



Supplemental CR 102 Memorandum

Allowing minors under the age of 21 on non-retail cannabis licensed premises

Date: April 23, 2025

Presented by: Denise Laflamme, Policy and Rules Coordinator

Background

In August 2022, the Board accepted two rulemaking petitions to amend WAC 314-55-015 to allow certain minors on the premises of licensed cannabis producers and processors under specific conditions. One petition sought to codify an LCB temporary COVID allowance that permitted minors under 16 years of age on the licensed premises of cannabis producers and processors. The conditions for this allowance included that the minor was a child or grandchild of the licensee, was not engaged in any work or act of employment for the licensee's business, and did not possess any products associated with the production, processing, or sales of cannabis. This allowance expired on December 31, 2022. The second petition requested that employees of contractors engaged in construction, electrical, plumbing, HVAC work, etc., who are under 21, be permitted on licensed premises of cannabis producers and processors, provided they are over the age of sixteen and not engaging in any work related to production, processing or sales of cannabis.

Under [WAC 314-55-015\(2\)](#), no one under 21 years of age may enter or remain on cannabis licensed premises except as provided in [RCW 69.50.357](#), which allows qualifying patients under 21 years of age on the premises of retail outlets only, under certain conditions. Statute explicitly prohibits the delivery, sale, or possession of cannabis products to persons under 21 years of age but does not prohibit persons under 21 years of age to enter or remain on the licensed premises of a producer or processor. The Board has broad statutory authority to adopt rules that regulate producer and processor licenses as provided in RCW 69.50.325, RCW 69.50.342, and RCW 69.50.345.

A CR 101 was filed on February 28, 2024 ([WSR 24-06-026](#)) that initiated rulemaking. A CR 102 was filed on January 15, 2025 ([WSR 25-03-081](#)). This memo describes the Supplemental CR 102 with proposed rules amended since the CR 102 was filed on January 15, 2025. Additional background was provided in the [CR 102 memo](#) dated January 15, 2025.

Stakeholder Engagement

Prior to filing the CR 101, rules staff reached out to the petitioner asking if they remained supportive of initiating this rulemaking. The petitioner responded that yes, they were still supportive. Subsequently, LCB rules staff received over 50 emails from people in support of rulemaking related to these petitions prior to filing the CR 101.

After filing the CR 101, an LCB project team was convened to discuss and develop draft rules. The project team included representation from the Attorney General's Office, Enforcement & Education division, the Licensing division, and the public health education liaison.

Two virtual stakeholder engagement sessions were held on Monday, September 16, and Thursday, September 19, 2024. A [Powerpoint presentation](#) with background information and conceptual rule elements, including draft conditions, was posted on the LCB rule webpage for discussion at these sessions. An invitation and links to session materials was sent out via a [Gov delivery](#) notice on September 5, 2024. The stakeholder sessions were recorded. Transcripts of these sessions with their attendance lists are included as an attachment in the [CR 102 memo](#) dated January 15, 2025.

In order to obtain feedback on draft rule language, a [Gov delivery](#) notice was sent out on November 20, 2024 requesting public feedback on draft rules prior to filing a CR 102. Draft rules were posted on the LCB webpage with a deadline of December 6, 2024, for comments.

Initial Proposed Rule Language to Amend WAC 314-55-015 – CR 102 filed January 15, 2025, under WSR 25-03-081.

On January 15, 2025, the Board approved filing of the CR-102 with proposed rules, filed as [WSR 25-03-081](#). The memorandum supporting the filing can be found [here](#) along with all attachments. The rule language amendments included with the initial proposed rules, as provided in the CR 102 memo, consist of the following:

Section 2: This language adds references to two new subsections with conditions for allowing certain minors on the licensed premises of cannabis producers and processors and adds a reference to an existing definition of person in [RCW 69.50.101](#) for clarity. The new language states that both groups of minors defined in this section may not possess any products associated with the production, processing, or sales of cannabis, and that violations are subject to the same penalties established for allowing persons under 21 years of age to frequent a licensed retail premises under [WAC 314-55-525](#) (category VI violations).

Section 3: This language states that persons under the age of 16 who are children and grandchildren of licensees may enter or remain on the licensee's premises of a cannabis producer provided that:

- The person does not enter or remain in areas where cannabis is present with a list of areas. Language states that violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under [WAC 314-55-522](#) (category III violations), and
- The person is under the direct supervision of the licensee while on the premises.

The language states that prior to allowing any child or grandchild on the licensed premises, the licensee must notify the enforcement and education division at LCB in writing with information about the children who may be present and when they may be present. Violations of this are subject to the same penalties as established for an operating/floor plan violation under [WAC 314-55-523](#) (category IV violations).

Section 4: This language states that a licensed producer or processor may allow a person under 21 years of age to enter or remain on the licensed premises under the following conditions:

The person:

- is at least 18 years of age.
- is employed by a licensed plumbing contractor, licensed electrical contractor, or a contractor registered with the Washington State Department of Labor and Industries.
- is on the licensed premises only during the course of their official employment and does not remain on the premises any longer than is necessary to perform duties associated with their employment.
- is accompanied by a supervisor who is employed by the same contractor who is at least 21 years of age.

Additional language states that the employee must wear an identification badge as required under [WAC 314-55-083](#) with new requirements to document the name of the contractor's business in the visitor log and whether the contractor is under 21 years of age.

Section 12: The new language states that nothing in this section conflicts with RCW 9.41.300 as to the entire premises remain classified as off-limits to persons under 21 years of age from the general public.

Comments received on CR 102

Following the proposed rules filing, the public comment period was open until the public hearing held on February 26, 2025. During this period, 19 people submitted comments via email, four people provided oral comments at the Board meeting on January 15, 2025, and four people provided oral comments during the hearing on February 26, 2025. Comments received during this time period are included in Attachment A. Based on these public comments, and subsequent direction from the Board, agency staff revised several aspects of the proposed rules resulting in a supplement CR 102.

Supplemental Proposed Rules (Supplemental CR 102)

The Supplemental Proposed rules aim to make the following changes to the Proposed rules filed with WSR 25-03-081:

Included processor premises

Language was added in (3) to include processor premises as a location where children and grandchildren of licensees may be present.

Moved violation and penalty associated with subsection (3)(c)

The language related to violations and penalties under WAC 314-55-522 associated with subsection (3)(c) has been moved to apply to all of subsection (3).

Added requirement for licensee to accompany and supervise child in areas where cannabis is present

Language in (3)(a) was amended to indicate children and grandchildren of licensees may not enter or remain in areas where cannabis is present unless they are accompanied by and under the direct supervision of the licensee.

Moved requirement for direct supervision of child as part of (3)(a)

Language from (3)(a) and (3)(b) were combined to indicate children must be accompanied and supervised by the licensee if they are in areas where cannabis is present.

Removed violation and penalty associated with requirement that children or grandchildren not enter or remain in areas where cannabis is present

Removed violation and penalty related to children being in areas where cannabis is present as language was added to allow children in these areas if accompanied and supervised by licensee.

Added requirement that licensee must be on premises when children are present

Language in (3)(b) was amended to add requirement that licensees be on the licensed premises at all times while their child or grandchild is present.

Removed requirement for notifying LCB under (3)(c)

Removed (3)(c) language requiring licensees to notify the LCB prior to allowing any child or grandchild of the licensee to enter or remain on the licensed premises. This includes removing requirement for licensee to provide LCB information about when children may be present and their ages.

Added another option for supervision of employees of contractors

Additional requirement was added to include general contractor with supervisory authority to assure employees of subcontractors are supervised by someone at least 21 years of age.

Estimated Costs of Compliance

Under the Regulatory Fairness Act (RFA) in chapter 19.85 RCW, agencies are required to consider the costs that complying with the proposed rules will impose on businesses, unless the proposed rules are subject to an exemption to this requirement. The CR 102 form describes these exemptions in more detail.

Proposed rules amending WAC 314-55-015 as part of this rulemaking do not qualify for any of the exemptions under the RFA. Therefore, the proposed rules are not exempt from the Regulatory Fairness Act.

LCB estimates there would be no cost associated with implementing this rule except if a business is found to be out of compliance that may result in a monetary penalty. Under [RCW 34.05.110\(4\)\(a\)](#), an agency is not required to waive a fine or penalty to correct a violation if the violation presents a direct danger to the public health. Because violations subject to the same penalties established under WAC 314-55-522 and WAC 314-55-525 have been identified and added to this draft rule language, we applied an estimated compliance cost of \$1250 for a first violation under WAC 314-55-522 as a maximum penalty when analyzing whether the rules would have a disproportionate impact on small businesses as defined in RCW 19.85.020(3). Other violations could result in penalties, but they would be less than \$1250, so \$1250 was assumed to be a maximum penalty for a first violation.

Based on an estimated compliance cost of \$1250, the estimated cost of compliance does not exceed the minor cost thresholds for any of the potential NAICS codes applicable to cannabis licensees (see CR 102 form for more detail). Therefore, implementation of this amended rule is not anticipated to result in more than minor costs on businesses as defined in RCW 19.85.020(2).

Rule Necessity

These rule changes are being considered based on two rulemaking petitions accepted by the LCB in 2022 to make permanent an allowance LCB had in place during COVID for children and grandchildren of cannabis licensees, and to extend a similar allowance to employees of contractors who are under 21 years of age. LCB has received widespread support for this rulemaking from stakeholders.

Description of Rule Changes

Reasons supporting proposal: The reasons supporting these proposed rules, in addition to that described above, are identified in the two tables below. Table 1 below identifies the changes **originally proposed** to WAC 314-55-015 in the CR 102 filed on January 15, 2025 (WSR 25-03-081).

Table 1. Original CR 102 proposed rules.

WAC 314-55-015 General information about cannabis licenses			
Section	Existing Rule Language	Proposed New Language	Reason for change
(2)	No one under 21 years of age may enter or remain on a cannabis licensed premises except as provided in RCW 69.50.357 .	Persons, as defined in RCW 69.50.101, who are under 21 years of age must not:	Replacing “may” with “must not” to clarify. Replacing “no one” with existing definition of person for consistency.
		(a) Enter or remain on the licensed premises of a cannabis licensee except as provided in RCW 69.50.357 or as provided in subsections (3) and (4) of this section.	This is added to indicate that two new subsections with exceptions are being added.
	N/A	(b) Possess any products associated with the production, processing, or sales of cannabis.	Adds language consistent with temporary COVID allowance.
		(b) Violations of this subsection are subject to the same penalties established for allowing persons under 21 years of age to frequent a retail licensed premises under WAC 314-55-525.	This is added to indicate what penalties apply for violations.
(3)	New: Conditions and requirements for allowing children and grandchildren of licensees on licensed premises.	Persons under the age of 16 who are children and grandchildren of licensees may enter or remain on the licensed premises of a cannabis producer, as provided in this subsection.	This is the same language included in the temporary COVID allowance.
		(a) The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment.	This is added to define restricted areas for children.
		(a) Violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under WAC 314-55-522.	This is added to indicate what penalties apply for violations.
		(b) The person is under the direct supervision of the licensee while on the premises.	This language is consistent with language in RCW 66.24.145 for children allowed on craft distilleries.
		(c) Prior to allowing any child or grandchild of the licensee to enter or remain on the licensed premises, the licensee must notify the enforcement and education division of the LCB in	This is added to describe new LCB notification requirements to indicate when children may be present.

		writing that children may be on their licensed premises. Written notification to the enforcement and education division must indicate the day(s) of the week, times of the day, and age of the child(ren) that may be present.	
		(c) Violations of this subsection are subject to the same penalties established for an operating/floor plan violation under WAC 314-55-523.	This is added to indicate what penalties apply for violations.
(4)	New: Conditions and requirements for employees of contractors working on licensed premises.	A licensed producer or processor may allow a person under 21 years of age to enter or remain on the licensed premises under the conditions outlined in this subsection.	This is added to indicate applicable age for this subsection.
		(a) The person under 21 years of age is:	This is added to indicate application of conditions to persons under 21.
		(i) At least 18 years of age.	Consistent with ages included in WAC 314-11-040 for employees under 21 years of age working on licensed liquor premises.
		(ii) Employed by a licensed plumbing contractor under chapter 18.106 RCW, or licensed electrical contractor under chapter 19.28 RCW, or a contractor registered with the Washington state department of labor and industries as required under chapters 18.27 RCW and 296-200A WAC.	These requirements were added to ensure employees worked for bona fide contractor businesses.
		(iii) On the licensed premises only during the course of their official employment providing contracted services to the licensee and does not remain on the premises any longer than is necessary to perform duties associated with their employment.	Consistent with WAC 314-11-040 for employees under 21 years of age working on licensed liquor premises.
		(iv) Accompanied by a supervisor at all times who is employed by the same licensed or registered contractor and who is at least 21 years of age.	This was added per supervision recommendations provided by WA Dept. of Labor and Industries.
		(b) In addition to requirements under WAC 314-55-083, including wearing an identification badge while on the premises, licensees must record the following information about employees of contractors in the visitor log:	This is being added to clarify the requirement for visitor information.
		(i) If the employee is under 21 years of age; and	This is being added to aid LCB staff in identifying contractors on premises.

		(ii) The name of contractor business for whom employee is engaged in work while on the licensed premises.	This being added to aid LCB staff in identifying contractor businesses on premises.
(5)–(11)	WAC 314-55-015(3) – (9)	have been renumbered as WAC 314-55-015(5) – (11)	
(12)	N/A	Nothing in this section conflicts with RCW 9.41.300 as the entire premises remain classified as off-limits to persons under 21 years of age from the general public.	Clarifies that the entire premises remain off-limits to weapons pursuant to RCW 9.41.300

Table 2 indicates changes in proposed rules for the Supplemental CR 102 made to the original CR 102 proposed rule language filed in WSR 25-03-081.

Table 2. Supplement CR 102 proposed rule – changes from original proposed rules.

WAC 314-55-015 General information about cannabis licenses			
Section	Proposed Rule (CR 102) WSR 25-03-081	Supplemental Proposed Rule (Supplemental CR 102)	Reason for change
(3)	Persons under the age of 16 who are children and grandchildren of licensees may enter or remain on the licensed premises of a cannabis producer, as provided in this subsection.	Persons under the age of 16 who are children or grandchildren of the licensees may enter or remain on the licensed premises of a cannabis producer <u>or processor</u> , as provided in this subsection.	Added cannabis processors to be consistent with original COVID allowance.
(3)	N/A	Violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under WAC 314-55-522.	Moved from under (3)(a) indicating that this applies to all of subsection (3).
(3)(a)	The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment, unless accompanied by and under the direct supervision of the licensee. Violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under WAC 314-55-522.	The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment, <u>unless accompanied by and under the direct supervision of the licensee.</u>	Amended language to combine (3)(a) and (3)(b) to indicate children must be accompanied and supervised by licensees if they are in areas where cannabis is present.

(3)(b)	The person is under the direct supervision of the licensee while on the premises.	The licensee is on the licensed premises <u>at all times while their child or grandchild is present.</u>	Replaced requirement for licensees to supervise children with requirement that licensee is on licensed premises at all times when a child is present. Moved supervision requirement to (3)(a) specific to when children are in areas where cannabis is present.
(3)(c)	Prior to allowing any child or grandchild of the licensee to enter or remain on the licensed premises, the licensee must notify the enforcement and education division of the LCB in writing that children may be on their licensed premises. Written notification to the enforcement and education division must indicate the day(s) of the week, times of the day, and age of the child(ren) that may be present. Violations of this subsection are subject to the same penalties established for an operating/floor plan violation under WAC 314-55-523.	N/A	Removed requirement for licensees to notify LCB prior to having children on premises and the violation associated with this requirement. This was removed based comments from stakeholders as being burdensome and including potentially publicly available data about children.
(4) (a)(iv)	Accompanied by a supervisor who is employed by the same licensed or registered contractor who is at least 21 years of age.	Accompanied at all times by either: (A) A supervisor who is employed by the same licensed or registered contractor and who is at least 21 years of age; or (B) A general contractor with supervisory authority and control over the workplace who is at least 21 years of age.	Added requirement to assure employees of subcontractors are supervised by someone at least 21 years of age.

Attachment A:

Emailed and Oral Comments at Board Meetings and Hearing in reference to the CR 102 Filed on January 15, 2025, as WSR 25-03-081

Attachments to Memo:

Supplemental CR 102 Minors on Non-Retail Cannabis Premises

Emailed comments

From: [Ryan Sevigny](#)
To: [LCB DL Rules](#)
Cc: [Vollendroff, Jim \(LCB\)](#); [Garrett, Ollie A \(LCB\)](#)
Subject: Minors on Farms
Date: Tuesday, January 14, 2025 6:43:00 AM
Attachments: [Outlook-mstopwqz.png](#)

External Email

Good Morning Gretchen and Board Members,

I write to you today as a parent of a 9yr old and a 6 yr old, both of whom will never know a day in their life where cannabis is not legal in this state.

We fully support prioritizing safety on cannabis farms, but the proposed rule imposes overly restrictive measures that go far beyond the temporary COVID-19 allowance. These new requirements place undue burdens on family farms and unfairly suggest that parents need LCB oversight to protect their children, an implication that is both unnecessary and offensive.

The assumption that farm owners and operators cannot ensure their children's safety undermines the trust placed in licensees. Family farms have consistently demonstrated their ability to operate safely, even during the temporary rule that permitted children on-site with reasonable precautions. Over that period, no significant safety concerns or incidents were reported.

Requiring prior written notice is another impractical aspect of the rule. Life with children is unpredictable, illness or other emergencies can arise without warning. Mandating LCB approval adds layers of unnecessary bureaucracy and increases the likelihood of accidental non-compliance.

The proposed rule also creates inequity by limiting accommodations to licensees and excluding employees. A more inclusive and practical approach would allow family farms and their teams to adapt while maintaining safety.

Here's why a balanced solution is critical:

1. Supporting Small and Women-Owned Businesses

Many small, independent, and women-led farms have highlighted the positive impact of having children on-site. It eases childcare challenges, strengthens family dynamics, and contributes to the overall well-being of their businesses. The proposed restrictions unfairly disadvantage these operations.

2. A Proven Track Record of Safety

The temporary COVID-19 allowance showed that children's presence on farms could be managed safely and responsibly. With no significant issues reported, there is no

evidence to justify rolling back these allowances.

3. **Preserving Generational Knowledge**

Farming is often a multi-generational endeavor. Allowing children to engage in age-appropriate farm tasks fosters their interest, teaches valuable skills, and helps ensure the future sustainability of cannabis farming in Washington.

Adopting a more balanced approach will support family farms without compromising safety, equity, or operational flexibility.

Best Regards,
Ryan

Ryan Sevigny

C: 425.420.0170

Order Online with the [Cultivera Marketplace](#)



From: [Frost, Gretchen D \(LCB\)](#)
To: [LCB DL Rules](#)
Subject: FW: Minors on site
Date: Tuesday, January 14, 2025 9:17:17 AM

Good morning, please see the written comments received this morning below.

Thanks, Gretchen

From: Frost, Gretchen D (LCB)
Sent: Tuesday, January 14, 2025 9:16 AM
To: Greg Haynes <greg.h.dlbd@gmail.com>
Subject: RE: Minors on site

Good morning Greg, thank you for your written comments. I've forwarded a copy to our Policy and Rules Team as well as the Board Members.

Have a great day!

Gretchen Frost

Executive Assistant to the Board



1025 Union Ave SE | PO Box 43076 | Olympia, WA 98504

Phone: 360.664-1656

Email: gretchen.frost@lcb.wa.gov

-----Original Message-----

From: Greg Haynes <greg.h.dlbd@gmail.com>
Sent: Tuesday, January 14, 2025 8:44 AM
To: Frost, Gretchen D (LCB) <gretchen.frost@lcb.wa.gov>
Subject: Minors on site

External Email

Good morning Gretchen,

I have yet to have anyone explain to me with any good reason or in fact, any reason why a minor/child of an employee or owner of a 502 license cannot be on site.

Personally, I can't see any safety hazards or risk involved with having someone under the age of 21 on a 502 producer or a processor site. I can certainly understand someone under the age of 21 that is unaccompanied by a guardian or parent inside a retail store just like it was back in the days when the state controlled all the liquor sites.

During the last year of sense the emergency rule that allowed children or minors of employees and owners of the licenses on site we took advantage of that by letting our management/employees bring their kids on site. We created a comfortable room with bathrooms and computers, as well as books and other learning material for the kids.

Please let me know if there's anything else I can add or help with trying to get this approved and put into regulation and rules. We have been doing this industry for over 10 years. I question when is the state going to treat it like any other industry, especially one that brings so many jobs and tax revenue to the state.

Sincerely,

Greg Haynes

Sent from my iPhone

From: [Jennifer Wick](#)
To: [LCB DL Rules](#); [Vollendroff, Jim \(LCB\)](#); [Garrett, Ollie A \(LCB\)](#)
Subject: Minors on Farms
Date: Tuesday, January 14, 2025 11:58:15 AM

External Email

***Good Morning,

I would please like to testify in the CR 102 hearing for Minors on Farms at the Board Meeting on 1/15.

This is a very big issue for our family. My son and I jointly own our company and my daughter is a single mom and school counselor . She has a daughter (my granddaughter) and she makes just enough to NOT qualify for any daycare assistance. The burden of childcare falls on my son and I. With most of the country unable to afford childcare and our new VP stating that grandparents, aunts and uncles should be stepping up, this proposed rule is far more restrictive than during COVID -19 and places unnecessary burdens on our family business. It says that we are trusted with the public's safety but that we are not responsible enough to ensure our children's safety.

As a small family, woman and disability owned company, ruling that we cannot bring our children or grandchildren to work is ridiculous and an unfair hardship. We also never know when the children will get sick or have snow days, so having to get written approval is absurd and an undue hardship. We are safer than alcohol or brewing facilities. Our children and grandchildren need to grow up learning the family business and to restrict their access to the knowledge that is passed down from generation to generation is disgraceful and a detriment to their future.

During Covid -19 having the childcare burden taken off our shoulders improved our family dynamic and allowed us more time as a family. The current restrictions are disproportionately unfair in the negative ways that it impacts our business and lives. We have proven that having our children and grandchildren could be managed safely and effectively. It never added to the risk to the public or our children.

Please delay the ruling of this proposition so that it can be written to be more balanced for P/P families. In conclusion, the assumption that farm owners and operators cannot be trusted to safeguard their own children undermines the autonomy and responsibility of licensees. Family farms have operated safely for years without incidents under the previous temporary rule, which allowed children on farms with reasonable safeguards. Over its duration, no significant issues were reported. Please delay the ruling and allow it to be written in a positive response to all of us that need to have our children and grandchildren present in our working lives.

Jennifer Wick
Prime Choice Canna LLC DBA Wave Edibles
Lic # 436793
253-278-2675
jennifer@waveedibles.com(insert your message)***

From: [Info Inbox](#)
To: [LCB DL Rules](#); [Vollendroff, Jim \(LCB\)](#); [Garrett, Ollie A \(LCB\)](#)
Subject: Minors on Farms
Date: Tuesday, January 14, 2025 12:00:08 PM

External Email

Good Morning,

I would please like to testify in the CR 102 hearing for Minors on Farms at the Board Meeting on 1/15.

This is a very big issue for our family. My son and I jointly own our company and my daughter is a single mom and school counselor . She has a daughter (my granddaughter) and she makes just enough to NOT qualify for any daycare assistance. The burden of childcare falls on my son and I. With most of the country unable to afford childcare and our new VP stating that grandparents, aunts and uncles should be stepping up, this proposed rule is far more restrictive than during COVID -19 and places unnecessary burdens on our family business. It says that we are trusted with the public's safety but that we are not responsible enough to ensure our children's safety.

As a small family, woman and disability owned company, ruling that we cannot bring our children or grandchildren to work is ridiculous and an unfair hardship. We also never know when the children will get sick or have snow days, so having to get written approval is absurd and an undue hardship. We are safer than alcohol or brewing facilities. Our children and grandchildren need to grow up learning the family business and to restrict their access to the knowledge that is passed down from generation to generation is disgraceful and a detriment to their future.

During Covid -19 having the childcare burden taken off our shoulders improved our family dynamic and allowed us more time as a family. The current restrictions are disproportionately unfair in the negative ways that it impacts our business and lives. We have proven that having our children and grandchildren could be managed safely and effectively. It never added to the risk to the public or our children.

Please delay the ruling of this proposition so that it can be written to be more balanced for P/P families. In conclusion, the assumption that farm owners and operators cannot be trusted to safeguard their own children undermines the autonomy and responsibility of licensees. Family farms have operated safely for years without incidents under the previous temporary rule, which allowed children on farms with reasonable safeguards. Over its duration, no significant issues were reported. Please delay the ruling and allow it to be written in a positive response to all of us that need to have our children and grandchildren present in our working lives.

Josh Wick
Prime Choice Canna LLC DBA Wave Edibles
Lic # 436793
253-278-2675
info@waveedibles.com

From: [Mike Crandall](#)
To: [LCB DL Rules](#)
Subject: Minors on Farms
Date: Tuesday, January 14, 2025 4:21:11 PM

External Email

I would like the courts to please delay action on this matter until they fully understand why cannabis producers and processors may need consideration when moving forward on this matter. My husband and I own and operate a small tier 1 with one employee. My daughter lost her husband 3 years ago and we have become a major part in caregiving for her 3 children. My daughter works an hour away from her home and we just so happen to work in the town she and her children live in. I'm not wanting to have my grandchildren at work 24/7, but I would like to be able to have them there when necessary. I would like you to consider the fact the we are not only thriving business owners, but parents and grandparents that want only what is best for families.

Thank you,

JeanEllen Crandall

Island Gro ***(insert your message)***

Sent from my iPhone

From: [Family Plot](#)
To: [LCB DL Rules](#); [Vollendroff, Jim \(LCB\)](#); [Garrett, Ollie A \(LCB\)](#)
Subject: Minors on Farms
Date: Tuesday, January 14, 2025 8:22:04 AM

External Email

Here are the main points I would like to make (I know that they look copied but I think they hit on the key points of concern),

- **Family Farms Thrive on Family Participation:** Family farms often rely on the support of their children and grandchildren, particularly during critical farming periods. Restricting their access limits opportunities for shared work and learning experiences.
- **Equity for Small and Women-Owned Businesses:** Many small, independent, and women-owned farms have reported that allowing children on-site improves family dynamics, reduces childcare burdens, and enhances the overall well-being of their businesses. The current restriction disproportionately impacts these businesses.
- **Proven Safety Record:** The temporary COVID-19 allowance demonstrated that children's presence on farms could be managed safely and effectively. There is no evidence to suggest that continuing this practice would pose a risk to public safety.
- **Generational Knowledge Transfer:** Farming is a generational profession. Allowing minors to participate in age-appropriate farm activities fosters early interest and hands-on learning, helping to sustain the future of cannabis farming in Washington

Being able to have acceptable ways to work and take care of children is a vital part of our industry. This is especially true for small operations. More restrictive rules do not help.

Please reconsider these changes.

Steve Kuhlman
Family Plot LLC
license #416068

From: [Awsm Gardens](#)
To: [LCB DL Rules](#); [Vollendroff, Jim \(LCB\)](#); [Garrett, Ollie A \(LCB\)](#)
Subject: Minors on Farms
Date: Tuesday, January 14, 2025 8:56:12 PM

External Email

Cannabis producers should have the same privileges as alcohol licensees when it comes to bringing their children to work—without additional restrictions. Cannabis is proven to be safer than alcohol, yet these proposed rules impose far more limitations than those placed on alcohol licensees.

From: [Caitlein Ryan](#)
To: [Garrett, Ollie A \(LCB\)](#); [Vollendroff, Jim \(LCB\)](#); [LCB DL Rules](#); [Nordhorn, Justin T \(LCB\)](#)
Subject: Minors on Farms
Date: Wednesday, January 15, 2025 8:38:57 AM
Attachments: [Minors on Farms 1-15-25.pdf](#)

External Email

Good morning,

I will be providing testimony at today's meeting and have attached written comments here as well. We were surprised to see this item on today's agenda, as we expected additional opportunities for feedback prior to the CR-102. The current CR-101 draft still requires significant work.

We've shared extensive feedback during two engagement sessions and would like to understand why this draft does not better align with the emergency rule on which the request was based. Additionally, we're concerned that the current draft does not reflect any of the input provided during those sessions.

We respectfully request further clarification and the opportunity to collaborate on refining these rules to ensure they are more aligned with stakeholder feedback.

Thank you,

--



Caitlein Ryan, PhD
Executive Director, The Cannabis Alliance

☐ Main: (253) 235-9045 ☐ Mobile & Text: (425) 314-9004

☐ thecannabisalliance.us

☐ caitlein.ryan@thecannabisalliance.us

☐ 12345 Lake City Way NE #170, Seattle, WA 98125





DEDICATED TO THE ADVANCEMENT OF A VITAL, ETHICAL, EQUITABLE, AND SUSTAINABLE CANNABIS INDUSTRY
WWW.THECANNABISALLIANCE.US

15 January 2025

Dear Members of the Washington State Liquor and Cannabis Board,

I am writing to respectfully request that the LCB pause the current rulemaking process regarding minors on outdoor farms. We believe that further consideration and refinement of these rules are necessary to ensure that they do not impose undue burdens on family farms and small businesses across Washington State.

While we recognize the importance of ensuring safety on cannabis farms, these proposed rules go beyond reasonable safety measures and instead create unnecessary obstacles for family-run businesses. These burdens are particularly onerous compared to the allowances made for alcohol licensees, despite cannabis being proven safer than alcohol. We ask the LCB to consider providing cannabis producers with the same privileges afforded to alcohol licensees when it comes to involving their children in farming activities.

We respectfully ask that the LCB delay action on this rule project for the following reasons:

1. **Existing Restrictions in Manufacturing:** Current regulations already limit where minors can be present in manufacturing businesses, ensuring their safety. Cannabis farming poses no additional threats that would justify imposing stricter restrictions than those already in place for other industries.
2. **Impractical Notification Requirements:** The requirement for prior written notification to the LCB's enforcement division before children can enter outdoor grow premises is impractical and burdensome. Family circumstances, such as childcare needs or a child's illness, can change unexpectedly, making it difficult to comply with rigid notification requirements.
3. **Unequal Treatment of Employees' Families:** The proposed rule allows only licensees' children and grandchildren under 16 to enter outdoor grow areas, excluding employees' families from similar accommodations. This unfairly limits flexibility for employees who may also benefit from the ability to have their children present during work hours.
4. **Proven Safety Record:** Under the temporary COVID-19 allowances, children were permitted on cannabis farms with reasonable safeguards in place. This temporary

measure worked effectively without resulting in significant safety issues. It is important to consider this proven track record when evaluating the necessity of the proposed restrictions.

5. **Arbitrary Allowances for Certain Trades:** The proposed rule allows electricians and plumbers under the age of 21 to enter licensed premises under certain conditions. However, it excludes other non-plant-touching contractors who may also need to perform essential services on farms, such as HVAC technicians, carpenters, and general contractors. This arbitrary distinction is inconsistent and places unnecessary limitations on farmers' ability to maintain their operations.

Family farm owners have long demonstrated their commitment to safety and responsible farming practices. Imposing additional bureaucratic hurdles only increases the risk of accidental non-compliance and places unnecessary burdens on already hard-working farmers. Additionally, these restrictive rules place a disproportionate burden on small and women-owned businesses, many of whom face unique challenges in balancing family and work responsibilities while sustaining their operations.

We urge the LCB to take a more balanced approach that acknowledges the unique needs of family farms and small businesses in the cannabis industry. We appreciate the LCB's efforts to ensure safety in the cannabis industry. However, we believe that these proposed rules require further consideration to avoid unintended negative consequences for Washington's family farms. We respectfully request that the LCB pause this rulemaking process to allow for more comprehensive input from stakeholders and to develop a rule that better aligns with the realities of cannabis farming.

Thank you for your time and attention to this important matter. We look forward to continued collaboration to ensure the success and sustainability of Washington's cannabis industry.

Sincerely,

A handwritten signature in black ink, appearing to read 'Caitlein', followed by a long horizontal flourish.

Caitlein Ryan, PhD
Executive Director, The Cannabis Alliance
caitlein.ryan@thecannabisalliance.us
425-314-9004

From: [Ashley Sjodin](#)
To: [LCB DL Rules](#)
Subject: (CR 102) to amend WAC 314-55-015 to allow minors on non-retail cannabis premises under certain conditions
Date: Wednesday, January 22, 2025 10:26:43 AM

External Email

Grown Folks 502's Public Statement on Age Restrictions for Cannabis Producer and Processor Premises

As a strong advocate for responsible cannabis practices, Grown Folks 502 firmly believes that **allowing individuals under the age of 21 on cannabis producer and processor properties is inappropriate**. Maintaining a clear standard of 21 and above is essential to ensuring safety, regulatory compliance, and public trust in the industry.

In evaluating this issue, we conducted a simple pros and cons analysis:

Pros of Maintaining the 21+ Age Restriction:

- Safety and Compliance: Keeping the age limit at 21 and above ensures a secure environment and aligns with regulatory standards.
- Public Perception: Strict age restrictions reinforce the industry's commitment to responsible practices, fostering greater public trust.

Cons of Maintaining the 21+ Age Restriction:

- Restrictive Access: This policy may limit opportunities for young individuals seeking education or career pathways in the cannabis industry.
- Implementation Challenges: Enforcing the restriction could be complex in ***certain** mixed-use or educational settings. (But industry access is not what we are discussing here.)

We could **NOT** find one valid reason for individuals under 21 years of age to be on **ANY** cannabis 21+ restricted premises under **ANY** condition.

An absolute and outright, “No.” from Grown Folks 502

“One petition requested to make permanent a temporary COVID 19 allowance adopted by the LCB that allowed children and grandchildren of licensees **under 16 years of age on the licensed premises.**”

Our response:

Cannabis producer and processor premises are **NO place for children**, and we must **uphold regulations that prioritize their safety** and well-being. Allowing school-aged children on cannabis producer and processor premises is not just inappropriately **reckless and dangerous** —it is **irresponsible**. Allowing school-aged children on these sites is

not just irresponsible—it is a **safety risk** that could lead to **preventable tragedies**. These facilities are **high-risk targets for robbery, requiring strict security measures to protect employees and assets**. Introducing children into such an environment **creates an unacceptable risk of harm**. **No responsible business, regulator, or policymaker should support a proposal that puts children in direct proximity to these hazards**. This is not a matter of industry access—it is a **matter of basic safety and common sense**. Any law or policy allowing this would be an **outright failure in public safety governance**.

“A second petition requested to allow employees under 21 years of age working for contractors who are on the premises conducting trade-related work such as electrical, plumbing, and construction.”

Our response:

There are enough companies in the state of Washington to be able to contract appropriately aged people to do building maintenance and work. There is **NO** need to amend any law to put young working people in the line of fire, literally for the sake of plumbing and maintenance. Again, these premises are targets for very violent robberies and young contracted workers should not be there at all or at least be fully informed of these precarious situations before they are put to work at these locations.

In conclusion, if this is the current practice, it needs to be stopped immediately and return the policy to sound

laws that citizens can trust are reducing harm and preventing liabilities.

We agree with and support the LCB, Stakeholders, and anyone else in fully REJECTING this proposal.

Thank you for receiving my public comment in the matter of,

Age Restrictions for Cannabis Producer and Processor Premises.

Ash Sjodin, Founder/CEO Grown Folks 502

From: [Ashley Sjodin](#)
To: [LCB DL Rules](#)
Subject: (CR 102) to amend WAC 314-55-015 to allow minors on non-retail cannabis premises under certain conditions
Date: Wednesday, January 22, 2025 11:07:08 AM

External Email

Grown Folks 502's Public Statement on Age Restrictions for Cannabis Producer and Processor Premises, II

As a strong advocate for responsible cannabis practices, Grown Folks 502 firmly believes that **allowing individuals under the age of 21 on cannabis producer and processor properties is inappropriate**. Maintaining a clear standard of 21 and above is essential to ensuring safety, regulatory compliance, and public trust in the industry.

Protecting Children from Unintended Risks in the Cannabis Industry

The cannabis industry **operates under strict 21+ regulations** for a reason. These policies do more than just ensure responsible consumption—**they also shape hiring practices and workplace environments under the assumption that no children will ever be present**.

Many **individuals with backgrounds that would prevent them from working in child-friendly spaces are legally employed in the cannabis sector** because the industry is **strictly for adults**. Allowing school-aged children onto cannabis producer and processor premises **directly contradicts this safeguard**, creating an unnecessary and **dangerous risk**.

Introducing children into these environments is not just inappropriate—**it is negligent**. This is not a space designed for minors, and **any attempt to change that ignores the potential dangers it creates**. The 21+ restriction exists to protect children by keeping them out of these spaces entirely. Any law or policy

allowing their presence would be **an irresponsible and dangerous failure in public safety governance.**

An absolute and outright, “No.” from Grown Folks 502

In conclusion, if this is the current practice, it needs to be stopped immediately and return the policy to sound laws that citizens can trust are reducing harm and preventing liabilities.

We agree with and support the LCB, Stakeholders, and anyone else in fully REJECTING this proposal.

Thank you for receiving my public comment in the matter of,

Age Restrictions for Cannabis Producer and Processor Premises.

Ash Sjodin, Founder/CEO Grown Folks 502

From: [JoAnne Brown](#)
To: [LCB DL Rules](#)
Subject: Strong Support
Date: Thursday, January 23, 2025 5:16:40 PM

External Email

Hello,

We are relatively new Producer/Processors - we are family owned, and my husband and I run the operations. We have 4 young children (3 in school, baby home) and our facility is almost 2 hours away.

Having the ability to bring the youngest to our commercial facility during the day or the occasional sick kid as needed to successfully run the op would be a huge advantage and cost cutter for us.

No, we aren't giving our 2 year old any products and will keep safe locks in place for safety and such.

Thank you for your consideration and we really hope this becomes approved in the near future!

Best Regards,
JoAnne
404-490-8547

From: [Nichole Ross](#)
To: [LCB DL Rules](#)
Subject: Public Comment: CR-102
Date: Tuesday, January 28, 2025 11:27:21 AM
Attachments: [Nichole signature \(1\).png](#)

External Email

Hello and happy new year!

My name is Nichole Ross, I coordinate fulfillment and oversee inventory at Oz Gardenz here in Bellingham. I am particularly invested in the effort to implement RCW 34.05.320; I believe it signifies great progress in both destigmatizing the legal cannabis industry and enabling license holders to conduct business in a way that supports a traditional, family-oriented lifestyle.

We are a small, close-knit, family owned and operated tier 1. I work in the front office with my mother-in-law (licensee) while my husband, along with his father and brother, handle growing operations. As you can imagine, we spend a lot of time at the shop as a family, sometimes up to 7 days a week. The office area where I spend my time is a private, secluded area and cannabis material rarely ever comes through our door. This space could very easily be outfitted to safely and healthily accommodate a child under direct supervision. As my husband and I are planning to start a family, I have often talked with my mother-in-law about how great it would be to be able to bring our child to work, keeping family close together throughout the day without having to source external childcare. As we saw during the COVID-19 pandemic, childcare became near impossible to safely secure, and the temporary amendment to this rule was a blessing for many families. In our current economy, pandemic or not, having the option to bring our child to work would be a blessing in many ways.

I urge the Board to adopt this rule in the name of Washington families like mine, working hard in this new industry to put food on their tables. I believe there are ways to create safe spaces for minors on these license premises. I believe there are many people in my position throughout the state- pushing for this change to help ease the stresses of running a business while raising a family. I believe this would be a positive change for our industry and I am eager to hear the Board's ruling.

Thank you for your time and consideration,
Nichole Ross
619.751.6484



NICHOLE ROSS

INVENTORY • FULFILLMENT
COORDINATOR

619-751-6484

nichole@ozgardenz.com

@oz_gardenz

OZ GARDENZ | BULLY BROTHERS | BRANDLESS

From: [Jocelyn Chan](#)
To: [LCB DL Rules](#); [Vollendroff, Jim \(LCB\)](#); [Garrett, Ollie A \(LCB\)](#); [Holmes, Pete](#)
Subject: Minors on Farms
Date: Monday, February 24, 2025 11:20:17 AM
Attachments: [Outlook-zvjK5fhv.png](#)

External Email

Dear Liquor and Cannabis Board,

I hope this email finds you well. My name is Jocelyn Chan, and I am writing to respectfully request that the Board reconsider current regulations preventing minors from being present on cannabis business premises.

As a dedicated mother and entrepreneur in the cannabis industry, I have worked hard to build and sustain a business that provides for my family. However, the current regulations create significant challenges in balancing my professional responsibilities with my role as a parent. In situations where emergencies arise, I find myself faced with the difficult decision of either neglecting my business or leaving my children without my presence—both of which are situations I want to avoid.

Allowing minors on the premises would provide much-needed flexibility, ensuring that I can continue to support my family while also being present for my children. It would also enable my children to witness the sacrifices and hard work I am putting into our future instead of growing up without my direct involvement because I chose to be in this industry.

I want to highlight that alcohol licensees are permitted to have families on site, and it seems only fair that cannabis licensees who operate under a similarly regulated and responsible environment should be allowed the same opportunity. This small adjustment would help entrepreneurial parents like myself maintain their businesses and set an example for future generations about the importance of work and family.

I would appreciate your understanding and consideration in allowing this change. It would provide parents in the cannabis industry the flexibility they need while also fostering an environment where children can learn the value of hard work, sacrifice, and balance.

Thank you for your time and attention to this request. I am more than happy to provide more details or discuss potential solutions to address any concerns.

Sincerely,
Jocelyn Chan
Momma Chan Farms
(909) 210-1343

Best Regards,

Jocelyn Chan | President



Momma Chan Farms

M: (909) 210-1343

From: [Les Manzanares](#)
To: [LCB DL Rules](#); [Vollendroff, Jim \(LCB\)](#); [Garrett, Ollie A \(LCB\)](#); [Holmes, Pete](#)
Subject: Minors on Farms
Date: Monday, February 24, 2025 12:13:19 PM

External Email

Good afternoon,
I'm very concerned about this and minors on farms.
I can remember back in a time during Covid when Walden Farms made tremendous progress letting the workers bring their children to work with them.
It was the only way we could keep industry going.
It wasn't wrongdoing.
It was done very professionally.
I believe there was a great role model established.

It should be performed. If there's anything you need I'm sure over at Walden they welcome farms to follow there model.

They can show you how they implemented a plan.
It worked very well with their employees and kept children safe, allowing us to maintain our insurance coverage and wages for food, fuel, and housing. ***(insert your message)***

Thank you for your time.

Les Manzanares
360-764-0227
seattlesuperchronicsllc@gmail.com



From: [Danielle Rosellison \(she/her\) - Trail Blazin'](#)
To: [LCB DL Rules](#); [Vollendroff, Jim \(LCB\)](#); [Garrett, Ollie A \(LCB\)](#); [Holmes, Pete](#)
Subject: Minors on Farms - Here is why this CR 102 still needs work
Date: Monday, February 24, 2025 12:23:03 PM

External Email

My name is Danielle and I was the 13th person to apply for a license and the 150th-ish to be approved. My kids were 1 and 4 at the time. As our family started Trail Blazin', that was some of the most difficult times of our lives.

One of the benefits of small businesses is that we can bring our kids to work if necessary, but that wasn't the case in the cannabis industry. If we needed to fix a manifest, resticker a packaging issue, we needed to find a babysitter for our kids so that we could go and work in our business. It was so hard. Our already packed and stressed schedules were just compounded without being able to bring our kids to work. Their grandmother helps a lot, but she lives farther out, so we'd have to drive 15 minutes past our facility, drop them off, drive 15 back to the facility, do what has to be done, then back to Gma's and then home. It would have been SO MUCH EASIER if we could have brought our kids into the facility.

Furthermore, child rearing still tends to fall disproportionately on the women of the household, so not allowing us to bring our kids to work just compounds this work load. Allowing minors in the workplace is about fair access to resources and positions.

Now, I see that you don't want our kids in the facility if they are over 16. My kids are now 12.5 and 15. Cannabis has literally put food on their table for the majority of their lives; they are probably more educated about cannabis than 99% of their schoolmates. One of the conversations that we had with them when they hit middle school and again as they hit highschool, was that due to their parents' profession that their friends were probably going to start asking them to steal them cannabis. We explained that supplying minors without a medical authorization is not only a felony, but we would lose our business license. This is not something to play around with and the ramifications of them making a poor choice could have detrimental consequences to our family. These are the kinds of conversations that small cannabis business owners are having with their teens and tweens. So while I understand where the fear comes from of having a 16-21 year old in the building, I think it's important to consider the caliber of conversations that are being had with these minors and 18-21 year olds. Whatever the fear is, I don't believe that our kids pose a threat to minors's access to cannabis. And, in a world where our family units are continually dissolving, don't we want to provide families every opportunity to be together? What happens if my kids have a consequence that requires 100% adult supervision? Being able to take them to work would be essential to our small business, and again, would fall predominately on the woman.

In conclusion, when the emergency rule went into place during COVID and allowed us to bring our kids to work, it was a game changer for me and my family (they were about 8 and 10 at the time), and specifically me. I could work in the business while they were with me, supervised, and doing virtual school. It kept us together and decreased my workload and guilt. **From one parent to another, please allow licensee's kids of all ages to have the ability to come to work with us by making the original emergency rule permanent with**

no changes.

Thank you and have a wonderful day.

Danielle Rosellison

Trail Blazin'

360.319.4576

From: [Frost, Gretchen D \(LCB\)](#)
To: [Laflamme, Denise M \(LCB\)](#)
Subject: FW: Minors on Farms
Date: Monday, February 24, 2025 2:49:32 PM

Hi Denise, please see written comments sent below.

From: Sherman Holdin <bluegrasscannabis@gmail.com>
Sent: Monday, February 24, 2025 1:29 PM
To: Frost, Gretchen D (LCB) <gretchen.frost@lcb.wa.gov>
Subject: Minors on Farms

External Email

I would please like to testify in the CR 102 hearing for Minors on Farms at the Board Meeting on 2/26.

Additionally

We recognize the importance of safety on cannabis farms; however, the proposed rule is far more restrictive than the temporary COVID-19 allowance and places unnecessary burdens on family farms. It also implies that parents need LCB oversight to ensure their children's safety, which is offensive and unwarranted.

The assumption that farm owners and operators cannot be trusted to safeguard their own children undermines the autonomy and responsibility of licensees. Family farms have operated safely for years without incidents under the previous temporary rule, which allowed children on farms with reasonable safeguards. Over its duration, no significant issues were reported.

Additionally, requiring prior written notice is impractical. Children can fall ill unexpectedly, and requiring LCB approval creates unnecessary bureaucracy and increases the risk of accidental non-compliance.

Finally, the proposed rule excludes employees from similar accommodations, limiting flexibility to only licensees. A more balanced approach would better serve the needs of family farms and their employees without compromising safety.

Sent from my iPhone

From: [Frost, Gretchen D \(LCB\)](#)
To: [Laflamme, Denise M \(LCB\)](#)
Subject: FW: Testifying at CR-102 Wednesday
Date: Monday, February 24, 2025 4:44:52 PM

Hi Denise, Additional written comments below. thanks

From: Jennifer Wick <jennifer@waveedibles.com>
Sent: Monday, February 24, 2025 4:35 PM
To: Frost, Gretchen D (LCB) <gretchen.frost@lcb.wa.gov>
Subject: Testifying at CR-102 Wednesday

External Email

Dear Gretchen,

My son Josh and I are partners on our license and would like to testify on Wednesday in support of allowing minors in producer/processor operations.

Currently, the inability to have minors on-site creates a significant hardship for our family. We must either find alternative care for my 1-year-old granddaughter or work opposite shifts, which eliminates our family time together. We believe there is no greater risk in having her at work with us than in brewery families having their children in areas where beer is being brewed.

Additionally, there were no issues with minors on-premise during Covid, and no license holder would jeopardize their child or their license by allowing cannabis by the minor.

Do we need to sign up or just log in to the meeting?

Thank you for your time and consideration.

Sincerely,
Jennifer

--

Jennifer Wick
Wave Edibles CEO
jennifer@waveedibles.com

253-278-2675

12785 Price Road SE
Olalla, WA 98359

It's a Good day for a Good Day:)

***THANK YOU FOR SUPPORTING A FAMILY OWNED AND OPERATED
SMALL BUSINESS:)***

From: [Crystal Oliver](#)
To: [LCB DL Rules](#)
Cc: [Garrett, Ollie A \(LCB\)](#); [Holmes, Pete](#); [Vollendroff, Jim \(LCB\)](#)
Subject: Comment WSR 25-03-081 Allowing minors on the licensed premises
Date: Monday, February 24, 2025 8:44:26 PM
Attachments: [COliverCommentsMinorsonSite.pdf](#)

External Email

Dear Denise Laflamme et al,

I appreciate the opportunity to submit comments in response to the WSLCB's January 15, 2025, Proposed Rule Making WSR 25-03-081 related to allowing persons under 21 years of age (minors) on the licensed premises of cannabis producers and processors provided certain conditions are met. While I am no longer a licensed cannabis producer nor actively engaged in cannabis policy related issues, I remain deeply grateful for the WSLCB's quick action to provide myself and fellow farmers relief via relaxed enforcement of WAC 314-55-015 in the wake of COVID-19 school and daycare closures. It provided our families the opportunity to be with one another, care for, and supervise our children while continuing to operate our businesses during an extremely challenging time.

I was heavily pregnant when I planted my first state legal cannabis seedling in the soil of my rural farm and gave birth one month prior to our first harvest in the fall of 2014. I can attest to the severe hardship and many challenges this unfair and unnecessary rule had on my own family. It is worth noting that while RCW explicitly disallows children on the premises of retail stores the law is silent with regard to children on the premises of producers and processors. This was an intentional omission to ensure cannabis licensees were treated similarly to alcohol licensees. The WSLCB chose to implement a prohibition on minors on producer and processor premises without direction from the voters nor the legislature. Additionally, this rule was implemented in the very beginning of recreational cannabis rulemaking when the WSLCB did not provide as many meaningful opportunities for stakeholder participation as it does now.

As the individual who drafted the initial request for relaxed enforcement in March of 2020 and the petition for rule making that instigated this proceeding in 2022, I felt compelled to offer some comments on the proposed language.

Issue 1: The limits outlined in proposed WAC 314-55-015 (3)(a) are too restrictive and don't provide enough flexibility given the diverse operating and floor plans of licensed producers and processors effectively rendering this rule change no different than the status-quo for many operations. The majority of producer and processor floor plans require individuals to pass through areas where cannabis is present to access offices, break rooms, and bathrooms which are the areas minors are most likely to spend time in when accompanying their parent or grandparent to their place of business. Prohibiting minors from entering areas where cannabis is present is effectively no different than leaving the current prohibition in place.

Suggested Solutions:

A. Striking (3)(a) in its entirety.

(3) Persons under the age of 16 who are children and grandchildren of licensees may enter or remain on the licensed premises of a cannabis producer, as provided in this subsection. ~~(a) The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment. Violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under WAC 314-55-522.~~

B. Rewriting 3(a) to include more precise language that targets specific safety concerns.

(3) Persons under the age of 16 who are children and grandchildren of licensees may enter or remain on the licensed premises of a cannabis producer, as provided in this subsection. ~~(a) The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment. Violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under WAC 314-55-522.~~ The person does not remain in areas where extraction is taking place nor in areas where plant cultivation lights are in use."

Issue 2: The requirement outlined in proposed WAC 314-55-015 (3)(c) creates a public record of where, when, and what age children are at a licensed premises subject to public disclosure. It is not reasonable nor safe for a variety of reasons for the WSLCB to maintain records about where children will be at certain times. This is information that should remain private.

Suggested Solution:

Strike the sentence requiring detailed information about the age of children and when they may be present.

~~(c) Prior to allowing any child or grandchild of the licensee to enter or remain on the licensed premises, the licensee must notify the enforcement and education division of the LCB in writing that children may be on their licensed premises. Written notification to the enforcement and education division must indicate the day(s) of the week, times of the day, and age of the child(ren) that may be present. Violations of this subsection are subject to the same penalties established for an operating/floor plan violation under WAC 314-55-523.~~

Issue 3: The requirement outlined in proposed WAC 314-55-015 (3)(c) to notice the WSLCB with days and times children may be present is burdensome and impractical as licensees don't always know in advance when they may need to bring their child or grandchild to work with them. Often when a licensee needs to bring their child or grandchild to work with them it is due to an unexpected lack of childcare or an urgent business need.

Suggested Solution:

Strike the sentence requiring detailed notification of children being present.

(c) Prior to allowing any child or grandchild of the licensee to enter or remain on the licensed premises, the licensee must notify the enforcement and education division of the LCB in writing that children may be on their licensed premises. ~~Written notification to the enforcement and education division must indicate the day(s) of the week, times of the day, and age of the child(ren) that may be present.~~ Violations of this subsection are subject to the same penalties established for an operating/floor plan violation under WAC 314-55-523.

Again, I appreciate the opportunity to offer comments to ensure the final rules are functional and adequately protect the privacy of children of licensees. I look forward to the WSLCB's adoption of reasonable rules that allow small, independent, and woman owned businesses the flexibility they need to balance the demands of family and operating a business in this challenging industry.

Highest Regards,

Crystal Oliver

From: [Crystal Oliver](#)
To: [LCB DL Rules](#)
Cc: [Garrett, Ollie A \(LCB\)](#); [Holmes, Pete](#); [Vollendroff, Jim \(LCB\)](#)
Subject: Comment WSR 25-03-081 Allowing minors on the licensed premises
Date: Monday, February 24, 2025 8:44:26 PM
Attachments: [COliverCommentsMinorsonSite.pdf](#)

External Email

Dear Denise Laflamme et al,

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I was heavily pregnant when I planted my first state legal cannabis seedling in the soil of my rural farm and gave birth one month prior to our first harvest in the fall of 2014. I can attest to the severe hardship and many challenges this unfair and unnecessary rule had on my own family. It is worth noting that while RCW explicitly disallows children on the premises of retail stores the law is silent with regard to children on the premises of producers and processors. This was an intentional omission to ensure cannabis licensees were treated similarly to alcohol licensees. The WSLCB chose to implement a prohibition on minors on producer and processor premises without direction from the voters nor the legislature. Additionally, this rule was implemented in the very beginning of recreational cannabis rulemaking when the WSLCB did not provide as many meaningful opportunities for stakeholder participation as it does now.

As the individual who drafted the initial request for relaxed enforcement in March of 2020 and the petition for rule making that instigated this proceeding in 2022, I felt compelled to offer some comments on the proposed language.

Issue 1: The limits outlined in proposed WAC 314-55-015 (3)(a) are too restrictive and don't provide enough flexibility given the diverse operating and floor plans of licensed producers and processors effectively rendering this rule change no different than the status-quo for many operations. The majority of producer and processor floor plans require individuals to pass through areas where cannabis is present to access offices, break rooms, and bathrooms which are the areas minors are most likely to spend time in when accompanying their parent or grandparent to their place of business. Prohibiting minors from entering areas where cannabis is present is effectively no different than leaving the current prohibition in place.

Suggested Solutions:

A. Striking (3)(a) in its entirety.

(3) Persons under the age of 16 who are children and grandchildren of licensees may enter or remain on the licensed premises of a cannabis producer, as provided in this subsection. ~~(a) The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment. Violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under WAC 314-55-522.~~

B. Rewriting 3(a) to include more precise language that targets specific safety concerns.

(3) Persons under the age of 16 who are children and grandchildren of licensees may enter or remain on the licensed premises of a cannabis producer, as provided in this subsection. ~~(a) The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment. Violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under WAC 314-55-522.~~ The person does not remain in areas where extraction is taking place nor in areas where plant cultivation lights are in use."

Issue 2: The requirement outlined in proposed WAC 314-55-015 (3)(c) creates a public record of where, when, and what age children are at a licensed premises subject to public disclosure. It is not reasonable nor safe for a variety of reasons for the WSLCB to maintain records about where children will be at certain times. This is information that should remain private.

Suggested Solution:

Strike the sentence requiring detailed information about the age of children and when they may be present.

(c) Prior to allowing any child or grandchild of the licensee to enter or remain on the licensed premises, the licensee must notify the enforcement and education division of the LCB in writing that children may be on their licensed premises. ~~Written notification to the enforcement and education division must indicate the day(s) of the week, times of the day, and age of the child(ren) that may be present.~~ Violations of this subsection are subject to the same penalties established for an operating/floor plan violation under WAC 314-55-523.

Issue 3: The requirement outlined in proposed WAC 314-55-015 (3)(c) to notice the WSLCB with days and times children may be present is burdensome and impractical as licensees don't always know in advance when they may need to bring their child or grandchild to work with them. Often when a licensee needs to bring their child or grandchild to work with them it is due to an unexpected lack of childcare or an urgent business need.

Suggested Solution:

Strike the sentence requiring detailed notification of children being present.

(c) Prior to allowing any child or grandchild of the licensee to enter or remain on the licensed premises, the licensee must notify the enforcement and education division of the LCB in writing that children may be on their licensed premises. ~~Written notification to the enforcement and education division must indicate the day(s) of the week, times of the day, and age of the child(ren) that may be present.~~ Violations of this subsection are subject to the same penalties established for an operating/floor plan violation under WAC 314-55-523.

Again, I appreciate the opportunity to offer comments to ensure the final rules are functional and adequately protect the privacy of children of licensees. I look forward to the WSLCB's adoption of reasonable rules that allow small, independent, and woman owned businesses the flexibility they need to balance the demands of family and operating a business in this challenging industry.

Highest Regards,

Crystal Oliver

Date: February 24, 2025

To: Denise Laflamme

CC: Jim Vollendroff, Ollie Garrett, & Pete Holmes

From: Crystal Oliver, former licensed cannabis producer

RE: WSR 25-03-081 Allowing persons under 21 years of age (minors) on the licensed premises of cannabis producers and processors provided certain conditions are met.

Attachments: Photo of Crystal Oliver planting her 1st state legal plant while pregnant, Photo of Crystal Oliver & her daughter after WSLCB allowed minors on site during COVID-19 childcare and school closures

Dear Denise Laflamme et al,

I appreciate the opportunity to submit comments in response to the WSLCB's January 15, 2025, Proposed Rule Making WSR 25-03-081 related to allowing persons under 21 years of age (minors) on the licensed premises of cannabis producers and processors provided certain conditions are met. While I am no longer a licensed cannabis producer nor actively engaged in cannabis policy related issues, I remain deeply grateful for the WSLCB's quick action to provide myself and fellow farmers relief via relaxed enforcement of WAC 314-55-015 in the wake of COVID-19 school and daycare closures. It provided our families the opportunity to be with one another, care for, and supervise our children while continuing to operate our businesses during an extremely challenging time.

I was heavily pregnant when I planted my first state legal cannabis seedling in the soil of my rural farm and gave birth one month prior to our first harvest in the fall of 2014. I can attest to the severe hardship and many challenges this unfair and unnecessary rule had on my own family. It is worth noting that while RCW explicitly disallows children on the premises of retail stores the law is silent with regard to children on the premises of producers and processors. This was an intentional omission to ensure cannabis licensees were treated similarly to alcohol licensees. The WSLCB chose to implement a prohibition on minors on producer and processor premises without direction from the voters nor the legislature. Additionally, this rule was implemented in the very beginning of recreational cannabis rulemaking when the WSLCB did not provide as many meaningful opportunities for stakeholder participation as it does now.

As the individual who drafted the initial request for relaxed enforcement in March of 2020 and the petition for rule making that instigated this proceeding in 2022, I felt compelled to offer some comments on the proposed language.

Issue 1: The limits outlined in proposed WAC 314-55-015 (3)(a) are too restrictive and don't provide enough flexibility given the diverse operating and floor plans of licensed producers and processors effectively rendering this rule change no different than the status-quo for many operations. The majority of producer and processor floor plans require individuals to pass through areas where cannabis is present to access offices, break rooms, and bathrooms which are the areas minors are most likely to spend time in when accompanying their parent or grandparent to their place of business. Prohibiting minors from entering areas where cannabis is present is effectively no different than leaving the current prohibition in place.

Suggested Solutions:

A. Striking (3)(a) in its entirety.

(3) Persons under the age of 16 who are children and grandchildren of licensees may enter or remain on the licensed premises of a cannabis producer, as provided in this subsection. ~~(a) The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment. Violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under WAC 314-55-522.~~

B. Rewriting 3(a) to include more precise language that targets specific safety concerns.

(3) Persons under the age of 16 who are children and grandchildren of licensees may enter or remain on the licensed premises of a cannabis producer, as provided in this subsection. ~~(a) The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment. Violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under WAC 314-55-522.~~ The person does not remain in areas where extraction is taking place nor in areas where plant cultivation lights are in use."

Issue 2: The requirement outlined in proposed WAC 314-55-015 (3)(c) creates a public record of where, when, and what age children are at a licensed premises subject to public disclosure. It is not reasonable nor safe for a variety of reasons for the WSLCB to maintain records about where children will be at certain times. This is information that should remain private.

Suggested Solution:

Strike the sentence requiring detailed information about the age of children and when they may be present.

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Again, I appreciate the opportunity to offer comments to ensure the final rules are functional and adequately protect the privacy of children of licensees. I look forward to the WSLCB's adoption of reasonable rules that allow small, independent, and woman owned businesses the flexibility they need to balance the demands of family and operating a business in this challenging industry.

Highest Regards,

Crystal Oliver

From: [Frost, Gretchen D \(LCB\)](#)
To: [LCB DL Rules](#)
Subject: FW: Children on farms proposal comments
Date: Wednesday, February 26, 2025 11:41:06 AM

FYI

From: Rock Island Farm <farmtherock@gmail.com>
Sent: Wednesday, February 26, 2025 9:57 AM
To: Frost, Gretchen D (LCB) <gretchen.frost@lcb.wa.gov>
Subject: Children on farms proposal comments

External Email

Please change parts of this rule before putting it into action, otherwise this rule is virtually useless to farmers.

Here is why this CR 102 still needs work: Cannabis producers should have the same privileges as alcohol licensees when it comes to bringing their children to work—without additional restrictions. Cannabis is proven to be safer than alcohol, yet these proposed rules impose far more limitations than those placed on alcohol licensees.

We recognize the importance of safety on cannabis farms; however, the proposed rule is far more restrictive than the temporary COVID-19 allowance and places unnecessary burdens on family farms. It also implies that parents need LCB oversight to ensure their children's safety, which is offensive and unwarranted.

The assumption that farm owners and operators cannot be trusted to safeguard their own children undermines the autonomy and responsibility of licensees. Family farms have operated safely for years without incidents under the previous temporary rule, which allowed children on farms with reasonable safeguards. Over its duration, no significant issues were reported.

Additionally, requiring prior written notice is impractical. Children can fall ill unexpectedly, and requiring LCB approval creates unnecessary bureaucracy and increases the risk of accidental non-compliance.

Here's why we should advocate for a more balanced approach:

It is nearly impossible to have a child under constant supervision while not being in areas where cannabis is present. Because if the parent is working it will be in areas where cannabis is present. And children not being allowed where cannabis is present is the problem, there were no problems during the covid exception when my child was in areas where cannabis was present, at that point i was able to supervise him at all times without a problem.

Equity for Small and Women-Owned Businesses, The current restriction disproportionately impacts these businesses.

Proven Safety Record: The temporary COVID-19 allowance demonstrated that children's presence on farms could be managed safely and effectively. There is no evidence to suggest that continuing this practice would pose a risk to public safety.

Let's work together to support a more equitable future for Washington's cannabis industry.

Meghann Frickberg

Washington Cannabis Indoor Tier-2 Farmer

From: [Jacobs, Daniel \(LCB\)](#)
To: [Jennifer Wick](#); [Frost, Gretchen D \(LCB\)](#)
Cc: [Laflamme, Denise M \(LCB\)](#); [LCB DL Rules](#)
Subject: RE: Josh Wicks Testimony
Date: Wednesday, February 26, 2025 11:53:48 AM

Mr. and Ms. Wick:

Thank you for reaching out. I have cc'd Denise Laflamme the Policy & Rules Coordinator on this rulemaking, as well as the rules inbox. Your feedback will be documented in the rule file.

Please feel free to follow up with any questions or concerns,

Sincerely,

Daniel Jacobs, Esq. *(he/him/his)*
Acting Rules & Policy Manager
Washington State Liquor and Cannabis Board
Daniel.jacobs@lcb.wa.gov
Mobile: (360) 480-1238



**Washington State
Liquor and Cannabis Board**

DISCLAIMER: The information provided above does not, and is not intended to, constitute legal advice; instead, all information, content, and materials included are done so in the scope of my employment as Policy & Rules Coordinator with the Washington State Liquor & Cannabis Board (LCB).

From: Jennifer Wick <jennifer@waveedibles.com>
Sent: Wednesday, February 26, 2025 11:03 AM
To: Frost, Gretchen D (LCB) <gretchen.frost@lcb.wa.gov>; Jacobs, Daniel (LCB) <daniel.jacobs@lcb.wa.gov>
Subject: Josh Wicks Testimony

External Email

Hello and Thank you for letting me submit this. Our power is out due to the storm this week. I am strongly in support of Minors on Premise. I am against having to give the LCB notice prior to my child being here. As this storm is one example, all of Port Orchard is without power and schools have been canceled. I would not have been able to give advance notice that my child would be here.

It's my mom, sister and I that run our business. We are just a small startup with 2 part time employees. We as a collective, cannot afford outside childcare. My child has immune issues and

being in a daycare setting with other sick children, cost us as a family in time away from work and our employees because they need us present to work.

As a license holder, I do everything in my power to protect my license and my business. My child will grow up with marijuana normalized but also knowing that it is not for them or their friends, and that they cannot ever touch it. I would never place my license in jeopardy.

With all the social equity regulations being created that our business fully supports as we are a woman owned business (2 women 1 man), it seems discriminatory towards families that have to have their children with them at work in the cannabis field. We all work hard for our licenses and to follow the rules and raise our families. Like anyone wants.

Sincerely

Josh Wick
info@waveedibles.com
253-973-2765

--

Jennifer Wick
Wave Edibles CEO
jennifer@waveedibles.com

253-278-2675

12785 Price Road SE
Olalla, WA 98359

It's a Good day for a Good Day:)

***THANK YOU FOR SUPPORTING A FAMILY OWNED AND OPERATED
SMALL BUSINESS:)***

From: Awsrn Gardens
To: [LCB DL Rules](#); [Vollendroff, Jim \(LCB\)](#); [Garrett, Ollie A \(LCB\)](#); [Holmes, Pete](#)
Subject: Minors on Farms
Date: Monday, February 24, 2025 7:48:42 PM

External Email

This really is a no brainer. I do not understand the excessive regulations on cannabis.

Cannabis producers should have the same privileges as alcohol licensees when it comes to bringing their children to work—without additional restrictions. Cannabis is proven to be safer than alcohol, yet these proposed rules impose far more limitations than those placed on alcohol licensees.

From: [Frost, Gretchen D \(LCB\)](#)
To: [Hamilton-Steele, Tierney A \(LCB\)](#); [Harrell, Susan L \(LCB\)](#); [Hays, Mallori L \(LCB\)](#); [Jacobs, Daniel \(LCB\)](#); [Kildahl, Jeff \(LCB\)](#); [Laflamme, Denise M \(LCB\)](#); [Nordhorn, Justin T \(LCB\)](#)
Subject: FW: Children on farms comments
Date: Wednesday, February 26, 2025 11:41:44 AM

FYI

From: Chad M <206bassculture@gmail.com>
Sent: Wednesday, February 26, 2025 9:59 AM
To: Frost, Gretchen D (LCB) <gretchen.frost@lcb.wa.gov>
Subject: Children on farms comments

External Email

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Here is why this CR 102 still needs work: Cannabis producers should have the same privileges as alcohol licensees when it comes to bringing their children to work—without additional restrictions. Cannabis is proven to be safer than alcohol, yet these proposed rules impose far more limitations than those placed on alcohol licensees.

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Let's work together to support a more equitable future for Washington's cannabis industry.

Chad Morgan
Washington Cannabis Indoor Tier-2 Farmer/Owner

Public comments at Board Meeting 01/15/25

Public comments, January 15, 2024 Board Meeting (taken from TVW recording at:
<https://twv.org/video/washington-state-liquor-and-cannabis-board-2025011006/?eventID=2025011006>

Minors on non-retail premises.

So we're going to move to our general public comment.

00:35:13.000 -- Just one other additional comment I'd like to make is as the new board chair and as the new board member comes on, I am trying to make these meetings as productive and informative as possible, which means that I'm in the process of talking about how do we conduct these meetings and including signing up and how do we just want to share that with you now. And as soon as he gets on and we have more of these conversations, just be aware that we're looking at those processes. In the meantime, I will expect the people adhere to the guidelines that I'll share just in a few minutes, but I just really am committed to keeping these meetings as productive as possible. I appreciate and appreciate community comment and engagement in our board meetings and want to set these meetings up so that they are structured in that way. Okay. So this is the public comment period of this meeting. Everyone will have up to three minutes to speak. Please limit your comments to LCB business and refrain from personal attacks are going off topic into things unrelated to what we do here. I will mention if I think the speaker has one or too far. Please be respectful to the speakers and everyone else who is present whether virtually or in person do not disrupt this meeting or others, making public comment. If we have any disruptions, I will pause public comment and further disruptions stop. And if the disruptions continue, I will ask you to be removed from the meeting. Please remember that this is being recorded and will be available online later. If you are in the room with us today, please be aware that the microphones are sensitive and they pick up papers, rustling and other things like that. And if you are in the room, please give us a second to connect you and we will do so. The question will give you an alert when you are 30 seconds is when you get to about 30 seconds and I will ask you to conclude your comments once you have reached the three minute mark. We will begin with public comment with those who have registered to speak virtually. Do I need to give them instructions to look in their box in their email for the link. Okay, so we have six people who have registered online. Okay, great. Okay, so we have six people who have registered online to speak. Gretchen has emailed you the link to actually join two of you have already done that. So we're going to start with the two have already done that for the remainder. If you're not in the is at the waiting room or where. Yeah, then please look in your email, follow that link and you'll be able to join the meeting. If for some reason people are not able to join. Remember, you can provide written comment and I would ask that you provide written comment in the event that you're not able to get in today. So we apologize for that. That's just a glitch that we've experienced this morning. So we'll go ahead and start one. Who's first first.

00:38:35.840 -- Okay, so Caitlin we will start with you.

You're up next. You should be able to go Caitlin. All right, good morning. Good morning. You'll hear me. Okay. Yeah. Wonderful.

1. Thank you Chair Vollendroff And board member Garrett, my name is Caitlin Ryan.

I'm the executive director for the Cannabis Alliance and I appreciate the opportunity to sort of share my perspective on the now CR 102 draft language for minors on farms.

I want to start by acknowledging the good intent behind it during COVID the emergency rule was extremely important and popular. And I want to highlight that the emergency rule as it was written, there were no Challenges with it. And I do that to sort of highlight the contrast for this emergency rules to what these now proposed permanent rules look like. I would like to just sort of highlight I really fully appreciate the balance we need to strike between protecting children and supporting responsible cannabis businesses. And I think it's a responsibility that we as parents in this industry take really seriously. In fact, I would argue that parents working in the industry are probably the most serious about effective measures for restricting child access and exposure as well as ensuring children have comprehensive safety education regarding cannabis. **It was commented that you are hearing that these rules are too restrictive and I think that the issue isn't so much that they're too restrictive that's that I think in a lot of places they're unnecessarily restrictive for a variety of reasons being that there are already other rules and statutes in place that sort of covered the things that are then being reiterated here.**

And then I appreciated sort of a little bit more explanation about the notice on farms. But I just would like to highlight that we're no different from any other parents in our desire for our children to grow up safely will adjusted and successful. Like all parents we're hardwired to do all that we can to ensure that that happens and sort of failing to believe that that's true. And I would like to point out that we're also deeply incentivized to demonstrate sort of almost perfect parenting around cannabis just because of the stigma attached to our profession.

Truly the worst thing that could happen to me would be for one of my children's take products from my farm or to advocate already illegal activity and underage use or to come to harm due to negligence at the work site.

And I just want to call out that sort of putting extra things in place to sort of show us how to parent in ways that also have fines associated. I think is really sort of problematic and I think that we have ways around this so some recommendations that we're making about this.

And I would say we would recommend a supplemental C102 would be around existing there are already restrictions.

I think the notification requirement. Thank you board member Garrett for addressing that.

We would like this to extend to employees not just owners we just heard some a bill in the legislature about workers on farms and I think that this would be an important extension as well.

I've also provided a lot of these comments in written form and happy to answer questions we really look forward to continuing to refine this so it makes sense for everybody involved.

Thank you very much, Caitlein.

Okay, who else do we have on line. I'm sorry Gretchen who is that.

2. Okay, next up we have Doug Henderson Doug you should be good to go.

00:42:28.840 -- Good morning.

Thank you very much for having me.

First and foremost I wanted to thank you for moving forward the CR 102 on cannabis waste that was built was very important to me. I'm the founder of England hemp brew and we're working towards using cannabis waste of all forms and recreation cannabis in order to improve our energy efficiency and environment.

And secondly, I do want to be able to comment on minors, minor children on premises echoing a lot of what Caitlein has said.

I've had emergencies since COVID since beyond where I'm not in a position to have childcare and come to my farm. If a pump goes down if I need to meet a delivery and I don't have childcare for my kids, I need the freedom to do that and they are always by happenstance. Having unnecessary rules that are there to protect my kids when I'm perfectly capable doesn't seem right. Further, we see in the alcohol space, we see in regular agriculture where we kind of walk a fine line between both. We see that there is no reporting requirement and all we're really required to do is keep our kids safe. We do that every single day for all of our employees like Kaylin said we're very capable of doing that for our kids. It's instilled in us almost, you know, if not genetically.

I want to also point out that the employees that work here also have those same hiccups and issues with childcare that I do.

I want to provide a safe space for our kids regardless of if they're our own and we should be able to extend, you know, those freedoms to our employees as supporting them as part of making sure that they can make a living and care for their children. I want to share that there is no evidence or research that really supports having additional restrictions on cannabis as compared to alcohol, beer, wine, etc. There are no psychoactive compounds in growing plants. It's a fun fact. So there isn't a risk of even kids plant touching. Farmers have been teaching their children how to work on farms, handle livestock, raise corn, raise all sorts of crops for hundreds and hundreds of years, our crop is no different. If we are able to be responsible as parents we are responsible in pass generational knowledge onto people. I have no other comments, except of say thank you very much.

00:45:45.840 –

3. I am Mika Sherman.

I am the co-founder and owner of Raven. We are here in the Olympia area.

I am also on the board of the Washington sun and craft growers association.

Similar comments to some other folks about the rule making involving minors on children.

Our members are definitely concerned about the sort of unnecessary restrictions that are being considered in that rule making package. The rule making that exists around the same rules for folks to bring their children to work in alcohol are actually pretty decent. I thought it would be more modeled in the proposed rules given that they already exist. They are already implemented in alcohol. The agency has an understanding of those rules and how they are implemented. They all seem perfectly amenable to the same situation in the cannabis industry. I would encourage you guys to model the same rules that already exists.

This brings me to another point around this. Oftentimes we create an idea in the rule making process and in the conceptualization process that isn't really implementable in reality. We create expectations that are not enforceable and they end up being only enforced against the willing. That creates a lot of unfairness and inequity in implementation. I think we are going down that path here with this rule making where we are going to create an elaborate set of expectations that are not actionable in reality. I think looking at more realistic, implementable solutions is something that we need to do more often. And I think this is Moving away from that. We definitely revisit that project in light of that and look to those alcohol rules as models.

The other thing I'll point out is we are already a state that allows minors on premises because **we had emergency rules** in place for the last couple of years that worked just fine. I am not aware of a single incident involving a child at work. I think we should embrace that success and continue to forward with that. Instead of Taking a step back and add a complication that just to be honest is probably not going to be born in reality anyways. Thanks. Great. Thank you very much.

48:25.840 –

4. My name is Jeremy Moberg.

I am the owner of Kennesau Farms and also on the board of Washington Sun and Craft Growers Association.

I wanted to mimic Mika's and Caitlin's testimony and give a little anecdote. This is probably a little bit too late for me but I had a daughter this entire time growing up and actually running a cannabis business and raising a daughter and They don't go well together. There were often emergencies where I had to show up and my daughter I remember distinctly like lining up rocks on the gate line. And yelling dad, dad. You know, I'm like working on electricity or something. Hopefully that that all can be addressed. The notification seems to be the biggest problem. Like you're just not going to have time to notify in these situations, So hopefully that's addressed.

I wanted to touch on a couple other issues. I submitted a petition over a year ago regarding the expiration date of testing. That petition was accepted on December 30th, 2023. I don't believe there's been any action we've gone through another year now. The 12 month expiration date is particularly harmful to sun growers. Since we follow a 12 month growing cycle, it's right at the time where we harvested. So we end up with great costs or not having products on the menu because our stuff is expiring as we're renewing it. I asked for an 18 month time span, even 15 would alleviate that. We're talking about changing a single digit in rulemaking. I'm really hopeful that that can be addressed.

At the time, I think we had discussions with various board members about perhaps we divide up different rulemaking into like express rulemaking versus complicated rulemaking.

It seems like there's a pipeline for rulemaking that sort of it's all in. And some of these less complicated rulemaking initiatives don't get addressed, they just get backlogged.

And also like to address the law surrounding flavored vapes. There is a clear rule against it. It's not a well written law in that flavored can mimic cannabis flavor. I'll tell you there's a ton of flavored vapes that do not mimic cannabis flavors. There has been zero enforcement on this. This is a child youth access issue.

It's a market fairness issue with again, like those who are willing. Everybody else who looks at the law and follows it isn't able to participate in that market. There is no cannabis strain called peach rains. There is no cannabis strain that tastes like watermelons. I hope that this can also be addressed. The last issue is that I want to skip the last issue. Thank you for your time. Thank you Jeremy.

Public Hearing 02/26/25 – Transcript

Great thank you Denise.

00:27:03.760 -- All right we will move right into our open public testimony regarding minors on non-retail cannabis license premises.

00:27:20.320 -- A reminder you will have three minutes and please stay on topic related to minors on non-retail cannabis license premises.

00:27:26.000 -- So we'll begin as we normally do with those who are signed up to speak virtually and so we will move right to our first person and that's Ezra I think.

00:27:38.560 -- Ezra registered I don't see him online at this time.

00:27:38.560 -- Okay I'll circle back to Ezra.

00:27:47.760 -- Okay next we have Sherman Holden.

00:27:47.760 -- Sherman registered I don't see him online this time.

00:27:56.480 -- Okay Jennifer Wick is up next.

00:28:08.960 -- Okay Jennifer you should be able to go.

00:28:21.360 -- Jennifer I don't know if you can hear us but you should be good to go.

00:28:24.480 -- I can hear you I'm trying to I thought you were going to hear me.

00:28:28.000 -- Okay sorry.

00:28:28.000 -- No worries welcome.

00:28:28.000 -- Thank you.

00:28:28.000 -- I didn't think I was going to go first.

00:28:34.720 -- So my name is Jennifer Wick and my son, daughter and I own wave edibles prime choice canna and we are in strong support of passing this because I have a one-year-old granddaughter and my daughter works with us, my son works here, and as of right now we have to work opposite shifts to provide childcare because there's no daycare available out we're in Kitsap County.

00:29:07.120 -- There's no daycare is available the hours that we really work they get upset when we come late or we smell like cannabis, they question whether we're picking her up if you know we've been indulging, so and it's thousands of dollars for wasting my granddaughters one years old.

00:29:25.360 -- So to be able to keep her in the part of the building in the offices up front where there's no THC or cannabis or even to go into the back because we're a candy maker to where the Melchars are she's one she's not getting into anything I can see all the way up until 16 years old that they wouldn't their family they don't know otherwise like we talk about cannabis and our edibles and everything in front of her it's our family business.

00:29:51.360 -- She's not gonna grow up not knowing the family business. kids are allowed in high in candy making facilities that employ huge equipment we don't have any of that we have no dangers here outside of our kitchen looks like our kitchen at home.

00:30:11.760 -- I mean our facility looks like our home we have employees that come in their kids are in daycare because they work normal hours but when we're all three of our family members so I can't I have to take mornings off to watch her then my daughter comes to work and then she comes home in the afternoon to watch her and it's a lot of just back and forth where if she could just be here we would have that quality family time that we all are craving and she would grow up secure and safe and not in the strangers facility with other children that we don't know if they're sick she has a low immune system she gets sick easily.

00:30:49.520 -- Jennifer you have 30 seconds.

00:30:55.280 -- I just want to wrap up and say that we are in support of this as wave edibles and we hope that it passes that we could have her here soon thank you.

00:31:05.440 -- Thank you Jennifer.

00:31:05.440 -- All right next we have Josh Wick.

00:31:13.520 -- I don't see Josh online at this time.

00:31:13.520 -- Jennifer is Josh there with you to participate.

00:31:33.440 -- Okay we'll circle back one more time and check on Josh in just a bit next up we have Caitlin Ryan.

00:31:43.520 -- Caitlin you should be good to go.

00:31:43.520 -- Yes hello.

00:31:49.120 -- And I do believe that Josh was on the same camera as just I think Jennifer wasn't able to answer you because her mike and camera were turned off.

00:31:54.560 -- Okay we'll see about that.

00:31:54.560 -- Thank you.

00:31:54.560 -- Perfect yeah.

00:32:01.520 -- Good morning.

00:32:01.520 -- Chair Vollendroff Board members Garrett and Holmes **my name is Caitlin Ryan.**

00:32:01.520 -- I'm the executive director here at the cannabis Alliance and I really appreciate the opportunity to share my perspective on these proposed rules.

00:32:10.880 -- I wanted to share by acknowledging the good intent behind it.

00:32:16.560 -- As someone who spent years in this industry as a parent and a licensee I appreciate the balance that we need to strike between protecting children and supporting responsible cannabis businesses.

00:32:26.400 -- And frankly it's a responsibility that we as parents and as an industry take really seriously.

00:32:32.560 -- In fact I would argue that the parents working in this industry are probably the most serious about effective measures for restricting child access and exposure as well as ensuring children have comprehensive safety education regarding cannabis.

00:32:42.400 -- And ultimately we are no different from any other parents in our desire for our children to grow up safely well-adjusted and successful like all parents we are hardwired to do all that we can to ensure that our children are in safe environments and have all the appropriate tools that they need to grow up in a well-adjusted way.

00:33:10.080 -- And frankly failing to believe that that is true we are also deeply incentivized to demonstrate perfect parenting in a lot of ways because of the stigma that's attached to our profession.

00:33:20.160 -- Truly the worst thing that could happen to me would be for one of my children to take product from the farm or to advocate for already illegal activity and underage use or to come to harm due to negligence at the work site.

00:33:30.240 -- Remember it has only been a decade since I was at high risk even if my children being taken from me because of the work that I do.

00:33:36.160 -- So careful doesn't even come close to describing how I and other parents in this industry navigate parenting and working in the cannabis industry.

00:33:46.480 -- For these rules you have received a lot of my comments already in written form but I'd like to highlight a couple of things that still need refinement.

00:33:51.600 -- I mean I would urge you to move into a supplemental CR-102 in order to address them.

00:33:55.600 -- One of them has already been talked about and that is that notification requirement.

00:34:01.200 -- It's sort of a got ya opportunity without actually I think getting that the heart of ensuring that this is a program that's rolled out safely.

00:34:15.280 -- Another issue is sort of that unequal treatment of licensees and employees.

00:34:21.280 -- Hear from folks.

00:34:21.280 -- Thank you so much.

00:34:21.280 -- Who sort of would like to be able to extend this to their employees instead of just being able to take advantage of themselves who are in a lot of the same situation that you have already heard about.

00:34:30.960 -- And then just would like to conclude by reminding you that we've already done this.

00:34:37.280 -- There is already a way you know a model that we can sort of follow.

00:34:42.560 -- Additionally alcohol has a format set up that we I think would be really pleased with.

00:34:49.840 -- So thank you for your presentation on this.

00:34:49.840 -- Yeah, happy to answer any questions.

00:34:54.560 -- Appreciate it.

00:34:54.560 -- Thank you very much.

00:34:54.560 -- Okay next up we have Bethany Redose.

00:35:11.280 -- Okay Bethany you should be able to go.

00:35:11.280 -- Okay thank you so much.

00:35:17.360 -- So I'm here today representing Washington Cannabis licensees association.

00:35:17.360 -- We're a newly formed association.

00:35:23.120 -- We have 47 licensed holders so producer processors or retailers with us.

00:35:29.200 -- And we are in strong support of you know this kind of allowance.

00:35:29.200 -- We would prefer it go to the COVID allowance model.

00:35:38.240 -- And I just want to speak on my own personal experience.

00:35:38.240 -- So I had a newborn during the COVID allowance time period and it allowed me to where I could breastfeed my child for the whole year.

00:35:52.400 -- Not something I would not have been able to accomplish without the allowances.

00:35:58.560 -- Currently the way the allowances are written.

00:35:58.560 -- I think it would still be very difficult for me to do the same thing that I did during the COVID allowance with in particular can't have children cannot enter areas where Canvas is present.

00:36:08.560 -- Really I just had him strapped to me full time and it made it to where it didn't impede my ability to go anywhere in the facility and operate.

00:36:22.000 -- And I just would really appreciate taking it from from that lens and that consideration that you know really like Caitlin said you know I'm so mindful and careful when it comes to you know our children and cannabis exposure you know we're really advocating and are very much mindful of the optics that we all are under.

00:36:44.400 -- And we really care about how we are perceived and you know at the end of the day we would really like to to have the same allowances that we've already shown that we're capable of doing under the COVID allowances and following the current alcohol guidelines.

00:37:04.640 -- So I appreciate your time and like I said membership isn't strong support of this and we would just really like to see you know a potential for us to continue to operate our family businesses in a productive way.

00:37:17.520 -- All right thank you Bethany I appreciate it.

00:37:17.520 -- All right next step we have Doug Henderson.

00:37:35.600 -- All right Doug you should be good to go.

00:37:38.960 -- Thank you good morning Chair Vollendroff and Board Member Garrett Holmes.

00:37:38.960 -- I want to thank the LCB for working with members of the public on the support and issue.

00:37:43.200 -- My name is Doug Henderson I'm the CEO of Painted Rooster cannabis company in Moxie Washington.

00:37:48.880 -- The only issue that I see that I take specific issue with is the reporting requirement for this which is just burdensome and it's never the intent of farmers for us to bring our kids to work other than due to extenuating circumstances.

00:38:04.880 -- When those issues arise you know we often have more to think about than a preemptive reporting requirement and being penalized for being a busy parent and working in cannabis is not in the best interest of our children or of our businesses and I would urge the board to strike the reporting component from this rule set and that's all I have for you.

00:38:20.560 -- Thank you for your time.

00:38:25.600 -- Thank you for coming today.

00:38:25.600 -- All right we're going to circle back to a couple people who did Ezra ever join.

00:38:30.960 -- I don't see Ezra.

00:38:30.960 -- Okay Ezra we're not finding you if you happen to be online please submit your comment and writing Sherman Holden.

00:39:00.960 -- Okay Sherman's saying message if you happen to be online and we're not seeing you please submit your comments and writing and then lastly we're going to circle back to Josh Wick who I believe is sitting with Jennifer in front of her computer or with her computer so let's try that.

00:39:25.360 -- Jennifer is Josh there with you.

00:39:25.360 -- Hi Josh is actually we're out in Kitsap County and we have no power so he is with the baby right now and he could not make it in to be here because first of all today either.

00:39:40.800 -- All right thank you and please let Josh know he's welcome to submit his comments and writing.

00:39:46.000 -- He did.

00:39:46.000 -- Okay great thank you so much.

00:39:46.000 -- All right all right in person will now move to in-person testimony on the public here in regarding minors in non-retail cannabis license and first up we have Micah Saini.

00:40:00.880 -- Yes the morning thank you Chair Valindra and members of the community Micah Saini with like as the cannabis just briefly I don't really know too much about this petition or not petition but rulemaking excuse me but I will say that you know we do support kids being on farms cannabis is a plant and we need to really start treating it like such of course we don't want kids around chemicals and anything that can be very harmful for them but you know there's going to be more black and brown rose coming about here soon and people might need to bring their kids to the farm so let's just I advise the

board or just back support to acknowledge that allowing kids to be on the farms uh push the protection into the kids but that's it thank you.

00:40:52.720 -- You can Mike appreciate it okay and last we have William doubt it if I not interrupting on the time I can see that I might hear what um my name is William Dory I can hear from uh WSU area so I spent last night driving in a few hours I wanted I'd like to cover a couple issues um some part of it's just the process on uh when you live on the east on the other side of state uh trying to get here in comment and I've a number of times tried to do this online and do the process and there technical issues or just plenty of plenty of issues so two two issues um if if there is some sort of satellite you know office or whatever somewhere we can let's say testify from the other side of the state it would be very helpful to access and and have people be able to get their their comments or or you know complaints or whatever it is um secondly your it is very I think there's there's potentially a lack of uh a capacity for empathy for some of the people at the LCB for the people that they've asked to be here like when you have a program for social equity and you're you're asking for people to come and participate with you and and the only read it way they can come and participate or if they're going to you know actually benefit from the program you're you're offering is that they be poor or financially efficient um traumatized by the state or or laws that you know maybe now we've we've found unconstitutional uh you're asking people that are without the resource without that that are knowingly traumatized that you've recognized the trauma and and the whole program that you're creating is is some sort of you know like as as a member you know a member of the state there are a uh you know this is like a a rape or ration for for sorry we we you know hurt you like let's try and help you know me but but your help if without if not done with care and with an understanding and enough empathy to understand where the people are at you can just cause for their harm uh if 30 seconds will you? Yeah I'll get you next time.

00:43:53.760 -- Thank you Mr.

00:43:53.760 -- Duddy.

00:43:55.760 -- Uh just a reminder and I did cut a little bit of slack to please stay on the topic that we're talking about I know you process thank you yeah okay thank you we'll get there okay all right so that concludes our um public hearing on the um miners on premises we'll move right into the next item here.