White Paper:
Medical Marijuana Regulation

March 29, 2019
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ELECTRONIC/WEB-BASED ATTACHMENTS:
Planning Commissioners will have the following items physically attached but which are linked in the digital paper available for the public.

ATTACHMENT 1- 1000 FT RADIUS ANALYSIS (LINK HERE)
ATTACHMENT 2- MAPS OF WHERE FACILITIES MAY BE PERMITTED TO LOCATE -
    ○ CULTIVATION & MANUFACTURING FACILITIES (LINK HERE)
    ○ TESTING FACILITIES (LINK HERE)
    ○ DISPENSARY FACILITIES (LINK HERE)
ATTACHMENT 3- DEPT OF HEALTH & SENIOR SERVICES - REGULATIONS (LINK HERE)
ATTACHMENT 4- STATE AMENDMENT 2 - MEDICAL MARIJUANA (LINK HERE)
Introduction

In November of 2018 Missouri voters passed Amendment 2 to legalize marijuana for medical purposes, to tax marijuana sales at 4 percent, and to spend tax revenue on health and care services for veterans. The Amendment requires the Missouri Department of Health and Senior Services to begin accepting applications for medical marijuana facilities no later than August 3, 2019, and to accept or reject applications for dispensaries within 150 days of receiving them.

This paper examines best practices from other municipalities with regard to the regulation of the location, establishment and operation of all medical marijuana facilities in order to ensure the health, safety and general welfare of the residents of the City of St. Louis. As this is a unique land use with ramifications not addressed by more traditional zoning district regulations, the proposed regulations in this paper are intended to provide reasonable restrictions within districts so that these uses do not compromise the health, safety and general welfare of persons in the district, or other uses allowed in each district.

Missouri Regulatory Framework

The City of St Louis has some options for regulating the various uses associated with medical marijuana based on state law. Local jurisdictions may enact ordinances or regulations which govern the time, place, and manner of an operation of medical marijuana related facilities. However, no local government shall prohibit Medical Marijuana Cultivation Facilities, Testing Facilities, Infused Products Manufacturing Facilities, or Dispensary Facilities, or entities with a transportation certification either expressly or through the enactment of ordinances or regulations that make their operation unduly burdensome.

Additionally, the state has provided that unless allowed by the local government, no new medical marijuana-related facility shall be initially sited within 1,000 feet of any then-existing elementary school, secondary school, child day-care center, or church. This paper examines this potential and provides some insight regarding this regulation as it pertains to the reality of the City of St. Louis’ built environment.
1,000 ft Radius Analysis

In an attempt to determine how the 1,000 ft radius regulation would apply to the City of St. Louis, the staff has identified 13 industrial sites, which are currently on the open market for sale, to determine if the most intense uses would reasonably be able to locate in the City of St. Louis. The assumption with this approach is that if an industrial site is not easily located more than 1,000 ft from an existing elementary school, secondary school, child day-care center, or church, then it would be even more difficult for a retail/less intense use to locate more than 1,000 ft from such a use. In each of the 13 sites identified on the image to the right, there was at least 1 conflict of use found; 12 of the 13 had at least 2 conflicts. Given that the distance requirement would make it difficult to locate these uses in the City without obtaining a variance, the decision has been made to regulate these uses through site and standard regulations without the 1,000 ft radius requirement to ensure the character of the neighborhoods of St. Louis are preserved. Please see the following link for more specific details on the 13 analyzed sites:

https://drive.google.com/file/d/1GspFBZLBfAqfCqQgoT6t4V_7IWhNlle9/view?usp=sharing
Unique Considerations

Medical Marijuana Specific Considerations

Crime
Research on the impacts of marijuana dispensary facilities in Denver's neighborhoods found that “neighborhoods with one or more medical or recreational dispensary saw increased crime rates that were between 26 and 1,452% higher than in neighborhoods without any commercial marijuana activity, but [they] also found that the strongest associations between dispensaries and crime weakened significantly over time.”¹ The authors caution that the results of the study are only based on information from Denver, the study may not be generalizable to other geographic areas.

In addition to the aforementioned study, researchers from the University of Southern California and the University of California examined the mass closing of hundreds of medical marijuana dispensary facilities in Los Angeles in 2010. The Study found that there was an immediate increase in property and theft from vehicle crime around dispensaries which were ordered to close relative to those that remained open. The researchers theorize that the results demonstrate that the dispensaries were not the crime magnets which contributed to the area walkability and increased the “eyes on the street” factor which deters these types of crime. The research concluded that retail businesses of any kind, including dispensaries, are effective in lowering crime.²

While multiple studies have been done to determine if Medical Marijuana Dispensary Facilities are correlated to increased crime, the conditions in each jurisdiction are different and results have varied. To ensure that neighborhood character is not negatively impacted, dispensaries will be contained within zoning districts which provide a higher density of retail and thus will be surrounded by more ‘eyes on the street’ to deter crime.

In addition to dispensary facilities, cultivation, manufacturing, and/or testing facilities are also susceptible to increased crime rates due to the high value of the plant, and the cash nature of the new industry given their inability to bank with FDIC insured banks. Throughout the recent evolution of medical and recreational marijuana, various state and local jurisdictions have passed security requirements to address crime or potential crime at these facilities. While a majority of jurisdictions at this point have required that security plans be submitted, reviewed, and approved by their police departments, multiple jurisdictions, including the State of California and the City of Chicago, have enacted security oriented site requirements. This approach ensures that security measures are applied uniformly and equally to the type of facility, including 24-7 security personnel and/or fire-proof safes or vaults for inventory and/or cash.

Given that a requirement for a security plan could allow for arbitrary requirements set forth by a particular reviewing department, the City of St. Louis finds that uniformly applying security measures equally is a “best practices approach” for an evolving and newly regulated industry with a unique set of issues. The City of St. Louis is therefore proposing security requirements be applied to each facility type. These specific requirements are laid out in the ‘Regulations by Use Type’ section of this paper.

Odor From a Distance

Multiple news articles from across the nation point out that marijuana cultivation and manufacturing elicits a skunk-like odor from a significant distance of the premises of the facility. In one particular instance, in California, farmers switched their product from flowers to marijuana, but the facility was not built or redesigned to accommodate the increased and decidedly more offensive odors emitted from the marijuana plant. Furthermore, municipalities across the nation have begun to require odor mitigation technologies be incorporated into the design or redesign of the building. While this can be increasingly more complex and costly in a building which is being retrofitted for the use of marijuana cultivation or manufacturing, there are now plenty of resources available to developers and business owners to ensure they fully understand the equipment necessary to abate any issues related to odor.

Staff is proposing that the following requirements be met to locate a cultivation or manufacturing facility in the City of St. Louis:

“The facility, except for a Medical Marijuana Dispensary or a Medical Marijuana Testing Facility, shall have an odor mitigation system that uses activated carbon filters, an ozone generator, UV light exposure, UV-C air disinfection, or other similar odor mitigation technology.”

Staff understands that odor can be a subjective issue and may depend on a person’s individual senses; therefore, the proposed requirement is to ensure that adequate devices are in place to neutralize and/or remove odors prior to emission into the atmosphere. These mechanisms will be reviewed, inspected and approved by the Mechanical Section of the Building Division. Should a nuisance occur, the Building Division will be able to inspect the devices to ensure they are working properly and/or require an additional device be put in place.

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Environmental Concerns

While technology and farming, and particularly urban farming, have come a long way to ensure efficiency in agricultural processes, there are a few concerns which have been raised with regard to their impact on the environment. Specific concerns to the ecology and local conditions which are already seeing impacts, i.e. the impacts of surface water diversions for marijuana cultivation on salmon in northwestern California watersheds. While this research has been location specific, the basic conclusion is that the cultivation of this crop requires a high level of resources, and thus will have an impact on the environment.

An independent report completed in 2012, by a researcher at the Lawrence Berkeley National Laboratory, estimates that the carbon dioxide pollution from electricity use and transportation fuels for all national production of marijuana products equals that of 3 million cars. The same paper concludes that energy efficiency from indoor marijuana cultivation pales in comparison to other industries and activities such as data centers, wood and paper production, and plastic and rubber production.

In addition to energy consumption, the marijuana cultivation facilities have raised concerns related to the impacts on watersheds and their ecology. The issue is most evident in California where water scarcity and periods of drought and forest fires have been at the forefront of people’s minds for a significant amount of time. The Salmonid Restoration Federation (SRF), a non-profit organization in California, has provided cannabis growers with a 60-page report for watershed best management practices. It includes information about why watershed management is important and resources for the best practices, including rainwater harvesting, efficient irrigation, and greywater usage. A research report published in 2015 by BioScience compares the water required for marijuana cultivation with other crops grown in the North Coast hydrologic region of California, concluding that the amount of water needed to grow the crop is less than that of other common crops such as potatoes and corn.

It should be noted that the State Department of Health and Senior Services has provided requirements related to the handling of wastewater generated during medical marijuana production and processing. In addition to wastewater, it discusses plant waste which, by their guidelines, must be rendered unusable prior to disposal.

5 https://journals.plos.org/plosone/article/file?id=10.1371/journal.pone.0120016&type=printable
6 http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.396.4759&rep=rep1&type=pdf
8 www.researchgate.net/publication/279180798_High_Time_for_Conservation_Adding_the_Environment_to_the_Debate_on_Marijuana_Liberalization
Property Values
Multiple studies have been done on the effects of Marijuana Dispensary Facilities on housing values, many of which were completed in the Denver market. One study completed in Denver found that the introduction of a new dispensary within a ½ mile of a new home increased the price by approximately 7.7%\(^9\). On the other hand, a survey completed by the National Association of Realtors found that more than three-quarters of its members have not seen a change in residential values near dispensaries, while one-tenth have seen an increase and the remainder have seen a decrease in property values\(^10\). While it is impossible to say what the effect on property values might be, it is fair to say that filling storefronts and bringing business owners, customers and visitors to currently vacant buildings will bring activity and jobs to areas where none currently exists, and this is positive.

Correlation with Opioid Consumption
Some studies have examined the effect of medical marijuana on the opioid epidemic. One study completed by researchers at the University of California and the RAND Corporation found that states which provide legal access to marijuana through dispensaries reduce death due to opioid overdoses with evidence that some individuals may be substituting highly addictive pain medication with marijuana, reducing the quantity of opioids they consume or forgoing them altogether.\(^11\) The Amendment 2 language for the legalization of Medical Marijuana in the State of Missouri does allow for the use of Medical Marijuana for “a chronic medical condition that is normally treated with a prescription medication that could lead to physical or psychological dependence when a physician determines that the medical use of marijuana could be effective in treating that condition and would serve as a safer alternative to prescription medication.” This could thus have positive effects where marijuana could substitute for opioids in these scenarios.

\(^11\) [https://www.nber.org/papers/w21345.pdf](https://www.nber.org/papers/w21345.pdf)
Missouri Specific Considerations

Missouri Right-to-Farm
The Missouri Right-To-Farm, Amendment 1 was approved by the voters of Missouri in August of 2014. This constitutional amendment provides protections to farmers and ranchers from nuisance suits, typically related to odor. Since that time, multiple people have attempted to use the amendment in an argument to protect themselves from lawsuits related to the growth of marijuana. All of these arguments were rejected due to the fact that it was a controlled substance. Additionally, a more recent case ruled that Marijuana is not a common item harvested in Missouri and therefore, cultivating it is not included in the extension of the meaning of the word agriculture and farming as understood by the legislature and the voters.\textsuperscript{12}.

Taxes
Amendment 2 authorizes a tax upon the retail sale of medical marijuana sold at Medical Marijuana Dispensary Facilities. The tax will be at a rate of four percent on the retail price and will be collected by each licensed Medical Marijuana Dispensary Facility. The proceeds, less actual collection costs of not more than 5%, will be deposited into the Missouri Veterans’ Health and Care Fund for health and care services for military veterans. In addition to this tax, existing general state and local sales taxes and use taxes that apply to retail sales will be continued to be collected and distributed as provided by law. Amendment 2 further states that no additional taxes shall be imposed on the sale of marijuana for medical use.

Application Processes
Residents of the City of St. Louis who are interested in learning more about medical marijuana, including the application process for obtaining a patient medical identification card for medical use, should visit the Missouri Department of Health and Senior Services website at the links below.

The following link is to the Department's frequently asked questions which include the cost of the application fee to obtain a patient identification card ($25.00), if and how a qualifying patient may grow their own medical marijuana plant(s), the date that the Department will begin accepting applications (currently scheduled for July 4, 2019), and the dates for accepting applications to operate the different types of facilities. \url{https://health.mo.gov/safety/medical-marijuana/faqs.php}

The following link is to the Department’s general webpage on this subject and includes links to the draft rules, Amendment 2, the pre-license fee schedule, and other helpful links. \url{https://health.mo.gov/safety/medical-marijuana/index.php}

\textsuperscript{12} \url{https://www.americanbar.org/content/dam/aba/administrative/state_local_government/UpdateonPlanning71515.authcheckdam.pdf}
City of St. Louis Specific Considerations

Overlay Districts
Given that the proposed amendment to the Zoning Code will be adding an entirely different regulating subject and chapter, all regulations proposed would be applicable to all underlying zoning districts regardless of the overlay. Should the various areas with existing overlay districts wish to regulate these uses differently than the underlying zoning districts, they will be required to amend the overlay district regulations to address the uses specifically.

Related Code Inconsistency
In January of 2019, the Planning Commission reviewed and recommended approval of a Zoning Text Amendment which would ensure compliance with State statutes and new FCC regulations regarding Small Cell Wireless Deployment. The legislation subsequently introduced at the Board of Alderman on January 11th has since received a public hearing, a second reading, and a perfection. This bill includes language which does not permit “any use prohibited by federal law, federal regulation or federal agency” in the “I” Central Business Zoning District and beyond. Given that medical marijauana is still a use prohibited by federal law, staff recommends that the language be amended to ensure that it refers only to wireless facilities. The board bill with this proposed change would remain separate from the bill proposing the medical marijuana regulations.
Regulations by Use Type

Cultivation

Definition (as presented in State legislation)- A facility licensed by the Department to acquire, cultivate, process, store, transport, and sell marijuana to a Medical Marijuana Dispensary Facility, Medical Marijuana Testing Facility, or to a Medical Marijuana-Infused Products Manufacturing Facility.

Existing Zoning Code Parallel Uses:

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<tr>
<th>Use</th>
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<tr>
<td>Farming &amp; Truck Gardening</td>
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<tr>
<td>Greenhouses</td>
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*Conditional use with no sales

NA = Not Allowed
C = Conditional Use
P = Permitted

Proposed Zoning Regulation:

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<td>NA</td>
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The application of a Marijuana Cultivation facility could, in some areas of the city, fit well into the landscape of an area commercial district (H), however, this is not the case in all areas of the City. By allowing the use in an H zoning district as a conditional use, the City can review and consider each facility and its surroundings separately, to allow more flexibility in requiring certain, more stringent stipulations that are responsive to the area. On the other hand, by permitting them in I-L districts, where the mix of uses and density is greater, the City can provide a list of site stipulations which apply to all facilities, but the process for gaining approval is much simpler and more streamlined.

To see a simple map view of where these facilities can be located, please see the following link: https://drive.google.com/file/d/1At6m6PIHdxesxg5F7g7AjsC6txz5jOcx/view?usp=sharing
Why treat Marijuana Cultivation different than Farming & Truck Gardening or Greenhouses?
Marijuana is only allowed for medical purposes in Missouri and is not allowed for general consumption, unlike the products produced by agricultural processes. Additionally, while the scale and type of use could be very similar, the Medical Marijuana Cultivation Facility is proposed to be treated as an entirely separate use due to the known issues which arise with the cultivation of marijuana specifically, including odor.

Specific Regulations Proposed:
The two biggest concerns and most frequently cited issues resulting from medical marijuana legalization across various states are related to safety/security, and odor/nuisance. The following regulations are proposed for the regulation of cultivation facilities in the City of St. Louis to address these potential issues, and the language for each regulation below has originated from other municipalities’ regulations. Each of the regulations below identified with an asterisk is a site regulation recommended to be imposed on all medical marijuana facilities, not simply those for cultivation.

**SAFETY & SECURITY RELATED REGULATIONS**

*Security Camera - The facility shall be monitored at all times by an Internet-based closed circuit television for security purposes. The camera and recording system shall be of adequate quality, color rendition and resolution to allow the ready identification of any individual committing a crime anywhere on or adjacent to the facility. The recordings shall be maintained for a period of not less than ninety (90) days and shall be made available to law enforcement authorities upon request.

*Fireproof vault or safe - The facility shall have a fireproof vault or safe that is incorporated into and securely attached to the building structure for the purpose of securely storing cash and any processed marijuana.

*Alarm System - The facility shall have a centrally monitored fire and burglar alarm system.

*Exterior Building Lighting - Exterior building lighting and parking area, if any, shall be equipped with lighting fixtures of sufficient intensity to illuminate all interior areas of the lot with an illumination of not less than 1.5 foot-candles evenly distributed as measured at floor level. These light fixtures shall be turned on from dusk to dawn.

*Secure Disposal - No person shall dispose of marijuana or marijuana-infused products in an unsecured waste receptacle not in possession and control of the licensee and designed to prohibit unauthorized access.

**Armed Security -** The facility, shall have an armed security guard on the premises at all times.

**Signage -** A facility shall not have a sign

*Outdoor Cultivation and Storage & Public View into Facility- No cultivation, processing, storage, display, sales or other distribution of marijuana shall be permitted outdoors or be visible from the exterior of the building.
NUISANCE RELATED REGULATIONS
*Nuisance beyond the property - No equipment or process shall be used that creates noise, dust, vibration, glare, fumes, odors or electrical interference detectable to the normal senses beyond the property boundary.

*On Site Use - There shall be no on-site consumption of marijuana or marijuana-infused products on the premises at any given time.

Odor Mitigation - The facility, shall have an odor mitigation system that uses an activated carbon filters, an ozone generator, UV light exposure, UV-C air disinfection, or other similar odor mitigation technology.

OTHER REGULATIONS
*State Compliance - The facility shall comply with all applicable regulations issued by the Missouri Department of Health and Senior Services. And the facility shall display its state issued license on the interior of the facility, visible to the public, at all times.
**Manufacturing**

Definition (as presented in State legislation)- A facility licensed by the Department to acquire, store, manufacture, transport, and sell marijuana-infused products to a Medical Marijuana Dispensary Facility, a Medical Marijuana Testing Facility, or to another Medical Marijuana-Infused Products Manufacturing Facility.

**Existing Zoning Parallel Uses:**

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<td>Oiled goods manufactured from raw materials</td>
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<tr>
<td>Bars and Taverns and packaged liquor stores and related uses</td>
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C = Conditional Use
P = Permitted

Why handle Marijuana Manufacturing different than oiled goods manufactured from raw materials and/or bars and taverns and packaged liquor stores?

A marijuana manufacturing facility is somewhere in the middle between an oiled goods manufactured from raw materials and a bar, tavern, packaged liquor store and related uses, including micro-breweries. The oiled goods manufactured from raw materials use is referring to fuel and oil extraction processes which are incredibly intensive and can create heavy nuisances. On the other hand, marijuana manufacturing is similar to breweries or micro-breweries whereby the processing of alcohol can be an intensive use which produces odor, major temperature regulation, vibrations, etc. Therefore, staff has determined that by allowing the use as a conditional use in the area commercial district (H), each facility in large regional commercial areas can be evaluated on a case-by-case scenario and additional site-specific requirements can be added, however the use could be permitted in the higher-density mixed use and industrial districts with appropriate conditions imposed by overarching regulations.

**Proposed Zoning Regulation:**

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NA = Not Allowed
C = Conditional Use
P = Permitted
To see a simple map view of where these facilities can be located, please see the following link:
https://drive.google.com/file/d/1At6m6PHdxeWxg5F7g7AjsC6txz5jOcx/view?usp=sharing

Specific Regulations Proposed:
Similarly to the cultivation facilities, the two biggest concerns and most frequently cited issues resulting from medical marijuana legalization related to manufacturing are related to safety/security, and odor/nuisance. The regulations proposed for the regulation of manufacturing facilities in the City of St. Louis to address these potential issues, are the same regulations identified as recommended for cultivation facilities.
Testing
Definition (as presented in State legislation)- A facility certified by the Department, to acquire, test, certify, and transport marijuana.

Existing Zoning Parallel Uses:

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<tr>
<th>Use</th>
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<tbody>
<tr>
<td>Laboratory</td>
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<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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Proposed Zoning Regulation:
Medical Marijuana Testing Facilities would be handled in the same manner that the laboratory uses are being regulated.

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https://drive.google.com/file/d/1mBllgUBJhlJuSvauCZb4x2fAO9OF4MOG/view?usp=sharing

Specific Regulations Proposed:
Unlike the cultivation and manufacturing facilities, the concerns and most frequently cited issues resulting from medical marijuana legalization related to testing are related to safety/security, but less related to odor/nuisance given the environment is more of a laboratory and the facilities will be taking small quantities from each batch, as opposed to keeping and testing large quantities. The regulations proposed for the regulation of testing facilities in the City of St. Louis to address these potential issues, are the same regulations identified as recommended for cultivation and manufacturing facilities, with the following exception(s):

**NUISANCE RELATED REGULATIONS**

**Odor Mitigation** - The facility, shall have an odor mitigation system that uses an activated carbon filters, an ozone generator, UV light exposure, UV-C air disinfection, or other similar odor mitigation technology.
Selling (Dispensing)

Definition (as presented in State legislation)- A facility licensed by the Department to acquire, store, sell, transport and deliver marijuana, marijuana-infused products, and drug paraphernalia used to administer marijuana as provided for in this section to a Qualifying Patient, a Primary Caregiver, another Medical Dispensary Facility, a Medical Marijuana Testing Facility, or a Medical Marijuana-Infused Products Manufacturing Facility.

Existing Zoning Parallel uses:

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<td>Drug Stores</td>
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NA = Not Allowed  
C = Conditional Use  
P = Permitted

Proposed Zoning Regulation:

<table>
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<th>Use</th>
<th>A</th>
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<th>C</th>
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<tbody>
<tr>
<td>Medical Marijuana Dispensary Facility</td>
<td>NA</td>
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To see a simple map view of where these facilities can be located, please see the following link:
https://drive.google.com/file/d/1buJBwmECAp2fLjfi_jRXqnyJaPWp3nuw/view?usp=sharing

Why handle Medical Marijuana Dispensary Facilities different than Drug Stores?
Research completed in early 2019 found that neighborhoods in Denver with one or more medical or recreational dispensaries saw increased crime rates, higher than in neighborhoods without any commercial marijuana activity, however that “the strongest associations between dispensaries and crime weakened significantly over time.”13 That is to say that an increase in crime initially was followed by a decrease in crime significantly over time. Given the uncertainty of crime that the dispensaries may bring, dispensaries will remain out of the residential districts and locate in more visible and high-traffic areas such as those in commercial districts and beyond.

Additionally, the characteristics of a drug store lend itself toward a neighborhood service that would likely serve the immediately surrounding area whereas the medical marijuana dispensary facilities will likely be

serving a larger market area. This may increase traffic and parking demand if people from outside the immediate vicinity are traveling to the facility. Keeping these facilities out of the primarily residential zones will ensure that neighborhood characters are preserved.

Specific Regulations Proposed:
Unlike the cultivation, manufacturing, and/or testing facilities, the concerns and most frequently cited issues resulting from medical marijuana legalization related to dispensary facilities are related to safety/security, but less related to odor/nuisance given the environment is more of a storefront whereby the products will be packaged and not used on the premises. The regulations proposed for the regulation of dispensary facilities in the City of St. Louis to address these potential issues are the same regulations identified as recommended for cultivation and manufacturing facilities, with the following exception(s):

**SAFETY & SECURITY RELATED REGULATIONS**

**Armed Security** - The facility shall not be required to have an armed security guard.

**Signage** - A facility may have a sign subject to specific requirements (provided below).

**NUISANCE RELATED REGULATIONS**

**Odor Mitigation** - The facility shall not be required to have an odor mitigation system.

Additionally, given the retail and advertising component, the following additional site requirements are recommended to ensure the character of the neighborhoods can be preserved, but to also ensure that the dispensary facility can sell associated medical marijuana supplies to qualified patients or primary caregivers:

**Mobile facilities** - The facility shall be located and operated from a permanent and fixed structure and may not be located in a trailer, cargo container or motor vehicle and the structure shall not be mobile or operate from a transitory location.

**Delivery** - The facility shall not provide delivery services for any of its products unless otherwise allowed by State law.

**Marijuana Paraphernalia** - Devices, contrivances, instruments, and paraphernalia for inhaling or otherwise consuming marijuana including, but not limited to rolling papers, and related tools, water pipes, and vaporizers may lawfully be sold at a medical marijuana dispensary, but only sold or provided to a qualifying patient or primary caregiver as defined by Missouri law.

**Additional Signage Requiring Qualifying Patient or Primary Caregiver ID** - The facility shall display a sign on the interior of the facility indicating that a patient identification card or primary caregiver identification card, issued from the Missouri Department of Health and Senior Services, is required and must be presented to purchase medical marijuana and marijuana infused products.

**Drive-up facilities** - The facility shall not sell to customers who are in cars or who consume the sold products in cars parked on the facility, nor shall it sell products through a sales window, to
customers who are in cars, for the immediate consumption by the customer either on or off the premises.

**Hours of Operation** - Hours of operation shall be limited to 8:00 a.m. to 8:00 p.m., Sunday through Saturday.

**Freestanding or Temporary Signage** - The facility shall not erect or use any freestanding signage and shall not have any temporary signage. All signs shall have appropriate permits prior to installation.

**Wall Signs** - Only wall signs shall be allowed and no signs shall extend above the roof of the building or extend more than 15 feet in height above grade. The provisions of Chapter 26.68 shall determine the total square footage of all signs attached to the building.

**Window & Door coverings** - The windows and doors of the facility shall not be covered by boards, mesh, grates, materials or coverings of any kind, except proper blinds and curtains.

**Attention Getting Devices** - The facility shall not have cord or rope type LED lighting surrounding or framing its windows or doors.