

08/14/2023

## Comments Regarding Proposed Changes under Proposal 20 (a) and 20 (b)

As a Local Authority, we certainly agree that there are ways to create efficiencies in the licensing process under the dual authority system in Colorado but we do not agree with the proposals for the following reasons:

### **Proposals 20(a) and 20(b) are ineffective, would increase workloads, and undermine local control**

- Proposal 20(a) implies that the local authorities are unnecessarily holding applications and not submitting them to the state in a timely manner. While this may be true in some places, most cities strive to send applications in as quickly as possible *as soon as they are complete and have been approved by the Local Authority*. Setting a specific timeframe to send applications to the state will create additional work and re-work because no time is allowed under these proposals for the numerous steps that take place at the local level to ensure that what is sent to LED is as complete and accurate as possible, as well as approved. This proposal would increase everyone's workload because incomplete applications would be submitted to LED in order to meet the timeline, causing more work and communication between LED and the local authorities.
- Additionally, since the LED has begun cc'ing applicants on their emails, applicants are more likely to be confused about who to contact and resolve any deficiencies.
- Local control is foundational to retail liquor licensing. By limiting the time local governments have to handle applications as put forth in these proposals, the premise of local control is eroded and undermined.
- By extending renewals from annual to every two years, local control is again eroded because local authorities often verify licensee details each year or require them to appear for renewals if they have had violations. By extending renewals, the local authority will not be able to routinely monitor possession, managers, violation history, etc.
- We firmly believe there is a direct correlation between licensee confusion and communications licensees receive directly from the state. Maintaining the local authority as the single point of contact for licensees is much less confusing and easier for all to manage.

### **We also oppose Proposal 21 because we do not support the need for application review timelines that are implemented by the state and, therefore, we do not feel Proposal 21 would help improve the process nor increase efficiency.**

A collaborative effort with those that do the bulk of the retail licensing work (local clerks) would certainly net many more effective ideas for improving the efficiency of the licensing process. Additionally, with the right technological solution, a software system could be designed with the dual authority process in mind that would allow for the City, the State and the licensee to all engage together regarding the application on one platform. Until this unified system can be achieved, a piecemeal, band aid approach should be avoided.