



New Hampshire Drug-Free Communities Coalitions

Local Problems Need Local Solutions

January 13, 2022

Honorable Daryl Abbas, Chair
Criminal Justice and Public Safety Committee
34 South Shore Road
Salem, NH 03079

Dear Representative Abbas:

We represent 10 NH Drug-Free Communities Coalitions who believe scientific evidence should guide marijuana policies. Science informs our decision making and practice. There is a significant body of evidence that demonstrates the health, safety and economic harms of marijuana legalization far outweigh the perceived social benefits.

Please know we are non-partisan and non-political organizations. However, we are politically aware. We understand that all sound public health and safety policy flows from our elected representatives.

So, we write to simply help inform your deliberations. Given our decades of experience, we believe we have a responsibility to call attention to the growing science on the risks of marijuana and the urgent need for informed decisions when considering public health and marijuana policy.

Allow us to be candid: marijuana legalization – commercial, private or state run -- would adversely impact our prevention efforts and turn back the clock on decades of incredibly hard work helping New Hampshire citizens overcome substance use challenges. We've dedicated our professional lives to this noble calling.

And yes, we could suggest safeguards like a full ban on advertising, a 2 percent cap on THC across-the-board, no addiction-for-profit industry representatives on any regulatory body, and strict limits on industry lobbying.

However, as we've seen time and again no number of legislative safeguards can protect the most vulnerable among us -- as the promises made and unkept on alcohol and tobacco attest. Even Governor Baker, who remains opposed to legalization, cannot get the Massachusetts legislature to take up his driving under the influence of marijuana Clardy Law – named for the Massachusetts state trooper killed by a marijuana drugged driver.

We know you have the health and safety of New Hampshire citizens foremost on your mind. So, to help inform your deliberations we'd like to provide you with an update of what recent medical science tells us about the addictive properties of marijuana:

- Virtually every medical and psychiatric association in America strongly opposes legalization and commercialization. In New Hampshire this includes the NH Medical Society, American Academy of Pediatrics (NH), Catholic Medical Center, NH Community Behavioral Health Association, NH Public Health Association, and the NH Nurses Association among many others.

- Moreover, a coalition of tens of thousands of physicians representing the Medical Associations of five other east coast states recently warned that “cannabis is a dangerous drug and is a serious public health concern” and the “the long-term public health costs associated with hospitalization and treatment for psychiatric/addictive disorders could significantly outweigh any revenues received from legalization.”
- Nor should we overlook the U.S. Surgeon General’s warning on the risks associated with marijuana use during pregnancy and on the developing brains of adolescents up to age 25.
- And this is not just about mature responsible adult use. Our decades of experience have proven where there’s more marijuana available for adults, there’s more marijuana available for the at-risk and vulnerable population we serve including teens, those suffering from opioid use disorder, and veterans:
 - The most recent CDC SAMHSA National Youth Risk Behavior Survey revealed 26% of NH High School students have used marijuana in the past 30 days — an astounding number which has the prevention community deeply concerned.
 - Recent government-sponsored peer-reviewed scientific studies show marijuana is a risk factor in the increased non-medical use of opioids and according to the National Academy of Sciences the **opioid crisis is worsening where marijuana has been legalized**.
 - The opioid catastrophe cannot be solved in isolation from marijuana legalization. Yes, not everyone using marijuana becomes addicted to heroin. But virtually all those recovering from heroin addiction attest marijuana led them down the road to addiction (CDC study).
 - The Veteran’s Administration is on record stating there is no evidence that marijuana is an effective treatment for PTSD and warns veterans that marijuana can be harmful to people with PTSD.
- Science is hard at work trying to help those with diagnosed severe cannabis use disorder and addiction: dozens of National Institutes of Health (NIH) sponsored **cannabis dependence** trials are currently underway.

But perhaps most heartbreaking is the sad yet preventable tales of moms losing their young adults to marijuana addiction and suicide. Of grave concern, recently, four toddlers (from different families) were admitted to a New Hampshire emergency room in a marijuana-induced coma. Their parents couldn’t wake them up.

These stories are all-the-more-tragic because we all know the truth: science tells us today’s marijuana is addictive and leads to mental illnesses such as anxiety, depression, psychosis, paranoia, and sadly, suicidal ideation. These are the facts. The preponderance of scientific research screams loudly to anyone who chooses to listen.

We often hear that marijuana legalization, taxation and regulation would prevent a black market here in New Hampshire. While we don’t profess to be experts on the illegal drug trade, even a cursory reading of

the press indicates drug cartels are using the cover of legality to flood into the legal states. And “home grow” states have an especially pernicious black-market problem.

Colorado law enforcement has shut down hundreds of illegal marijuana grow houses in residential neighborhoods run by international cartels. The governor of California said illegal marijuana is “getting worse, not better.” He called out the National Guard to help destroy illegal grow sites. These are called self-inflicted wounds.

We shouldn’t be fooled by the industry mantra that all is well in the legal states. Oregon is awash with so much legal marijuana that if growing were to stop today, it would take six years to smoke or eat it all. The state has, unsuccessfully, tried to curb production. A 2019 Oregon state audit report revealed marijuana regulators have failed to meet even basic standards of contaminate testing, mandatory inspections, and diversions into the black market. Regulation has essentially collapsed in Oregon.

The Vermont Department of Health in 2020 issued a warning that “marijuana use is a significant public health problem in Vermont, and it is getting worse.”

High-potency marijuana has become a public health crisis in Colorado. A Medical Director at the state’s largest non-publicly owned psychiatric hospital in the state – the Medical Center of Aurora – said the emerging epidemic of marijuana addiction “threatens to swallow the lives of a whole generation of Coloradans.”

It’s so bad in Colorado, the governor just signed a landmark marijuana reform bill drafted by the Speaker of the House. Both had been early pro-marijuana advocates. Buyer’s remorse has set in. They rushed head-long into legalization without a full appreciation for the science.

The bill establishes a scientific council to study the latest science and make recommendations on high potency marijuana; requires data from emergency rooms for marijuana related addiction, cannabis use disorder, hyperemesis, and suicidal ideation; requires coroners to do toxicology screens in each case of suicide, overdose, or accidental death; and limits and caps the amount of THC that can be purchased.

The bill also cracks down on Colorado’s medical marijuana program (thousands of 18-year old’s have medical marijuana cards). It caps the sale of concentrates, requires warnings on serving size, creates a database to prevent store hopping to obtain more than the capped amount of concentrates and tightens regulations on the sale of medical marijuana to 18–20-year-olds. Sadly, this scientific approach should have been used years ago to inform Colorado legislators prior to the 2014 vote to legalize.

This reform bill was ferociously opposed by the addiction-for profit industry who rely on ever-increasing botanically engineered high-concentrate THC to entice dependent customers back for more marijuana. This puts increased profits ahead of public health and safety.

And to the best of our knowledge little if any of Colorado’s belated turn-to-science has been reflected in any New Hampshire marijuana legalization or commercialization bill nor in the State’s regulation of the Therapeutic Cannabis Program (TPC).

Online web site sampling done by the U.S. Surgeon General of Alternative Treatment Centers around the country – including New Hampshire -- found astonishingly high concentrations of THC (over 50%) being

sold in the form of gummies, candy, and food to those 10,688 New Hampshire citizens (ranging in age between 4 and 100) with state-sanctioned medical marijuana cards (2020 NH TCP Data Report).

The generally accepted medical and psychiatric THC content known to be efficacious in the treatment of neuropathic pain and reduce the risk of addiction is 5-10%. Many states are now capping THC in their medical marijuana programs at 10-15%. A New Hampshire bill to cap THC at 10% **failed** in a Senate committee last session on the advice of the Department of Health and Human Services Therapeutic Cannabis Program Director.

So perhaps the New Hampshire legislature could pass a Colorado-style medical marijuana reform bill before rushing head-long into full recreational commercialization. We would wholeheartedly support such an effort.

Some have raised the issue of growing public support for legalization as reflected in a University of New Hampshire poll. As with all polling, the answer depends on the question asked. And this poll asked a loaded question and unscientifically equated marijuana with alcohol and tobacco:

*“If **small** amounts of marijuana were legalized for **personal use** in New Hampshire, would you approve or disapprove of marijuana being sold at **licensed** retail outlets and taxed at levels **similar to alcohol and tobacco?**” (emphasis added).*

No wonder upwards of 68% responded favorably to a seemingly harmless question. But when you give voters a choice between decriminalization, medical and recreational, 53% of New Hampshire voters **oppose** commercialized marijuana as reflected in a recent Emerson College poll.

We would suggest marijuana legalization is not as popular as this UNH poll reflects. A better metric -- with considerable political consequences -- is the *not-in-my-backyard* effect. Twelve of the seventeen states that legalized marijuana did so through ballot initiatives not through their legislatures. Big Marijuana poured millions into signature campaigns to get questions on the ballot.

This left parents, teenagers, health-care professionals, the faith-based community, civic leaders, drug prevention, treatment, recovery, and educational professionals scrambling to ban pot shops in their communities and neighborhoods.

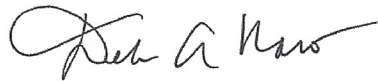
This grassroots effort has been telling: 175 out of 243 municipalities in Colorado have banned pot shops (72%); 80% in California; 65% in Massachusetts; and 60% in Oregon. The remaining legal states have seen similar numbers. Predictably this has pushed pot shops into poor and disadvantaged urban neighborhoods. Manchester, already suffering from the opioid crisis, would likely become ground zero for pot shops if marijuana is legalized here.

Finally, others have raised the issue of inevitability. Perhaps it's the realism in our drug prevention calling that we subscribe to the quip that the only things certain in life are death and taxes. Everything else can be influenced through hard work and courage. Year-after-year we resist the temptation to throw in the towel. This year was no different: in the face of the largest recorded number of overdose deaths in the nation's history we continue to work even harder to prevent and reduce substance misuse to protect our children, public health, and public safety.

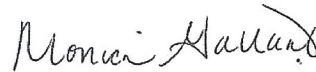
Pro-marijuana is fond of pointing out we're surrounded by legal states. But does that mean we should join them in promoting bad public health and safety policy? New Hampshire is the *Live Free or Die* state and is not beholden to the policies of our neighbors. We prefer to call New Hampshire a safe, healthy, productive oasis attracting families and workers from around the region to help sustain our New Hampshire Advantage.

So, we would encourage you to follow the science in your deliberations and help us protect the vulnerable in the communities we serve. Marijuana legalization has the potential to negatively change our state in ways we can't imagine. There will be no turning back.

Thank you for your service and for listening to our concerns.



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