olympia’s request to expand the banned products list within its Alcohol Impact Area (AIA) under WAC 314-12-215(3)(e). As a frequent visitor to downtown Olympia and customer of its businesses, I urge you to approve the city’s request.

The products whose off-premises sale the city seeks to ban in its AIA combine very high alcohol content with very low price. They provide the alcohol equivalent of three or four shots of spirits for under two dollars. Their principal consumers appear to be chronic alcoholics, and their principal purpose appears to be feeding addictions for profit. The major brewers and others who manufacture these products, the distributors who supply them to retailers, and the retailers who sell them, should all be embarrassed.

RCW 66.08.010 charges the Board with protecting the welfare, health, peace, morals, and safety of the people of the state. I truly don’t understand why the Board allows these high-alcohol, low-priced products to be sold anywhere in the state. At the least, you should prohibit their sale in downtown Olympia when the city has clearly shown, as it has here, their damaging effect on that area and on the people who live, work, shop, and recreate there.

The city asked the Board to ban many of these products more than two years ago. Because WAC 314-12-215(3)(c) requires proof of harm on an individual product-by-product basis before the Board will approve an AIA, the list of banned products was narrowed to just a handful most often found in the streets and alleys in 2013. It was entirely predictable that other products with the same characteristics would appear on the retailers’ shelves and the streets and alleys of downtown, as they have. Fortunately, WAC 314-12-215(3)(e) allows you to expand the banned products list based only on their similarity to the products already banned. The city has gone beyond what the rule requires, and shown the substitution and continued harm that has occurred because of the “whack-a-mole” approach of WAC 314-12-215(3)(c). If you fail to add any of the products the city is now requesting to the banned list, I’m sure those products will continue to appear, in larger quantities, on the shelves and in the streets and alleys.

Please approve the city’s current request, and provide the enforcement necessary to meet your duty to protect the public. It would be a wonderful change to see the Board show more interest in serving the public than the alcoholic beverage industry in downtown Olympia. Thank you for your consideration.

Sincerely,

Richard D. Van Wagenen