

April 9, 2021

Wheat Ridge City Council  
City Hall  
7500 W. 29th Avenue  
Wheat Ridge, CO 80033

**RE: Support for Council Bill Number 04-2021, Tobacco Retail Licensing**

Dear Council Members:

On behalf of Jefferson County Public Health (JCPH), I am writing to thank you for your leadership in youth tobacco prevention and to express our support of Council Bill Number 04-2021 to establish a tobacco retail licensing program in the City of Wheat Ridge. Our tobacco prevention team has been fortunate to participate in the dialogue about the proposed policy over the last several months, and we are grateful for our strong partnership with the City.

The proposed policy in Wheat Ridge uses an evidence-based approach to support tobacco prevention among youth. The Centers for Disease Control and Prevention reports that nearly 9 out of 10 adults who smoke cigarettes daily first began by age 18.<sup>1</sup> A local policy that raises the age of sales to 21 in alignment with new state and federal law, coupled with a strong local tobacco retail licensing program, is part of a comprehensive public health strategy to reduce tobacco and nicotine initiation and dependence among youth. Healthy Kids Colorado Survey data from 2019 illustrates the challenges that we are facing: in Jefferson County, 26.0 percent of youth reported past 30-day use of e-cigarettes (also known as vaping), 5.2 percent reported use of cigars, chewing tobacco and similar products, and 4.1 percent reported smoking conventional cigarettes. Research has shown that youth who begin vaping are more likely to go on to smoke conventional cigarettes.<sup>2</sup> Cigarette smoking causes more than 480,000 deaths annually (including from secondhand smoke exposure) in the United States alone.<sup>3</sup> Although cigarette smoking has declined significantly since 1964 in the United States, disparities in tobacco use remain across groups defined by race, ethnicity, educational level, socioeconomic status and geographic region.

The 2019 Healthy Kids Colorado Survey indicates that 63.8 percent of Jefferson County youth reported that it would be “sort of easy” or “very easy” to obtain vape products and 48.5 percent think it would be “sort of easy” or “very easy” to obtain cigarettes. With this information in mind, JCPH is pleased to see that the proposed policy is comprehensive and includes all tobacco retailers, with the assurance of compliance checks twice per year which include underage purchase attempts for compliance monitoring. These components are vital for the success of these policies. For other

<sup>1</sup> “Youth and Tobacco Use.” Centers for Disease Control and Prevention, 16 Dec. 2020. [https://www.cdc.gov/tobacco/data\\_statistics/fact\\_sheets/youth\\_data/tobacco\\_use/index.htm#:~:text=Tobacco%20product%20use%20is%20started%20and%20established%20primarily%20during%20adolescence.&text=Nearly%209%20out%20of%2010,try%20smoking%20by%20age%2026.&text=Each%20day%20in%20the%20U.S.,youth%20start%20smoking%20every%20day.](https://www.cdc.gov/tobacco/data_statistics/fact_sheets/youth_data/tobacco_use/index.htm#:~:text=Tobacco%20product%20use%20is%20started%20and%20established%20primarily%20during%20adolescence.&text=Nearly%209%20out%20of%2010,try%20smoking%20by%20age%2026.&text=Each%20day%20in%20the%20U.S.,youth%20start%20smoking%20every%20day.)

<sup>2</sup> Dunbar, M.S. (2018). *Disentangling Within- and Between-Person Effects of Shared Risk Factors on E-cigarette and Cigarette Use Trajectories from Late Adolescence to Early Adulthood*. Nicotine and Tobacco Research. [https://www.rand.org/pubs/external\\_publications/EP67710.html](https://www.rand.org/pubs/external_publications/EP67710.html)

<sup>3</sup> “Tobacco-Related Disparities.” Centers for Disease Control and Prevention, 3 Feb. 2020. [www.cdc.gov/tobacco/disparities/index.htm](http://www.cdc.gov/tobacco/disparities/index.htm).

Jefferson County communities that have adopted tobacco retail licensing policies, we have seen that an annual license fee commensurate with the costs of administration, education, compliance and enforcement of the license is a cornerstone of a sustainable and robust licensing program. Communication and education provided in collaboration with the retail community will also be key ingredients in operationalizing this policy.

Finally, JCPH supports the policy provisions that will reduce youth exposure to tobacco, thus reducing tobacco use initiation. The City's proposal to institute 1,000-foot distance restrictions on new tobacco retail licenses near schools and youth-oriented facilities, one-year dormancy provisions on existing licenses, along with the provision prohibiting self-service displays in many tobacco retail settings, further reduces young people's access to tobacco. The tobacco industry has long used advertising to target young people, and the strategies included in the City's proposed ordinance are critical for reducing youth exposure to tobacco industry influence and can ultimately help to eliminate health disparities and promote health equity.

Thank you for your consideration of these comments. On behalf of JCPH, I urge you to adopt this important tobacco prevention proposal. Strong local tobacco policy, like the work being done in Wheat Ridge, is an essential complement to any state or national policy. The strong local oversight outlined in the City's proposed ordinance will be critical for preventing youth tobacco use and creating a healthier environment for our young people. If adopted, our team looks forward to continued collaboration with the City of Wheat Ridge to implement this measure. Please do not hesitate to contact Ellen Stern, Tobacco Policy Specialist, at [estern@jeffco.us](mailto:estern@jeffco.us) if you have any further questions.

Sincerely,



R. Dawn Comstock, PhD  
Executive Director  
Jefferson County Public Health