



## MEMORANDUM

TO: Peter Mlynarik, Chair, and  
Members of the Board

DATE: November 14, 2017

FROM: Erika McConnell, Director  
Marijuana Control Board

RE: Regulations Project – Onsite  
consumption

**Summary:** This regulations change sets the conditions under which a retail marijuana store could establish an onsite consumption area on the retail store's licensed premises, after board approval of an onsite consumption endorsement for that licensee.

In order to provide guidance for staff, I request that the board consider clarifying the following questions or issues:

1. 370(a)(1) does not permit the consumption area to be outdoors, but (c)(1)(C)(ii) contemplates an outside area. This conflict needs to be resolved, and if the board wants to permit an outside consumption area, I recommend establishing some standards.
2. Local governments—it is unclear whether or not local governments can opt out of onsite consumption endorsements altogether, or if they can only disallow consumption by inhalation. If a community wanted to opt out of onsite consumption altogether (by ordinance or initiative), would they just protest every application? Additionally, the language at (a)(2)(A) that I believe the board added to allow local governments who have banned smoking to disallow consumption by inhalation is very awkwardly worded.
3. In (a)(2)(B), how will “looping” be prevented? (“Looping” is the practice of purchasing more than the allowed limits by making multiple transactions.)
4. In (b)(6), can a customer bring marijuana that they purchased at that retail store a week prior into the consumption area? If the intent is that the purchase and consumption are to take place within the same visit, this should be clarified. May also need clarification in (c)(1)(E).
5. There is a great deal of confusion about the meaning of (b)(7).
6. Is a separate public entrance from the outside to a marijuana consumption area permitted or is the access to the consumption area intended to be only through the retail store?

7. Consider adding an application fee, as this will require a certain amount of staff time and local government time.

Additionally, I recommend that the board make the following amendments:

- a) Change (b)(1) to say, “sell marijuana concentrate for consumption in the marijuana consumption area or allow marijuana concentrate to be consumed in the marijuana consumption area,” This change more clearly states the intent of the board.
- b) Move (b)(4) to 3 AAC 306.310 and make applicable to the entire retail store, not just the marijuana consumption area.
- c) Delete (b)(5) as unnecessary due to 3 AAC 306.310(a)(2).
- d) Add a new (c)(1)(F) to require the retail marijuana store to have a plan for monitoring overconsumption.
- e) Change (c)(1)(C) to require (i) only if consumption by inhalation is permitted. Add to (c)(2), “the separate employee monitoring area, if applicable;”
- f) Add to the regulations project a change to 3 AAC 306.025(b) to require endorsement notice.
- g) Change (e) to say, “The non-refundable endorsement fee for a new or renewal onsite consumption endorsement is \$1,000.” to clarify that it is not an application fee.
- h) Move (g) and (h) to 3 AAC 306.060.

**Recommendation:** Amend based on staff and public comments and put out for public comment.

3 AAC 306 is amended by adding a new section to read:

**3 AAC 306.370. Onsite consumption endorsement for retail marijuana stores.**

(a) A licensed retail marijuana store with an approved onsite consumption endorsement is authorized to

(1) sell marijuana and marijuana product, excluding marijuana concentrates, to patrons for consumption on the licensed premises only in an area designated as the marijuana consumption area and separated from the remainder of the premises, either by being in a separate building or by a secure door and having a separate ventilation system;

(2) sell for consumption on the premises

(A) marijuana bud or flower in quantities not to exceed one gram to any one person in a single transaction, unless prohibited by local ordinance or state law;

(B) edible marijuana products in quantities not to exceed 10 mg of THC to any one person in a single transaction; and

(C) food or beverages not containing marijuana or alcohol; and

(3) allow a person to remove from the licensed premises marijuana or marijuana product that has been purchased on the licensed premises for consumption under this section, provided it is packaged in accordance with 3 AAC 306.345.

(b) A licensed retail marijuana store with an approved onsite consumption endorsement may not

(1) sell marijuana concentrate for consumption in the marijuana consumption area;

(2) allow any licensee, employee, or agent of a licensee to consume marijuana or marijuana product, including marijuana concentrate, during the course of a work shift;

(3) allow a person to consume tobacco or tobacco products in the marijuana consumption area;

(4) allow intoxicated or drunken persons to enter or to remain in the marijuana consumption area;

(5) sell, give, or barter marijuana or marijuana product to an intoxicated or drunken person;

(6) allow a person to bring into or consume in the marijuana consumption area any marijuana or marijuana product that was not purchased at the licensed retail marijuana store;

(7) deliver marijuana or marijuana product to a person already known to be in possession of marijuana or marijuana product that was purchased for consumption on the premises;

(8) sell, offer to sell, or deliver marijuana or marijuana product at a price less than the price regularly charged for the marijuana or marijuana product during the same calendar week;

(9) sell, offer to sell, or deliver an unlimited amount of marijuana or marijuana product during a set period of time for a fixed price;

(10) sell, offer to sell, or deliver marijuana or marijuana product on any one day at prices less than those charged the general public on that day;

(11) encourage or permit an organized game or contest on the licensed premises that involves consuming marijuana or marijuana product or the awarding of marijuana or marijuana product as prizes; or

(12) advertise or promote in any way, either on or off the premises, a practice prohibited under this section.



(c) An applicant for an onsite consumption endorsement must file an application on a form the board prescribes, including the documents and endorsement fee set out in this section, which must include

(1) the applicant's operating plan, in a format the board prescribes, describing the retail marijuana store's plan for

(A) security, in addition to what is required for a retail marijuana store, including:

- (i) doors and locks;
- (ii) windows;
- (iii) measures to prevent diversion; and
- (iv) measures to prohibit access to persons under the age of 21;

(B) ventilation. If consumption by inhalation is to be permitted, ventilation plans must be

- (i) signed and approved by a licensed mechanical engineer;
- (ii) sufficient to remove visible smoke; and
- (iii) consistent with all applicable building codes and ordinances;

(C) isolation of the marijuana consumption area from other areas of the retail marijuana store. The marijuana consumption area must

- (i) include a smoke-free area for employees monitoring the marijuana consumption area; and
- (ii) be entirely outdoors in a designated smoking area or separated from other retail areas by a wall with a secure door;

(D) unconsumed marijuana, by disposal or by packaging in accordance with 3 AAC 306.345; and

(E) preventing introduction into the marijuana consumption area of marijuana or marijuana products not sold by the retail marijuana store; and

(2) a detailed premises diagram showing the location of

(A) serving area or areas;

(B) ventilation exhaust points, if applicable;

(C) doors, windows, or other exits;

(D) access control points; and

(E) adequate separation from non-consumption areas of the retail marijuana store and consistent with 3 AAC 306.370(a)(1).

(d) An application for a new onsite consumption endorsement must meet the requirements of 3 AAC 306.025(b) and include in that notice the license number of the retail marijuana store requesting the endorsement.

(e) The non-refundable fee for a new or renewal onsite consumption endorsement is \$1,000.

(f) The retail marijuana store holding an onsite consumption endorsement under this chapter shall

(1) destroy all unconsumed marijuana left abandoned or unclaimed in the marijuana consumption area in accordance with the operating plan and 3 AAC 306.740;

(2) maintain a ventilation system that directs air from the marijuana consumption area to the outside of the building through a filtration system adequate to reduce odor;

(3) include in the security plan how the licensee intends to restrict access to the marijuana consumption area to persons under the age of 21;

(4) monitor patrons for overconsumption;

(5) display all warning signs required under 3 AAC 360.360 within the marijuana consumption area, visible to all consumers;

(6) provide written materials containing marijuana dosage and safety information for each type of marijuana or marijuana product sold for consumption in the marijuana consumption area at no cost to patrons; and

(7) label all marijuana or marijuana product sold for consumption on the premises as required in 3 AAC 306.345.

(g) The right of local governments to protest the issuance or renewal of individual retail marijuana store onsite consumption endorsements is separate from the right to protest the issuance of a retail marijuana store license. Not later than 60 days after the director sends notice of an application for a new or renewal onsite consumption endorsement, a local government may protest the application by sending the director and the applicant a written protest and the reasons for the protest. The director may not accept a protest received after the 60-day period. If a local government protests an application for a new or renewal onsite consumption endorsement, the board will deny the application unless the board finds that the protest is arbitrary, capricious and unreasonable.

(h) A local government may recommend that the board approve an application for a new or renewal onsite consumption endorsement with conditions. The board will impose a condition recommended by a local government unless the board finds the recommended condition to be arbitrary, capricious and unreasonable. If the board imposes a condition recommended by a local

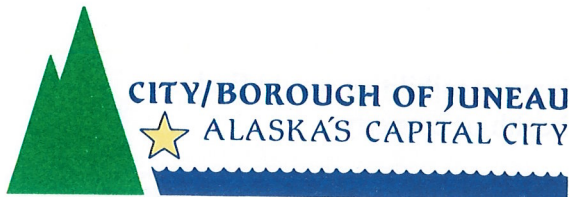
government, the local government will assume responsibility for monitoring compliance with the condition unless the board provides otherwise.

(i) The holder of an onsite consumption endorsement must apply for renewal annually at the time of renewal of the underlying retail marijuana store license.

**3 AAC 306.990 (b)** is amended to add the following subsections:

(27) “marijuana consumption area” means a designated area within the licensed premises of a retail marijuana store that holds a valid onsite consumption endorsement, where marijuana and marijuana products, excluding marijuana concentrates, may be consumed.

(28) “retail marijuana store premises” means an area encompassing both the retail marijuana store and any marijuana consumption area.



**OFFICE OF THE MANAGER**

Telephone: (907) 586-5240; Fax: (907) 586-5385

[Rorie.Watt@juneau.org](mailto:Rorie.Watt@juneau.org)

October 17, 2017

Peter Mlynarik, Chair  
Marijuana Control Board  
550 W 7<sup>th</sup> Ave., Suite 1600  
Anchorage, AK 99501

Re: Comment from the City and Borough of Juneau Regarding the Proposed Regulations  
Regarding the Addition of an Onsite Marijuana Consumption Endorsement

Dear Chair Mlynarik:

The City and Borough of Juneau respectfully provides the following comments to the Board's proposed regulations allowing for onsite marijuana consumption endorsements to retail marijuana licenses.

1. The City and Borough of Juneau has regulated smoking in public places within the City and Borough since 2001. In 2011, the CBJ successfully defended its second-hand smoke ordinance in *Fraternal Order of Eagles v. City and Borough of Juneau*, 254 P.3d 348 (Alaska 2011).

While the proposed regulations attempt to limit the smoking of marijuana within an onsite consumption area to some degree, the proposed regulations are not consistent with, and are less protective of public health, than the City and Borough of Juneau's code.

As this is a health and welfare issue more appropriately left to the municipalities to regulate within their communities, we ask that the regulations be amended to permit onsite consumption of marijuana by smoking (including vaping) only to the extent allowed by local code.

2. The proposed regulations require any retail store holding an endorsement to "maintain a ventilation system that directs air from the marijuana consumption area to the outside of the building through a filtration system adequate to reduce odor." (Emphasis added).

The proposed standard is less strict than the City and Borough of Juneau's:

CBJ 49.65.1260 - Odor.

All marijuana establishments shall utilize a ventilation and odor system that prohibits the detection of noxious odors from outside the licensed premises. For purposes of this section, noxious odors are those odors detectable outside of the

licensed premises that a reasonable person of ordinary sensibilities would find negatively affects the person's enjoyment of life, health or property.

We ask that the proposed regulation be amended to defer to local ordinance. Without this change, the Board will be creating an unfair inconsistency within the CBJ. Retail stores without an onsite marijuana consumption endorsement will be required to comply with CBJ code, while those with the endorsement would ostensibly be required to comply only with the State's less stringent ventilation requirement. Again, this is a health and welfare issue that is properly left to the municipalities to regulate within their respective communities.

3. The proposed regulations require an operator to "display all warning signs required under 3 AAC 360.360 within the marijuana consumption area, visible to all consumers."

The CBJ also requires the display of certain documents (*see* CBJ 49.65.1255). We ask that the regulations be amended to require not only the documentation required by State law, but also any documentation or signage required by municipal ordinance.

We appreciate the continued work of the Board and its staff. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Watt', is written over the printed name.

Duncan Rorie Watt  
City and Borough Manager



## CITY OF FAIRBANKS

Jim Matherly, Mayor

800 CUSHMAN STREET  
FAIRBANKS, ALASKA 99701-4615

OFFICE: 907-459-6793

FAX: 907-459-6787

[jmatherly@fairbanks.us](mailto:jmatherly@fairbanks.us)

October 2, 2017

Alcohol & Marijuana Control Office  
Director Erika McConnell  
550 W 7th AVE, STE 1600  
Anchorage, AK 99501

Re: On-Site Consumption at Marijuana Retail Stores

Dear Ms. McConnell,

I'm writing you this letter on behalf of the City of Fairbanks to express our opinion regarding on-site consumption of marijuana at retail stores in Fairbanks. All City Council members, our Police Chief, and myself unanimously agree that on-site consumption should not be considered an option for Fairbanks retail stores at this time.

While we have several concerns, such as how on-site consumption would work together with our goal of having smoke-free workplaces, our main concern is the safety of our residents. Currently, there is not a consistent and validated standard to determine how much marijuana one person can consume and still safely drive. There are also significant hurdles for law enforcement in the areas of roadside detection and sobriety testing. The science and research behind the laws of how much alcohol one can consume and still drive safely has not been done concerning marijuana.

Legal marijuana is a fairly new industry in Alaska and there are other issues, such as zoning and density, related to this industry that still require a substantial amount of attention from our City. We believe that it would be best to work through these other issues and let the industry gain some experience before adding the complication of on-site consumption.

Sincerely,

  
Mayor Jim Matherly  
City of Fairbanks

Cc: Chief Eric Jewkes  
Fairbanks City Council







## City of Homer

[www.cityofhomer-ak.gov](http://www.cityofhomer-ak.gov)

Office of the City Clerk

491 East Pioneer Avenue  
Homer, Alaska 99603

[clerk@cityofhomer-ak.gov](mailto:clerk@cityofhomer-ak.gov)

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### MEMORANDUM

TO: CITY COUNCIL AND MAYOR ZAK

FROM: CANNABIS ADVISORY COMMISSION

THRU: RENEE KRAUSE, CMC, DEPUTY CITY CLERK

DATE: AUGUST 28, 2017

SUBJECT: RECOMMENDATION TO OPPOSE ONSITE CONSUMPTION OF MARIJUANA BY SMOKING

The State of Alaska Marijuana Control Board issued proposed regulations for Public Comment. Most of the proposed regulations or amendments were not commented on by the Commission. However, the Commission did comment on the proposed changes to the regulations regarding onsite consumption which generally include the following for retail establishments:

1. 3 AAC 306.370 proposes to allow retail marijuana licensees to apply for an onsite consumption endorsement if certain conditions are met.
2. 3 AAC 306.99 proposes to define "marijuana consumption area" and "retail marijuana store premises"

At the regular meeting of August 24, 2017 the Cannabis Advisory Commission reviewed the proposed regulations, discussed and made a recommendation to oppose allowing consumption by smoking of marijuana for the proposed onsite consumption regulations. Following is the excerpt from the minutes of that meeting reflecting the discussion on proposed regulations:

#### *NEW BUSINESS*

#### *C. Proposed Regulations Open for Comment as provided in the Supplemental Packet*

#### *a. Notice of Proposed Changes in the regulations of the Marijuana Control Board to Marijuana Plant Count, Testing of Marijuana and Reporting of testing Equipment Failure*

*There was no comment or recommendation from the Commission on these proposed regulations.*

#### *b. Notice of Proposed Changes on Financial Interest in Marijuana Businesses and Restrictions on Advertising of Marijuana, Marijuana Products and Marijuana Businesses in the Regulations of the Marijuana Control Board*

*There was no comment or recommendation from the Commission on these proposed regulations.*





## City of Homer

[www.cityofhomer-ak.gov](http://www.cityofhomer-ak.gov)

## Homer City Council

491 East Pioneer Avenue  
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October 9, 2017

Marijuana Control Board  
Alcohol Marijuana Control Office  
550 W. 7<sup>th</sup> Avenue, Suite 1600  
Anchorage, AK 99501  
Email: [amco.regs@alaska.gov](mailto:amco.regs@alaska.gov)

Chair Mlynarik and Board Members,

The City of Homer Cannabis Advisory Commission reviewed the current proposed changes to the regulations of the Marijuana Control Board and submitted their recommendation regarding onsite consumption to the Homer City Council for consideration.

After reviewing the information provided by the Commission and the Homer Police Department, the Homer City Council concurs with the Homer Cannabis Commission and supports the prohibition of the onsite consumption of smoking due to the hazardous effects of second hand smoke on emergency personnel that may have to respond to an establishment. However, we also recommend prohibiting onsite vaping and dabbing based on the lack of scientific studies of the effects of secondhand vapors on first responders.

Regards,

Bryan Zak, Mayor  
On behalf of the Homer City Council

Encl.

Memorandum from City of Homer Cannabis Advisory Commission

1 By: Matt Cooper  
2 John Davies  
3 Introduced: 04/27/2017  
4 Adopted: 04/28/2017  
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7 FAIRBANKS NORTH STAR BOROUGH

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9 RESOLUTION NO. 2017 – 18

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11 A RESOLUTION SUPPORTING SMOKE-FREE WORKPLACES IN ALASKA  
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13 WHEREAS, tobacco smoke contains more than 7,000 chemicals,  
14 including at least 69 of which are known to cause cancer<sup>1</sup>, including formaldehyde,  
15 benzene, vinyl chloride, arsenic, ammonia and hydrogen cyanide<sup>2</sup>, and people who are  
16 exposed to secondhand smoke are inhaling many of the same cancer-causing  
17 substances and poisons as smokers<sup>3</sup>; and  
18

19 WHEREAS, numerous studies have found that tobacco smoke is a major  
20 contributor to indoor air pollution and that breathing secondhand smoke is a cause of  
21 disease in healthy nonsmokers<sup>4</sup>, including heart disease, stroke, respiratory disease  
22 and lung cancer<sup>2</sup>; and  
23

24 WHEREAS, the 2006 U.S. Surgeon General's Report, *"The Health*  
25 *Consequences of Involuntary Exposure to Tobacco Smoke,"* concluded that there is no  
26 risk-free level of exposure to secondhand smoke; ventilation and other air cleaning  
27 technologies cannot eliminate exposure of nonsmokers to secondhand smoke; and  
28 smokefree workplace policies are the only effective way to eliminate secondhand smoke  
29 exposure in the workplace<sup>4</sup>; and  
30

31 WHEREAS, the 2010 U.S. Surgeon General's Report, *"How Tobacco*  
32 *Smoke Causes Disease,"* determined that even occasional exposure to secondhand  
33 smoke is harmful<sup>5</sup>; and  
34

35 WHEREAS, there are serious questions about the safety of inhaling the  
36 substances in some e-cigarette aerosol, and e-cigarettes have not been subject to  
37 thorough, independent testing, making it difficult for users to be sure of what they are  
38 actually inhaling; and  
39

40 WHEREAS, some studies have shown that some e-cigarettes can cause  
41 short-term lung changes and irritations and the long-term health effects, are unknown<sup>10</sup>;  
42 and  
43

44 WHEREAS, for every nine smokers who die, one nonsmoker dies from  
45 exposure to secondhand smoke<sup>6</sup>; and  
46

WHEREAS, approximately half of Alaska's population is not protected by a smokefree workplace law<sup>7</sup>; and

WHEREAS, among those who work primarily indoors, young adults aged 18 to 29 are significantly less likely to be protected by a smokefree indoor workplace policy than other Alaskan adults<sup>8</sup>; and

WHEREAS, research in communities where smokefree laws have been adopted has consistently shown neutral or positive economic effects to the hospitality industry following a smokefree workplace requirement<sup>9</sup>; and

WHEREAS, smokefree workplace laws protect people from secondhand smoke<sup>4</sup>, reduce tobacco use overall and reduce health care costs<sup>6</sup>; and

WHEREAS, all Alaskans have the right to breathe smokefree air; and

WHEREAS, the Alaska State Senate is considering Senate Bill 63, Regulation of Smoking, that prohibits smoking in certain places, including certain workplaces;

NOW THEREFORE BE IT RESOLVED, the Fairbanks North Star Borough supports a law in Alaska to make all workplaces 100% smokefree to protect the health and safety of all workers and visitors from the dangers of secondhand smoke and to enhance economic development.

BE IT FURTHER RESOLVED that the Borough Clerk shall transmit a copy of this resolution to Governor Walker, Senator Micciche, and the Interior Delegation.

PASSED AND APPROVED THIS 28<sup>TH</sup> DAY OF APRIL, 2017.

  
Kathryn Dodge  
Presiding Officer

ATTEST:

  
Nanci Ashford-Bingham, MMC  
Borough Clerk

Yeses: Tacke, Cooper, Quist, Roberts, Gray, Davies, Sattley, Lawrence, Dodge  
Noes: None

## SOURCES

1. U.S. Surgeon General, *How Tobacco Smoke Causes Disease*, 2010.
2. American Cancer Society Cancer Action Network, *The Facts About Secondhand Smoke*, 2012.
3. Centers for Disease Control and Prevention, *Health Effects of Secondhand Smoke*, [www.cdc.gov/tobacco/data\\_statistics/fact\\_sheets/secondhand\\_smoke/health\\_effects/#lung](http://www.cdc.gov/tobacco/data_statistics/fact_sheets/secondhand_smoke/health_effects/#lung).
4. U.S. Surgeon General, *The Health Consequences of Involuntary Exposure to Secondhand Smoke*, 2006.
5. U.S. Surgeon General, *How Tobacco Smoke Causes Disease: The Biology and Behavioral Basis for Smoking-Attributable Disease Fact Sheet*, 2010, [www.surgeongeneral.gov/library/reports/tobaccosmoke/factsheet.html](http://www.surgeongeneral.gov/library/reports/tobaccosmoke/factsheet.html).
6. Centers for Disease Control and Prevention. *Smoking-Attributable Mortality, Years of Potential Life Lost, and Productivity Losses—United States, 2000–2004*. Morbidity and Mortality Weekly Report 2008; 57(45):1226–8.
7. Tobacco Program Records, 2012 and Alaska Department of Labor and Workforce Development 2011 Population estimates. [www.almis.labor.state.ak.us/pop/popest.htm](http://www.almis.labor.state.ak.us/pop/popest.htm).
8. Alaska Department of Health and Human Services, 2012 Alaska Tobacco Facts, 2012.
9. Eriksen, Michael & Frank Chaloupka. *The Economic Impact of Clean Indoor Air Laws*. CA: A Cancer Journal for Clinicians. 2007. <http://caonline.amcancersoc.org/cgi/content/full/57/6/367>.
10. American Cancer Society Cancer Action Network, *Commonly Asked Questions about Electronic Cigarettes*, 2014.

1 By: Andrew M. Gray  
2 Matt Cooper  
3 John Davies  
4 Introduced: 10/26/2017  
5 Amended: 10/26/2017  
6 Adopted: 10/26/2017  
7 Immediate  
8 Reconsideration Failed: 10/26/2017  
9 Adopted: 10/26/2017  
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11

12 FAIRBANKS NORTH STAR BOROUGH

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14 RESOLUTION NO. 2017- 42  
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16 A RESOLUTION COMMENTING ON THE STATE OF ALASKA MARIJUANA CONTROL  
17 BOARD PROPOSED REGULATIONS CONCERNING ON-SITE CONSUMPTION OF  
18 MARIJUANA OR APPROVAL OF DESIGNATED AREAS FOR ON-SITE CONSUMPTION  
19 AT LICENSED RETAIL MARIJUANA ESTABLISHMENTS  
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21 WHEREAS, the Alaska Marijuana Control Board (AMCB) met July 12-14, 2017 in  
22 Fairbanks to consider, among other things, updates on implementation of marijuana  
23 establishment licensing, ongoing and proposed regulations projects, and other matters that may  
24 come before it; and  
25

26 WHEREAS, The AMCB subsequently opened their selected proposal for a 60-  
27 day public comment period, after which the proposed language will come back to the AMCB for  
28 action to amend the proposal, adopt it or reject it; and  
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30 WHEREAS, Currently, consumption of marijuana on, in or upon any public place  
31 is prohibited by Alaska Statute 17.38.040 and Chapter 9.12 FNSBC; and  
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33 WHEREAS, Under state law, consumption of marijuana or a marijuana product  
34 on the premises of a licensed retail marijuana store is not allowed, except in a designated area  
35 on the licensed premises as authorized with prior approval of the AMCB and when purchased  
36 on the licensed premises (3 AAC 306.305(a)(4) and 3 AAC 306.310(b)(2)) - yet the AMCB has  
37 not authorized on-site consumption anywhere in the state to date; and  
38

39 WHEREAS, Chapter 9.12 FNSBC does not allow consumption of marijuana on  
40 the premises of a licensed retail marijuana store, but the FNSB Assembly may pass future  
41 legislation to allow on-site consumption if there is action by the AMCB authorizing it; and  
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43 WHEREAS, The FNSB Assembly has filed no protest against 11 retail marijuana  
44 establishment licenses in the borough, and has more applications currently proposed and  
45 anticipated to come before the body in the near future; and  
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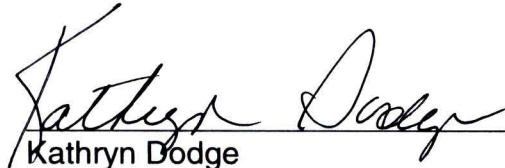
47 WHEREAS, If the AMCB authorizes on-site consumption at designated areas on  
48 licensed premises, the Fairbanks North Star Borough should provide meaningful comments on  
49 the proposed regulations that reflect the values and concerns of the community;  
50

51 NOW, THEREFORE, BE IT RESOLVED that the Assembly of the Fairbanks  
52 North Star Borough provides the following comments on the pending state regulations and  
53 approval of designated areas that allow for on-site consumption on the licensed premises of  
54 retail marijuana stores located in the Fairbanks North Star Borough:


- 55 1. The regulations should contain express language authorizing  
56 municipalities to regulate or prohibit onsite consumption.
- 57 2. Proposed regulations in 3 AAC 306.370(a)(2) are vague and should be  
58 clarified, because subsection (A) specifically references "unless  
59 prohibited by local ordinance or state law," whereas subsection (B) does  
60 not, suggesting that a local ordinance may not regulate onsite  
61 consumption of edible marijuana products.
- 62 3. The regulations should contain strong protections from cannabis smoke  
63 consistent with the Borough's resolution supporting a smoke free  
64 workplace, which is attached.
- 65 4. 3 AAC 306.370(c)(1)(B) should require ventilation that is not only  
66 sufficient to remove visible smoke but sufficient and certified to remove  
67 particles from the air that may harm employees and other patrons.  
68 Moreover, the ventilation requirement should require removal of odors  
69 from exhaust.
- 70 5. The AMCB should consider whether 3 AAC 306.370(c)(1)(C)(i) is  
71 sufficient to provide for both employee oversight of consumption and  
72 protection of employees from smoke.

73  
74 BE IT FURTHER RESOLVED that upon passage and approval, the Borough  
75 Clerk is directed to send signed copies of this resolution by mail and email as soon as  
76 practicable to the Alaska Marijuana Control Board.

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78 PASSED AND APPROVED THIS 26<sup>TH</sup> DAY OF OCTOBER, 2017.

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Kathryn Dodge  
Presiding Officer

ATTEST:

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Nanci Ashford-Bingham, MMC  
Borough Clerk

Yeses: Cooper, Quist, Gray, Davies, Lawrence, Dodge  
Noes: Tacke, Roberts, Sattley





THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of  
Health and Social Services

DIVISION OF BEHAVIORAL HEALTH  
Anchorage Regional Office

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Anchorage, Alaska 99503-5924  
Main: 907.269.3600  
Toll Free: 800.770.3930  
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October 24, 2017

Erika McConnell, Director  
Alcohol & Marijuana Control Office  
550 W. 7<sup>th</sup> Avenue, Suite 1600  
Anchorage, AK 99501

Dear Ms. McConnell,

On behalf of the Division of Behavioral Health, I respectfully submit the following comments and recommendations on proposed regulations 3 AAC 306.370 and 3 AAC 306.990 9 (b) to allow retail marijuana licensees to apply for an onsite consumption endorsement, and to define "marijuana consumption area", respectively.

**We request the Board strike all allowance for smoked, vaporized or aerosolized marijuana consumption in any indoor spaces. Further, regulations should not allow for any reference to HVAC engineer sign off.**

*Exposure to second hand smoke is a serious health hazard.* It is of concern marijuana is most commonly smoked and marijuana smoke is hazardous to lung health. Marijuana smoke contains many of the same carcinogens and toxins as tobacco smoke (Moir, et al, 2008; Wang, et al, 2016). Additionally, there is evidence that smoking marijuana causes chronic bronchitis and contributes to other health problems. Let it be known to the Board that smoking in indoor places poses a serious health risk for workers, customers and all others in the building. The American Society for Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) has concluded that cleaning air, ventilation and separating smokers from nonsmokers does not eliminate health hazards of second hand smoke for either nicotine or marijuana products.

*Smoking is a serious health issue for people with behavioral health disorders.* The Division recognizes that approximately 50% of people with mental illness and addictions smoke, compared to 23% of the general population. Further, smoking-related illnesses cause half of all deaths among people with behavioral health disorders. The Division is particularly

concerned about the disproportionate number of our behavioral health consumers that shall be impacted by allowing indoor smoke in marijuana facilities.

*Alaskans are invested in increasing the percentage of nonsmoking adults and youth.* The Division endorses the Healthy Alaskans 2020 goals to increase the percentage of adults and youth who currently do not smoke cigarettes. Whether they are nicotine or marijuana, all combustible products pose health hazards to those exposed. Allowing indoor smoking in any form will jeopardize these goals but more importantly the health and safety of all those exposed.

*There is concern for the risk to public safety.* It is known that marijuana impairs reaction time, hand-eye coordination and perception of time and distance, all of which can increase the risk of being involved with motor vehicle crashes, (National Academies of Sciences, Engineering and Medicine, 2017). The Division is concerned an increase in consumption in marijuana retail outlets could increase driving under the influence of marijuana.

**Ballot measure 2 when passed, intended to prohibit public consumption of marijuana. Public consumption as proposed by the board shall have unacceptable and unavoidable negative impacts on the public. The Division strongly opposes the allowance of public consumption as described above.** Thank you for your consideration in supporting policies that protect the health and safety of all Alaskans.

Sincerely,

A handwritten signature in blue ink that reads "Randal P. Burns". The signature is fluid and cursive, with a long horizontal stroke at the end.

---

Randal Burns, Director  
Division of Behavioral Health  
Department of Health and Social Services



Municipal Clerk's Office  
Amended with Substitution and Approved  
10/10/2017

Submitted by: Assembly Member Weddleton, Assembly Chair  
Traini, and Assembly Members Demboski,  
Petersen, Constant, and Dyson  
Prepared by: Municipal Clerk's Office  
Reviewed by: Municipal Legal Dept.  
For reading: September 26, 2017

**ANCHORAGE, ALASKA**  
**AR No. 2017-321, As Amended**

**A RESOLUTION OF THE ANCHORAGE MUNICIPAL ASSEMBLY SUBMITTING COMMENTS TO  
THE STATE OF ALASKA ON ITS DRAFT REGULATIONS REGARDING THE ADDITION OF AN ON-  
SITE MARIJUANA CONSUMPTION ENDORSEMENT TO THE RETAIL MARIJUANA LICENSE.**

**WHEREAS**, on August 21, 2017, the State of Alaska Marijuana Control Board (MCB) released  
draft regulations regarding the addition of an on-site marijuana consumption endorsement to the retail  
marijuana license for public comments; and

**WHEREAS**, public comments regarding the draft state regulations for on-site marijuana  
consumption are due to the MCB not later than 4:30 p.m. on October 27, 2017; and

**WHEREAS**, on behalf of the Assembly, the Community and Economic Development Committee  
reviews all new municipal marijuana license applications to ensure adequacy and involvement with the  
community has been addressed; and

**WHEREAS**, as part of the Community and Economic Development Committee's involvement  
with the marijuana license applicants and the community, the Committee encourages public involvement  
in the evolution of the marijuana industry within Anchorage; and

**WHEREAS**, the Community and Economic Development Committee requested public comments  
from Assembly Members, Community Councils, and others to be submitted to the Clerk's Office with the  
intent to collaborate and create Municipal public comments regarding the draft state regulations for on-  
site consumption.

NOW, THEREFORE, THE ANCHORAGE ASSEMBLY RESOLVES:

**Section 1.** The attached comments regarding the proposed changes to the regulations of the  
Marijuana Control Board regarding the addition of an on-site marijuana consumption endorsement to the  
retail marijuana license are approved by the Assembly.

**Section 2.** Upon passage and approval, the Municipal Clerk is directed to send signed copies of this  
resolution with the committee comments as soon as practicable to the Alaska Marijuana Control Board.

**Section 3.** This resolution shall be effective immediately upon passage and approval by the Assembly.

PASSED AND APPROVED by the Anchorage Assembly this 10th day of October, 2017.

  
Chair

ATTEST:

  
Municipal Clerk

**Proposed State of Alaska Draft Regulations Regarding the Addition of an Onsite Marijuana Consumption Endorsement to the Retail Marijuana License.**

3 AAC 306 is amended by adding a new section to read:

**3 AAC 306.370. Onsite consumption endorsement for retail marijuana stores.**

Amendments from the Anchorage Assembly Community & Economic Development Committee Meeting of September 14, 2017 added in legislative drafting format in red; areas of concern formatted in red with comments in black in right-hand column.

Proposed Text of Regulation	Anchorage Assembly Comments
<p>(a) A licensed retail marijuana store with an approved onsite consumption endorsement is authorized to</p> <p>(1) sell marijuana and marijuana product, excluding marijuana concentrates, to patrons for consumption on the licensed premises only in an area designated as the marijuana consumption area and separated from the remainder of the premises, either by being <u>outdoors or</u> in a separate building or by a secure door and having a separate ventilation system;</p> <p>(2) sell for consumption on the premises</p> <p>(A) marijuana bud or flower in quantities not to exceed one gram to any one person in a single transaction, unless prohibited by local ordinance or state law;</p> <p>(B) edible marijuana products in quantities not to exceed 10 mg of THC to any one person in a single transaction; and</p> <p>(C) food or beverages not containing marijuana or alcohol; and</p> <p>(3) allow a person to remove from the licensed premises marijuana or marijuana product that has been purchased on the licensed premises for consumption under this section, provided it is packaged in accordance with 3 AAC 306.345.</p>	
<p>(b) A licensed retail marijuana store with an approved onsite consumption endorsement may not</p>	<p>The provisions of regulations (b)(1)-(b)(12) raise the questions:</p> <ul style="list-style-type: none"> <li>• How does the Municipality enforce the above (1-12)? For</li> </ul>



(1) sell marijuana concentrate for consumption in the marijuana consumption area;  
 (2) allow any licensee, employee, or agent of a licensee to consume marijuana or marijuana product, including marijuana concentrate, during the course of a work shift;  
~~(3) allow a person to consume tobacco or tobacco products in the marijuana consumption area;~~  
 (4) allow intoxicated or drunken persons to enter or to remain in the marijuana consumption area;  
 (5) sell, give, or barter marijuana or marijuana product to an intoxicated or drunken person;  
 (6) allow a person to bring into or consume in the marijuana consumption area any marijuana or marijuana product that was not purchased at the licensed retail marijuana store;  
~~(7) deliver marijuana or marijuana product to a person already known to be in possession of marijuana or marijuana product that was purchased for consumption on the premises;~~  
 (8) sell, offer to sell, or deliver marijuana or marijuana product at a price less than the price regularly charged for the marijuana or marijuana product during the same calendar week;  
 (9) sell, offer to sell, or deliver an unlimited amount of marijuana or marijuana product during a set period of time for a fixed price;  
 (10) sell, offer to sell, or deliver marijuana or marijuana product on any one day at prices less than those charged the general public on that day;  
 (11) encourage or permit an organized game or contest on the licensed premises that involves consuming marijuana or marijuana product or the awarding of marijuana or marijuana product as prizes;  
~~or~~  
 (12) advertise or promote in any way, either on or off the premises, a practice prohibited under this section; or  
(13) allow a person to smoke marijuana products in the marijuana consumption area in any manner that is inconsistent with all applicable state and local second hand smoke control ordinances.

example, per 3 AAC 306.700, marijuana handler permit training covers impairment, effects of consumption, ID verification, and how to intervene to prevent unlawful consumption.

- Does this mean the operator enforces (b)(1)-(b)(12)?

Remove the provision in (b)(3) to allow local governing bodies to regulate tobacco or tobacco products, ~~“allow a person to consume tobacco or tobacco products in the marijuana consumption area....”~~

The language at (b)(7) is confusing and unclear: “deliver marijuana or marijuana product to a person already known to be in possession of marijuana or marijuana product that was purchased for consumption on the premises....” The regulation is not clear and the raises the following questions: Does the consumer only get one chance to buy 1 gram or 10 mgs of THC. If consumers have eaten/smoked all of their purchase, are they still in possession or can they then buy more?

Add a definition of “deliver” to 3 AAC 306.990(b).

<p>(c) An applicant for an onsite consumption endorsement must file an application on a form the board prescribes, including the documents and endorsement fee set out in this section, which must include</p> <p>(1) the applicant's operating plan, in a format the board prescribes, describing the retail marijuana store's plan for</p> <p>(A) security, in addition to what is required for a retail marijuana store, including:</p> <p>(i) doors and locks;</p> <p>(ii) windows;</p> <p>(iii) measures to prevent diversion; and</p> <p>(iv) measures to prohibit access to persons under the age of 21;</p> <p>(B) ventilation. If consumption by inhalation is to be permitted, ventilation plans must be</p> <p>(i) signed and approved by a licensed mechanical engineer;</p> <p>(ii) sufficient to remove visible smoke; and</p> <p>(iii) consistent with all applicable <u>local</u> building codes and ordinances;</p> <p>(C) isolation of the marijuana consumption area from other areas of the retail marijuana store. The marijuana consumption area must</p> <p>(i) include a smoke-free area for employees monitoring the marijuana consumption area; and</p> <p>(ii) be <del>entirely</del> outdoors in a designated smoking area <del>or</del> separated from other <del>retail</del> areas by a wall with a secure door, <u>or in a separate building; and</u></p> <p>(iii) <u>separate from edible consumption area;</u></p>	

<p>(D) unconsumed marijuana, by disposal or by packaging in accordance with 3 AAC 306.345; and</p> <p>(E) preventing introduction into the marijuana consumption area of marijuana or marijuana products not sold by the retail marijuana store; and</p> <p>(2) a detailed premises diagram showing the location of</p> <p>(A) serving area or areas;</p> <p>(B) ventilation exhaust points, if applicable;</p> <p>(C) doors, windows, or other exits;</p> <p>(D) access control points; and</p> <p>(E) adequate separation from non-consumption areas of the retail marijuana store and consistent with 3 AAC 306.370(a)(1).</p> <p>(d) An application for a new onsite consumption endorsement must meet the requirements of 3 AAC 306.025(b) and include in that notice the license number of the retail marijuana store requesting the endorsement.</p> <p>(e) The non-refundable fee for a new <del>or renewal</del> onsite consumption endorsement is <del>\$1,000-2,000</del>. <u>The non-refundable fee of a renewal onsite consumption endorsement is \$1,000.</u></p>	<p>The suggested increased fee is to provide \$1,000 to cover local cost of processing the license and inspecting a new consumption site</p> <p>The Assembly Committee recommends reduction in the license fee in subsequent years. The local governing body requests 50% of this application fee.</p>
<p>(f) The retail marijuana store holding an onsite consumption endorsement under this chapter shall</p> <p>(1) destroy all unconsumed marijuana left abandoned or unclaimed in the marijuana consumption area in accordance with the operating plan and 3 AAC 306.740;</p> <p>(2) maintain a ventilation system that directs air from the marijuana consumption area to the outside of the building through a filtration system <del>adequate to reduce odor that does not emit an odor that is detectable by the public from outside the public consumption site except as allowed by a local government conditional use permit process;</del></p>	



<p>(3) include in the security plan how the licensee intends to restrict access to the marijuana consumption area to persons under the age of 21;</p> <p>(4) monitor patrons for overconsumption;</p> <p>(5) display all warning signs required under 3 AAC <del>306360</del>.360 within the marijuana consumption area, visible to all consumers;</p> <p>(6) provide written materials containing marijuana dosage and safety information for each type of marijuana or marijuana product sold for consumption in the marijuana consumption area at no cost to patrons; and</p> <p>(7) label all marijuana or marijuana product sold for consumption on the premises as required in 3 AAC 306.345.</p>	
<p>(g) The right of local governments to protest the issuance or renewal of individual retail marijuana store onsite consumption endorsements is separate from the right to protest the issuance of a retail marijuana store license. Not later than 60 days after the <u>local government receives</u> <del>director sends</del> notice of an application for a new or renewal onsite consumption endorsement, a local government may protest the application by sending the director and the applicant a written protest and the reasons for the protest. The director may not accept a protest received after the 60-day period. If a local government protests an application for a new or renewal onsite consumption endorsement, the board will deny the application unless the board finds that the protest is arbitrary, capricious and unreasonable.</p> <p>(h) A local government may recommend that the board approve an application for a new or renewal onsite consumption endorsement with conditions. The board will impose a condition recommended by a local government unless the board finds the recommended condition to be arbitrary, capricious and unreasonable. If the board imposes a condition recommended by a local government, the local government will assume responsibility for monitoring compliance with the condition unless the board provides otherwise.</p>	

<p>(i) The holder of an onsite consumption endorsement must apply for renewal annually at the time of renewal of the underlying retail marijuana store license.</p>	
<p><b>3 AAC 306.990 (b)</b> is amended to add the following subsections: (27) “marijuana consumption area” means a designated area within the licensed premises of a retail marijuana store that holds a valid onsite consumption endorsement, where marijuana and marijuana products, excluding marijuana concentrates, may be consumed. (28) “retail marijuana store premises” means an area encompassing both the retail marijuana store and any marijuana consumption area. <u>(29) “deliver” means ....</u> <u>(30) “diversion” means ....</u></p>	<p>Add definitions for “deliver” and “diversion.”</p>

Honorable Board Members;

This letter is issued with the support and approval of the AACOP Board of Directors.

It is the mission of the Alaska Association of Chiefs of Police (AACOP) to support law enforcement agencies around the state and to advocate for the safety of all persons, including first responders. It has been brought to our attention that the Marijuana Control Board is accepting public input on whether onsite consumption, smoking and vaping of marijuana, should be allowed on licensed premises. Alaska is currently the only state considering this option and as such it should be carefully considered by all parties. We oppose this proposition based on a variety of applicable standards.

On a substantive level and using tobacco smoking as a parallel; nearly all localities in the State have enacted codes that prohibit smoking in restaurants, bars and other public places. This is based largely on the health impacts of second-hand smoke but also on social platforms to enhance accessibility of public to all persons without the fear of health hazards. To allow on-site consumption of marijuana is counter-intuitive. Smoking is banned in nearly all public areas. This should apply to both tobacco and marijuana. In the same vein, the Marijuana Control Board has rejected the proposal for marijuana smoking clubs. In many ways, the 'on-site smoking rooms' proposal is a repackaging of the same concept. It should be recognized as such.

In terms of health risks: any 'second-hand smoke' poses a health risk to people other than the primary consumer. Due to the lack of extended research, many of the risks of marijuana smoke are unknown. What is known is that exposure to 'second-hand marijuana smoke' includes both tar and byproducts of combustion, but also to the psychoactive properties of marijuana.

As public policy, it is contrary to customary care standards for the State to sanction a known hazardous practice that exposes first responders to the inhalation of a substance that currently has unknown second-hand smoke health implications. National Institute on Drug Abuse (NIH) has shown that THC was present in the blood of non-smokers who have spent time in a "well-ventilated space with people casually smoking marijuana." First responders will inevitably be required to respond to these locations to handle unruly patrons, incapacitated patrons, and or health emergencies and these "smoke rooms" pose an unacceptable risk of exposure.

These establishments would be open to the public. And like any other location, police, fire and medics may likely respond to these locations for any number of emergent issues. AACOP opposes on-site consumption in any public locations on the grounds that second hand marijuana smoke is hazardous to the health of anyone who comes in contact with it – including first responders.



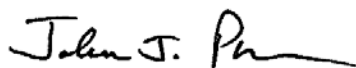
In terms of regulation, both marijuana and alcohol have intoxicating effects. The mantra of the pro-marijuana lobby is for the similar regulation of marijuana and alcohol. AACOP is in agreement that there should be parallels to regulation. Neither should be consumed by minors; consumed in public; or marketed in areas where minors may be present. In the same manner, public education on the effects of these substances should be a foremost concern in terms of State policy.

However, marijuana and alcohol can't simply be regulated the same. They are different substances that are introduced into the body in different ways. In this regard, AACOP does not oppose the on-site consumption of marijuana edibles. Just as a person is able to consume alcohol in a liquor establishment; people should be able to consume edibles in a marijuana establishment. These behaviors are parallel and have no external effect on others, including first responders.

It is for these reasons that the AACOP Officers and Board of Directors oppose on-site smoking rooms in marijuana establishments.

We are available and interested in participating in dialogue about this issue. The people of Alaska have voted to allow the sale and consumption of recreational marijuana. However, we strongly advocate that the State remain within the confines of the original proposition as presented: personal use in a private setting.

With Sincere Regards,



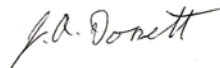
John J. Papasodora  
Chief of Police, Nome Police Department  
President  
Alaska Association of Chiefs of Police



Ronda Wallace  
Chief of Police, Kodiak Police Department  
Secretary  
Alaska Association of Chiefs of Police



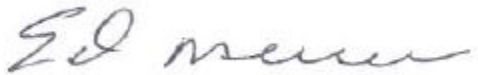
Mike Holman  
Chief of Police, Unalaska Police Department  
Vice-President  
Alaska Association of Chiefs of Police



Josh Dossett  
Deputy Chief, Ketchikan Police Department  
Treasurer  
Alaska Association of Chiefs of Police



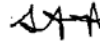
Brad Johnson  
Deputy Chief, Fairbanks Police Department  
Past President  
Alaska Association of Chiefs of Police



Ed Mercer  
Chief of Police, Juneau Police Department  
Board Member  
Alaska Association of Chiefs of Police



Thomas Clemons  
Chief of Police, Seward Police Department  
Vice-Chair  
State Association of Chiefs of Police  
(SACOP)



Steve Dutra  
Chief of Police, North Pole Police Department  
Board Member  
Alaska Association of Chiefs of Police



Board Member  
Captain, C Detachment Commander  
Alaska Association of Chiefs of Police

To: Members of the Alaska Marijuana Control Board  
CC: Erika McConnell, Director; Jed Smith, Local Government Specialist  
From: Anna B. Brawley, Turnagain resident, Anchorage  
Date: Monday, September 25, 2017  
Re: Comments on Proposed Onsite Consumption Regulations (3 AAC 306.370 and -990)

The following comments are in response to the proposed onsite consumption endorsement for marijuana retail stores. As always, thank you for the opportunity to comment and participate in this process—a policy decision of this magnitude deserves robust public dialogue.

---

## ***Overall Comments on Proposed Endorsement***

**I oppose the concept of onsite consumption at marijuana retail stores at this time.** I believe this concept continues to be advanced by the Marijuana Control Board without sufficient public discourse about the idea, particularly because we would be the first jurisdiction in the U.S. to allow this activity, and that there is no current legal authority in state statute to support the Board's ability to allow this activity.

**Ballot Measure 2 was clear, the public consumption of marijuana was intended to remain illegal until subsequent legislative action directed otherwise.** The language in the ballot measure, voted on by the public and now enacted in AS 17.38.040, does not allow for public consumption of marijuana. The first regulations adopted by the Board in February 2015 to define "public" supported this restriction: the draft license regulations released for public comment in fall 2015 specifically prohibited public consumption and onsite consumption at retail stores, and were only changed with an amendment during a Board meeting, after public comment was closed. I am also aware of the subsequent rounds of public comment on similar draft regulations over the last several months, but still believe that the underlying legal issues remain, and that the Board cannot act on its own to allow this activity as an add-on to a license type which does not currently allow this activity.

**To date, no other state has allowed, through legislation or regulation, this activity.** The closest policy found in states that legalized marijuana production and sale is that of the City of Denver, which has created a mechanism to allow people to "BYOM" marijuana products purchased elsewhere to restaurants that otherwise do not sell the products, a related but separate concept to this proposal. Existing state law has established that retail stores are considered public places: AS 18.80.300(16) defines a public place as "a place that caters or offers its services, goods, or facilities to the general public," even if (like alcohol and marijuana establishments) the law restricts who can enter the premises, in both cases adults at least 21 years of age.

Furthermore, while I thoroughly understand the general concept of an endorsement as an add-on that allows the licensee to expand their operational activities or physical premises, **I believe that this activity would be more appropriately established as a new license type in statute**, meaning that it must be brought to the Legislature for deliberation and inclusion in state law. The equivalents in AS Title 4, the state's alcohol laws, are a package store (AS 04.11.150, sales for off-site consumption only) and several separate retail licenses that allow onsite consumption (beverage dispensary license in AS 04.11.090, restaurant or eating place license in AS 04.11.100, etc.). If the intent of the ballot measure, and the motivation of the originator of

that ballot measure, was to *truly* regulate marijuana like alcohol, and not just to take political advantage of the public's current attitudes toward alcohol as a way to normalize marijuana consumption, it necessarily follows that allowing onsite consumption on licenses premises must be defined as its own license type, as it is a distinctly different type of activity than selling products for consumption off the premises. Ballot Measure 2 clearly outlined the allowed activities and general license types that the state should create, and the equivalent of a bar, restaurant or similar establishment was not among them.

**Not only is it inappropriate for the Board to consider such a significant public policy without this clear statutory basis, but it sets a troubling precedent for this Board to overstep its statutory authority in future decisions,** whether about regulations or decisions on a particular license. There are many documented cases of such decisions related to the Alcoholic Beverage Control Board, which has generated years of legal disputes because granting a license confers quasi-property rights to the holder, and therefore makes these types of imprudent decisions difficult to reverse in the future and. I believe the Board has an important role to play in overseeing the licensing system overall, and should be mindful of the future impacts of its present decisions.

**I believe that allowing this activity is not in accordance with the language or stated intent of the ballot measure, or the subsequent laws put into place in AS 17.38,** and believe that it is imprudent of our state to allow this activity without careful consideration of its impacts, and to use an administrative process (adopting regulations) to settle what should be a legislative issue with robust public debate. **I urge the Board to seek additional legal counsel on their ability to act on this matter,** and to make public any legal opinion from the Department of Law or documentation of the legal authority (if any) that would allow the Board to enact regulations to allow this activity, which seems to be expressly prohibited in statute.

### ***Questions about Draft Regulation***

The concept of allowing onsite marijuana consumption at retail stores raises several important policy and logistical questions, many of which are not specifically addressed in the regulations but which should be considered as part of the policy- and decision-making process. I would be interested in the Board's response to these questions, but recognize they may or may not be able to be addressed in the regulation per se.

- **How does the Board propose to address, or direct businesses to address, the potential public safety issues of individuals leaving an establishment after using marijuana products, and still being significantly under the influence?** Many communities do not have sufficient public transportation options and are not compactly developed enough that it is feasible to assume a person would be able to walk home or take other forms of transit. Inhaling or ingesting marijuana, even in moderate quantities, can render a person sufficiently incapacitated to drive for at least two hours, and often for an even longer period of time when ingesting edibles.
- **How will customers safely get home, or back to their hotel, or another destination? How will drivers on roads adjacent to these establishments be protected from drugged drivers?** I live close to Spenard Road and near Midtown in Anchorage, a corridor and area which has struggled for decades with the impacts of having many alcohol licenses and being a location that attracts many intoxicated people. Many communities are smaller, but are equally car-dependent and will struggle with these same issues.

- **How does the Board propose to address, or direct businesses to address, the realistic possibility that employees will be exposed to secondhand marijuana smoke and/or become partially intoxicated in the course of their work,** when they are attending to customers in the onsite consumption area for a several-hour shift? The regulation [section (c)(1)(C)] requires businesses to address these issues, but the language does not sufficiently address what happens when the employee enters the consumption area, and furthermore appears to undermine the ability of the business to meet the requirement in (b) to not “allow any licensee, employee or agent of a licensee to consume marijuana or marijuana product [...] during the course of a work shift.”
- **How does the Board propose to address, or direct businesses to address, the odor and secondhand smoke issues associated with an outdoor seating area at an establishment adjacent to a parking lot, residential neighborhood, or businesses who are frequented by parents/adults with children?** This may be a feasible option for businesses with their own standalone building on a large property, and surrounded by their own parking lot, but seems problematic at best for many communities with compact downtowns, or strip-mall developments, or otherwise with high potential for spillover. Again, alcohol establishments often provide outdoor seating where you can consume a drink, but consuming alcohol typically does not involve a specific odor or potential for secondhand exposure and intoxication. Smokefree laws typically include a required minimum distance from a building, or entrance to a building, recognizing that smoking immediately outside of a building exposes others who enter and leave the building to that smoke, or those next to open windows, or especially if a smoker stands next to the outside air intake system.
- **How does the Board propose to address issues related to the consumption of marijuana-infused edibles, as they take longer for the body to metabolize and have been shown to be susceptible to accidental overconsumption?** Unlike smoked or vaporized THC, which is absorbed through the lungs quickly and processed in the space of two hours, THC absorbed through the digestive system takes a longer time to take effect and a longer time to fully work through the body. There are numerous stories of users unaccustomed to marijuana edibles ingesting a large amount without realizing its effects. Unfortunately, this is likely to be a common situation for people who are going to these retail establishments for the first time or who have not used edibles before. How will businesses accommodate customers who stay for more than two hours? How can a business adequately control against overconsumption? I believe that the proposed 10 mg serving size will mitigate the possibility of overconsumption, but it remains a real risk depending on the level of enforcement for the per-person consumption limit, whether or not someone uses multiple methods simultaneously, and/or whether a person consumes marijuana immediately before entering the establishment and then consumes even more.
- **What level of liability and responsibility will a marijuana business have for the conduct of their customers immediately leaving their establishment?** The regulations outline specific requirements and responsibilities for the business, but there are still unanswered questions about whether and how a business would be responsible for a customer who leaves their store and immediately drives under the influence, whether or not they cause damage or injury, but especially if they do. I recognize the business’s limited ability to control behavior outside their walls, and have concerns about how a business would be held responsible, or perceived responsibility in the court of public opinion, for a

serious incident. Businesses should have their own concerns about the implications of this proposal. I do not believe the correct answer is to hold businesses completely liable for the conduct of their customers after the fact, but this reality needs to be carefully considered and the business's liability clearly outlined. It is also not appropriate, as a policy, to completely hold these businesses harmless from any future problems, as this creates a disincentive for them to be self-enforcing, if they know that they will not be penalized.

### ***Specific Comments by Regulation Section***

Notwithstanding my general opposition to this concept and the process by which it is being considered, I recognize that there is considerable political pressure from the marijuana industry and others to enact this policy, and that the structure of the Marijuana Control Board (which currently includes two marijuana industry representatives) is such that there is a good chance this regulation will be adopted in some form in the near future. So, my comments should not be interpreted as support for the concept in any way, but as additional detailed comments on the specifics of the proposal should it be adopted in this form. I do support most of the specifics in the ordinance as ways to mitigate some of the serious potential negative consequences.

All section references below refer to proposed 3 AAC 306.370. No comments on -990.

**-(a)(2) I support including a limit on what can be sold for onsite consumption.** I support allowing sales of food or beverages, provided they do not contain alcohol. I am somewhat concerned about the allowance of sale of one gram per person, as this seems like a significantly larger serving than one person could reasonably consume in the space of one or two hours. While I understand that it is common for stores to sell pre-packaged product in one-gram amounts, this seems somewhat excessive and may be the equivalent of selling someone a six-pack of beer, as opposed to a single mixed drink or pint at a bar. Consider reducing the amount of bud or flower per person, and let stores package their products in smaller amounts accordingly. Some stores appear to be offering pre-rolled joints for sale, this may be a better benchmark for a serving limit, depending on the amount of product in a typical joint.

**-(a)(2) I support allowing sale of food and non-alcoholic beverages.** As noted further below, considering how these policies will influence social norms in the future is very important. Allowing service of food and other products, other than alcohol, may encourage moderate consumption and a culture closer to that of a restaurant or café.

**-(b)(1) I support not allowing consumption of marijuana concentrates.** These products are by definition extremely potent, and are unlikely to be the product of choice for a casual or first-time user. Banning these products from the beginning helps form some of the required norms about marijuana use which are not yet established in the broader community, just as drinking extremely potent or excessive amounts of alcohol is not considered a healthy norm in our society. This comment should not be interpreted as a request to ban these products outright, but to point out that policies like these will be responsible for setting social norms in the future. In the realm of alcohol control, Alaska and many states have already banned extremely high alcohol content products for this same reason (in Alaska, anything over 76% ABV, AS 04.16.110).

**-(b)(2) and (c)(1)(B) and (c)(1)(C) and (c)(1)(E), I do not believe businesses will be able to adequately protect employees' health, while allowing them to effectively monitor customers' behavior, if smoking is allowed.** Keeping employees in a separate room will limit

their ability to watch customers' behavior, and inevitably they will spend considerable time in the consumption area bussing tables or responding to requests. And as noted above, no ventilation system will protect against secondhand smoke. Like alcohol, marijuana is a mind-altering and intoxicating substance. **Unlike alcohol, however, and like tobacco, combusting or heating marijuana as vapor for inhalation creates secondhand smoke**, with the following concerns:

- Combusted material has many of the same carcinogens present in tobacco and any other burned substance.
- Vaporized material may have lesser health impacts, but in the absence of robust research into the health effects of marijuana in the U.S., we cannot conclude it is “harmless” or make claims about its effects relative to combusted marijuana.
- Ventilation systems have been shown to be insufficient to remove all of the harmful particles in combusted smoke, and therefore are not sufficient protection for public health. The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) publishes indoor air quality standards and have included marijuana and e-cigarette smoke in its definition of “environmental tobacco smoke,” for which the only sufficient protection is to not allow use of these substances in an indoor setting.
- Regardless of the heating method, secondhand marijuana smoke may be not only hazardous to health, but still contains psychoactive compounds that can induce the same effects as when inhaled directly.
- A recent *Health Affairs* article, “A Safer Way to Legalize Marijuana” (September 2017) posits that we now have a unique opportunity to create evidence-based public policy around marijuana use, unlike the policies we enacted for tobacco, decades after use had become normalized and after we learned the serious health harms of using those products. While the evidence base is not yet comprehensive, we know that inhaling combusted smoke is a bad idea. As public policymakers, the Board and other governing bodies have the responsibility to consider the evidence available and to protect public health and safety—this responsibility should be foremost and not secondary to that of protecting or enhancing specific business interests. Regulating marijuana does not have to be a referendum on whether or not marijuana is a good idea, and there is clear evidence that while smoking combusted marijuana is common practice now, it is not the best delivery method for the psychoactive cannabinoids, and is likely detrimental to health. We have an opportunity to establish new social norms, for recreational use as well as medical use.  
<http://healthaffairs.org/blog/2017/09/08/a-safer-way-to-legalize-marijuana/>
- The Board must carefully consider the legal implications of its decision, and the very real possibility that establishing a precedent for legal indoor consumption of *marijuana* smoke will re-open the already-established legal precedent that indoor consumption of *tobacco* smoke is a serious public health risk. It is easy to say that the two substances are different, which they are. However, it is equally easy to draw parallels between the two, and treating one differently than the other opens the door for legal challenges from the tobacco industry, in spite of decades of evidence and public policy decisions that have greatly contributed to the decline in tobacco use rates, and deaths due to tobacco use and secondhand smoke. Please do not rule in favor of one industry without considering the possibility of a legal challenge from another industry.

**-(b)(3 through 12) I support all of these provisions, as they are consistent with those for alcoholic beverage establishments outlined in AS 04.16.015 and other existing law.**

**-(c)(1)(C)(ii) I do not support allowing smoking at designated outdoor areas if immediately surrounded by other businesses,** for the reasons described on page 3. If this activity is still allowed, I would strongly encourage local governments to place further restrictions on the location or setting for this activity.

**-(f)(2) As noted above, I do not believe that ventilation will protect public health against the effects of smoke, and the draft language only addresses odor, not particulate matter in smoke that is known to be a health risk.**

**-(f)(6) I support the requirement of businesses to provide dosage and safety information about the products they are offering to customers, at no cost.**

**-(g and h) I strongly support the right of local governments to protest the issuance of this endorsement, separate from the retail license itself.** This is an important feature of Title 4 as it relates to alcohol, and is consistent with the law and spirit of Alaska, that local governments should have self-determination and local control. Furthermore, I support local governments' ability to require conditions on the license or endorsement according to local conditions, particularly if neighbors or others have valid concerns about negative impacts from this activity in the specific proposed location. There is clear precedent established in Title 4 for alcohol licenses (AS 04.11.480 and related laws), and this should be retained for marijuana licenses.

**However, I also strongly encourage the Board to amend the regulation to also include similar provisions for an individual to object to the endorsement and/or license, consistent with what is afforded for individuals in AS 04.11.470 for alcohol licenses.** Local governments often have public review processes in which they invite public comment on an alcohol license application, renewal or transfer. However, not every community includes such broad input, and often local governments restrict their comments to whether the licensee has met the various administrative requirements and tax obligations, not whether or not it is a good idea. Furthermore, this also limits the scope of public comment on an application to a specific type of entity, and not other stakeholders who may also have legitimate concerns, including surrounding business owners, neighbors, or individuals with (for example) knowledge that the business owner has not been a responsible operator and would be concerned about how the new endorsement would be enforced.

While developing the concept of endorsements under the Title 4 Review project over the last five years, the stakeholder group discussed at length the importance of local review for alcohol licenses, particularly because the ultimate decision lies only with the Board. If we are to treat marijuana licenses like alcohol licenses, we should establish the same public review process in order to maximize the Board's ability to understand the larger community's perspective on the application—while remaining the Board's decision whether or not to act on an objection.

I again thank the Board for consideration of these comments, and would be happy to provide further information about any of the points made above.

Sincerely,

Anna Brawley



**From:** AMIA Association  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Support for On\_Site Consumption  
**Date:** Friday, October 27, 2017 3:28:09 PM

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Carroll E. (Cary) Carrigan

11801 Toy Dr.

Anchorage, AK 99515

27OCT2017

Re: Support of On-Site Consumption Regulations

To The MCB,

I am writing today in support of the on-site regulation as proposed. It has been difficult getting to this point and I know it has been difficult for the Board judging by the number of people who discussed this with me.

This is the interesting part of my job with the AMIA, it allows me to listen to a large number of Alaskans in all regions of the state. The overwhelming majority want to see these regulations passed and for this issue to move forward. We would benefit from some open forums put on by the MCB about an issue like this. If AMCO would hold some open meetings on specific topics, it would be helpful. I know this has been discussed.

Most of the topics brought up to me:

- There are bars; aren't we supposed to be regulated like alcohol?
- It is time to tackle this. Do we need to wait longer?

- The tourists need to be able to access marijuana, why can't we afford them an opportunity to consume?
- If marijuana is legal, and votes seem to have recently solidified that opinion in the general population, why can't we figure out the logistics to make this possible?

These are all valid questions. The biggest pushback to On-Site Consumption seems to be from The Lung Association and the Cancer Society. I understand their position, anything that is not clean air is a threat. So please consider the S'More. One of my favorites. And on the list of pollutants, since anything which burns is on the list. There is nothing worse than a smoking marshmallow destroying the planet. My point is that there are ways to accomplish on-site consumption and not run down the street with our hair on fire.

We see constant improvement in ventilation systems and controls for managing air quality. We need to move the agenda that was voted on by the state forward, and allow on-site consumption in a controlled way that does not endanger the public. It is achievable. There are solutions for minimizing exposure, for protecting the public, and allowing consumption. We can work beneficially together, and everyone wins.

Thank you for your time on this,

Carroll E. Carrigan  
Executive Director  
Alaska Marijuana Industry Association  
[www.alaskamarijuanaindustry.org](http://www.alaskamarijuanaindustry.org)



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**From:** Troy Foley  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Fwd: Public Comment regarding On-Site Consumption  
**Date:** Wednesday, August 23, 2017 2:49:03 PM  
**Attachments:** [PublicComment-OnsiteConsumption.docx](#)

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Members of the Marijuana Control Board:

It is imperative in a fully functioning democracy that science informs government. To that end, I have listed several scientific articles in support of enacting and regulating on-site consumption in Alaska.

A February 2017 article from The New England Journal of Medicine offers: "Most studies suggest that driving under the influence of alcohol is more dangerous than driving under the influence of cannabis..."<sup>1</sup>

A February 2015 report from the US Department of Transportation offers the contention that much of the increased risk of vehicular accidents due to THC consumption is in fact not a result of THC usage but a mischaracterization of the fact that the populations most likely to be involved in an accident also fall into the populations most likely to happen to consume THC on a regular basis: "This finding indicates that these other variables (age, gender, ethnicity and alcohol use) were highly correlated with drug use and account for much of the increased risk associated with the use of illegal drugs and with THC."<sup>2</sup>

The most recent statistics from the Alaskan state Department of Transportation website shows that from 1994 to 2009 alcohol was involved in not less than 30% of traffic-related fatalities for any single year. In fact, 6 years out of the 16 displayed show alcohol as a factor in more than **half** of traffic-related fatalities in Alaska.<sup>3</sup>

With this information in mind, I recommend that the board recognize the public health benefit of encouraging cannabis use as a safer alternative to alcohol use by way of enacting the draft regulation that authorizes the licensing of on-site consumption of marijuana. The existence and continued endorsement of on-site alcohol consumption at the cost of 10,265<sup>4</sup> American lives in the year of 2015 alone warrants at least a trial period of not less than 5 years for on-site marijuana consumption in the interest of preserving the public safety.

Thank you for your consideration of these facts.

Troy Foley

Owner, Foley's Irish Green

License Number 12825

1. <http://www.nejm.org/doi/citedby/10.1056/NEJMp1614783#t=references#t=citedby>
2. [http://www.nhtsa.gov/staticfiles/nti/pdf/812117-Drug\\_and\\_Alcohol\\_Crash\\_Risk.pdf](http://www.nhtsa.gov/staticfiles/nti/pdf/812117-Drug_and_Alcohol_Crash_Risk.pdf)
3. [http://www.dot.state.ak.us/highwaysafety/assets/Alcohol\\_related\\_fatal\\_crashes\\_compared\\_to\\_total\\_fatal\\_crashes\\_94-09.pdf](http://www.dot.state.ak.us/highwaysafety/assets/Alcohol_related_fatal_crashes_compared_to_total_fatal_crashes_94-09.pdf)
4. <https://www.nhtsa.gov/risky-driving/drunk-driving>

PS. I am unsure if my original submittal of this email fell "before" the public comment period, and am submitting again in the event that it did and will not be considered.

**From:** Sig & Arlene Strandberg  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** 10-27-17 Comment and Protest on proposed 3 AAC 306.370 allowing retail marijuana licensees to apply for an onsite consumption endorsement.  
**Date:** Friday, October 27, 2017 4:14:40 PM

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## 10-27-17 Comment and Protest on proposed 3 AAC 306.370 allowing retail marijuana licensees to apply for an onsite consumption endorsement.

We challenge and protest the legality of proposed 3 AAC 306.370 that would allow retail licensees to apply for an onsite marijuana consumption endorsement. This is predicated on the statute authorizing retail marijuana establishments specifically providing for both a retail marijuana premises and on the same premises for a marijuana consumption area. The necessary precedent in Alaska Statutes is separate specific authority (NOT IN STATUTE NOW) for retail marijuana licensees to operate an adjoining/on premises consumption space. Other states have enacted statutory schemes that couple marijuana retail operations with conditional endorsements. That is, other states authorize and distinguish between retail establishment sales of marijuana products and separate on premises space for the consumption of purchased marijuana products. The Alaska Statutes currently do not provide the legal means by which retail licensees may obtain an endorsement for on premises consumption of marijuana products.

Sigvald J. & Arlene C. Strandberg



Virus-free. [www.avast.com](http://www.avast.com)

Alaska Marijuana Control Board

October 2017

Re: Proposed Regulations Allowing Onsite Consumption



Dear Alaska Marijuana Control Board Members:

**On behalf of the American Cancer Society Cancer Action Network (ACS CAN), I am writing to oppose the current draft regulations for onsite marijuana consumption.** I provided comments when this proposal was previously under review by the Marijuana Control Board (MCB), and have updated these recommendations to reflect your latest draft regulations.

**Specifically, ACS CAN opposes onsite marijuana smoking or aerosolizing because of the health hazards to non-users, both employees, and potentially to adjacent businesses.** If the MCB decides to allow onsite consumption by smoking or aerosolizing, it should be limited to stand alone or freestanding buildings versus at establishments sharing common walls, internal overhead space or ventilation systems. For your reference, House CS for Senate Bill No. 63 (CRA), the state legislation currently under consideration by the legislature to create smoke-free public places and workplaces, contains language defining the term “freestanding”.

## **BACKGROUND**

### **Health Effects of Exposure to Marijuana Smoke**

Smoking marijuana poses significant risks to users and to those in close proximity to use. Factors including the illegal status of marijuana under federal law and co-occurring behaviors such as cigarette smoking have made research on the health effects of exposure to marijuana smoke challenging. What is known is:

- The most common way marijuana is used is through inhalation.<sup>1</sup>
- Marijuana smoking affects lung function including inflammation of the large airways, increased airway resistance, and lung hyperinflation.<sup>2</sup>
- Marijuana smoke contains the same fine particulate matter found in tobacco smoke that can cause heart attacks.<sup>3</sup>
- Marijuana smoke contains many of the cancer-causing substances found in tobacco smoke. This raises the potential for marijuana smoke to potentially cause cancer, although few studies have been done to determine a link.<sup>4</sup>

## **CURRENT PROPOSAL RECOMMENDATIONS**

### **Conflict with Local Requirements**

Proposed 3 AAC 306.370 (a)(2)(A) includes language that addresses the relationship between onsite consumption and local ordinances or state law. It suggests that a local ordinance can prohibit onsite consumption of marijuana bud or flower within a particular

jurisdiction, although it is not clear whether the intent of this language is to address only the quantity of how much can be consumed onsite. The language does not indicate that a local ordinance can prohibit onsite consumption of edible marijuana products. ACS CAN supports language that allows a local ordinance to prohibit onsite marijuana smoking (and aerosolizing). Following the logic of this recommendation, the MCB will presumably want to expand this local authority to include edible products.

**ACS CAN recommends eliminating any potential confusion by redrafting this section to make it explicit that a local jurisdiction can act to prohibit onsite consumption by smoking (including aerosolizing), or as edibles, or as both within its boundaries. Language should be added to ensure this authority to preclude onsite consumption within its boundaries applies not only to municipalities, but to any unincorporated community as defined by state law.** This authority is separate from the local option to prohibit marijuana establishments, or the language in proposed 3 AAC 306.370 (g) that provides a right of a local government to protest the issuance or renewal of an individual retail marijuana onsite consumption endorsement.

### **Onsite Use of Tobacco and Tobacco Products**

Proposed 3 AAC 306.370 (b)(3) prohibits the onsite use of tobacco or tobacco products within a marijuana onsite consumption area. **ACS CAN fully supports this provision** and recommends the language be expanded to cover any non-marijuana e-cigarette or electronic smoking device or product. We are aware of other comments suggesting elimination of this provision and leaving it as a local choice. ACS CAN disagrees with this suggestion and notes that many jurisdictions in Alaska (including most second-class boroughs) do not possess health powers allowing the local regulation of tobacco use in public places or workplaces.

### **Ventilation Ineffective**

The proposed regulations include several references to using ventilation as a means to reduce or eliminate impacts from onsite marijuana consumption by smoking. 3 AAC 306.370 (c)(B) requires a system that is “sufficient to remove visible smoke”, while 3 AAC 306.370 (f)(2) requires ventilation “adequate to reduce odor”. ACS CAN makes note of an internal conflict in the applicable standard for compliance.

Of greater concern is the lack of a standard to eliminate health hazards from exposure to secondhand marijuana smoke or aerosol. I note and appreciate the intent to protect employees both in the marijuana business and adjacent businesses. However, **this cannot be accomplished by “a secure door”**.

Ten years ago, the US Surgeon General released a comprehensive report entitled *The Health Consequences of Involuntary Exposure to Tobacco Smoke*. **The Surgeon General concluded that separating smokers from nonsmokers, cleaning the air,**

**and ventilating buildings cannot eliminate exposure of nonsmokers to secondhand smoke.** The only effective way to fully protect nonsmokers from exposure to secondhand smoke is to completely eliminate smoking in indoor public spaces.<sup>5</sup>

The American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) affirmed in 2010, and re-affirmed in 2013, that the only means of effectively eliminating the health risk associated with indoor exposure is to prohibit smoking activity.<sup>6</sup> More recently, **ASHRAE has added both secondhand marijuana smoke and electronic cigarette aerosol to its definition of secondhand smoke.**

According to ASHRAE:

- No other engineering approaches, including current and advanced dilution ventilation or air cleaning technologies, have been demonstrated or should be relied upon to control health risks from secondhand smoke exposure in spaces where smoking occurs.<sup>7</sup>
- While some engineering measures may reduce secondhand smoke exposure and some of the corresponding odor and irritation, smoke-free air cannot be accomplished with any engineering or other approaches besides prohibiting smoking.<sup>7</sup>

## **Local Government Right to Protest**

Proposed 3 AAC 306.370 (g) grants the right of a local government to protest the issuance of individual endorsements. There is language requiring the MCB to deny an application if the local government objects unless the board finds the objection is “arbitrary, capricious or unreasonable”. No definition of this term is included. 3 AAC 306.370 (h) anticipates the possibility of local conditions that can be imposed on an individual endorsement, subject to the same standard that such conditions are not “arbitrary, capricious or unreasonable”. Again, this term is not defined.

ACS CAN suggests this should be changed to require an affirmative action of support by the local jurisdiction to allow such an endorsement under (g), thereby eliminating the need to determine whether or not such a decision is “arbitrary, capricious or unreasonable”. We also suggest a similar change in (h) to allow a local jurisdiction authority to impose conditions as determined by that jurisdiction.

ACS CAN makes note of the same question about broadening this authority to unincorporated communities, not just local municipalities. We suggest amending both (g) and (h) accordingly.



## Summary

Addressing the issue of marijuana use more broadly, the American Cancer Society supports the need for more scientific research on cannabinoids for cancer patients, and on better and more effective therapies that can overcome the often debilitating side effects of cancer and its treatment.

Smoking marijuana poses significant harms to users and those in close proximity. Although smoked marijuana delivers THC and other cannabinoids to the body, it also delivers harmful substances to users and those around them, including many of the cancer-causing substances found in tobacco smoke.

ACS CAN, as the American Cancer Society's advocacy affiliate, has not taken a position on legalization of marijuana for medical purposes because of the need for more scientific research on marijuana's potential benefits and harms.

However, ACS CAN opposes the smoking or aerosolizing of marijuana and other cannabinoids in public places, including any workplace, because the carcinogens in marijuana smoke pose numerous health hazards to others in the user's presence.

Thank you for your consideration of these comments.

Sincerely,



Emily Nenon  
Alaska Government Relations Director  
American Cancer Society Cancer Action Network

## References:

<sup>1</sup> Volkow, ND et al. Adverse Health Effects of Marijuana Use. *The New England Journal of Medicine* 370 (23); June 5, 2014.

<sup>2</sup> Volkow, ND et al. Adverse Health Effects of Marijuana Use. *The New England Journal of Medicine* 370 (23); June 5, 2014.

<sup>3</sup> Brook, R.D., Rajagopalan, S., Pope, C.A., 3rd, Brook, J.R., Bhatnagar, A., Diez-Roux, A.V., Holguin, F., Hong, Y., Luepker, R.V., Mittleman, M.A., Peters, A., Siscovick, D., Smith, S.C., Jr., Whitset, L., and Kaufman, J.D. (2010). Particulate matter air pollution and cardiovascular disease: An update to the scientific statement from the American Heart Association. *Circulation* 121: 2331-78.

<sup>4</sup> National Institute on Drug Abuse; National Institutes of Health; U.S. Department of Health and Human Services.

<sup>5</sup> U.S. Department of Health and Human Services (HHS). *The Health Consequences of Involuntary Exposure to Tobacco Smoke: A Report of the Surgeon General*. U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, Coordinating Center for Health Promotion, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2006.

<sup>6</sup> Americans for Nonsmokers' Rights. Ventilation and Air Filtration: What Air Filtration Companies and the Tobacco Industry Are Saying. August 2005. Available at <http://www.no-smoke.org/document.php?id=267>.

<sup>7</sup> ASHRAE, 2013.

**From:** Christie Adams  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On Site Consumption Endorsement  
**Date:** Thursday, September 14, 2017 11:05:25 PM

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Hello Marijuana Control Board,

My name is Christina Adams and I am a lifelong Juneauite looking to establish a cannabis cafe here in town.

I do not own a marijuana retail shop, however I do wish to be considered for an on site consumption permit so that I may open a cannabis cafe that is separate from the marijuana retail shops in town.

As an emerging small business here in Juneau, I would hate to see marijuana retail shops hold a monopoly over the establishment of cannabis cafe's. Please consider giving small business owners like myself the chance to open a on-site consumption location without having to own a marijuana retail shop. If you were to make on-site consumption endorsements available for other businesses (i.e. cafe's, restaurants, tour buses, etc) we would see tremendous business development & economic growth across the state.

For these reasons, I ask the Marijuana Control Board to consider allowing non-marijuana retail shops to apply for an on-site cannabis consumption endorsement under project/regulation # JUN2017200548.

I appreciate your time & thank you for your consideration.

Sincerely,

Christina Adams, Owner  
Alaska Cannabus Tours, LLC  
907-957-4321  
[alaskacannabustours.com](http://alaskacannabustours.com)

**From:** Hillary Addison  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** "Public comment in support of the On-Site Regulation"  
**Date:** Friday, October 27, 2017 2:49:12 PM

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To Whom it May Concern,

I am writing to voice my support with actions taken by the board to move forward with on-site consumption regulations to apply practical, common sense regulations for On-Site Consumption.

The reasons I believe that regulating on-site consumption is the right thing for our state are three fold.

First, regulate like alcohol, which was the intent of ballot measure two creates a similarity in alcohol bars to on-site consumption. This similarity brings up the obvious question: "If alcohol bars are OK, why aren't Cannabis Businesses with appropriate licensure and planning?"

Second, the Cannabis Industry is already generating revenue for the State of Alaska, and this is another revenue stream which is direly needed at this time.

Lastly, cannabis carries a low risk of dependence and no documentation of overdoses ever occurring related to cannabis consumption.

I hope that the board reconsiders current verbiage that excludes concentrates from On-Site Consumption. Since concentrates are acceptable to sell at retail stores, I see no reason that they should not also be offered at On-Site Consumption approved facilities.

Thank you for your time,  
Hillary Addison

October 27, 2017

Marijuana Control Board  
550 West 7<sup>th</sup> Avenue, Suite 1600  
Anchorage, AK 99501

**RE: MCB Proposed Regulations-marijuana retail store onsite consumption  
endorsement: Oppose**

Dear Chairman Mlynarik and Marijuana Control Board Members,

The American Heart Association/American Stroke Association (AHA/ASA) is opposed to the proposed regulations that will allow inhaled consumption of marijuana onsite in retail marijuana stores. We oppose the smoking or “aerosolization” of marijuana in public places as it poses numerous health hazards to the user and others in the user's presence.

The research is clear that exposure to secondhand tobacco smoke adversely affects cardiovascular health and impairs blood vessel function. A recent study showed that, similar to tobacco, marijuana secondhand smoke exposure impairs vessel function.

The proposed regulations allow for a ventilation plan to remove visible smoke and odor. The organization that develops engineering standards for building ventilation systems, the American Society of Heating, Refrigeration and Air-Conditioning Engineers has concluded that ventilation systems cannot eliminate Environmental Tobacco Smoke (ETS). In 2015, they expanded their definition of ETS to include marijuana smoke and the emissions produced by electronic smoking devices.

We urge you to reject this proposal and protect workers and patrons in these establishments from the effects of secondhand smoke. Should you have any questions, please feel free to contact me at 907-865-5300

Sincerely,



Jamie Morgan  
Senior Director of Advocacy and Policy Campaigns

**From:** Denis  
**To:** [CED AMCO REGS \(CED sponsored\): commentary@alaskadispatch.com](mailto:commentary@alaskadispatch.com)  
**Subject:** Onsite Consumption  
**Date:** Sunday, September 03, 2017 5:12:02 PM

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I am in favor of allowing onsite consumption, I don't use the stuff myself but don't consider myself morally superior because I don't.

-there should be a place like a bar or coffee shop, where people can go to smoke (not drink), dance or eat as well as purchase cannabis.

-now, no public consumption is allowed, like the prohibition against drinking alcohol in public. Give people a place to go and enjoy themselves with others who enjoy the same activity.

-Alaska could sell consumption business licenses like liquor licenses. Tax the sales there. Allow coffee shops like Amsterdam does...still does....it works there and can work here.

-allow tourists to come to Alaska and enjoy a smoke. Ye gads, they come here and cannot smoke in a hotel, in a bar, in a restaurant, on the street....why buy it?

Where CAN they smoke? Keep the consumption off the street by giving people places to enjoy it.

-give folks a choice of intoxicants, and a place to enjoy them, if that's what they want. Why should they be limited to getting rowdy in a bar and fighting? Alcohol causes aggression and violence, we have centuries of evidence of that fact.

-allow edibles to be sold in bars or restaurants. Good for the patrons if they want it. but can see high class eateries offering MJ brownies, cookies, sauces....good for appetites! That is happening in other states now.

-the most important concept is that the population which voted for MJ legalization now deserves the opportunity to change peoples attitudes about legality. IT IS LEGAL HERE, FOLKS. GET OVER THINKING IT IS NOT.

In my community a small minority tried to prohibit sales and commercial growing, and lost by a 4:1 vote. Bigger than even the vote here to legalize it. We cannot continue to allow the minority to dictate public policy or 'socially engineer' our communities and what we (the majority) allow. If the minority do not want to smoke it, that's fine. But they have no more right to deny others a place to enjoy it, than they have a right to control what others watch on TV, write, eat, drink, think or utter.

Denis Allen  
Valdez

October 18, 2017

State of Alaska  
Department of Commerce, Community, and Economic Development  
Alcohol & Marijuana Control Office  
Marijuana Control Board  
550 W. 7th Ave, Suite 1600, Anchorage, AK 99501

Re: Comment on Onsite Consumption Regulations

Dear Members of the Marijuana Control Board,

On behalf of our members in Alaska, Americans for Nonsmokers' Rights (ANR) encourages the Alaska Marijuana Control Board to **prohibit marijuana smoking and vaping of aerosolized marijuana in all public places and workplaces, at all times, without exception**. ANR is a national, member-supported public health non-profit organization established in 1976 that advocates for smokefree environments to protect nonsmokers' health and safety.

Like secondhand tobacco smoke, marijuana smoke contains fine particulate matter that poses health risks to non-users and is a form of indoor air pollution. In several peer-reviewed research studies, tobacco and marijuana smoke have both been shown to impair blood vessel function and they contain significant amounts of chemicals harmful to public health (see attached fact sheet). Therefore, people who choose to smoke marijuana should not smoke it in public where it could harm others. To protect the health of non-users, the smoking and vaping of marijuana **should not be allowed in indoor spaces** where smoking poses a serious health hazard to workers and others in the building.

Additionally, the regulations as written contain a requirement for ventilation systems. The American Society for Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE), the standard setting body for the HVAC industry, affirms that mechanical solutions like **ventilation cannot control for the health hazards of secondhand smoke**. ASHRAE's ventilation standard (62.1) for acceptable indoor air quality is now based on an environment that is free from tobacco and marijuana smoke and secondhand aerosol.

The proposed ventilation requirements in the regulations would cause businesses to invest money in structural changes (an unfunded mandate) and yet do nothing to address the health hazards of exposure to secondhand marijuana smoke. For this reason, ANR recommends that the marijuana regulations be amended to remove the ventilation requirement and instead not allow smoking or vaping of marijuana indoors. Indoor consumption of edibles, however, is acceptable since this doesn't pose a health hazard to other people in the building. If people want to smoke marijuana, they should do so in ways that do not harm others including smoking it outside their place of residence.

It is also important that the proposed marijuana regulations be amended to **include explicit anti-preemption language** to make clear that license holders are subject to both current and future local smokefree air laws.

As of October 2nd, 2017, there are at least **200** U.S. municipalities and **10** states that now restrict, prohibit, or limit smoking of marijuana in public and/or workplaces in some manner. Many cities and states now recognize that it is important to protect public health from exposure to secondhand marijuana smoke. Regardless of how one feels about marijuana use, no one should have to breathe secondhand marijuana smoke at their workplace or in public places.

Given these facts, ANR urges the Alaska Marijuana Control Board to **prohibit smoking and vaping of marijuana in workplaces and enclosed places to protect the health of people who breathe in these venues.**

Please feel free to contact me at 510-841-3045 if you have any questions, comments, or feedback.

Sincerely,



Cynthia Hallett, MPH  
President and CEO

Attachment: Marijuana Secondhand Smoke Fact Sheet

# SMOKEFREE IS SMOKEFREE

Nobody should have to breathe secondhand marijuana smoke at work, in public, or where they live.

Smoke is smoke — regardless of the device or description. Secondhand marijuana smoke contains hundreds of chemicals — just like secondhand tobacco smoke. Many of the chemicals in secondhand marijuana smoke are **toxic and contain hazardous fine particles that pose a significant health risk to non-smokers.**

- More laws legalizing marijuana = increased exposure to secondhand marijuana smoke.
- Employees and patrons protected by current smokefree laws may have their health put at risk by exposure to marijuana smoke. Marijuana smoking should not be allowed in smokefree spaces.
- The commercialized marijuana industry looks and sounds a lot like Big Tobacco. Together they are working to circumvent progress on smokefree air.
- The vast majority of the population are non-smokers. Smokefree means smokefree — no cigarettes and cigars, e-cigarette use, or marijuana use.

## SECONDHAND MARIJUANA SMOKE

contains many of the same **CANCER-CAUSING SUBSTANCES** and **TOXIC CHEMICALS** as secondhand tobacco smoke, including:



**3 times**  
the amount of  
**ammonia**



significant levels of **mercury, lead, formaldehyde, benzene, hydrogen cyanide, & toluene.**

## PROTECT HEALTH

**Protect workers and the public from exposure to secondhand smoke** by prohibiting marijuana smoking in all workplaces and enclosed public places.



Currently, approximately **157 municipalities** and **5 states** specifically restrict marijuana use in smokefree spaces in some manner. **Protect smokefree workplace laws — include marijuana in your policy!**

For more information about marijuana and smokefree laws, visit



[www.no-smoke.org](http://www.no-smoke.org)



AMERICAN  
NONSMOKERS'  
RIGHTS FOUNDATION



**From:** Heather Aronno  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comment in opposition to allowing on-site consumption of marijuana  
**Date:** Friday, October 27, 2017 11:24:17 AM

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As an Anchorage resident of over 10 years, I am proud to live in a community with a strong smoke-free workplace ordinance.

I respectfully oppose the public consumption of smoked, dabbed, vaped or aerosolized marijuana because of the significant health harms to users and non-users.

I have many friends who work in the customer service industry in and outside of Anchorage. Judging from some of their experiences, working in a restaurant that allowed smoking was, at best, tolerable, and at worst, an experience that triggered asthma attacks. Places like Anchorage and Palmer have passed local smoke-free ordinances to protect workers from exposure to secondhand smoke in the workplace, which has had a beneficial effect of healthier work environments and a more welcoming atmosphere for those who don't smoke.

The proposed regulation that would allow on-site consumption of marijuana by smoking it puts the health of employees in those shops at risk. No type of ventilation system will protect workers and patrons from the effects of secondhand smoke, vapor or aerosol. Secondhand marijuana smoke can exacerbate health problems, including people with respiratory conditions like asthma, bronchitis, or COPD, as well as heart disease and stroke.

Everyone has the right to breathe clean air. Smoke-free policies are designed to protect the public and all workers from exposure to the health hazards caused by secondhand tobacco smoke. The same should be true for marijuana smoke.

Thank you for your consideration in supporting employee and public health.

Sincerely,  
Heather Aronno  
Anchorage



October 25, 2017

Marijuana Control Board  
550 W. 7<sup>th</sup> Ave., Suite 1600  
Anchorage, AK 99501

Dear Marijuana Control Board,

On behalf of the Alaska Tobacco Control Alliance, we respectfully submit comments on proposed regulation changes to 3 AAC 306, pertaining to onsite consumption of marijuana at licensed retail stores. We are concerned for Alaskans' health with the proposed regulations. **We oppose the public consumption of smoked, dabbed, vaped or aerosolized marijuana because of the significant health harms to users and non-users.**

**Ballot Measure 2 was clear, the public consumption of marijuana was intended to remain illegal.** The language in the ballot measure, voted on by the public and now enacted in AS 17.38.040, does not allow for public consumption of marijuana and includes a \$100 fine for this activity.

**No type of ventilation system will protect workers and patrons from the effects of secondhand smoke, vapor or aerosol.** The licensee would be required to provide a ventilation plan to address byproducts of using marijuana onsite. Ventilation may reduce odors, but will not protect workers' health from marijuana smoke:

- Even high-quality ventilation systems will not prevent marijuana smoke or aerosol from moving from the consumption area into other areas of the retail store. A building must be completely smokefree to eliminate the health effects caused by smoke or aerosol.
- The American Society for Heating, Refrigerating and Air Conditioning Engineering (ASHRAE) is the national professional organization that develops engineering standards for building ventilation systems. In a 2010 position paper, ASHRAE has concluded that the only acceptable industry standard is completely free from secondhand smoke: "At present, the only means of effectively eliminating health risk associated with indoor exposure is to ban smoking activity." Ventilation will not completely remove the carcinogens and particulates from the air. More recently, ASHRAE *added marijuana smoke and e-cigarette vapor* to this list. The current proposal includes ventilation requirements for establishments that allow smoking, which may reduce or eliminate visible smoke and/or odors within or outside of the consumption area, but ventilation will not address the health impacts of marijuana smoke and would therefore not be effective protection against secondhand smoke for either workers or the public.

- Recent studies have demonstrated that secondhand marijuana smoke contains many of the same cancer-causing substances and toxic chemicals as secondhand tobacco smoke. Secondhand marijuana smoke can exacerbate health problems, including people with respiratory conditions like asthma, bronchitis, or COPD, as well as heart disease and stroke.

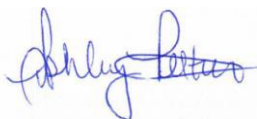
**Allowing secondhand marijuana smoke exposure in publically accessible places is not good public health policy.** In 2006 the Surgeon General concluded that there is no safe level of secondhand tobacco smoke. While studies of the health risks associated with marijuana use and exposure are limited to date, due to its being illegal under U.S. federal law, marijuana smoke is similar in composition to secondhand tobacco smoke, with the potential for similar health and safety risks to the public. Preventing secondhand smoke exposure to forestall costly health issues makes good policy sense given current evidence: Secondhand marijuana smoke contains many of the same cancer-causing substances and toxic chemicals as secondhand smoke. Some of the known carcinogens or toxins present in marijuana smoke include: acetaldehyde, ammonia, arsenic, benzene, cadmium, chromium, formaldehyde, hydrogen cyanide, isoprene, lead, mercury, nickel, and quinolone (Moir, et al, 2008). Moir, et al. also found significant amounts of mercury, cadmium, nickel, lead, and chromium in marijuana smoke. Comparing it to tobacco smoke, there was 20 times the amount of ammonia and 3-5 times more hydrogen cyanide in marijuana smoke.

- In 2009, the California Office of Environmental Health Hazard Assessment added marijuana smoke to its Proposition 65 list of carcinogens and reproductive toxins.
- In 2014, researchers demonstrated the impact of secondhand marijuana smoke on blood vessel function. Thirty minutes of exposure to secondhand marijuana smoke at levels comparable to those found in restaurants that allow cigarette smoking led to substantial impairment of blood vessel function. Marijuana smoke exposure had a greater and longer lasting effect on blood vessel function than exposure to secondhand tobacco smoke.
- In study after study, we know that the heart attack and stroke rates drop when communities and states go smokefree. Once an individual quits smoking, their risk of heart attack and stroke drop 50% in a year.

Everyone has the right to breathe clean air. Smokefree policies are designed to protect the public and all workers from exposure to the health hazards caused by secondhand tobacco smoke. The same should be true for marijuana smoke. **Based on the available science, we recommend the Board not allow smoked, dabbed, vaporized or aerosolized marijuana consumption where workers are present.**

Thank you for your consideration in supporting worker and public health.

Sincerely,



Chair, Alaska Tobacco Control Alliance

**From:** Sean Avery  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public comment in support of the On-Site Regulation  
**Date:** Friday, October 27, 2017 12:24:29 PM

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***I support on-site consumption for the following reasons:***

- Those who choose to use cannabis should be allowed to consume in communal settings which will be regulated, secure, and on-camera just like on-site consumption of alcohol.
- Many Alaskans do not have a residence that allows consumption, such as multi-family dwellings, pioneer or veterans homes, apartments buildings or condo units.
- This is a freedom of choice issue which harms no one, and potentially puts millions of dollars into state coffers through industry taxation.
- There is no credible evidence that second-hand cannabis smoke, unlike tobacco smoke which is laden with toxic chemicals, causes lung damage.
- Many responsible parents would appreciate not having to walk through clouds of smoke on our Alaskan sidewalks.
- Contractors and ventilation experts/technicians would appreciate the income from the build outs of these high-tech systems. This provides ancillary jobs!
- Visitors to Alaska would have a place to safely consume the products they are legally allowed to purchase.

**FROM THE DESK OF  
Desiree Ballesteros  
3051 Crest Avenue, Lower  
Ketchikan, Alaska 99901  
907-322-0913**

To: Marijuana Control Board

I am writing in regard to the Resolution Allowing for On-Site Consumption of Marijuana or Approving Designated Areas for On-Site Consumption in Licensed Retail Marijuana Establishments.

Ballot measure No. 2 specifically states it will ban the public use of marijuana. It does not differentiate between smoking and the consumption of edibles.

I am requesting as a concerned citizen of the State Of Alaska that this change be not made to current state law. If the people of Alaska wanted public consumption of marijuana they should have written it into the original law.

Should the Marijuana Control Board decide to change the law it should be put to the voters in a state wide election.

Sincerely,

Desiree Ballesteros

**From:** noelcbell  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** No to onsite consumption  
**Date:** Thursday, October 19, 2017 5:29:49 PM

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To whom it may concern:

I'm adding my voice to the argument against onsite consumption of recreational marijuana.

I have several concerns; the first being that no filtration system has been identified that will remove the harmful effects of second hand marijuana smoke from the air. This poses a health risk to workers who will be exposed.

My second concern has to do with how marijuana is metabolized after being consumed and the real danger impaired driving from consumption at a retail establishment will present to my family, friends and community.

Please, do not allow on site consumption. The law was clear when marijuana was approved for recreational use, that there would be no on site consumption.

Thank you  
Noel Crowley-Bell  
2301 N Broadway Dr  
Palmer, AK 99645

Sent from my GCI smartphone

**From:** Rick Hinkey  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption  
**Date:** Friday, September 29, 2017 2:13:12 PM

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Dear Marijuana Control Board,

According to Ballot Measure 2, 53% of Alaskan voters chose to legalize the recreational use and cultivation of Marijuana. It was clear, in that measure, that public use of marijuana would remain illegal, and it was with that understanding that voters said yes. Decriminalization and legalization of personal use makes total sense to me. Commercialization and onsite consumption do not.

Now that the marijuana industry has gotten their foot in the proverbial public's door, have pretty much gotten control of the regulatory board, they are now trying to rip it wide open to allow for what some are calling smoking lounges, weed bars, flophouses, drug dens, or the more euphemistic terminology the industry would prefer, onsite consumption. The problem is we are not talking about burgers and fries here. Drive through fast food is dangerous enough to our health; drive through drugs take distracted driving to a completely new level.

There is no safe level of exposure to second-hand smoke. That is the Surgeon General's conclusion regarding tobacco smoke. Why would second-hand marijuana smoke be any different? Public safety and health should be the top priority of this regulatory board, and industry profits should come below those.

The arguments for onsite consumption seem legit in a precursory sort of way. "Oh my, tourists won't have any place to imbibe if we don't give them one." Well, to be honest, I couldn't care less about such a narrow-minded perspective nor about tourists with such little self-control that they cannot go without for a day or two of roaming around Alaska. I do care a lot about those who use our roads, sidewalks and bicycle paths on a daily basis to be worry free of drugged drivers who happened to pop into a drug den to get high before they carry on to their next errand.

The real driving force behind the marijuana industry's exertion is money. The more people use, the more they buy. The more they buy, especially in the form they would be in at weed bars, the more money the industry makes. It is big tobacco all over again. Get them hooked early, and you have a lifetime customer. No wonder they're spending tens of thousands of dollars to buy voters. Please don't be distracted from those issues that are more important to all Alaskans. Namely public health and safety.

Onsite consumption is a bad decision for all Alaskans. If nothing else it should be approached in a more deliberate, thoughtful and educated way.

[Rick Hinkey MDiv, MNA | Fairbanks Manager](#)  
[Serving Alaska](#)

[526 6<sup>th</sup> Ave., Suite 203](#)  
[Fairbanks, AK 99701](#)  
[P: 907-891-7451](#)

**From:** Gordon Bell  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Date:** Friday, October 27, 2017 12:19:26 PM

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*To whom it may concern;*

*I am opposed to allowing for ingested consumption of marijuana because I have concerns about public safety and driving under the influence. The proposed regs would allow for up to 1 gram of marijuana to be consumed in one visit, and I think that is way too much! Many people become intoxicated on marijuana after only a few puffs, tokes, hits or whichever terminology you would care to use. I am a retired addictions counselor with over 25 years in the field and have seen the impact marijuana use has had on people. If people choose to ingest marijuana in the privacy of their own homes that is their choice and I support that but consuming on-site at a marijuana shop and then leaving to go home or elsewhere puts the public at risk.*





## **Healthier Mat-Su communities through clean air and tobacco-free environments**

Marijuana Control Board  
550 W. 7<sup>th</sup> Ave., Suite 1600  
Anchorage, AK 99501

Dear Marijuana Control Board members,

On behalf of the Breathe Free Mat-Su Coalition, in line with our vision and mission statements, to promote a healthier Mat-Su community through clean air and empowering community members to advocate for clean air, we respectfully submit our written opposition to the proposed on-site marijuana consumption regulation.

Below is a list of Breathe Free Mat-Su Coalition concerns, many of which have been raised in coalition meetings over the last year and half, as the Marijuana Control Board continues to try and advance regulations to implement the Alaska Marijuana Ballot No. 2(2014); regulations that consider allowing onsite consumption in marijuana retail businesses.

- Ballot Measure 2 did not allow for the public consumption of marijuana. It was intended to remain illegal until subsequent legislative action directed otherwise.
- Secondhand smoke causes lung cancer in adults who have never smoked. The fine particles and toxic chemicals in both marijuana and tobacco secondhand smoke also cause lung irritations and increased risk for asthma, lung inflammation, bronchitis, and COPD exacerbations.
- The draft regulation requires the business to maintain a smokefree area for employees to monitor the consumption area, but it is unrealistic to require the business to keep employees away from smoke while working and workers would still be exposed to marijuana smoke when they enter the consumption area.
- The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) publishes national indoor air quality standards, and has for several years stated that there is no acceptable level of environmental tobacco smoke (ETS) to be considered having safe indoor air. They find there is no existing ventilation system that can sufficiently remove these particles from the air, and that an indoor smoking ban is much more effective to ensure adequate air quality. More recently, ASHRAE *added marijuana smoke and e-cigarette vapor* to this list. The current proposal includes ventilation requirements for establishments that allow smoking, which may reduce or eliminate visible smoke and/or odors within or outside of the consumption area, but ventilation will not address the health impacts of marijuana smoke and would therefore not be effective protection against secondhand smoke for either workers or the public.

BFMS members are also concerned about what happens to customers after leaving the consumption area, particularly if they are inexperienced with marijuana use and/or have overconsumed. There is currently no way to accurately test impairment levels in the field. What public safety impacts will local authorities have to deal with from drugged driving?

Finally, BFMS urges the Marijuana Control Board to review the presentation and materials provided by the State's own Health Department before making any policy decisions about marijuana consumption.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ashley Peltier". The signature is fluid and cursive, with the first name "Ashley" written in a larger, more prominent script than the last name "Peltier".

Ashley Peltier, Co-Chair  
Breathe Free Mat-Su Coalition

**From:** Kim Bodiker  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Marijuana regulations  
**Date:** Thursday, October 26, 2017 10:17:19 PM

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Dear Sir,

I'm writing this plea to comment on the proposed draft regulations for onsite consumption of marijuana. We owe this to the future generations of Alaska to protect them from the harm that this drug will do to our communities. I'm concerned since there is no regulation at the State or Local level to keep these stores from being in or near our neighborhoods, but your regulations will allow people to drive to our neighborhood, smoke pot outdoors and then somehow get home. There is no logic to having onsite consumption venues for marijuana, which is why no state has done that. They can buy their product and take it home. Please don't allow onsite consumption in our State.

Sincerely,  
Frank and Kim Bodiker

**From:** Sharon Brand  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Marijuana in retail shops  
**Date:** Monday, October 23, 2017 3:15:23 PM

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To Whom It May Concern;

I strongly feel that Marijuana shops should NOT allow onsite consumption of marijuana use. Why should anyone be exposed to second hand marijuana smoke if they don't want to. Plus cigarette smoking is not allowed in businesses why should marijuana? What kind of message are we sending the young people? Who really knows the risks of marijuana, we know what happens with cigarette smoke, could that be true for marijuana?

Thank you,  
Sharon Brand

**From:** Whitney Branshaw  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption Public Comment  
**Date:** Friday, October 27, 2017 3:09:51 PM

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Dear AMCO,

I am writing this email in submittance of public comment to support the endorsement for onsite consumption. I believe that having an option for onsite consumption is vital to the success of the legal marijuana industry in Alaska. Without the option for onsite consumption we eliminate a safe space for people to consume a legal product whether they are tourists or residents. Some Alaska residents live in a space where it is not legal to consume marijuana, or they prefer not to consume in their residence due to sharing a space with children or other friend and family members that do not partake. The absence of a regulated venue for consumption also opens up the opportunity for legal consequences such as citations for public consumption. A designated onsite consumption space also reduces the chance of disturbing others in the community that don't wish to be exposed to cannabis products. The initiative to legalize recreational marijuana was based on regulating marijuana like alcohol. We have 1,864 liquor licenses in the state, those licenses include 664 full bar licenses where alcohol can be consumed onsite. We have not one legal space in the state to consume legal marijuana in our state, other than private residences. I also think it is also vital to the legal retail marijuana market to have a place where tourists and visitors can sample legal product without the fear of legal repercussions or public stigma.

I encourage the board to support the endorsement for onsite consumption in the hopes that the we can create a safe venue for consumption and continue to further the legal recreational marijuana industry in Alaska.

Thank you for your time and consideration in this matter.

Whitney Branshaw



635 G Street, Suite 100-907  
Anchorage, Alaska 99501

August 31, 2017

Marijuana Control Board

Peter Mlynarik, Chair

Mark Springer

Loren Jones

Brandon Emmett

Nicholas Miller

Alcohol & Marijuana Control Office

550 West Seventh Avenue, Suite 1600

Anchorage, Alaska 99501

RE: Proposed 3 AAC 306.370. Onsite consumption endorsement for retail marijuana stores.

Dear Sirs:

Great Northern Cannabis, Incorporated (GNC) is an Alaska corporation with approximately 40 full- and part-time employees, and 25 Alaskan shareholders from a wide variety of backgrounds. We currently own and operate a cultivation facility and a retail store. We thank you for the opportunity to comment on the proposed regulations for onsite consumption of cannabis products.

In general, GNC supports the proposed regulations. We note the structure attempts to limit consumption to responsible levels, a worthwhile goal, which seems to be the rationale for excluding marijuana concentrates. We think this exclusion is a mistake as environmental impacts from concentrate consumption are less than those of flower consumption and, given that concentrate consumption produces effects much more quickly than edible products, concentrates could be safely used onsite with proper warning signage and advice from budtenders. Indeed, patrons choosing to consume edibles due to their sensitivity to smoke would likely appreciate the less-obtrusive nature of concentrates.

We would also suggest some other types of onsite consumption provisions, though perhaps in another iteration of the regulatory process; co-operative, public, restaurant and topical.



Regarding co-operative, given the high costs of ventilation systems and other necessary appurtenances it may make sense for a group of retailers to establish a single location for customers to consume their products. Admission to the facility could be included with purchases from any of the participating stores and those wishing entry with products from other retailers could pay an admission fee. Signage providing information on responsible consumption would be robust and existing prohibitions on re-selling products should remain in place at such locations.

As to the public, we share concerns associated with customers making a legal purchase, departing a retail establishment then consuming marijuana, especially smoking flower or bud, in public places. We are of the understanding that some jurisdictions have small public facilities for consumption, essentially modified shipping containers, that allow users to quickly and safely ingest marijuana products with substantially reduced impact on non-users. Such facilities could be operated by local governments or non-profits funded by tax revenues or contributions from cannabis businesses. Amenities might include video monitoring, interior lighting and lockable doors to restrict usage to designated hours. Permits for these facilities should be relatively minimalist and simple to obtain as the involved parties will spend considerable time and effort ascribing roles and responsibilities. This work product can be expressed as an operating plan provided to AMCO and modified as conditions merit. Further regulation can be promulgated by local jurisdictions.

Another area worthy of consideration is permitting restaurants to serve cannabis-infused meals. Given the existing prohibition on co-location of cannabis and alcohol businesses this would likely be best pursued as a separate project.

Finally, we feel spas should be able to apply topical cannabis products to informed adult clients. Again, likely a separate regulatory project.

Again, we thank the board and staff for working with licensees, local government and the public to promote safe, non-obtrusive consumption of marijuana products.

Best regards,



Stephen W. Brashear  
Chief Executive Officer



**From:** Elva Cerda  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Cc:** [mbbutler@gci.net](mailto:mbbutler@gci.net)  
**Subject:** Against "On-site Marijuana Consumption"  
**Date:** Friday, October 20, 2017 4:33:14 PM

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I am against any regulations that allow onsite consumption of marijuana in retail marijuana establishments.

1. Consumption of marijuana in these establishments would mean an increase in people operating vehicles on the roads of Alaska while under the influence. We need safer roads, not more dangerous ones. The first goal of local and state government is the protection of its residents. The State of Alaska is running a series of advertisements that state "Drive high, get a DUI". Why should the State of Alaska be encouraging DUI's by allowing people to consume at retail marijuana locations and then drive home?

2. Anchorage has a Clean-Air law that bans the use of cigarettes, cigars, marijuana and vaping products in public facilities. Allowing the smoking of marijuana inside of establishments would endanger the health of employees and most probably mean a gutting of Anchorage's Clean Air laws.

3. Emergency personnel (police, fire and EMT's) would be reluctant to enter these facilities in that they could be contaminated by the smoke and be impaired and unable to perform their critical jobs for the remainder of their shifts.

3. Consumption of edible marijuana products onsite would be dangerous in that it takes a much longer time for the active ingredient to hit the bloodstream. Consumers could leave the locations thinking that they are sober enough to drive when in reality they might not be.

I voted to legalize marijuana consumption in people's homes but would not vote for it again if I knew that onsite consumption was even an option for the future.

Please hold a public hearing on this issue in Anchorage in the near future. There are many, many residents who are concerned about on-site consumption.

Mark Butler  
P.O. Box 90110  
Anchorage, Alaska  
99509-0110  
[mbbutler@gci.net](mailto:mbbutler@gci.net)  
CL/TXT 240-3868

**From:** Joe Byrnes  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comments on Marijuana Control Board proposed regulations--marijuana retail store onsite consumption endorsement  
**Date:** Monday, October 23, 2017 5:25:27 PM

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October 23, 2017

Erika McConnell  
Alcohol and Marijuana Control Office  
550 W. 7th Avenue, Suite 1600  
Anchorage AK 99501  
[amco.regs@alaska.gov](mailto:amco.regs@alaska.gov)

RE: Comments on the onsite consumption endorsement

Thank you for the opportunity to provide comments to the proposed onsite consumption endorsement for retail marijuana stores. While there are some elements in the overall proposal that would lessen the public impact of onsite consumption, there are many features that are problematic.

My comments today largely echo the ones I registered in 2016 when a similar proposal was brought forward by the board. The similarity is no small part due to the board's failure to address many of my underlying concerns from those comments, and it baffles me why a such a similar proposal would be submitted despite the strong public opposition to the previous proposal.

I preface my comments with my concern that this proposal, like the last one, is inconsistent with the language in statute and the initiative. According to the Public Notice, the statutory authority for these regulations are found in AS 17.38.010; AS 17.38.070; AS 17.38.121; AS 17.38.150; AS 17.38.190; AS 17.38.200; AS 17.38.900. I can find nothing in those statutes that would authorize consumption on the premises of a retail marijuana establishment.

AS 17.38.020(4) states that while consumption of marijuana is allowable for personal use, "nothing in this chapter shall permit the consumption of marijuana in public." AS 17.38.040 bans public consumption and imposes a \$100 fine for doing so. AS 11.81.900(53) defines "public place" as a "place to which the public or a substantial group of persons has access and includes highways, transportation facilities, schools, places of amusement or business, parks, playgrounds, prisons, and hallways, lobbies, and other portions of apartment houses and hotels not constituting rooms or apartments designed for actual residence." While "public" is not defined in Title 17, a consistent approach to the term in statute would indicate that consumption in a location, other than a private residence, is unlawful.

Furthermore, in AS 17.38.070(a), the statutes defining the lawful operations of a retail marijuana establishment, there is no mention of the sale of marijuana to consumers for onsite consumption. In Title 4, if an alcohol establishment is allowed to sell alcohol for onsite consumption of product, that activity is specifically mentioned in the authorizing

statute for that license. The language in Title 17 is exclusive in nature by listing activities that would not be an offense, thus an expansive reading would be incorrect. The creation of regulations that allow onsite consumption bypasses the legislative process. Nothing in HB 123, the statutes creating the Marijuana Control Board, gave them the MCB authority to reinterpret statute in this manner. Regardless of what proponents of onsite consumption say, this seems to me to be a gross misrepresentation of what advocates of the initiative stated during the 2014 campaign and goes beyond what is expressly allowed by law. If it is the desire of the marijuana industry to have onsite consumption, then it needs to go through the legislative process.

I think it is also worth noting that Alaska would be the only state to allow on-site consumption. While the initiative itself brought the state into relatively new waters, this particular activity is very untested. In the Netherlands, where onsite marijuana consumption is tacitly allowed in "coffee shops," there are new efforts by the Dutch government to curtail that activity due to the public nuisance caused by patrons, particularly tourists (Mike Corder, "As US states allow pot sales, Dutch reverse course," Denver Post, March 7, 2014 [http://www.denverpost.com/marijuana/ci\\_25294755/us-states-allow-pot-sales-dutch-reverse-course](http://www.denverpost.com/marijuana/ci_25294755/us-states-allow-pot-sales-dutch-reverse-course)).

While the public nuisance and other societal effects are notable, public safety is of the greatest importance and must be kept in perspective with any actions taken by the board. The [Washington State Marijuana Impact Report](#) recently found that there has been a 122 percent increase in incidents involving marijuana-impaired drivers in Washington between 2010 and 2014. [AAA made similar observations](#) as well, finding that of all of the THC-positive drivers involved in fatal crashes about a third had neither alcohol or other drugs in their systems.

For these reasons, not only do I believe an onsite consumption "endorsement" has no basis in law, but it also a highly problematic public policy.

### Specific Comments

Beyond those concerns, regarding the specific terms of the proposed regulations, I offer the following comments.

#### Excluding marijuana concentrates

The inclusion of this provision is an improvement over the 2016 proposal. Concentrates have a vastly magnified effect on physiology. Furthermore, not allowing concentrate should also exclude the sale of marijuana edibles produced with marijuana concentrates. The delayed peak onset of THC in marijuana edibles can take hours and would further make it difficult for stores to identify intoxicated individuals when serving them.

#### Limitations on sale amounts

While I agree with the intention of limitations on sale quantities: reduction of the quantity of the intoxicant a consumer can possess to avoid over intoxication, I'm unsure the regulations as written fully achieve that. With the limitations on sale amounts, it is concerning that there is no accompanying regulation on THC content/potency. Even a small quantity of marijuana can be very potent. Quantity limitations will only cause the

market to create increasingly potent products to circumvent the limitation. A large quantity of sale isn't a public safety concern in of itself. What is a greater concern is the heavy consumption of high THC potent marijuana.

Removal of unused marijuana product purchased for consumption

The 2016 proposal explicitly prohibited the removal of unused marijuana product purchased for consumption, while the current draft regulations allow it. With the exception of wine bottles, similar action is not allowable with alcohol establishments and this provision has the potential to promote public consumption.

Sale of food or beverages not containing marijuana or alcohol

The sale of food or beverages is another provision that was not in the 2016 proposal. While it is encouraging that items that contain marijuana or alcohol are not allowed to be sold, the sale of other food and beverage items will encourage longer term stays and further intoxication of patrons which further exacerbates the public safety risk as patrons transporting themselves off the premises.

Transportation of patrons to and from the premises

There is nothing mentioning how consumers will leave the establishment. Depending on the product, THC content, and the user, the effects of marijuana differ from person to person and even with the sale limitations, a person could consume enough marijuana to make him or her unsafe to drive for a significant period of time. While it's the legal responsibility of the user to make good judgement on operating a motor vehicle, the sort of behavior being enabled in the draft regulations are a serious public safety risk to fellow motorists that should be addressed in some practical manner such that patrons who have imbibed should not leave in a motorized vehicle under their control.

Ventilation requirements need stronger odor mitigation

Section (f)(2) states that stores must "maintain a ventilation system that directs air from the onsite consumption area to the outside of the building through a filtration system adequate to reduce odor." However, as somebody who has rented apartment spaces adjacent to marijuana smokers, I know air flows are difficult to predict and even with ventilation, the odor can unintentionally waft into adjacent rooms and spaces. There doesn't seem to be any recourse for neighboring property owners in the regulations if that happens. If I owned a property adjacent to one of these establishments (like in a strip mall) it would be very disconcerting to me if marijuana odor came into my space. The language "reduce odor" is highly ambiguous and at a minimum, odor mitigation must be strong enough that no discernable smell can be detected in the surrounding area outside of the establishment. This is further problematic because section (c)(1)(C)(ii) would indicate that outdoor smoking would be allowed. The carrying of marijuana odors into the surrounding area would be unacceptable and a blatant circumvention of AS 17.38.020(4) and AS 17.28.040 prohibiting public consumption.

Other Safeguards are good

Section (b) also offers several good safeguards. Of note, subsection (b)(4) not allowing intoxicated or drunken persons to enter or remain on premises is good since it helps prevent the dual use of marijuana and alcohol ("crossfading") which is a serious public safety concern for both the user and other motorists. Avoiding situations where an

alcohol intoxicated individual is allowed to consume marijuana is prudent. Subsection (b) (7) is good for not allowing the delivery of more marijuana product to a person who already is in possession of marijuana product closes a potential loophole created by the limitation on sales quantities. Subsections 8-12 which prohibit sales discounts, contests, or other prohibited practices are all good safeguards against promoting over-consumptive behavior.

#### Firearms on premises

One thing I noticed which was not in the regulations was the possession of firearms. I'm unsure if this appears in another area of the regulations. Beyond the federal issues of possessing a firearm as a user of a federally controlled substance, under state statute it is a misconduct involving a weapon in the fifth degree (AS 11.61.220(2)) to knowingly possess a loaded firearm on the person in any place where intoxicating liquor is sold for consumption on the premises (emphasis added). The intention of this statute is clear: persons who are not mentally cognizant should not handle a firearm. Marijuana legalization (and onsite marijuana consumption) undoubtedly was not contemplated when the statute was created. A ban on weapons in onsite consumption locations should be considered by the board.

**From:** CATALYST ADMIN  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption  
**Date:** Friday, October 27, 2017 2:17:10 PM

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To Whom It May Concern:

I am writing in regards to onsite consumption of marijuana on businesses as I do support this debate. While working, most humans are subject to sitting or standing for a few hours. Considering that most people are in pain and marijuana is a pain reliever, most bodies could do wonders with a little onsite consumption. People can drink alcohol indoors and you can vape or smoke in some stag shops. To say people cannot consume marijuana because it is a drug? Either you come up with a better reason other than "he said, she said" or simple as it is, regulations should not be just.

Rebecca McMahon

**From:** Trav-Laurel Chace  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Proposed draft for onsite consumption  
**Date:** Friday, October 27, 2017 10:42:30 AM

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Hello. I would like to share my thoughts regarding the proposed regulations for onsite consumption of marijuana. I'm concerned for the safety of our children as many establishments are close to neighborhoods and schools. The Lung Association as well as others have stated that no amount of ventilation can mitigate the bad health effects of second-hand smoke from any source. Plus I really don't want people high on drugs partying in my neighborhood until 5am, whether they are inside or outside of a marijuana establishment. Even alcohol stores and bars are separate licenses and can't be in the same place, so why would we make an exception for marijuana? It doesn't make sense. Fourthly, how will you have a designated driver in a smoking facility to insure no one high on drugs doesn't drive?

Thank you for your thoughtful consideration to this very important matter.  
Sincerely, Laurel Chace



**From:** Ezequiel Chalbaud  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Re: Alaska Public Consumption Comment  
**Date:** Friday, October 27, 2017 1:20:29 PM

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I would like to clarify that when I said public consumption I meant onsite consumption.

Thank you

On Fri, Oct 27, 2017 at 1:09 PM, Ezequiel Chalbaud <[ezerider@gmail.com](mailto:ezerider@gmail.com)> wrote:

Dear lawmakers,

I am writing in favor of public consumption of Cannabis in my beloved state of Alaska. I have lived in Alaska for over 8 years and plan on spending the rest of my life and raising my children in the state that captured my heart. I am a college educated professional, that have worked in Alaska's mining and oil industries, and hold an management level job in a company that currently provides jobs for over 1500 people in the state.

I believe it is important to support the only growing sector of our economy at this point and not criminalize our tourists. People need a place to consume cannabis just like people need a place to consume alcohol. Alaska law enforcement is struggling to keep up with the significant rise in crime the state is experiencing and burdening them with criminalizing it's citizens and tourists that would like to abide by the law seems in itself a crime.

It is important to understand that public consumption does not mean smoking only. There are a wide range of ways in which cannabis can be consumed including ones that have no psychotropic effects.

I fully support public consumption of cannabis in Alaska.

Thank you

Carlos Ezequiel Challbaud

**From:** Jennifer Germer  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site consumption of Cannabis  
**Date:** Friday, October 27, 2017 3:10:31 PM

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Hello,

Regarding the Marijuana Control Board proposed regulations--marijuana retail store onsite consumption endorsement, specifically 3 AAC 306.370 and 3 AAC 306.990, I am writing as a lifelong Alaskan to express my FIRM support for these changes to the Alaska Administrative Code.

I have children, a Bachelors of Science, own a house in Anchorage, pay my taxes, and support the economic growth and prosperity of Alaska. Cannabis is a key component of that growth strategy.

Again, I am in complete support of onsite, safe consumption. We are over 4 billion in debt, have a shrinking economy, high crime, and are in desperate need of tax revenue and opportunity.

I encourage AMCO to please respect the wishes of the people, who have already strongly spoken on this issue, and permit the safe and legal use of cannabis. The people voted to have cannabis regulated like alcohol, and so it should.

There needs to be safe place for our residents AND tourists to consume. The last thing we need is to distract our already overwhelmed law enforcement with some peaceful tourist consuming in a park because they had no where else to consume. Please, don't make our tourists criminals. There are several reasons why a resident wouldn't be able to consume at home as well. People that rent apartments, people with children at home, etc. We MUST provide a safe place for legal consumption!! Please, don't make criminals out of our residents either.

If you have any questions, please write or call to my contact info below.  
Thank you for your open and honest consideration on this matter.

Jennifer (Germer) Chalbaud

[1-907-278-1180](tel:1-907-278-1180)

[Jegermer@gmail.com](mailto:Jegermer@gmail.com)

**From:** Carrie Harris  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I Support On site consumption of marijuana, cannabis  
**Date:** Thursday, October 26, 2017 11:55:20 AM

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I am writing in support of on-site consumption of marijuana and cannabis products. For the following reasons

\*We are adults we have voted for marijuana legalization twice now with overwhelmingly popular support.

\* if it is necessary to start another citizens initiative to allow on-site use of cannabis and cannabis products we will.

It would be sad for us to have to do that our government is supposed to work for the people not against them.

\* I'm writing this as an individual not representing the Homer Cannabis Commission I am Vice Chair of the Homer cannabis Commission we have at our city council recently approved waiting on regulations from the the state for on-site cannabis consumption of edibles.

\* I believe this will allow for more business opportunities and more needed jobs, please don't be the one to hinder that while you're handing out another liquor license where the real danger actually exist.

\* I understand the states fear of on-site cannabis consumption if you go to any of the bars and ask any of the bartenders they'll tell you there has been a major decline in there 25 and under crowd, and allowing on-site consumption will further that decline so I realize the alcohol tax money lost as a fear but that's not irrational fear because that money will be saved. Less resources will have to be used in the court system. Why because people who smoke pot are relaxed, they don't get stoned then beat their wives, that is alcohol. They don't get into stoned brawls, as there are drunk in brawls. I will say I have some expert experience in this area, I was a cop in the lower 48, in the 90s. I never went to a domestic that involved pot. I did go to a lot that involved Alcohol, in fact I don't remember going to one that didn't involve alcohol. I never went to a house party fight that involved pot or even a noise complaint, but I did with alcohol. Giggle fits just don't end in fist fights.

People are social creatures, they are going to gather to smoke, cape, and eat cannabis, currently they step outside the bars and smoke. Then go back in and have another beer. You don't have the man power to stop it, and the bartenders can't be everywhere at once.

As a night time cab driver I worked in Anchorage, Juneau, and Homer. I have watched it nightly for years.

(To calm you fears I have been here since 99 don't smoke pot when driving or even the potential to have to drive. I do smoke pot when I break bones.)

\* allowing onsite consumption gives Adults a venue other than bars to socialize, it gives Adult tourists a venue to use Cannabis, and they want to try it. I have picked those tourists up young adults to old Seniors looking for pot I had to take them to the bars and tell them to follow their nose stoners share, most the old ones were trying for the first time, then I picked them up happy.

\* onsite consumption opens the doors to restaurants, jobs. Cannabis Bars, jobs and socialization without having to be in the company of drunks telling the same story over and over again.

\*It will also bring in alot of revenue.

\* As for the unknown health effect, we are adults. This is a choice we made about our bodies when we voted, it is a choice we make when we choose to use and how we choose to use.

\*As for federal regulations I as a regular voter don't care what they think, if they choose to withhold funds then our representatives will have to stop giving oil away, tax mining a more, and skip the office remodeling.

\*I support onsite smoking, vaping, and eating of cannabis. I support sales of both cannabis and non cannabis items and foods. I support letting local governments ability to say yes or no to smoking.

\*The only part of onsite consumption I don't support is parking, I do not support parking for anyone other than employees. This will greatly reduced driving under the influence bars need to be the same way its a simple fix. Just FYI i know In my 42 years of life I have smoked less pot and drank less than any of you.

I still see their is more benefits than harm.

Carrie Harris

**From:** Mark Cheseto  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Marijuana Onsite Consumption  
**Date:** Wednesday, September 20, 2017 1:03:52 PM

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Hello,

My name is Marko Lemtukei, I am Wasilla resident. I am writing my opposition on allowing onsite consumption of marijuana. Evidence have showed that the effect on marijuana is different for each person, it takes longer in other for it to kick in, if onsite consumption is allowed, public safety will be at risk because most people will be driving under influence. There is also a misconception that it is safer than tobacco. Marijuana has more than 60 carcinogens. With the rise in opioid crisis, this could be a loophole for many young people to engage in drug reliance. More regulation need to be enacted on marijuana use just like the case of alcohol would be a better way to do it. There is no level of "high" that can be deemed safe.

With regards,

Marko

**From:** Karen & Steve Clautice  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Friday, October 27, 2017 12:17:13 PM

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We would like to go on the record as being opposed to onsite consumption for the following reasons:

1. Onsite Consumption would put stoned drivers on the roads:

a. Bars are a big enough problem, but at least some measures are in place to limit drunk driving. Bartenders cannot serve drunken customers. But because there are no ways to easily tell if a person is stoned that would hold up in court, “budtenders” won't be able to police their customers.

b. Alaska has no limits on THC content and THC concentrates added to edibles can make them extremely potent. Edibles can kick in long after the drug is ingested and the high can last for hours, so there is no way to keep a consumer of edibles at an onsite consumption location until they are safe to drive.

c. Alcohol has a testable driving limit of .08% blood alcohol level. Drunken drivers face serious consequences if caught. The limit has been lowered over the years so as to include any minor level of impairment. But there's no test and never will be for marijuana impairment. Police have no way to test and site stoned drivers that will stand up in court.

2. Smoking at onsite consumption sites will provide unsafe work environment for the workers or any emergency personnel who may be called in. Their exposure to second hand marijuana smoke could make them test positive making them unemployable by many. Outdoor smoking puts the neighborhood at risk.

3. Some strains of marijuana can make a person aggressive—another threat to the public at an onsite consumption site.

4. Onsite consumption has not been legalized anywhere else in the nation. Let someone else discover the unexpected pitfalls before we try to regulate this too.

5. Onsite consumption is not included in the enumerated legalized commercial marijuana activities. You cannot legalize through regulation, an activity that is not legal by law.

Karen and Steve Clautice

P.O. Box 83628, Fairbanks, AK 99708

**From:** Lisa Coates  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Regulations comment in Support of On-Site Consumption  
**Date:** Monday, October 23, 2017 11:01:14 PM

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I would like to submit my full support for the on-site consumption of cannabis. I believe it should be regulated like alcohol. No different. Many people do not live where they can openly consume cannabis. They live in apartment buildings, retirement homes, or condos. Cannabis users under the influence do not become violent when under the influence and the smoke created is not full of toxic chemicals like cigarette smoke is. Visitors to Alaska should have a place to consume cannabis safely.

This is also a freedom of choice issue. It harms no one, and has the potential to add more money to the state of Alaska thru taxation.

Respectfully,  
Lisa Coates  
[Lisa@ljoutfitters.com](mailto:Lisa@ljoutfitters.com)

--

Lisa Coates  
[lisa@ljoutfitters.com](mailto:lisa@ljoutfitters.com)  
907-252-4755

**From:** Christopher Constant  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Support Marijuana Public Consumption Regs  
**Date:** Wednesday, October 25, 2017 1:54:07 PM

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I would like to go on record supporting the promulgation of regulations for public consumption of marijuana. Common sense rules would go a long way in solving some of the issues related to the marijuana industry.

Thank you,  
Chris Constant  
Anchorage AK



**From:** Kristin Cox  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comments for the proposed marijuana on-site consumption  
**Date:** Friday, October 27, 2017 2:23:07 PM

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I'm writing to oppose the Marijuana Control Boards proposed on-site endorsement.

When I voted to approve marijuana legalization I did it with the understanding that this would legalize personal marijuana use as well as growing, buying and selling. The initiative specifically said NO Public use. Retail establishments are public places.

Marijuana second hand smoke is just as dangerous as tobacco second hand smoke. It is not in the public's interest to be exposed to second hand marijuana or tobacco smoke or to give the public, including youth, the impression that it is somehow safer. The burden of proof should be on the industry, not public health, to wait for 30 years of research to proof safety not harm.

Juneau has already suffered a devastating and permanent blow to three families from driving high on marijuana. One child dead, one permanently disabled and one incarcerated. More of these vehicular crashes are inevitable with an on-site marijuana endorsement. It's just whether the math works out in favor of the industry making money vs the families losing loved ones.

Please don't prioritize profits over public health.

Kristin Cox  
Juneau, AK 99801

**From:** Brian Coyle  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment in Support of Onsite Consumption Endorsement  
**Date:** Friday, October 27, 2017 1:26:54 PM

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Dear AMCO,

I fully support legal and safe on-site consumption of Cannabis. Alaska residents and Tourists who are over 21 need a place to legally consume cannabis outside of a private home. Without this option, it will continue to be consumed on the sidewalks, in the parks and parking lots and no one wants that!

Let's follow through on the initiative that was passed and "Regulate Marijuana Like Alcohol"

Thank you,

Brian

--  
Brian Coyle  
[briancgm@gmail.com](mailto:briancgm@gmail.com)  
303-304-9661

**From:** Lee Anne Crafton  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Smoke FREE PLEASE  
**Date:** Monday, October 23, 2017 10:49:53 AM

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Persons using marijuana for cancer or other illnesses do not need to be exposed to smoke while making purchases.  
Please keep shops smoke free.

thanks

May you feel safe, happy, healthy, and live with ease.

Peace and Grace

Lee Anne Crafton  
Care Coordinator and Court Visitor  
AK Hippie Chic Services  
Seeking Love, Finding Peace.  
PO Box 392 Kasilof AK 99610  
907-690-4469 office  
907-782-4145 Fax

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**From:** Buddy Crowder  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public comment in support of On-site Consumption  
**Date:** Monday, October 23, 2017 11:06:19 PM

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I would like to comment that I am in full support of regulations to allow on-site consumption of cannabis. It will provide a safe place for people to consume, much like the regulated alcohol industry. Many Alaskans who don't live in a private home should have a place they can go to that doesn't require them to be smoking out in public parks, sidewalks, etc. Visitors to Alaska also need a legal place to consume. It goes hand in hand. A regulated cannabis industry needs a regulated public place to consume.

Sincerely,  
Buddy Crowder  
[HerbanExtracts@gmail.com](mailto:HerbanExtracts@gmail.com)

**From:** Libby Dalton  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** onsite consumption of marijuana  
**Date:** Thursday, October 26, 2017 7:43:06 AM

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Re: the proposed draft regulations for onsite consumption of marijuana.

I'm concerned since there is no regulation at the State or Local level to keep these stores from being in or near our neighborhoods, but your regulations will allow people to drive to our neighborhood, smoke pot outdoors and then somehow get home. There is no logic to having onsite consumption venues for marijuana, which is why no state has done that. They can buy their product and take it home.

I have enough to worry about when I drive home; darkness, fog, snow, slick & icy roads, drunk drivers, moose. Don't add another hazard with pot smokers high on marijuana behind the wheel.

Do not allow onsite consumption in our State.

Libby Dalton  
370 Louise Lane  
Fairbanks, AK 99709

Sent from [Mail](#) for Windows 10

**From:** Char Day  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Cc:** [Marge.Stoneking@lung.org](mailto:Marge.Stoneking@lung.org); "[Emily Nenon \(Emily.Nenon@cancer.org\)](mailto:Emily.Nenon@cancer.org)"; [edyrodewald61@gmail.com](mailto:edyrodewald61@gmail.com)  
**Subject:** Official comments to Alaska Marijuana Control Board  
**Date:** Thursday, October 26, 2017 1:30:14 PM  
**Attachments:** [Marijuana Fact Sheet-101817.pdf](#)  
[Letter to AK Marijuana Control Board for regulation Oct 2017.pdf](#)

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Dear Alcohol & Marijuana Control Office,

Please accept the attached comments to the Alaska Marijuana Control Board about the new proposed regulations for on-site consumption. Thank you very much for the opportunity to provide input.

Sincerely,  
~Char Day

**Char Day**  
***Program Manager***  
**Americans for Nonsmokers' Rights**  
**American Nonsmokers' Rights Foundation**  
Direct: 970-259-3548  
Mobile: 970-317-8955  
[char.day@no-smoke.org](mailto:char.day@no-smoke.org)  
[www.no-smoke.org](http://www.no-smoke.org)

**From:** Nils Degerlund  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption of marijuana  
**Date:** Thursday, October 26, 2017 6:10:23 PM

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I am writing to express my dismay and disapproval of a proposed regulation change permitting on site consumption of marijuana. The regulation change is a bad idea for a number of reasons, including:

1. Such a regulation change affects the entire population, not just vendors of marijuana and needs to come before the people for a vote.
2. There is presently no effective regulation to keep these stores from being established and operated in residential neighborhoods near schools, bus stops, churches, day care centers and other places where our children play and learn. Our local government has shown little to no desire to stand guard for the public and has approved every single application for permit to operate a marijuana establishment, even when it violates local zoning ordinances.
3. Marijuana IS a gateway drug and as such its use should not be encouraged by the state any more than tobacco. See the study carried out by Columbia University's Mailman School of Public Health and the City University of New York which found that adults who used cannabis over 3 years were 5 times more likely to develop an alcohol problem over those who didn't. Add to that the McDowell Group reports on the Economic Effects of Alcohol and Drug Abuse and it is clear that our State cannot afford to promote or encourage or facilitate the consumption of cannabis in any location.
4. I believe that liquor stores are prohibited from on site consumption. Why should the situation be any different with marijuana?

Nils Degerlund  
3900 Plack Road  
North Pole, Alaska 99705



**From:** Kevin Doyle  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment on Marijuana Control Board proposed regulations--marijuana retail store onsite consumption endorsement - Support  
**Date:** Friday, October 27, 2017 10:20:20 AM

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Dear MCB and AMCO Staff,

I am writing in to support the regulations as drafted. Below are some of my reasons:

1. People who choose to use cannabis, either recreationally or medicinally, with friends, should be allowed to consume in communal settings which will be regulated, secure, and on-camera.
2. Allowing for groups of people to consume together is an excellent way for people to further their understanding and ensure their safety as some are more experienced than others. Usage data may also be observed in these settings.
3. Cannabis is an adult-use only substance and many responsible parents who want their children to wait until legal age prefer to not consume at home.
4. Many Alaskans do not have a residence that allows consumption, such as multi family dwellings, pioneer or veterans homes, apartments buildings or condo units.
5. Public health and safety would be better served with cannabis cafes. Unlike alcohol, cannabis does not generally cause people under the influence to act irresponsibly, nor to commit acts of domestic violence.
6. This is a freedom of choice issue which harms no-one and potentially puts millions of dollars into state coffers through industry taxation.
7. There is no credible evidence that second-hand cannabis smoke, unlike tobacco smoke which is laden with toxic chemicals, causes lung damage.
8. Many parents would appreciate not having to walk through clouds of smoke on our Alaskan sidewalks.

9. Contractors and ventilation experts/technicians would appreciate the income from the build outs of these high tech systems. This provides jobs!
10. Visitors to Alaska, would have a place to safely consume the products they are legally allowed to purchase. It is not fair for us to offer legal product to an adult, collect their tax money, but offer them no place to consume without subjecting them to civil fine or potential criminal penalty.
11. The definition of public should be fairly applied. Let's compare: Public nudity is not allowed, however we have strip clubs; public nudity is not allowed, however we have locker rooms at fitness centers; open containers are not allowed, however we have carve outs for festivals- party buses – convention centers, etc.; public urination is not allowed, however we offer public restrooms.

Thank you,

Kevin Doyle

**From:** jared.dropps@yahoo.com  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Please make Alaska better!  
**Date:** Thursday, October 26, 2017 9:52:20 AM

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To whom it may concern,

I am very disappointed with the recent decisions my fellow Alaskans have made regarding the legalization of marijuana and its consumption. I was born and raised in the Fairbanks area and now I have a wife and three children of my own. I fail to see how allowing a mind-altering drug to be freely grown, distributed, and consumed in any area (including my neighborhood) is making Alaska better. Drugs breed crime just as alcohol does. Is this the type of environment the majority of working Alaskans want to raise a family in?

Another concern is the increase in who will be driving under the influence. As a commercial driver transporting hazardous materials for the last 8 years I have witnessed many Fairbanks drivers whose driving skills are marginal on a good day. Now, I get to share the road with folks who have just left a smoke shop and have a nice afternoon buzz to get them through the rest of the day, and my family gets to share the road with them as well. The argument that the individuals who are already getting high to escape reality will have enough character to get a designated driver is ridiculously unproven at best, and borderlines denying reality itself. I hope that the Marijuana Control Board will do all that it can to curb this insanity. Onsite and public consumption should be out of the question. Let's make Alaska better! Thank you!

Sincerely,  
Jared

Sent from my iPhone

**From:** jim.dyer@spiceratchet.com  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment: On-Site Consumption  
**Date:** Thursday, October 26, 2017 2:41:41 PM

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Dear AMCO:

This e-mail is to provide my comments regarding the proposed regulations for the marijuana retail store onsite consumption endorsement.

My comments are as follows:

It is critical to the success of the legal marijuana industry in Alaska that consumers have a place to consume marijuana, other than their home, hotel room, or a public place where consumption might be considered a nuisance to other persons in the area. A designated area in a retail marijuana store seems like the best solution and will yield the following benefits.

- Gives tourists and visitors a place to consume without bothering anyone else.
- Allows local residents to consume without exposing their kids to this adult activity, or their neighbors to the smoke.
- Eliminates the need for non-residents to smoke marijuana on public streets, or in public parks.
- Provides a controlled environment for people to enjoy marijuana, without creating any sort of disturbance.

The legal marijuana industry is important to the state's economy, and onsite consumption is essential to the industry's success. Please adopt the proposed regulations for the marijuana retail store onsite consumption endorsement.

Sincerely, Jim

Jim Dyer

Chief Operating Officer

**JKD Brands, LLC**

Tel. 907-929-5838

Cell: 907-885-5135

Fax: 907-929-5895

E-Mail: [jim@jkdbands.com](mailto:jim@jkdbands.com)

Website: <http://jkdbands.com/>

Skype: jim.dyer88

**From:** Chris  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comments RE: Marijuana Onsite Consumption Endorsement  
**Date:** Friday, October 27, 2017 3:00:18 PM

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I'm sending this email to comment on the proposed regulations which would allow for onsite consumption of marijuana in our State. I am not entirely opposed to the recent legalization of marijuana, but I am seeing that the lack of regulation and the rush to promote all aspects of the commercial industry are causing significant conflict in my community.

I am requesting that the State take a step back and slow the process a bit. Research the communities and consider moving forward with more caution for public safety. As with any drug or alcohol, marijuana has some users who imbibe responsibly and some who abuse the product and will pose a hazard to the community. There is no way around it, so steps need to be taken to evaluation and minimize the risks to our communities.

I could be convinced that a level of onsite consumption could be established, but the proper research and regulation need to be in place first to address public safety concerns:

**Impair Driving** – there is currently no definitive standard or method of testing that has been established for determining marijuana impairment as it relates to operating a vehicle on our roads. This needs to be in place before knowingly creating a situation that will be abused to create hazardous driving conditions for everyone that shares our roads. Once the State has established a legal limit and sobriety testing methods for marijuana consumption, then marijuana bars or tasting venues could be considered responsibly.

**Require a Separate License** – Onsite consumption should not be allowed at retail stores any more than drinking alcohol should be allowed in a liquor store. Bars require a separate license and cannot sell alcohol products “to go”. Marijuana retail stores and tasting/smoking bars should also be required to be unique places of business.

**Limit the Quantity of Licenses** – Similar to liquor licenses, both retail licenses and onsite consumption bar licenses should be limited based on population density. Onsite consumption should be managed in a way that is sustainable for the community.

**Protection of Sensitive Locations** – Greater buffer zones should be established for onsite consumption bars. These buffer zones should be measured from lot lines and not public entrances. 1,000 feet to protect public and private schools, daycare facilities, all personal residences, churches, playgrounds, school bus stops, etc. Currently retail shops are being licensed and set up in the midst of long-established residential communities. If onsite

consumption were allowed in these locations the risks posed by impaired drivers or pedestrians would be increase sharply for the children who ride their bikes on our streets and play in their own yards next to these new businesses. 1000 foot buffer zones not only helps to protect the general public from hazards of habitual abusers but will allow for responsible consumption and enjoyment of the range of cannabis products. These buffer zones to protect families would help to prevent such conflict in the community because people can then have the choice to participate or not.

For the safety and security of our neighborhoods, please do not rush to approve onsite consumption until after these important steps are in place.

Thank you for your consideration,

Christa Dyer

[crh77@hotmail.com](mailto:crh77@hotmail.com)

907-378-0144

**From:** Chuck Eddington  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption of marijuana  
**Date:** Tuesday, October 24, 2017 9:26:19 AM

---

Hello,

I am writing you to comment on the proposed draft regulation to come before the board to allow on site consumption of marijuana. The original initiative did not allow for onsite consumption and it should not be allowed now - outside the intent of the initiative. We don't allow that for packaged alcohol sales in this state and in fact require a designated driver for patrons to get home from drinking establishments. This would be no different than allowing patrons to drink the alcohol product they just purchased in a Safeway store, or convenience store, or any other packaged alcohol store. Imagine a shopper in a grocery store wandering around the store, or outside in the parking lot, drinking their just purchased alcohol!

Also, how will there be a designated driver if even the person who is not actually smoking marijuana, if there is such a non-smoking person (and who is ostensibly the "designated driver"), is still in the company of those who are smoking marijuana, given that they will be breathing in the same smoke that the smokers are (even continuing in the vehicle)? Marijuana should be treated no differently than alcohol in this regard.

Now that it is legal to have retail pot business in residential neighborhoods, if this ordinance passes you will have marijuana smoke wafting thru neighborhoods for others to breath in second hand. It was determined long ago (the 1960's I believe) by the surgeon general of the United States that cigarette smoke, including second hand smoke, is harmful to health. Marijuana smoke is no different. One added distraction is that now there will be crowds of folks hanging around those establishments, creating a public nuisance and additional traffic flow / parking issues, since there most likely will not be adequate parking at those establishments in residential neighborhoods. And lastly, since these establishments are allowed to be open until 5 AM it will disturb the peace of the neighborhoods.

Please do not allow on site consumption in our state!

Chuck Eddington

Fairbanks



Virus-free. [www.avast.com](http://www.avast.com)



**From:** Don Enslow  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Alaskans at risk of exposure to secondhand marijuana smoke  
**Date:** Thursday, October 26, 2017 8:40:31 PM

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**As a survivor of Stage 4 Colon Cancer I am opposed to the proposed regulation allowing for onsite consumption in marijuana stores.**

**I am opposed to allowing inhaled consumption of marijuana because I have concerns about the health impacts of secondhand smoke exposure.**

**We used to separate smoking from non-smoking sections and I thought that was adequate but now I know that second hand smoke can be inhaled from a distance and can also be adsorbed by building material of construction that can ultimately potentially expose a number of individuals. We used to try to filter out or ventilate secondhand smoke from smoking areas; now we know that doesn't work. The proposed regs call for ventilation sufficient to remove visible smoke and odor, but that won't necessarily remove the fine and ultrafine particles and toxins . That concerns me because exposures to these toxins can be carcinogenic. We know that secondhand marijuana smoke and secondhand tobacco smoke contain many of the same toxins and carcinogens.**

**Thanks for the opportunity to express my concern regarding this proposed regulation.**

**Don Enslow  
donenslow@gmail.com**

Sent from [Mail](#) for Windows 10

**From:** Shelly Erickson  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Retail onsite consumption  
**Date:** Tuesday, October 10, 2017 5:07:48 PM

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I am extremely concerned about the lack of immediate driving of intoxication/drug impairment test for those driving under the influence of marijuana and other substances.

I think it is critical to have those safety nets in place before we have commercial consumption businesses

We have to protect the non users too. If there is no method that will get drivers under a substance off the road it will open up to costly legal battles especially when there is loss of life.

Thank you  
Shelly Erickson  
Box 3695  
Homer, Alaska. 99603

Public Comment from R.C. Tinderbox.

3 AAC 306.370 proposes to allow retail marijuana licensees to apply for an onsite consumption endorsement if certain conditions are met.

We feel this is a critical part of the legal industry as far as tourist are concerned as well as a safe place for our locals to consume cannabis. For a tourist it will be the matter of finding a place to consume cannabis when they have just purchased it legally, they cannot consume in a park, in public, in the hotel room, unless approved by the hotel , a rental car and if they do not have a friend with private property they are FORCED to consume in an illegal area with the potential of a ticket, this is not fair or acceptable to tell tourist who do not know our laws to say yes you can buy it but you are not able to consume anywhere oh and by the way you can't take it home with you out of State. For locals it will also be a matter of finding a place to consume with the same problems the tourist will have with one exception, they live here and may have private property they can smoke on but what about the parents that don't consume at home because of children or the renter that cannot smoke in his home. This is legal in our State and much as prohibitionist do not want this, it would be much easier to come up with regulations that regulate with support in this industry then constantly trying to dismantle what was voted on. I know that with reasonable regulations, protections for the employees as well as the public, the board can come up with reasonable regulations so that tourist as well as our locals have a safe place to consume their purchases.

**From:** Christopher Farris  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public comment for onsite consumption.  
**Date:** Friday, October 27, 2017 12:30:35 PM

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Marijuana Control Board,

The need for onsite consumption is important to consider for Alaska and its residents. If we ask people to consume responsibly then we need a realistic way for them to comply with that request. The State of Alaska, The citizens of the state and the Marijuana Industry will all benefit from transparency about how to be responsible. Currently being able to purchase but to have no place to consume is a confusing message to the public of how to consume responsibly.

- The tourists and visitors need a place to consume responsibly.
- Locals will have a place to consume out of the home away from children if needed.
- Eliminates the need for Tourists to consume in a public place.
- Provides a controlled and legal environment for people to enjoy marijuana, without creating any sort of disturbance.

The legal marijuana industry is a growing part of the state's economy, and onsite consumption is important to the industry's success. Please adopt the proposed regulations for the marijuana retail store onsite consumption endorsement.

Chris Farris

CFO – Green Jar

**From:** hek  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Marijuana Regs.  
**Date:** Monday, October 23, 2017 11:03:31 AM

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PLEASE don't let there be on-site smoking. The retail sales are bad enough at this point! We already have a state with a huge alcohol problem – sadly it has always been that way – and now you have thrown marijuana into the mix, just making it worse. And we have the largest incidence of rape in the country. WHY do you want to make this worse? More car accidents from people operating under the influence and more crime, etc., Etc., ETC. I just don't get it. WHY do you insist on compounding this and just making things worse?!

Please also send my comments to the Marijuana Control Board.

Thank you,  
Karen Franke-Helton

**From:** Make A Scene  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Regarding Onsite Consumption  
**Date:** Tuesday, October 24, 2017 3:50:07 PM

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To Whom It May Concern

I have performed as a musician for many years, played in countless nightclubs, and watched the human toll of the bar scene. Broken homes, broken lives, broken bones, and broken laws. I quit performing several years ago because I could no longer, in good conscience, contribute to the bar scene's dysfunctional culture.

None of these things would manifest from onsite consumption of cannabis.

As a matter of public safety, cannabis cafes and other onsite consumption locations will offer a better, safer, healthier alternative to the bar scene. It will reduce DUI's, as cannabis doesn't cause drunkenness, and cannot be reasonably associated with alcohol without the Strategies 360 PR firm to spin it as such. People don't over use cannabis, because like coffee, the effect is unpleasant. Whereas alcohol consumption tends towards over-consumption. Cannabis consumers are not pursuing a wild party, but a pleasant evening.

You could offer local people a chance to have a thoughtful, considerate, lighthearted evening with friends and pleasant music - or - you could prop up the alcoholic dens of iniquity that plague our society, make our roads unsafe, contribute to almost all domestic violence assaults, and literally kills Alaskans.

You will never get rid of alcohol.

But you can offer a safe alternative.

Please, consider how many lives will be saved, how many homes will be spared, and do the right thing.

Allow onsite consumption, please, for the safety and wellbeing of all Alaskans.

Sincerely  
Josh Fryfogle  
907-315-0024

Sent from my iPad

**From:** Karla Gelhar  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** For Consumption Lounge  
**Date:** Wednesday, August 30, 2017 9:48:20 PM

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Hello,

Thank you for your service and trying to navigate how to impliment the legalization of marijuana.

I am all for the consumption lounges. I have an office in downtown Ketchikan that is tucked away from the main street. Today, outside my door 3 gentlemen were hanging around smoking marijuana. They looked like tourists and not people accessing the offices in my area. This has happened multiple times. Mostly tourists trying to find an out of the way place to smoke marijuana and then go about their visit. People need somewhere to consume their purchase of marijuana and not have to duck behind buildings and in ally ways to do it.

Please allow consumption lounges so people can consume in a designated area.

Thank you,

Karla Gelhar  
Marriage and Family Therapist  
540 Water St Suite 202  
Ketchikan, AK 99901

907-921-1543

Sent from my iPhone

**From:** Brandon Germer  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Marijuana Retail Store Onsite Consumption Endorsement  
**Date:** Wednesday, October 25, 2017 12:04:46 PM

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Hello,

Regarding the Marijuana Control Board proposed regulations--marijuana retail store onsite consumption endorsement, specifically 3 AAC 306.370 and 3 AAC 306.990, I am writing as a lifelong Alaskan to express my FIRM support for these changes to the Alaska Administrative Code.

I have children, a Bachelors of Science and a Masters degree, own a house in Anchorage, pay my taxes, and support the economic growth and prosperity of Alaska. Marijuana is a key component of that growth strategy.

Again, I am in complete support of onsite, safe consumption. We are over 4 billion in debt, have a shrinking economy, high crime, and are in desperate need of tax revenue and opportunity. Please respect the wishes of the people, who have already strongly spoken on this issue, and permit the safe and legal use of marijuana.

If you have any questions, please write or call to my contact info below.

Brandon Germer  
1-907-748-5499  
[bgermer@gmail.com](mailto:bgermer@gmail.com)



**From:** Mervin - Jenny Gilbertson  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Erika McConnell  
**Date:** Thursday, October 26, 2017 8:04:57 PM

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Erika McConnel  
Alcohol and Marijuana Control Office  
550 W. 7th Avenue, Suite 1600  
Anchorage AK 99501  
[amco.regs@alaska.gov](mailto:amco.regs@alaska.gov)

I am writing this email to comment on the proposed draft regulations for onsite consumption of marijuana. It really concerns me that there is no regulation at the State or Local level to keep these stores from being in or near our neighborhoods, but your regulations will allow people to drive to our neighborhood, smoke pot outdoors and then somehow these people have to get home. Who will regulate whether they are safe enough to drive home without running over us or our family members? What if it was your family member who gets hurt or killed? If people want to smoke marijuana they should do it safely in their own homes so no one is affected by their lack of safety concern when they travel home. No other state has allowed this onsite consumption venues for marijuana, because there is no logic behind it. Please don't allow onsite consumption in our State.

Sincerely,

Jenny Gilbertson

October 26, 2017

Marijuana Control Board

I write to oppose any regulation that would allow onsite consumption in marijuana stores. The main reason I'm against this regulation is the impact of secondhand smoke on the health of those exposed to it. The proposed regulations would allow up to 1 gram of marijuana to be consumed in one visit. This is absurd.

The proposed regulations call for ventilation sufficient to remove visible smoke and odor. But what about the ultrafine particles and toxins that you can't smell or see? We already know that secondhand marijuana smoke contains any of the same toxins and carcinogens as tobacco smoke.

In years past, we tried to separate smoking from non-smoking sections in restaurants, movie theaters and airplanes. That clearly didn't work. Then we tried to filter out or ventilate secondhand smoke. That didn't work either. Surely these lessons should be applied to marijuana.

Please do not allow on-site consumption of marijuana.

Thank you.

Martha J. Ginsburg  
2600 Redwood Street  
Anchorage, AK 99508

**From:** Glenda Smith  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support regulations for public businesses for cannabis consumption  
**Date:** Tuesday, October 24, 2017 10:18:32 PM

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I think we need to look at business models that work, some for 50+ years. Some people travel to Amsterdam JUST for the coffee shops--which is one reason you might want to consider what to call them.

In Amsterdam: A licensed seller of cannabis products is always referred to as a coffee shop. A *koffiehuis* (coffee house) sells coffee and light meals. A *café* is a casual restaurant and/or bar. If you're still confused, look for a green and white sticker in the window (pictured at left), a license which designates the establishment a coffee shop.

Additionally, this would create additional jobs in construction and in service industry.

Some people do not live in a housing situation that allows them to consume at home, i.e. multifamily, Pioneer homes, etc.

I have witnessed cannabis consumption and alcohol consumption and, given a choice, I would opt for cannabis bars anytime. I have NEVER witnessed anyone become angry or violent consuming cannabis.

Since tourism is stated to be our #3 industry, let's give our visitors a place to safely consume the products they buy and not expect them to hide in the alley or, heaven forbid, consume on a Princess Tours bus.

And last, but probably not least, in our time of economic stress, when cannabis was set up to be treated like alcohol, let's provide consumption sites and include taxation of consumers into the state coffers.

Glenda Smith  
Palmer, Alaska



Virus-free. [www.avast.com](http://www.avast.com)

**From:** Brian Guvenir  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Opposition to Onsite Marijuana Consumption  
**Date:** Thursday, October 26, 2017 9:46:24 PM

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To Members of the Marijuana Control Board:

I am very strongly opposed to the proposed regulation allowing for onsite consumption in marijuana stores.

I am opposed to allowing inhaled consumption of marijuana because of the adverse health effects of secondhand smoke exposure. In the past, attempts were made to filter out or ventilate secondhand smoke from smoking areas. We know that did not work at all. The proposed on site marijuana regulations call for ventilation sufficient enough to remove visible smoke and odor. However, this won't effectively remove the fine and ultrafine particles and toxins. This concerns me because secondhand marijuana smoke and secondhand tobacco smoke contain many of the same toxins and carcinogens.

I am a critical care RN at Providence Hospital who often sees the deadly effects of second hand smoke. This not only affects those who are the active users, but also those around them, such as in strip malls, where the public does not have a choice.

I am also very opposed to allowing for any consumption of marijuana in public places because driving under the influence would endanger public safety. I believe when the public voted on the ballot initiative to legalize marijuana, they did not intend it to be legal for use in public places like marijuana cafes.

Brian Guvenir, RN, BSN; Chemical Engineering BS, MS, PhD  
Anchorage, AK

**From:** Sam Hachey  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Approval of On-Site Consumption  
**Date:** Wednesday, October 25, 2017 9:41:07 AM

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Greetings Amco,

Thank you for taking the time to read my request. I know we are all very busy and it's refreshing that you folks have the time to listen to the public. Thank you.

*I am writing in support of the on-site consumption for the reasons stated below:*

\* Allowing for groups of people to consume together is an excellent way for people to further their understanding and ensure their safety as some are more experienced than others. Usage data may also be observed in these settings.

\* people who choose to use cannabis with friends, either adult-use or medicinally, should be allowed to consume in communal settings which will be regulated, secure, and on-camera.

\* This is a freedom of choice issue which harms no one, and potentially puts millions of dollars into state coffers through industry taxation.

\* Visitors to Alaska would have a place to safely consume the products they are legally allowed to purchase. It is not fair for us to offer legal product to an adult, collect their tax money, but offer them no place to consume without subjecting them to civil or potential criminal penalty.

I support On-Site because cannabis is supposed to be treated like alcohol and adults need some venues to smoke in where they can gather.

Sincerely,

Sam Hachey

Operations  
Tanana Herb Company  
(907) 888-9696  
[TananaHerbCompany.com](http://TananaHerbCompany.com)

**From:** Reed Harding  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment for On site consumption 3 AAC 306.990 3 AAC 306.370  
**Date:** Friday, October 27, 2017 2:05:02 PM

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I want to thank the Marijuana Control Board for accepting public comment in this matter. I believe it is important to seek this feedback.

My name is Reed Harding and I live in Ketchikan Alaska. I work in the Ketchikan Wellness Coalition as their Drug Free Communities Coordinator. I am married and I have two teenage daughters in High School and two toddlers. I want Ketchikan and all of Alaska to be a safe place for my family and everyone else as well.

As a professional in prevention, I have concerns about this proposed rule change. I do not feel that after years of campaigning to bring smoking outdoors and away from indoor spaces that we should be endorsing a move to bring it back indoors. Marijuana smoke is not healthy and I am worried about the health of the employees and patrons.

Ventilation is not sufficient to remove the fine particles that are known to cause cancer. This is why we have rejected indoor smoking. We have tried to divide, we have tried to ventilate, but the reality is there is no safe exposure to smoke. I am concerned that employees working an eight-hour shift will be exposed to copious amounts of smoke.

In Ketchikan many of these proposed on site locations will be attached to other buildings and have apartments above them. By making this decision to allow smoking indoors you would be affecting more than just willing participants and employees. I wonder about families that live above these establishments and the health effects on their children.

As a father of a daughter who works part-time in a shop that is attached to a proposed on site location I am upset by the idea. She has an inhaler and to know that she will have to deal with the health effects of others choices seems unacceptable.

I feel very strongly that by endorsing indoor smoking that we are affecting our entire community in a negative manner. As cancer and other issues such as asthma increase who will be responsible for the results of this decision. Simply put, don't make your habit my problem.

Thank you for taking the time to read this and consider what the public has to say.

Reed Harding  
DFC Program Coordinator  
Ketchikan Wellness Coalition

**From:** lacey harris  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On Site Consumption  
**Date:** Wednesday, October 25, 2017 8:45:44 AM

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To Whom It May Concern;

I support public consumption of marijuana. I feel that it should be regulated just like alcohol. Please make areas available for people to consume marijuana. We should have the choice to sample the product we purchase. Or sit in a public area and consume, just like I would with alcohol.

We have a booming tourism industry. I work in a Cannabis retail store. Time and time I was asked over the summer "Where can I smoke this legally? Safely?" I had to tell them there is no place. With onsite consumption we could raise the amount of people who visit our great state, and pay taxes for their Cannabis.

The people who work in this new field would know what they were getting into. They are all over 21, and able to make their own choice. There will be ventilation. There will be limits. This needs to happen for a state lacking in revenue.

Let the Green Rush happen! Let Alaska get the revenue it needs. VOTE YES for on site consumption.

Sincerely,  
Lacey D. Harris

Sent from my iPad

**From:** Elizabeth Hays  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption of marijuana  
**Date:** Wednesday, October 25, 2017 8:28:45 AM

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Dear MCB Members,

I am writing to add my voice in SUPPORT of onsite consumption of marijuana, cannabis cafes, and other venues that allow the responsible adult partaking of cannabis in all forms.

Tourists need a place to enjoy their TAXED marijuana purchases, as do residents.

It's the law to regulate marijuana like alcohol, so let's have marijuana "bars", if you will.

It just makes sense.

Thank you,

Elizabeth Haus



**From:** Tim Hinterberger  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Marijuana Control Board proposed regulations--marijuana retail store onsite consumption endorsement  
**Date:** Sunday, October 01, 2017 10:25:45 PM

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Dear Members of the Board,

The proposed regulations to permit onsite cannabis consumption at retail facilities will advance both personal freedom and public safety.

Currently, with nowhere to publicly consume marijuana lawfully, adults are subject to a violation and a fine of \$100. Under these new proposed regulations, onsite consumption areas will allow adults to responsibly consume cannabis without the threat of penalty. These designated areas must be separated from a retail facility via either a separate building; a secure door with a separate ventilation system; or by the establishment of a designated outdoor smoking area. Consumers will not be allowed to bring their own cannabis into the site, but may only consume limited quantities of cannabis purchased at the retail facility.

The current practice of allowing adults to purchase cannabis without providing legally defined public places or establishments to use it creates a burden for many consumers, especially visitors, and for law enforcement. Licensing and regulating the social use of cannabis will limit the use of cannabis in non-designated public spaces.

These benefits of permitting and regulating onsite consumption are obvious and outweigh any possible negative effects. However, opponents of the proposed regulations continue to voice baseless concerns and to greatly exaggerate the purported negative effects. I discuss their three most common arguments below.

1. Argument: Employees of onsite consumption establishments will be exposed to marijuana second-hand smoke (SHS). This is the exact equivalent of restaurant and bar employees' exposure to tobacco SHS, which is prohibited in Anchorage.

Fact: The two situations are completely different. Restaurant and bar patrons do not go to those establishments primarily to consume tobacco, and restaurant and bar employees' duties have nothing to do with patrons' tobacco consumption. At cannabis cafes, on the other hand, cannabis consumption will be the customers' primary activity, and the employees will be present for the sole purpose of overseeing that consumption. Both patrons and employees will enter the facilities with the full understanding and expectation that they will be exposed to cannabis SHS.

2. Argument: Cannabis SHS causes known health problems.

Fact: No physiological, pathological or epidemiological evidence attributes any negative health impacts to cannabis SHS. Opponents of these regulations cite one experiment (1) in which a physiological response called "flow-mediated dilation" was measured in arteries of rats before and after exposure to cannabis SHS. The investigators found that marijuana SHS exposure impaired the response in rats longer than did tobacco SHS exposure. While this is an interesting observation from the standpoint of experimental physiology, it bears no obvious relationship to any human disease processes associated with cannabis consumption. Although epidemiological analyses have found that even direct (i.e., first-hand) cannabis consumption over many years is not strongly associated with an increased risk with of cardiovascular disease, it is true that emerging data suggest that cannabis smoking may have adverse effects

on the cardiovascular system. However, a 2017 report by the National Academies of Sciences, Engineering, and Medicine concluded that “the evidence is unclear as to whether and how cannabis use is associated with [heart attack] and stroke.” What is clear is that the much lower exposure resulting from SHS would carry even lower risk. This point bears repeating: there is no epidemiological evidence linking cannabis SHS exposure with cardiovascular injury.

With regard to the lungs, the evidence is conclusive that even direct, first-hand exposure to cannabis smoke causes little long-term damage. “Regular smoking of marijuana by itself causes visible and microscopic injury to the large airways that is consistently associated with an increased likelihood of symptoms of chronic bronchitis that subside after cessation of use. On the other hand, habitual use of marijuana alone does not appear to lead to significant abnormalities in lung function when assessed either cross-sectionally or longitudinally, except for possible increases in lung volumes and modest increases in airway resistance of unclear clinical significance. Therefore, no clear link to chronic obstructive pulmonary disease has been established. Although marijuana smoke contains a number of carcinogens and cocarcinogens, findings from a limited number of well-designed epidemiological studies do not suggest an increased risk for the development of either lung or upper airway cancer from light or moderate use, although evidence is mixed concerning possible carcinogenic risks of heavy, long-term use. ... In summary, the accumulated weight of evidence implies far lower risks for pulmonary complications of even regular heavy use of marijuana compared with the grave pulmonary consequences of tobacco.” (2) This point bears repeating: there is no epidemiological evidence linking cannabis SHS exposure with lung damage.

3. Argument: Ventilation systems cannot remove cannabis smoke from enclosed spaces.

Fact: Opponents of the proposed regulations have no basis for such a claim. They cite the American Society of Heating, Refrigerating and Air-Conditioning Engineers, ASHRAE, whose 2015 manual “Ventilation for Acceptable Indoor Air Quality” added marijuana smoke to their definition of environmental tobacco smoke (ETS) and states that there is no ventilation system that can eliminate ETS. Opponents of the proposed regulations have implied (3) that the ventilation engineers’ statement is based on some sort of documented adverse health effects of cannabis SHS in well ventilated spaces. In fact, ASHRAE presents no such evidence, because no such research exists. There is no reason to doubt the common-sense idea that proper ventilation systems can keep cannabis smoke at negligible levels in rooms where smoking takes place.

The choice by patrons to participate in cannabis onsite consumption and the choice by workers to expose themselves to cannabis SHS cannot in any way be equated to tobacco SHS exposure by patrons and employees in other sectors of the hospitality industry. During the debate over cannabis legalization in Alaska in 2014, the possible health risks of direct, first-hand cannabis smoke were widely discussed, and voters came to the reasonable conclusion that there is little evidence of significant health risks. Since SHS exposure levels are much lower, it makes no sense to claim cannabis SHS poses such a health risk that onsite consumption should remain prohibited.

Sincerely,  
Timothy Hinterberger, PhD

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1. Wang X, et al, J Am Heart Assoc. 2016 Aug; 5(8): e003858.

2. Tashkin DP, Ann Am Thorac Soc. 2013 Jun;10(3):239-47

3. For example, at the Sep. 2017 meeting of the Anchorage Federation of Community

**From:** Lance O. Ho  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Cc:** [reed@ktnkwc.org](mailto:reed@ktnkwc.org); [Paul Hook](#)  
**Subject:** On site consumption/marijuana smoke  
**Date:** Friday, October 27, 2017 12:51:56 PM

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I am Lance, currently working at Gateway in Ketchikan. I use to smoke all things, from tobacco to marijuana, crack and crystal meth. I am also a recovering drug addict of 30 years. I am strongly against marijuana use and furthermore, cannot understand how you would want to allow on-site consumption.

These are businesses that will operate in buildings shared with other businesses. The smoke and residue of the marijuana smoke will travel from room to room no matter what you try to implement to avoid such harm to other individuals. I strongly feel that this is a policy that everyone from the state and other businesses are willing to over-look for a few bucks. How in the world can a person knowing expose people to fumes that are so dangerous without them even realizing what they are breathing into their lungs.

My entire adult life we have been warned and explained the dangers of smoke from other people. Many thousands of people have died from second hand tobacco smoke inhalation and now because you all want to profit from a new and extremely lucrative business of the legalization of marijuana, It is a completely wrong morally and ethically and each and every-one of you are aware of that. Are you aware of the fact that marijuana second hand smoke is 10 times worse than tobacco smoke?

Please take all things into consideration, think of our health over your bank accounts please.

Thank you for your time!

Sincerely,

Lance Ho

**From:** Tyler Hollister  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public comment to support on site consumption of marijuana  
**Date:** Friday, October 27, 2017 12:50:36 PM

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Dear members of the MCB,

I am writing in support of on site consumption of marijuana. Alaska has continuously showed overwhelming support for common sense marijuana laws and regulations. The reality of our situation is that we are now selling large quantities of legal marijuana throughout the state and as a result we now see thousands of renters, visitors and tourists forced to consume their legally purchased cannabis as if they are still doing something illegal. This is not an issue that just the marijuana industry wants, this is an issue that the people of Alaska need. The people of Alaska need common sense regulation of on site marijuana consumption similar to that of the alcohol industry.

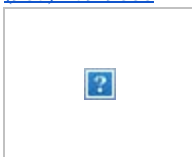
The Fairbanks North Star Borough and the City of Fairbanks recently voted in favor of keeping a legal marijuana industry with an almost unprecedented margin of victory (over 70-30) in a record turnout. The reason people showed up for this election in record numbers was for one issue, marijuana. The Fairbanks community made a major statement in this election that our community supports legal access to cannabis. It simply does not make one bit of sense to allow the legal sale of marijuana while forcing people to still step behind the bushes or risk being evicted to consume it. We absolutely need a place for responsible adults to consume cannabis in a safe and regulated environment.

Thank you for your time and consideration,

--

***Tyler Hollister***

Pakalolo Supply Company  
1851 Fox Avenue  
Fairbanks, Alaska 99701  
[\(907\) 479-9000](tel:(907)479-9000)



[thollister@pakalolosupplyco.com](mailto:thollister@pakalolosupplyco.com)  
<http://pakalolosupplyco.com>  
[Pakalolo Supply Co. - Facebook](#)

**FROM THE DESK OF  
Paul Hook  
2729 Tongass Ave. #106  
Ketchikan, Alaska 99901  
907-617-0563**

To: Marijuana Control Board

I am writing in regard to the Resolution Allowing for On-Site Consumption of Marijuana or Approving Designated Areas for On-Site Consumption in Licensed Retail Marijuana Establishments.

Ballot measure No. 2 specifically states it will ban the public use of marijuana. It does not differentiate between smoking and the consumption of edibles.

I am requesting as a concerned citizen of the State Of Alaska that this change be not made to current state law. If the people of Alaska wanted public consumption of marijuana they should have written it into the original law.

Should the Marijuana Control Board decide to change the law it should be put to the voters in a state wide election.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Hook', written over a horizontal line.

Paul Hook

**From:** Stacy Huffman  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Regulations comment in support of on site consumption regulations.  
**Date:** Tuesday, October 24, 2017 3:37:15 PM

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I am writing in support of on site consumption. On site consumption would benefit Alaska and Alaskans in so many positive ways.

Tourism is one. Tourist would most definitely purchase cannabis, if they had a safe friendly place to consume. That's tax dollars, more supply and demand, more jobs. Win win.

Secondly, locals do deserve the same rights as local bars have. A safe place to consume, safer than bars even.

My third point I'd like to mention is that on-site consumption speaks volumes to our youth. That yes, adults of 21 and older can consume cannabis responsibly. That cannabis is no longer considered a drug. And we tax paying citizens who are moms, dads, business owners, teachers, mechanics, Secretary's etc, are successful adults and can consume cannabis freely on site or in our homes.

Let Freedom Ring!

Thank you,  
Stacy H.



Dear Marijuana Control Board,

October 23, 2017

I am submitting the following comments, on behalf of the Juneau Clean Air Coalition, in opposition to the proposed on-site regulation, for the fourth time.

First, the marijuana legalization initiative stated clearly there would be no public consumption of marijuana. Retail establishments are public places. Allowing marijuana consumption goes against what was originally stated in the initiative.

Second, the dangers of second-hand tobacco smoke have been well established. Peer-reviewed and published studies show that exposure to secondhand marijuana smoke has similar health and safety risks for the general public.

Secondhand marijuana smoke contains many of the same cancer-causing substances and toxic chemicals as secondhand tobacco smoke, including significant levels of mercury, cadmium, nickel, lead, and chromium, as well as 20 times the amount of ammonia and 3-5 times more hydrogen cyanide <sup>1</sup>.

Marijuana smoke also contains fine particulate matter, like tobacco smoke, which has been shown to immediately and adversely affect the cardiovascular system. Marijuana smoke exposure had a greater and longer-lasting effect on blood vessel function than exposure to secondhand tobacco smoke <sup>2</sup>. Secondhand marijuana smoke can cause lung irritation, asthma attacks, and respiratory infections and can exacerbate conditions like asthma, bronchitis, or COPD <sup>3</sup>.

In addition, people exposed to secondhand marijuana smoke can have detectable levels of THC in their blood and urine <sup>4</sup>.

Alaskan communities fought long and hard to pass local comprehensive clean indoor air laws. Allowing onsite marijuana consumption will greatly undermine the integrity of these initiatives passed to protect their citizens.

Everyone has the right to breathe smokefree air. Smokefree policies are designed to protect the public and all workers from the health hazards of secondhand smoke. Scientific evidence shows the same should be true for secondhand marijuana smoke.

**In the interest of health for all Alaskans and long-term savings in healthcare costs, the use of combustible or aerosolized marijuana should be prohibited in public places.**

Respectfully submitted,

Juneau Clean Air

1. Moir, D., et al., A comparison of mainstream and sidestream marijuana and tobacco cigarette smoke produced under two machine smoking conditions. *Chem Res Toxicol* 21: 494-502. (2008).  
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2. Wang, X., et al., "Brief exposure to marijuana secondhand smoke impairs vascular endothelial function" (conference abstract). *Circulation* 2014; 130: A19538.  
[http://circ.ahajournals.org/content/130/Suppl\\_2/A19538.abstract](http://circ.ahajournals.org/content/130/Suppl_2/A19538.abstract)
3. "Air and Health: Particulate Matter." National Environmental Public Health Tracking Network, U. S. Environmental Protection Agency. <http://ephtracking.cdc.gov/showAirHealth.action#ParticulateMatter>
4. Herrmann ES, et al., "Non-smoker exposure to secondhand cannabis smoke II: Effect of room ventilation on the physiological, subjective, and behavioral/cognitive effects." *Drug and Alcohol Dependence*. 2015 Jun 1;151:194-202. <http://www.ncbi.nlm.nih.gov/pubmed/25957157>



**From:** Anna Jolley  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption of marijuana  
**Date:** Monday, October 02, 2017 7:18:22 PM

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This is a comment concerning legalizing on-site consumption of marijuana. Please do not allow this or rush into this process. I am totally against this. There needs to be more time to develop regulations on how to test for driving while under the influence of marijuana. People using are high, how are the store owners going to control who is leaving after using? We definitely do not want this in our town of Talkeetna, Alaska or in our state.

I am a mother of four and a nurse in this community. I have seen firsthand the devastating effects of this drug on our community and youth around the state.

Anna Jolley  
907-733-0102

**From:** Anna Jolley  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Please consider my opinion  
**Date:** Monday, October 23, 2017 1:36:15 PM

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I am opposed to the proposed regulation allowing for onsite consumption in marijuana stores.

I am opposed to allowing inhaled consumption of marijuana because I have concerns about the health impacts of secondhand smoke exposure.

We used to separate smoking from non-smoking sections . We used to try to filter out or ventilate secondhand smoke from smoking areas; now we know that doesn't work. The proposed regulations call for ventilation sufficient to remove visible smoke and odor, but that won't necessarily remove the fine and ultrafine particles and toxins . We know that secondhand marijuana smoke and secondhand tobacco smoke contain many of the same toxins and carcinogens.

I am opposed to allowing for ingested consumption of marijuana because I have concerns about public safety and driving under the influence. The proposed regulations would allow for up to 1 gram of marijuana to be consumed in one visit, and I think this is scary. This is putting us and our families at great risk!

This industry is moving way too fast with minimal regulation at the detriment to the health of our families and communities. Please consider this!

Anna Jolley RN  
Mother of Four  
PO Box 313 Talkeetna, AK 99676  
907-733-0102

**From:** Emily Kane  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Proposed on site cannabis consumption  
**Date:** Friday, September 08, 2017 7:20:17 PM

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Cannabis needs to fully come out of the closet. It is bringing new revenue to multiple AK communities but the businesses can't open bank accounts. Cannabis is being successfully used as an exit drug for getting folks off lethal (and often legal) substances like alcohol and opioids. But doctors are shying away due to perceived social stigma. Patients could be helped with medicinal use to relieve pain, insomnia, anxiety, and as more research emerges ([realmofcaring.org](http://realmofcaring.org)) we will start to appreciate further benefits in allaying the legion neurodegenerative diseases that threaten to overwhelm our health and social systems.

How are folks supposed to figure out which strain works for them unless they can experiment in a safe space with knowledgeable bud tenders? You literally cannot die from cannabis overdose. You could feel altered, even paranoid, or fall asleep -- but no evidence of acute death exists because we have virtually no endocannabinoid receptors in the heart and lungs.

Please allow cannabis to be consumed by adults in ventilated lounges. Much much safer than alcohol.

Dr Emily Kane  
Member, Society of Cannabis Clinicians  
Juneau AK

[www.DrEmilyKane.com](http://www.DrEmilyKane.com)  
[www.naturopathic.org](http://www.naturopathic.org)  
[www.primarydoctor.org](http://www.primarydoctor.org)

Join with me in  
Cultivating Exuberance

Karen Perdue  
204 Front Street  
Fairbanks, Alaska 99701

Comments on Onsite Consumption Regulations  
October 22, 2017

I have commented several times on these regulations. Each time I have expressed and continue to have grave concerns that we –as Alaskans-are moving forward on providing public places for individuals to consume cannabis without understanding or engaging in a true dialogue about the risks and legitimate concerns of all Alaskans.

I believe the initiative and subsequent law and regulations authorized marijuana consumption in private settings and the establishment of marijuana bars or onsite consumption was not one of the four authorized licensure categories.

I would continue to request that Alaska wait until other states have moved forward on onsite consumption legal structures so we might learn from them. To date, I am not familiar with any jurisdictions in North America that have authorized onsite consumption.

In addition, most of the states that have authorized legal marijuana sale-through medical or recreational – have statewide smoke free laws. This is the case for Washington, Oregon, California and Colorado. Since a significant amount of marijuana consumption is smoking it is essential that onsite consumption not hinder the increasing movement in Alaska across jurisdictions to limit indoor smoking and exposure to secondhand smoke- including tobacco and marijuana.

The MCB board in its discussion on this issue has indicated that onsite consumption would be a “sampling or tasting” setting where patrons would spend minutes to less than an hour sampling products with the idea of getting a better notion of what to purchase. This would be similar to distilleries or breweries. But few of the restrictions to limit consumption that are placed on those alcohol establishments such as hours, and disincentives to linger are present in these regulations.

This regulatory proposal is for an endorsement to the retail license. An endorsement is auxiliary to the main license and authorizes a discreet specific activity. This endorsement is overly broad for such a large segment of activity. Sanctions for violations must be tied to the retail license.

Specific comments on regulations:

**Local option:**

As intended by action at the July MCB meeting, the regulations should contain specific and clear language authorizing municipalities to regulate onsite consumption as a category rather than by individual license. The proposed language is vague.

The language is also potentially inconsistent. Section 3 AAC 306 370 A specifically references unless prohibited by local ordinance or state law, whereas subsection B does not, suggesting that a local ordinance may not regulate onsite consumption of edibles.

Unincorporated communities have no ability under this section to regulate marijuana businesses. Neither do other forms of community organization including tribal governments and community associations.

The regulations should ensure that all forms of municipal government-no matter how small- have the local option.

**Veto power**

Municipalities and other government entities should have veto power over authorization and reauthorization of individual endorsements on the retail license. Current language allows municipalities to object and recommend certain limits or conditions. It does not mean that the MCB board will honor those concerns.

While this may seem to be overprotective of local jurisdiction, this is all totally new. This step would go a long way to meeting concerns of communities that are distrustful of a fast moving new activity—that of onsite consumption.

The regs could be drafted in a way that still gives ultimate jurisdiction to the State to deny or sanction an endorsement holder if it finds it necessary.

The draft regs do seem to indicate the MCB board must give great weight to the concerns and objections of local government in determining the granting of and renewal of endorsements, but there are many unanswered questions that are essential to preserving local control.

The definition of arbitrary, capricious and unreasonable is presumably defined in precedent or elsewhere in regulation or law. The way the regs are drafted it seems all three conditions must be present for the board to overturn a local decision. It the Board should to justify that action in an administrative process including a written decision justifying why their action if it is contrary to local decision-making.

How will the appeal process be handled? Will an administrative process be instituted that brings a decision of an administrative officer to the Board?

**Summary:**

Local municipal and tribal governments should have veto power over granting onsite consumption endorsements. This seems an appropriate protection of check and balance during a time unprecedented action on the part of the state to authorize onsite consumption.

A clear administrative process and record should be established if the state retains control in overriding local decisions.

**Food and Beverages should be limited or not allowed**

Similar to other licensure categories in alcohol that are meant for “tasting room” activity there should be limits on the serving of food and other non alcoholic beverages. Title 4 has regulated brewery tasting rooms for a number of years. Similar restrictions are appropriate for marijuana onsite consumption.

Title 4 Sec. 04.11.130 limits food and entertainment in brewery tasting rooms as follows:

- (e) Unless prohibited by AS 04.16.030, a holder of a brewery license may sell not more than 36 ounces a day of the brewery's product to a person for consumption on the premises if
  - (1) the brewery does not allow live entertainment, televisions, pool tables, dart games, dancing, electronic or other games, game tables, or other recreational or gaming opportunities on the premises where the consumption occurs;
  - (2) the brewery does not provide seats at the counter or bar where the product is served;

Will the MCB board be sanctioning an operating restaurant that serves unlimited amounts of food and incenting overconsumption? The endorsement is attached to a retail store and it would seem an overreach to also include an eating place in this endorsement the equivalent of a Restaurant Eating Place License or REPL. There are many specific rules and standards that are attached to this category in the alcohol statutes.

What about Happy Hour promotions? Discounted or free food should be prohibited. AAC 306.370 B 8-10 prohibits selling marijuana at a discount or sale, but patrons are often incented to stay and consume by discounted or free food promotions.

## **Separate building should always include the retail store**

I endorse the concept of the retail store with an attached endorsement for a marijuana bar in a stand-alone building. This does possibly protect neighbors with adjacent walls and ventilation systems from odor AND particulates. For one, the stand-alone would have a separate ventilation system.

I do not support the current regulation language that allows the onsite consumption space to be physically separate from the retail store. It is necessary to have visual supervision of the consumption area to prevent overconsumption.

3AAC 306.370 1 Allows for the marijuana bar to be in a separate building from the retail store. ...Either by a separate building or by a secure door and having a separate ventilation system.

In my many years working with state laws and regulations I have participated in and observed expensive disputes about the definition of a separate building or a collocated facility.

- How far apart is acceptable to ensure supervision and security? Ten feet? Two blocks? On the same campus but not in visual access to the retail store? Across town? It should be clear that the onsite consumption area is immediately adjacent to the retail license in a manner that the retail personnel can visually supervise the endorsement activity.
- How many of these stand alone separate endorsements will be allowed with one retail license? It should be clear that only one endorsement space is authorized with one retail license.
- Does the onsite consumption area that is separate need to operate continuously or will it be allowed to be a special event license-catering to things like a concert event or a party? These events encourage over consumption and are far away from the concept of a tasting room.

## **Intoxication**

360.370 b 4 does not allow an intoxicated person to enter or remain on the premises. In another section it states that patrons must be monitored for overconsumption.

Are both the terms intoxicated and overconsumption defined in regulation as it relates to onsite consumption settings? If so, these references should be cited in the onsite consumption regulations.

Does this definition of intoxication cover all aspects of impairment that can be exhibited by marijuana products—such as edibles? And in the onsite setting as opposed to purchasing at the retail counter.

Impairment standards should be set to prevent harm to the public by delayed onset of intoxication and impairment. The definition of overconsumption and intoxication should be a high standard, as with alcohol, to protect the public from unnecessary risk. There is no definable, measurable definition of these conditions in the regulations and this is a huge gap. The MCB should be monitoring the science on this evolving area and providing feedback to the Board on how to incorporate the best thinking on this to protect the Alaska public. This is ESPECIALLY true when the regulations authorize many features, which allow patrons to spend lots of time in these settings.

The amount of consumption of marijuana products will be very hard to monitor in that it differs from alcohol in that it is common for patrons to share products and there are varying times of onset of effects depending on the product. It will be hard if not impossible to monitor individual intake.

## **Hours**

I'm under the impression that the state regulations would allow an onsite consumption establishment to be open from 8am- 5am. If so this is a ridiculous amount of time for operation of onsite consumption. This surely points to the idea that this is a bar not a tasting room or sampling activity. While municipalities will likely place further restrictions on hours this is not necessarily possible for communities in the unincorporated areas or in all communities. This presents a significant risk to public safety. The MCB should limit the hours to those allowed alcohol licensees who promote sampling, as specified in Title 4.

Title 4 Sec. 04.11.130 limits food and entertainment in brewery tasting rooms as follows:

- (e) Unless prohibited by AS 04.16.030, a holder of a brewery license may sell not more than 36 ounces a day of the brewery's product to a person for consumption on the premises if
  - (3) the room where the consumption occurs is not open before 9:00 a.m. and serving of the product ends not later than 8:00 p.m.

I recommend this approach to the MCB.

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## **Harmful effects of Smoking and second hand smoke**

I support the regulation 306.370 b3 which does not allow any form of tobacco consumption in the onsite consumption area.

It is essential that this portion of the regulation remain in any final product. The harmful effects of tobacco and second hand tobacco smoke are beyond challenge scientifically. In addition this could create a loophole by the state to local municipalities who already have smoke free ordinances in place.

The Medical Officer of the State of Alaska and the State Epidemiologist have both presented written and in person testimony to the MCB regarding the harmful effects of smoking marijuana and the second hand smoke effects. While these are not the same morbidities as tobacco –they exist all the same. They include respiratory and harmful heart effects. The MCB should do much more than regulate odor and visible smoke and should reach out nationally and internationally to get the best thinking on this. In this debate it should be acknowledged there are some medical benefits to some products containing CBD. Most of these products do not need to be inhaled through the lungs.

## **Fines and sanctions:**

The draft rules are silent on the sanctions for violation of the rules.

What are the fines and sanctions for violation of the states rules regarding onsite consumption? These are not spelled out in the draft regulations. Do the fines accrue to the retail store or the endorsement or both?

Alcohol fines are stiff including up to \$10,000 fine and license suspension for up to 45 days for the first violation of selling to an underage drinker and permanent suspension and up to \$50,000 fine for third offense. These apply to breweries, distilleries and bars. There are many other sanctions under the alcohol statutes, which allow the state to incent adherence to its rules.

Fines also pertain to retailers who sell tobacco under an endorsement. The fine and sanction structure penalize both sale of tobacco and the retailers overall license.

The board has not, to my knowledge, articulated a specific sanction philosophy to marijuana bars or tasting rooms whichever these are. This needs to be done now before the endorsement category is allowed.

Fines and sanctions need to be levied against the retail license since the endorsement is auxiliary to the primary business. For the sanctions to be

meaningful and affect behavior they must be significant, swift and against the retail license.

Also the MCB needs to examine if the sanctions to individual tenders for serving overconsumers are up date and relevant to the onsite consumption setting.

Final comments

I continue to oppose the opening of onsite consumption endorsements. If the MCB decides to proceed they must tighten the rules by which this activity is regulated with the philosophy it is a tasting or sampling activity. Smoking and second hand smoking effects should be limited and minimized.

Once the regulations are in place it will be much harder to limit or tighten rules.

End of comments

**From:** Karen Karlen  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Proposed Draft Regulations for On-site Consumption of Marijuana  
**Date:** Thursday, October 26, 2017 10:40:27 AM

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To Whom It May Concern,

I'm writing to comment on the proposed draft regulations for on-site consumption of marijuana.

I'm concerned that there are no regulations at the state or local level to keep stores from being in neighborhoods with children or near schools. I'm concerned that the regulations would allow people to drive to a neighborhood, consume marijuana outdoors and then get home while under the influence of marijuana. They should not be driving.

If people want to buy marijuana, then they can take it home and consume it.

Please, do not allow on-site consumption in our state of Alaska.

Thank you.

**Karen Karlen**  
**Fairbanks, Alaska**

**From:** Alyssa Keill  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption comments  
**Date:** Thursday, September 14, 2017 2:06:48 PM

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Dear Board Members,

While I generally support the decriminalization of marijuana, for those who need it medically, I do not support the idea of onsite consumption. I am not confident that there are appropriate safe-guards in place to warrant this kind of action. Marijuana effects are difficult to measure, last for hours, and vary from person to person. At least with alcohol, there is a definite measure (BAC) to determine intake. I don't see how this protects the community once people leave these smoking bars, with a level of impairment that no one knows. Marijuana affects the user's judgement, perceptions of reality, and ability to react quickly. Are these people safe on the road? Am I safe with these people on the road?

Also, are the employees able to be guaranteed not-under-the-influence through second-hand smoke? Were I in charge of a business, I would not want my store being run by an employee under the influence, because that is when mistakes could be made. Alert employees would be your first line of defense in judging the safety of the consumer, the way bartenders refuse to sell alcohol to very impaired customers. Smoke goes where it wants, and employees are around ALL the time. Whether they want it or not, how can you guarantee their safety? The soundness of their decisions?

Info I found: Research has shown that, in chronic users, marijuana's adverse impact on learning and memory can last for days or weeks after the acute effects of the drug wear off. As a result, someone who smokes marijuana every day may be functioning at a sub-optimal intellectual level ALL of the time.

Alyssa

**From:** Rick and Paris Kinmon  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** re: Online Consumption  
**Date:** Friday, October 27, 2017 11:33:24 AM

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*I am opposed to allowing for ingested consumption of marijuana because I have concerns about public safety and driving under the influence. The proposed regs would allow for up to 1 gram of marijuana to be consumed in one visit, and I think that this will just be the crack in the door needed to allow for more and more abuse. You cannot walk into a liquor store, purchase alcohol, open it in the store and begin consuming. In my mind it is the same thing.*

*Respectfully,*

*Paris Kinmon*

**From:** Kim Kole  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption  
**Date:** Friday, October 27, 2017 3:26:36 PM

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I support onsite consumption because:

- the Heart and Lung Association has been fighting this because of the clean air resolution. If people don't have a place to consume with friends on site, many will go home or to friends' homes to consume where there are zero ventilation systems. This Association should be supporting onsite consumption because there will be ventilation systems in place to reduce any potential damage that they are claiming is a problem.
- people need a place to consume who don't want to or are unable to consume in their homes.
- tourists need a place to consume when they purchase products from our stores.
- if people come together in bars and restaurants to consume alcohol, then they should also be able to get together to enjoy each other's company while partaking in a less damaging substance.
- the definition of "public" should be outside of private property, like in the street. If someone owns the building, they should be allowed to determine if they want people consuming on their property. Urinating on the street is unacceptable, but urinating in a public bathroom is fine. Drinking while walking down the street is unacceptable, but drinking in a privately owned restaurant is fine.
- this is a question of personal freedom. We should be able to consume and be in a room with other people consuming if we want to do so.

Thank you very much for listening to public comments throughout this process.

Kim Kole  
Raspberry Roots

**From:** Cameron Kuhle  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support marijuana onsite consumption  
**Date:** Thursday, October 26, 2017 3:43:38 PM

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Dear AMCO:

This e-mail is to demonstrate my support regarding the proposed regulations for the marijuana retail store onsite consumption endorsement.

My comments are as follows:

It is critical to the success of the legal marijuana industry in Alaska that consumers have a place to consume marijuana outside of a private residence where their consumption would not be considered a nuisance to other persons in the area. A designated area in a retail marijuana store seems like the best solution and will yield the following benefits.

- Gives tourists and visitors a place to consume without bothering anyone else.
- Allows local residents to consume without exposing their kids to this adult activity, or their neighbors to the smoke.
- Eliminates the need for non-residents to smoke marijuana on public streets, or in public parks.
- Provides a controlled environment for people to enjoy marijuana, without creating any sort of disturbance.
- Reduces intoxicated driving occurrences by enabling establishment employees to monitor users for excess use, and help arrange transportation if necessary.

The legal marijuana industry is important to the state's economy, and onsite consumption is essential to the industry's success. Please adopt the proposed regulations for the marijuana retail store onsite consumption endorsement and lead the legal states in pioneering the industry.

Thank you for your consideration.

Cameron Kuhle  
Technician  
JKD Brands, LLC  
10263 Nigh Rd. #8  
Anchorage, AK 99515  
907-929-5838

**From:** iheartbigpapa@yahoo.com  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Tuesday, October 24, 2017 7:54:58 PM

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To whom it may concern,

I support on site consumption.

I believe people need some place to use cannabis. Not everyone owns a home. What about tourist? It would be reckless to not do some thing about this. It will only increase the amount of people smoking publicly when it is clear people don't want that. People also need to be able to socialize with their cannabis.

The definition of Recreational Cannabis Use is; relating to or denoting cannabis use on an occasional basis for enjoyment, especially while socializing.

How can we have a recreational cannabis industry that does not allow us to recreate with our cannabis?

It just makes sense.

People needed some where to drink alcohol besides their homes so we gave them bars. Why would we deny cannabis users the same access or respect?

I am proud of the board for bringing it this far already. Now let's finish it and do the right thing.

Make on site consumption a reality ASAP.

Thanks for taking the time to read and consider my opinion.

Kyle H.  
Talkeetna, Alaska  
14 year resident and proud Alaskan citizen

Sent via the Samsung Galaxy Note® 3, an AT&T 4G LTE smartphone



**From:** Ronda Lambert  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Support for on-site consumption  
**Date:** Wednesday, October 25, 2017 10:43:43 AM

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I support on site consumption for retail marijuana stores.

As a retail marijuana store owner I see a real need for the State to adopt on site consumption for the tourists and locals. Right now, there is no where to legally consume outside of a personal residence, even then it may not be an option if one lives in a multi-housing complex. Our tourists are especially in a difficult position, as they can legally purchase marijuana, but have no where to consume it without facing fines and penalties.

As a state that has opened its doors to cannabis for those who chose to consume, we have a responsibility to provide safe, compliant places for them to do so. I believe that this board is moving in the right direction by setting out safe, fair, guidelines for them to do so.

Sincerely,

Ronda Lambert

**From:** Robert Lane  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Consumption of Marijuana.  
**Date:** Monday, October 23, 2017 12:09:53 PM

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Marijuana Control Board,

I'm writing to express my opposition to allowing marijuana to be consumed where people could experience second hand exposure. Marijuana is still illegal under federal law. There are many occupations and circumstances where the presence of even small amounts of marijuana in the body could result in job termination and/or disciplinary action. Speaking as a former airline pilot who was randomly tested for drugs and alcohol as a condition of employment I would not have wanted even incidental exposure to jeopardize my job. If people want to consume marijuana they should do it in the privacy of their own home.

Sincerely

Robert W. Lane  
907-223-1566

Sent from my iPad

**From:** Kelly Larson  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Marijuana Onsite Consumption  
**Date:** Thursday, October 26, 2017 4:13:51 PM

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Marijuana Control Board,

I feel like I shouldn't have to be the voice of reason and logic! Can you not see the outcome of allowing on-site consumption of marijuana. Isn't it bad enough we have drunk drivers leaving bars (yes, people drink at home too) getting on our roads? Now you want to double that risk by ALLOWING people to get high on-site (yes, people already get high at home), get in their vehicles, and also hit the roads- endangering even more Alaskans. The same roads my family uses. Why are you doubling the risk of impaired drivers? Don't we have enough? Who is going to be to blame when (not if) someone loses their life by a stoned person leaving a pot shop and driving impaired.

Who is going to police this? Our already over-loaded police and state troopers? What about the employees who are exposed to the pot smoke or loiterers (customers and vagrants who will save their money and just get a contact high)- remember contact highs? They'll be baked when they get off work (and also get into their vehicles on our roads). Do you seriously think a separate ventilation room will prevent someone from loitering in there all day? And they'll be baked too (and also get into their vehicles on our roads).

Seriously. Why are you even considering this amendment? This is nonsensical! I do not want the Marijuana Control Board to amend the existing law and allow retail marijuana store to have onsite consumption.  
Kelly Larson

## Gloria Manni

2208 Churchill Drive, Anchorage AK 99517  
T 907.276.8498 – Email: glmanni@gci.net

October 26, 2017

To: Marijuana Control Board  
amco.regs@alaska.gov

Re: Comments to Proposed Changes to the Regulations for Onsite Marijuana Consumption at retail stores  
3 AAC 306-370 and 3 AAC 306.990

I appreciate the opportunity to submit my comments. In short:

1) I have no objection to allow retail marijuana (MJ) licensees to establish on site "MJ consumption areas" for MJ edibles only, subject to the proposed limitations and appropriate user testing after consumption to insure that customers are not impaired when leaving the onsite consumption area.

2) I oppose to allow retail MJ licensees to establish on site "MJ consumption areas" for any form of smoking, vaping, etc. of marijuana buds or flowers, because it may weaken or undo the current smoke free indoor air rules that have been established in the State and specifically in Anchorage by AMC 16.65.010.

### Discussion:

I assume that the proposed regulations changes stem from well intended business motivations, however public health and safety must be protected and must not become secondary to the interest or financial motivation of any group.

- It is disappointing that the proposal to allow Onsite MJ Consumption is not supported by an estimated business plan indicating the gross benefit to the MJ industry, and the resulting related fees and tax revenue to the state and local communities. Because the use of MJ - as alcohol - may cause different levels of impairment that may require first responders intervention, identification of potential tax revenue is important to communities to plan for, and fund, intervention resources similar to those that are now required to respond to the effect of excessive alcohol consumption.

- The MJ industry has shaped its regulation after those of the alcohol industry; however smoking of MJ products is comparable only to the tobacco industry and smoking of tobacco is not allowed in public places. The negative health impact resulting from primary and second-hand tobacco have been well established through numerous and highly reputable studies that do not need to be listed again here since they have already been provided to your office by health organizations. I can personally attest to the negative health impact of tobacco smoke having experienced premature grave family losses resulting from tobacco smoke.

Smoke is dangerous because of the particulates emitted in the burning process and I understand that no commercial filtration systems are available yet to trap them. Laws and regulations have been put in place at national, state and municipal levels to control smoke in public places. It is not responsible to risk overturning them.

- Consideration of onsite MJ smoking areas must be preceded by absolute assurance from the State Attorney General and the Anchorage Municipal Legal Department that the smoke free rules established for tobacco will not be overturned if such sites were allowed.

- Given the public health risks similarities of tobacco, alcohol and MJ consumption, I suggest that the labels of all MJ products include warnings comparable to those required for tobacco and alcohol products.

Thank you for your attention.

/Gloria Manni/

**From:** marcy@lawcorner.net  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site consumption  
**Date:** Friday, October 27, 2017 4:11:19 PM

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TO WHOM IT MAY CONCERN:

I SUPPORT on-site consumption, and as a 54 year resident of the State of Alaska, I believe we have serious constitutional rights of assembly that are being denied by denying our right to assemble and our right to lawfully consume Cannabis together.

Additionally, the original ballot measure was not trying to limit adults from gathering in a public space to consume, but more to limit the open use of Cannabis in parks or from people walking down the street ingesting like they do tobacco. But, as was pointed out by a Senator in a public meeting; we have laws against public urination, but we still have "public restrooms" for that purpose. It goes to follow that if public restrooms keep people from urinating in public, that public Cannabis consumption areas will keep people from consuming in parks or on street corners.

Please pass on-site consumption regulations.

Thank-you,

Ronda L. Marcy



**Marijuana Control Board:**

As you consider proposed regulations for the on-site consumption of marijuana, the Anchorage Chamber of Commerce stands firm on the position of prohibiting smoking in the workplace within the Municipality of Anchorage. Anchorage Municipal Code (AMC 16.65) is the law that prohibits smoking in all enclosed public places and workplaces.

The Anchorage Chamber of Commerce and its board of directors supported this law when it was implemented in 2007, and our position remains the same. Second-hand smoke from marijuana contains many of the same dangerous qualities as cigarette smoke and can have similar harmful effects. We do not support any changes in law or regulations that would degrade Anchorage's smoke free ordinance. In the best interest of employee and customer safety, smoking of any kind should not be allowed in a contained or indoor work area.

Please note and respect the law that is put in place in the Municipality of Anchorage that prevents smoking in the workplace and in public areas. This law was passed in the best interest of health for all employees and patrons, and it has been embraced by residents and businesses since its passage a decade ago

Thank you for your time and consideration.

Sincerely,

Bruce Bustamante

President

**From:** Michael Mason  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On Site Consumption  
**Date:** Friday, October 27, 2017 10:14:41 AM

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Hello,

I am a licensed and bonded concert promoter. I voted to legalize and regulate marijuana like alcohol 3 years ago.

Today I can submit a temporary permit to ABC and bring a licensee to a special event for alcohol (an addictive and destructive substance) but if I were to book an act like Cypress Hill or another marijuana-friendly major national touring act there is no permitting process with the MCB to bring in a marijuana licensee. Similarly, a chef who wants to serve a gourmet meal involving intoxicating products as part of the feature of the meal is currently prohibited from expressing their art by the failure of the MCB to establish rules for on site consumption. It's been 3 years guys, what's taking so long are you all stoned?

Outdoor events have had attendees toke up for decades, we kick people out who violate the rules which discourages their future attendance - but if we could give them a cordoned off area outside where they wouldn't disturb other attendees and they could safely enjoy the show with their legally purchased products then our economy would benefit.

Give legitimate businesses in a state that voted to regulate it like alcohol the ability (within reason) to allow it in safe, controlled, 21+ conditions JUST like alcohol. No need to recreate the wheel here.

Thank you,  
Michael Mason  
Owner, ADK Events LLC  
(907)351-5647

**From:** wadenz matade  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** OnSite Consumption  
**Date:** Wednesday, October 25, 2017 12:53:32 PM

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I support regulation for on-site consumption.

It is not always convenient or even possible to consume cannabis in the home, and with cannabis being a social gathering point, it seems necessary for a common place to gather and be able to consume together. There are many other reasons, but this one is most important to me.

please move forward with onsite consumption in Alaska,

thank you  
wade



**From:** Scott Maxwell  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Friday, October 27, 2017 10:29:24 AM

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To whom it may concern -

I am a resident of Anchorage, and I support the creation of licensure that would allow marijuana businesses to establish onsite consumption areas within their place of business. I support this not only as a consumer, but as a citizen who believes that such endorsements would be in the interest of public safety.

Scott Maxwell  
907-752-9050

**From:** Michael McCuen  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption  
**Date:** Thursday, October 26, 2017 1:24:55 AM

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I support public use and/or onsite consumption of cannabis.

I feel that cannabis is no more intoxicating than alcohol and causes people to be less violent than alcohol. I feel that people have the right to test the product before purchasing it, as with any other consumables in the retail industry. I would love to see cafes and lounges open up where people could mingle and partake in onsite consumption as they do in bars, but I would even be ecstatic over being aloud to sample the product onsite as you do with food in the grocery store. I do not feel that a sample amount is enough to cause a person to be a danger to society or themselves, therefore, I believe that onsite consumption has benefits and can be handled in a safe manner. I feel that the average cannabis consumer would love to feel accepted by society. I feel that the average cannabis consumer is forced to be a "hermit" given the current regulations. I feel that this affects a person's mentality, making them less likely to engage in community activities. I feel that this has given cannabis consumers a bad reputation and a false stereotype. I feel that many cannabis consumers do not drink alcohol. I feel that this creates a sense of inequality. I feel that equality and unification are two of the most important aspects of a community and by neglecting to allow equality and unity is instigation for rebuttle. This creates an imbalance within the community. I do not feel that onsite consumption will pose any dangers for the community. I feel that the allowance of onsite consumption will only bring the community together. I do not see any reason not to allow onsite consumption.

Best regards,  
Michael McCuen

**From:** Sam Hachey  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Approval of On-Site Consumption  
**Date:** Wednesday, October 25, 2017 9:41:07 AM

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Greetings Amco,

Thank you for taking the time to read my request. I know we are all very busy and it's refreshing that you folks have the time to listen to the public. Thank you.

*I am writing in support of the on-site consumption for the reasons stated below:*

- \* Allowing for groups of people to consume together is an excellent way for people to further their understanding and ensure their safety as some are more experienced than others. Usage data may also be observed in these settings.
- \* people who choose to use cannabis with friends, either adult-use or medicinally, should be allowed to consume in communal settings which will be regulated, secure, and on-camera.
- \* This is a freedom of choice issue which harms no one, and potentially puts millions of dollars into state coffers through industry taxation.
- \* Visitors to Alaska would have a place to safely consume the products they are legally allowed to purchase. It is not fair for us to offer legal product to an adult, collect their tax money, but offer them no place to consume without subjecting them to civil or potential criminal penalty.

I support On-Site because cannabis is supposed to be treated like alcohol and adults need some venues to smoke in where they can gather.

Sincerely,

Sam Hachey

Operations  
Tanana Herb Company  
(907) 888-9696  
[TananaHerbCompany.com](http://TananaHerbCompany.com)

**From:** Marc McNab  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site cannabis use letter  
**Date:** Sunday, September 03, 2017 9:20:36 PM

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I strongly favor the approval of the current proposal to allow on site use of cannabis in all its forms. In fact, I am all for making cannabis a complete equal to alcohol and allow cannabis bars to exist under the same rules as bars that sell and serve beer, wine and hard liquor. Please consider the following points:

- [if !supportLists]-->1. <!--[endif]-->I was a regular customer of the now out-of-business Pot Luck Events (3<sup>rd</sup> Avenue and E Street in Anchorage) and now am part of an unnamed group that gathers for the enjoyment of cannabis use. In both cases, I have NEVER witnessed any out of control behavior; the police never had to respond, there was no anger, and no raised voices! Cannabis use WILL occur; I have my own house, friends and other cannabis friendly property to use, but what can out-of-town visitors/tourists do? Alleyways or a woodland trail?
- [if !supportLists]-->2. <!--[endif]-->The legal cannabis industry is growing leaps and bounds! Buildings that used to be vacant now are attractively remodeled, paying property taxes, employing many people and selling a product in demand. Allowing on site consumption will assist in this positive trend to continue.
- [if !supportLists]-->3. <!--[endif]-->I've read that this on-site cannabis use proposal would only allow using cannabis edibles; smoking cannabis is seen by some as a source of hazardous second hand smoke. But it's not! First, there are few, if any carcinogens in cannabis smoke and second, cannabis smoke has many proven health benefits. That said, cannabis users have other methods of use other than infused foods and smoking joints. These methods include smoking the cannabis concentrate called shatter that gives off much less smoke than joints, and the use of an e-cigarette with a THC liquid cartridge and using dry herb vaporizers, both of which only give off vapor, which is only hot air akin to cooking food.

Marc McNab

Anchorage, Alaska

**From:** Mike M  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** proposed draft regulations for onsite consumption of marijuana  
**Date:** Tuesday, October 24, 2017 6:12:38 PM

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To:  
Erika McConnell  
Alcohol and Marijuana Control Office  
550 W. 7th Avenue, Suite 1600  
Anchorage AK 99501  
[amco.regs@alaska.gov](mailto:amco.regs@alaska.gov)

Dear Ms. McConnell,

I'm writing to comment on the proposed draft regulations for onsite consumption of marijuana.

First, there is no regulation at the State or Local level to keep these stores from being in or near our neighborhoods. Your proposed regulations will allow people to drive to our neighborhood, smoke marijuana outdoors and then somehow get home.

Second, unlike a designated driver at a bar, who can visit with friends while only drinking non-alcoholic beverages to remain sober, a so-called "designated driver" at an on-site pot consumption location is sitting there in the presence of second-hand pot smoke. This exposure does not in any way assure that this "designated driver" will not also be impaired.

It does not make any logical sense to have onsite consumption venues for marijuana, which is why no state has done that. They can buy their product and take it home.

Please don't allow onsite consumption in our State.

Sincerely,  
Michael Mitchell  
Fairbanks, AK

**From:** Charles Moran  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Thursday, August 31, 2017 8:52:59 AM

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Hello members of the Alaska Marijuana Control Board,

My name is Charles Moran, I am a born and raised Alaskan from Ketchikan. I am writing to you concerning the proposed change allowing onsite consumption in dispensaries meeting certain criteria.

As you know Ketchikan and many towns in Southeast Alaska thrive on tourism. I have known the Woodwards, who operate the Stoney Moose in Ketchikan, for many years and when I visited their establishment this summer it was clear their wonderful business's potential was severely curtailed by fact that any tourists wanting to purchase their products would have no where to legally consume them.

I urge you therefore to allow business in our beautiful state to be able to provide that space. Changing this regulation would not only allow business to greatly expand their consumer base and bring more money into our economy, I wholly believe it continues the proud Alaskan tradition of supporting local business owners and giving them every available opportunity to thrive.

I thank you for your time and your consideration of this issue. I hope you will choose to support our business owners and continue our State's proud tradition of personal freedom.

Sincerely,  
Charles Moran  
Ketchikan Alaska  
820 Monroe St.

Sent from my iPhone

**From:** Herbal Outfitters  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Per On-Site Consumption  
**Date:** Friday, October 27, 2017 1:26:24 PM

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I am writing this to show support for on-site consumption. I manage a retail marijuana store in Valdez & I see daily instances of how these establishments could benefit both tourist and locals in the state.

With having safe legal access to cannabis individuals over the age of 21 should be able to come together and safely consume their cannabis in some fashion where it is not solely limited to personal residences.

Thanks for your time & consideration,  
Derek Morris

--

**Derek Morris**

General Manager

**Herbal Outfitters**

**E: [info@herbaloutfitters.green](mailto:info@herbaloutfitters.green)**

**C: (719) 964-1854**

**O: (907) 835-4201**

**From:** Muller, Judith M  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption of marijuana  
**Date:** Tuesday, October 24, 2017 8:29:18 AM

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I work in a cancer program and see the devastating effects of smoking and chewing tobacco and other products on the health of individuals who use the products and those people who work or live around them.

Please do not move us backwards in our efforts to reduce incidence of and mortality from cancer. Please do not allow on site consumption of any substances, including marijuana.

**Judith Muller, MHA**





THE STATE  
of **ALASKA**

GOVERNOR BILL WALKER

**Department of  
Health and Social Services**

DIVISION OF PUBLIC HEALTH  
Director's Office

3601 C Street, Suite 756  
Anchorage, Alaska 99503-5924  
Main: 907.269-8126  
Fax: 907.269-2048

October 23, 2017

Erika McConnell, Director  
Alcohol and Marijuana Control Office  
550 W 7th Ave, Suite 1600  
Anchorage, AK 99501

Dear Ms. McConnell:

On behalf of the Alaska Office of Substance Misuse and Addiction Prevention, we respectfully submit comments on proposed regulation 3 AAC 306.370 and 3 AAC 306.990 (b) to allow retail marijuana licensees to apply for an onsite consumption endorsement, and to define "marijuana consumption area", respectively. This proposed regulation raises concern for Alaskans' health and safety; therefore, we oppose the onsite (public) consumption of smoked, vaped, aerosolized, and edible marijuana products on retailer premises because of the potential health harms to users and non-users.

**Public consumption of marijuana was intended to remain illegal.** The language in Ballot Measure 2, voted on by the public and now enacted in AS 17.38.040, does not allow for public consumption of marijuana and includes a \$100 fine for this activity. Regulations—first adopted by the Board in February 2015 to define the term "public"—support this restriction. Sec 17.38.020 of the initiative stated: "...nothing in this chapter shall permit the consumption of marijuana in public."

**Many local communities lack the health powers to enact smokefree laws.** The proposed regulations 3 AAC 306.370 (a) (2) (A) states that these regulations would be in effect "unless prohibited by a local ordinance or state law." Currently, approximately half of Alaska's population is covered by a local smoke free workplace law and many of those communities have updated their local ordinances to include marijuana secondhand smoke. However, some boroughs, such as the Matanuska Susitna Borough and the Fairbanks North Star Borough, would be unable to choose to prohibit onsite consumption if they wanted to because they are organized as second class boroughs without health powers.

**Marijuana is known to impair reaction time, hand-eye coordination, and perception of time and distance, all of which increase the risk of being involved with motor vehicle crashes.**

Marijuana affects people differently. The high from smoking marijuana can often be felt right away. However, the effects of marijuana can take longer to develop and last longer when eating or consuming marijuana. It is known that marijuana can make it unsafe to drive, bike, and do other activities, and the effects of marijuana edibles can last longer than users think. A person may feel safe to drive after a few hours; however, impairment can last much longer.

In a recent report released by the National Academies of Science, Engineering and Medicine, “substantial evidence of the statistical association between cannabis use and increased risk of motor vehicle crashes” was identified as one of the primary conclusions. Our concern with this proposal is that an increase in public consumption of marijuana may lead to increased driving under the influence, a significant public health area of concern.

**Exposing others to secondhand smoke (SHS) is a public health hazard.** In 2006, the U.S. Surgeon General concluded that there is no safe level of secondhand tobacco smoke. Because marijuana is illegal under federal law, there have been a limited number of studies examining health risks associated with second marijuana smoke exposure. However, peer-reviewed and published studies indicate that exposure to secondhand marijuana smoke may pose health risks for the public, especially due to its similar composition to secondhand tobacco smoke. According to Moir, et al, (*Chem Res Toxicol* 2008;21:494-502): “Secondhand marijuana smoke contains many of the same cancer-causing substances and toxic chemicals as secondhand smoke. Some of the known carcinogens or toxins present in marijuana smoke include: acetaldehyde, ammonia, arsenic, benzene, cadmium, chromium, formaldehyde, hydrogen cyanide, isoprene, lead, mercury, nickel, and quinolone. Moir, et al. also found significant amounts of mercury, cadmium, nickel, lead, and chromium in marijuana smoke. Comparing it to tobacco smoke, there was 20 times the amount of ammonia and 3-5 times more hydrogen cyanide in marijuana smoke.”

Additionally, a recent study published in the Journal of the American Heart Association concluded that “second hand smoke can exert similar adverse cardiovascular effects regardless of whether it is from tobacco or marijuana.” (Wang X, et al; *J Am Heart Assoc* 2016; DOI:10.1161/JAHA.116.003858)

**No type of ventilation system will protect the public from the effects of secondhand smoke, vapor or aerosol.** The proposed regulations contain a requirement for separate ventilation systems, separated by a “secure door”. Filtering the air or using ventilation systems will not completely protect the public’s health from marijuana smoke. This is supported by the 2006 U.S. Surgeon General report entitled “The Health Consequences of Involuntary Exposure to Tobacco Smoke: A Report of the Surgeon General.” The report stated that the scientific evidence now supports the following major conclusion:

“Eliminating smoking in indoor spaces fully protects nonsmokers from exposure to secondhand smoke. Separating smokers from nonsmokers, cleaning the air, and ventilating buildings cannot eliminate exposures of nonsmokers to secondhand smoke.”


October 23, 2017

Page 3

Furthermore, American Society for Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE), the standard setting body for the ventilation industry, affirms that mechanical solutions like ventilation cannot control for the health hazards of secondhand smoke, and it recently amended its ventilation standard in 2016 for acceptable indoor air quality to address marijuana. The proposed ventilation requirements in the regulations would cause businesses to invest money in structural changes, and yet not eliminate the health risks of exposure to marijuana secondhand smoke.

*Based on these concerns for the health and safety of Alaskans, we recommend the Board not allow smoked, vaped, aerosolized, or edible marijuana consumption in public.* Thank you for your time and consideration in supporting the health and safety of all Alaskans.

Sincerely,



Jay C. Butler, MD  
Chief Medical Officer, and  
Director of the Division of Public Health

**From:** CHARTERS INC PHANTOM-TRI RIVER  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** NO consumption on premises!!  
**Date:** Thursday, August 24, 2017 12:46:01 PM

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To whom it may concern:

As a tour operator and resident in Talkeetna I am **very opposed** to changing the law to allow the consumption of marijuana on the premises where it is being sold.

With the budget issues in Alaska the state closed up the trooper post at the junction 14 miles from Talkeetna. As a result, we have noticed an increase in vandalism in the early morning hours to many businesses here in Talkeetna, as well as a higher than normal amount of people who are under the influence of marijuana.

Drinking in this little town is a problem not to mention now you have allowed the opening of a pot shop here in town which sells edibles laced with marijuana as well as the actual drug itself. There is nothing good to come from selling pot here except someone getting rich off it.

The people who purchase this drug from the local pot shop currently are not allowed to consume it on the premises. I don't think the law should be changed to allow that. This is a small village with a huge influx of people during the summer months. If you allow the consumption on the premises, you will have a bunch of drugged out stoners walking the streets, not to mention participating in activities here.

As a business owner I do not want to have high or stoned clients. Not only is it offensive to other clients, it is a major safety issue. With alcohol I can at least smell it and monitor how much of it goes on my boat. With pot it poses a different problem...if you allow consumption the client can get high and then come get on the boat. When this town gets out of control with stoners (like it will) Princess Cruise lines and other big tour companies will cease coming here. What was once a quaint little village is now becoming a destination that families will choose to avoid.

Please DO NOT ALLOW consumption on the premises!

Margo Nealis  
Phantom-Tri River Charters Inc.  
Talkeetna AK

**From:** John Nemeth  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Cannabis Consumption  
**Date:** Friday, September 08, 2017 9:28:46 AM

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AMCO,

I am writing to fully support onsite consumption of cannabis. This will provide a safe place for people to consume and keep it off the streets and other non regulated areas where it can effect non consumers or under aged individuals.

Please adapt reasonable regulations to support onsite consumption. This should be mandatory for all Alaskan communities.

Thank you for your time,

John Stephen Nemeth  
(907)-290-3433  
1220 Glacier Ave #204  
Juneau, AK 99801

Sent from John Nemeth's iPhone

**From:** John S Nemeth  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment in Support of On-Site Regulation  
**Date:** Thursday, October 26, 2017 1:28:42 PM

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I am writing in support of the on-site consumption of marijuana for the reasons stated below:

- People who choose to use cannabis with friends, either adult-use or medicinally, should be allowed to consume in communal settings which will be regulated, secure, and on camera.
- Allowing for groups of people to consume together is an excellent way for people to further their understanding and ensure their safety as some are more experienced than others. Usage data may also be observed in these settings.
- Cannabis is an adult use only substance and many parents who want their children to wait until legal age prefer to not consume at home.

Thank you for your time,

John

JOHN S NEMETH  
[c] 313.318.5322  
[jsnemeth@me.com](mailto:jsnemeth@me.com)  
1220 Glacier Ave, #204  
Juneau, AK 99801

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**From:** darrell niles  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** IN SUPPORT OF ON SITE CONSUMPTION REGULATION  
**Date:** Wednesday, October 25, 2017 10:05:17 PM

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WE THE PEOPLE of ALASKA VOTED TO REGULATE CANNABIS LIKE ALCOHOL. I am in support of legalizing on site consumption for the following reasons.

1) Tourism- People that come to Alaska to visit do not have a home to consume purchased Cannabis from a regulated retail store. This puts tourist in a position where they have to consume illegally if they purchase cannabis from a retail store. It also prevents tourist from purchasing legal cannabis because there is not a legal place to consume.

2) Alcohol is used in public settings and therefore cannabis should be dealt with in the same manner. After all, this is what the people voted for!

3) Responsible cannabis users need a place to socially consume cannabis products.

4) Revenue for the state. Onsite consumption will require retail stores to employ more Alaskans to monitor these places. A person that can consume where they purchase is more likely to purchase larger amounts which in return is revenue for the state from the cultivator.

5) Many Alaska residents live in apartments and cannot consume it in their residence because it is against their landlords policy.

6) On site consumption keeps cannabis in a controlled environment and out of the hands of minors.

Thank you for the opportunity to let the peoples voice be heard,

**From:** Kristen Niles  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site Consumption  
**Date:** Thursday, October 26, 2017 11:26:14 AM

---

WE THE PEOPLE of ALASKA VOTED TO REGULATE CANNABIS LIKE ALCOHOL. I am in support of legalizing on site consumption for the following reasons.

- 1) Tourism- People that come to Alaska to visit do not have a home to consume purchased Cannabis from a regulated retail store. This puts tourist in a position where they have to consume illegally if they purchase cannabis from a retail store. It also prevents tourist from purchasing legal cannabis because there is not a legal place to consume.
- 2) Alcohol is used in public settings and therefore cannabis should be dealt with in the same manner. After all, this is what the people voted for!
- 3) Responsible cannabis users need a place to socially consume cannabis products.
- 4) Revenue for the state. Onsite consumption will require retail stores to employ more Alaskans to monitor these places. A person that can consume where they purchase is more likely to purchase larger amounts which in return is revenue for the state from the cultivator.
- 5) Many Alaska residents live in apartments and cannot consume it in their residence because it is against their landlords policy.
- 6) On site consumption keeps cannabis in a controlled environment and out of the hands of minors.

Thank you for the opportunity to let the peoples voice be heard,

Kristen Niles



**From:** Marci Nowland- Cartier  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support onsite consumption in Alaska  
**Date:** Friday, October 27, 2017 11:01:09 AM

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Dear AMCO:

This e-mail is to provide my comments regarding the proposed regulations for the marijuana retail store onsite consumption endorsement.

My comments are as follows:

It is critical to the success of the legal marijuana industry in Alaska that consumers have a place to consume marijuana, other than their home, hotel room, or a public place where consumption might be considered a nuisance to other persons in the area. A designated area in a retail marijuana store seems like the best solution and will yield the following benefits.

- Gives tourists and visitors a place to consume without bothering anyone else.
- Allows local residents to consume without exposing their kids to this adult activity, or their neighbors to the smoke.
- Eliminates the need for non-residents to smoke marijuana on public streets, or in public parks.
- Provides a controlled environment for people to enjoy marijuana, without creating any sort of disturbance.

The legal marijuana industry is important to the state's economy, and onsite consumption is essential to the industry's success. Please adopt the proposed regulations for the marijuana retail store onsite consumption endorsement.

Sincerely,

Marci Cartier

AK Fireweed

Sent from [Mail](#) for Windows 10



Jana D. Weltzin  
Licensed in Alaska &  
Arizona 3003  
Minnesota Blvd.,  
Suite 201  
Anchorage, Alaska 99501  
Phone 630-913-1113  
Main Office 907-231-3750  
JDW, LLC  
jana@jdwcounsel.com

October 27, 2017

Marijuana Control Board  
Director McConnell  
*Sent Via Email*

**Re: Public Comment for November 2017 MCB Meeting**

Dear Honorable Members of the Marijuana Control Board & Director McConnell:

Thank you for considering my public comment for the regulation projects identified below.

**Onsite Consumption Venues**

Now that marijuana is a legal product in the state of Alaska it is essential we provide a place for residents and tourist to consume their legal cannabis in a legal way. There are negative impacts of legalizing a product, but at the same time prohibiting any venue other than one's home to consume it. Children will be subjected to second hand smoke in homes if we do not provide a ventilated space for them to comfortable consume. Children will also be subjected to the second-hand smoke and the viewing of persons consuming in open play areas like parks and play grounds if we do not provide a place to consume for marijuana uses. With the goal of protecting health and safety of the public the proposed regulations are not perfect, but they are a perfect stepping stone to move forward and refine and tweak as implementation occurs.

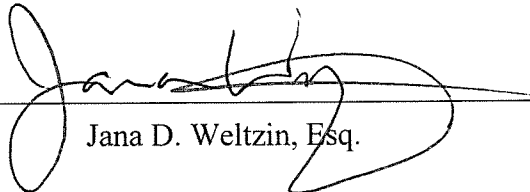
One of Alaska's most important (and renewable) resources is our tourism industry – if we do not provide a consumption venue for marijuana it could negatively affect our tourism industry. Approximately 1,857,500 visitors came to Alaska between May and Sept of 2016. (*see <https://www.commerce.alaska.gov/web/Portals/6/pub/TourismResearch/AVSP/2016/00.%20AVSP%207%20FULL%20DOCUMENT.pdf?ver=2017-06-06-143654-223>*). One of the most

negative and consistent reports of other legalized states is the complaint of persons smoking marijuana in parks and on the sidewalks. 82% of all summer visitors from out of state come to Alaska for a family vacation/for fun. *Id.* If those families visit our communities and our natural parks are plagued with the smell of marijuana cigarettes, it could leave a negative impression (as it has in other states) on those visitors, and that could reduce our number of visitors in the following years. With social media and the ability to reach hundreds/thousands of people just from the touch of an iphone screen, one family's bad experience could snowball to another family not visiting our great state next year. It may seem like a small impact at first, but over time if we are known as the stinky last frontier, it could have a real financial impact on one of our only upward trending economic drivers. In 2016, our visitors spent almost two billion (\$2BILLION) dollars on food, gifts, Alaskan excursions, not to mention the economic impacts of those employed by the tourism industry. It's a huge revenue source for our economy and we must protect it in all the ways that we can, including providing a venue for marijuana consumers (who may be tourists as well) and by providing natural, clean, smoke free parks for families to enjoy.

The proponents of clean air do incredibly valuable work, of which none of their work will be undermined by providing a ventilated, regulated and separated consumption area for marijuana consumers. In fact, the great work of the clean air proponents will actually be furthered by reducing the risk of kids in their homes being subjected to marijuana second hand smoke and in parks and on the streets.

While no ventilation system is perfect, a ventilation system designed to filter fine particulates out of the air is better than no ventilation system – which is exactly what will happen if we do not move the onsite consumption regulations forward into law. Children, instead of employees, will be forced to inhale unfiltered marijuana second hand smoke (and at least under the proposed regulations employees will have the choice whether to work in these types of establishments and the air will at least be filtered and ventilated). Park goers will have no filtration system to protect them as they walk their dog through the park. Some choice is better than no choice at all. Provide the venue for consumers to consume – give them a choice to engage in consumption away from children & away from those who have chosen not to consume, in a ventilated and filtered environment.

As always, thank you for your hard work and dedication to our state and industry.



Jana D. Weltzin, Esq.

**From:** Terry Snyder  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 4:16:04 PM

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I would like to submit testimony the the board is collecting regarding onsite consumption of marijuana on behalf of myself only.

I think it is premature for the state to allow for onsite consumption. While I am not personally against the legalization of marijuana (I moved to Alaska in the 70's when it was legal) I think it is irresponsible of the state to allow any second hand smoke in the workplace even if workers are aware it is present for several reasons.

- The investment into the science of the effects of marijuana to the public has not been done to the state should always be conservative in its regulation when it comes to the safety and health of people.
- The effects on individuals varies wildly and there is not conclusive evidence that it would be a safe practice to be allowed for the same reasons we do not let people sample liquor they intend to buy at liquor stores.
- Alaska can not afford at this time the possible costs of what will results in increased enforcement, investigative and legal costs to a strained public safety department.

It is only prudent to take the advantage to see how other states much more advanced in the experience of legislating marijuana for the public.

Respectfully,

Terry Snyder  
Palmer, Alaska

**FROM THE DESK OF  
Sunny Webster  
59 Mattle Road  
Ketchikan, AK 99901  
907-225-5281**

To: Marijuana Control Board

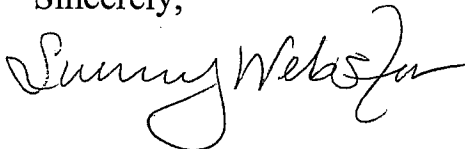
I am writing in regard to the Resolution Allowing for On-Site Consumption of Marijuana or Approving Designated Areas for On-Site Consumption in Licensed Retail Marijuana Establishments.

Ballot measure No. 2 specifically states it will ban the public use of marijuana. It does not differentiate between smoking and the consumption of edibles.

I am requesting as a concerned citizen of the State Of Alaska that this change be not made to current state law. If the people of Alaska wanted public consumption of marijuana they should have written it into the original law.

Should the Marijuana Control Board decide to change the law it should be put to the voters in a state wide election.

Sincerely,

A handwritten signature in cursive script that reads "Sunny Webster". The signature is fluid and stylized, with the first and last names being clearly legible.

Sunny Webster

**From:** marcy@lawcorner.net  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site consumption  
**Date:** Friday, October 27, 2017 4:11:19 PM

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TO WHOM IT MAY CONCERN:

I SUPPORT on-site consumption, and as a 54 year resident of the State of Alaska, I believe we have serious constitutional rights of assembly that are being denied by denying our right to assemble and our right to lawfully consume Cannabis together.

Additionally, the original ballot measure was not trying to limit adults from gathering in a public space to consume, but more to limit the open use of Cannabis in parks or from people walking down the street ingesting like they do tobacco. But, as was pointed out by a Senator in a public meeting; we have laws against public urination, but we still have "public restrooms" for that purpose. It goes to follow that if public restrooms keep people from urinating in public, that public Cannabis consumption areas will keep people from consuming in parks or on street corners.

Please pass on-site consumption regulations.

Thank-you,

Ronda L. Marcy

Submitted By	Comment
<p>10/27/2017 2:29:42 PM  Caleb Szklarz  <a href="mailto:caleb.usa@outlook.com">caleb.usa@outlook.com</a>  North Pole, AK, US  Anonymous User</p>	<p>Hello Mrs. McConnell,  Good afternoon. I'm writing this email to express my comments on the proposed draft regulations for onsite consumption of marijuana. This makes absolutely no sense to endanger more lives by having onsite consumption venues for marijuana. No other state has done that. If they want to buy their product and use it at their house that is one thing but this will hurt all of us in Alaska, the residents, tourists, everyone!</p> <p>It is hard to believe we have to justify why such a thing is hurtful for Alaska but since we do, here it goes.</p> <p>1. Someone who leaves one of these sites is likely to drive or even if they are walking around they are still a danger to others:</p> <ul style="list-style-type: none"> <li>• Unlike alcohol when they smoke this it their body absorbs THC right away.</li> <li>• It has been documented by our U.S. gov't research that, marijuana affects almost every organ in the user's body, and their nervous system and immune system, too. This is not the people we want on any road but especially on our often icy roads.</li> <li>• A few of the symptoms of those who use marijuana, can have are:</li> <li>• Slowed reaction time (If you drive after using marijuana, your risk of being in a car accident more than doubles.(A scary thought on our dangerous winter roads. Especially when it has been shown that most of the consumers of Marijuana are between 18-25 so have not had as many years' experience driving in adverse driving conditions.</li> <li>• impaired body movement and coordination</li> <li>• difficulty with thinking and problem-solving, (both of course needed for safe driving)</li> <li>• Dizziness</li> <li>• impaired memory</li> <li>• hallucinations</li> <li>• delusions</li> <li>• psychosis</li> <li>• paranoia</li> </ul> <p>2. The Lung Association and others have made it clear that there is no amount of ventilation that can mitigate the bad health effects of</p>

Submitted By	Comment
	<p>second-hand smoke from any source. Removing visible smoke is insufficient to protect health.</p> <p>3. NIDA states in their U.S. government publication that secondhand marijuana smoke can do as much damage to the heart and blood vessels.</p> <p>4. Babies born to mothers who inhaled secondhand smoke are often lower birth weight and are more likely to die from SIDS (sudden infant death syndrome).</p> <p>5. To allow these impaired people to consume marijuana at public establishments makes absolutely no sense. With alcohol you can have a designated driver drinking their own non-alcoholic drink, however that is not possible in a smoking facility. The second hand smoke impairs the “designated driver” as well.</p> <p>6. Traffic fatalities linked to marijuana are up sharply in Colorado since the legalization of marijuana and we will obviously have more driving drugged if this goes through.</p> <p>7. It is my understanding that it is illegal to smoke marijuana in public and that includes public buildings and outdoors. The 2014 initiative didn't have any license for on-site consumption, so we never voted on it.</p> <p>8. The legislature has never added it as an option. It's just the MCB, that has decided to make their own law, and it would ultimately take a court case to stop the regulations if they implement them.</p> <p>9. In addition it isn't allowed in any of states that legalized marijuana. The MCB is making Alaska a Guinea pig, with no way of knowing the long-term results of this foolish idea.</p> <p>10. If you speak to troopers or local police officers you will learn that there has already been a definite increase in the drugged driving rate in ours and other states that have legalized marijuana, allowing people to consume on-site will obviously not help this issue but will have the opposite effect.</p> <p>Thank you for giving this serious consideration. We need your help to protect our State. Everyone knows our state is in trouble but if this goes through we will be in much worse shape than we can imagine.</p>



Submitted By	Comment
	Thank you, Caleb Szklarz Fairbanks North Star Borough Registered Voter
<p>10/26/2017 9:53:09 PM Goldie Szklarz <a href="mailto:servingmyfamilyinak@gmail.com">servingmyfamilyinak@gmail.com</a> North Pole, AK, US Anonymous User</p>	<p>Ms. McConnell, Greetings, I'm writing this email to express my comments on the proposed draft regulations for onsite consumption of marijuana This makes absolutely no sense to endanger more lives by having onsite consumption venues for marijuana. No other state has done that. If they want to buy their product and use it at their house that is one thing but tis will hurt all of us in Alaska, the residents, tourists, everyone! It is hard to believe we have to justify why such a thing is hurtful for Alaska but since we do, here it goes.</p> <p>1. Someone who leaves one of these sites is likely to drive or even if they are walking around they are still a danger to others:</p> <ul style="list-style-type: none"> <li>• Unlike alcohol when they smoke this it their body absorbs THC right away.</li> <li>• According to WEB MD and the U.S. National Library of Medicine, marijuana affects almost every organ in the user's body, and their nervous system and immune system, too. This is not the people we want on any road but especially on our often icy roads.</li> <li>• A few of the symptoms of those who use marijuana, can have are:</li> <li>• Slowed reaction time (If you drive after using marijuana, your risk of being in a car accident more than doubles.(A scary thought on our dangerous winter roads. Especially when it has been shown that most of the consumers of Marijuana are between 18-25 so have not had as many years' experience driving in adverse driving conditions.</li> <li>• impaired body movement and coordination</li> <li>• difficulty with thinking and problem-solving, (both of course needed for safe driving)</li> <li>• Dizziness</li> <li>• impaired memory</li> <li>• hallucinations</li> <li>• delusions</li> <li>• psychosis</li> <li>• paranoia</li> </ul>

Submitted By	Comment
	<p>2. The Lung Association and others have made it clear that there is no amount of ventilation that can mitigate the bad health effects of second-hand smoke from any source. Removing visible smoke is insufficient to protect health.</p> <p>3. NIDA states in their U.S. government publication that secondhand marijuana smoke can do as much damage to the heart and blood vessels.</p> <p>4. Babies born to mothers who inhaled secondhand smoke are often lower birth weight and are more likely to die from SIDS (sudden infant death syndrome).</p> <p>5. To allow these impaired people to consume marijuana at public establishments makes absolutely no sense. With alcohol you can have a designated driver drinking their own non-alcoholic drink, however that is not possible in a smoking facility. The second hand smoke impairs the “designated driver” as well.</p> <p>6. Traffic fatalities linked to marijuana are up sharply in Colorado since the legalization of marijuana and we will obviously have more driving drugged if this goes through.</p> <p>7. It is my understanding that it is illegal to smoke marijuana in public and that includes public buildings and outdoors. The 2014 initiative didn't have any license for on-site consumption, so we never voted on it.</p> <p>8. The legislature has never added it as an option. It's just the MCB, that has decided to make their own law, and it would ultimately take a court case to stop the regulations if they implement them.</p> <p>9. In addition it isn't allowed in any of states that legalized pot. The MCB is making Alaska a Guinea pig, with no way of knowing the long-term results of this foolish idea.</p> <p>10. If you speak to troopers or local police officers you will learn that there has already been a definite increase in the drugged driving rate in ours and other states that have legalized marijuana, allowing people to consume on-site will obviously not help this issue but will have the opposite effect.</p> <p>Thank you for giving this serious consideration. We need your help to protect our State.</p>

Submitted By	Comment
	<p>Everyone knows our state is in trouble but if this goes through we will be in much worse shape than we can imagine.</p> <p>With my Gratitude for your help, Goldie Szklarz Registered voter in the Fairbanks North Star Borough</p>
<p>10/26/2017 8:00:53 PM Holly Szklarz <a href="mailto:szklarz9@gmail.com">szklarz9@gmail.com</a> North Pole, AK, US Anonymous User</p>	<p>Dear Ms. McConnell,</p> <p>Thank you for taking the time to read this email. I greatly appreciate that.</p> <p>I'm writing this email to express my comments on the proposed draft regulations for onsite consumption of marijuana. I'm concerned since there is no regulation at the State or Local level to keep these stores from being in or near neighborhoods, but your regulations will allow people to drive to our neighborhood, smoke marijuana outdoors and then somehow get home. It makes no sense to endanger more lives by having onsite consumption venues for marijuana, which is why no state has done that. It makes much more sense for them to only be able to buy their product and take it home.</p> <p>There are numerous reasons why this would be extremely hurtful in our state.</p> <ul style="list-style-type: none"> <li>• The effects from those consuming marijuana and then being around the public can be devastating, especially if the user were to drive which sadly often be the case.</li> <li>• According to the U.S. National Library of Medicine, those who use marijuana, can have Impaired perception and motor skills, panic, paranoia, or acute psychosis symptoms.</li> <li>• To allow these impaired people to consume marijuana at public establishments makes absolutely no sense. With alcohol you can have a designated driver drinking their own non-alcoholic drink, however that is not possible in a smoking facility. The second hand smoke impairs the "designated driver" as well.</li> <li>• Several of these retail establishments are near residential neighborhoods, if this atrocity were to happen, people going there specifically to get intoxicated, and then somehow getting home.</li> <li>• It's illegal to smoke pot in public and that includes public buildings and outdoors. The 2014 initiative didn't have any license for onsite</li> </ul>

Submitted By	Comment
	<p>consumption, so it wasn't voted in by the voters, and the legislature has never added it as an option. It's just the MCB, the industry-controlled marijuana control board that has decided to make their own law, and it would ultimately take a court case to stop the regulations if they implement them.</p> <ul style="list-style-type: none"> <li>• There has already been a definite increase in the drugged driving rate in ours and other states that have legalized marijuana, allowing people to consume on-site will only increase that rate. Please don't allow onsite consumption in our wonderful state of Alaska.</li> </ul> <p>Thank you again for caring for the people of Alaska and seeking to do what is in our best interest.</p> <p>Sincerely, Mrs. Holly L. Szklarz Eielson AFB</p>
<p>10/26/2017 7:04:38 PM Wasilla, AK, US Anonymous User</p>	<p>Please do not put tighter restrictions on the use of cannabis. We need to educate people and people deserve the opportunity to use publicly. America has demonized a medicinal plant that was given to us in nature. It is no more abused than anything else on the planet. There will always be someone who will abuse something and anything on the planet can be abused. I have stage 4 cancer which is what brought me to use cannabis but now that I've used it, I understand all the things I didn't understand before. This is simply keeping the public uneducated as to what cannabis is and how it is to be used. It should be legal for medical and recreational use in all 50 states with no ability for federal over reach. This is what we need more of not less of. It's heroin that is killing our kids, destroying our families and creating criminals in our communities. If you want to pass legislation that matters to the people, create tough laws to punish those crimes, provide heroin treatment in all communities across the country and help pay for it with taxes we get from marijuana sales. By the way it should be cannabis not marijuana. Start by changing your terminology to something with a clean name.</p>
<p>10/26/2017 6:53:55 PM Orion Donicht</p>	<p>I support on site consumption.</p>

Submitted By	Comment
<a href="mailto:Oriondonicht@gmail.com">Oriondonicht@gmail.com</a> Anchorage, AK, US Anonymous User	
10/26/2017 11:14:23 AM Sigvald J. & Arlene C. Strandberg <a href="mailto:sigarlenestrandberg@gci.net">sigarlenestrandberg@gci.net</a> Anchorage (North Star), , US Anonymous User	October 25, 2017 Statement by Sigvald J. & Arlene C. Strandberg We oppose the State Marijuana Control Board adopting any rules, regulations, advisories of any sort, that allow, permit, or acquiesce to, use of any marijuana product on the premises where the sale of it occurs, whether indoors or on open air areas adjacent to the retail business. An Onsite consumption facility operated by the retail outlet encourages “having one for the road.” Driving out onto the public highway or street addled by marijuana introduces a new danger to the public. It will double the number of people inebriated and incapacitated to a varying degree out on the public ways. In effect we will face the prospect of an increasing number of “double drunks” on our highways. The 2014 marijuana legalization initiative contained no provision for adoption by the Marijuana Control Board of regulations in the Alaska Administration Code permitting on premises consumption of marijuana products (including cookies and cakes). The legislature has not given the Marijuana Control Board authority to address this question. Therefore, the Fairbanks North Star Borough Assembly should oppose the MCB adopting regulations permitting retail onsite consumption. Regulations are for the purpose of interpreting and making specific existing laws. Unless the legislature enacts a measure that the Governor signs or allows to become law without his signature, giving the MCB authority to regulate licensed retail marijuana business on site consumption, or, in the absence of this new authority, the State’s Attorney General issues a formal opinion clearly affirming the ability of the MCB to adopt regulations under existing law covering onsite consumption, the Assembly, under its Zoning Authority, should pull any marijuana retail operation zoning permit where the permittee allows onsite consumption.
10/25/2017 9:23:57 PM	I support onsite consumption endorsements,

Submitted By	Comment
<p>Cade Inscho  <a href="mailto:cinscho@icloud.com">cinscho@icloud.com</a>  Anchorage, AK, US  Anonymous User</p>	<p>fully. I also think that you regulate the THC content &amp; amount of purchasable concentrate to .25g per servings. The concentrate would have to be a min 3:1 CBD:THC. On a typical concentrate containing 80% Cannabinoids that would be 60% CBD, 20% THC. These two cannabinoids are antagonists of each other, in short, CBD modulates the way THC binds to the CB1 receptor, thus resulting in a substantial reduction in intoxication. If inhaled this effect is acute &amp; can be used to reduce THC induced dysphoria rapidly. It is for this reason that I feel concentrates should be allowed in the onsite consumption endorsed space, with strict controls on THC &amp; purchase limits. I would be glad to answer any questions anyone might have.</p> <p>Respectfully  Cade Inscho</p>
<p>10/25/2017 4:43:05 PM  Sheri Thomson  <a href="mailto:sheri1969@yahoo.com">sheri1969@yahoo.com</a>  Palmer, AK, US  Anonymous User</p>	<p>I support onsite consumption.</p>
<p>10/25/2017 3:13:47 PM  Caren  <a href="mailto:caren@mtaonline.net">caren@mtaonline.net</a>  Wasilla, AK, US  Anonymous User</p>	<p>I would hope that the Board is a body of responsible, reasonable and clear thinking individuals. Alcohol has proven to be quite costly for our state and those who consume alcohol are allowed to do so on site, at bars, where the alcohol is purchased. Their rights to do so are protected and we all know how wrong that can go.</p> <p>Marijuana has yet to be proven that it creates hostility in users like alcohol. There are ways to keep the "smell" away from the nonconsuming public. Fear mongering defeats everything that our society as adults has chosen as acceptable as long as guidelines are followed. If reviews of any particular establishment reveals inappropriate behavior, it can be either fined or shut down. The regulations the Board has instituted should be applied, followed and followed up by a review. What is everyone so afraid of, that we will actually make it work? Our state needs the revenue and marijuana does not make someone a bad person, the ACTIONS of the person proves someone as bad. I</p>

Submitted By	Comment
	<p>guarantee if someone opposed to this suddenly got cancer, they would not hesitate to consume if their doctor told them about the benefits to their situation.</p> <p>The specific areas for consuming could be mandated to exist in the furthest location in the establishment to the front door. I believe giving it a chance to prove itself will show that responsible individuals can be trusted not to become the lecherous criminals they are currently being portrayed as without any proof to that fact.</p>
<p>10/25/2017 1:47:27 PM  Peter Vars  <a href="mailto:peacemonger701@hotmail.com">peacemonger701@hotmail.com</a>  Wasilla, AK, US  Anonymous User</p>	<p>Please allow on site consumption .I see this as a great way to grow the industry .It will give our vibrant tourist industry yet one more reason to flourish.</p> <p>Thank you for concern in this matter.</p>
<p>10/25/2017 1:25:34 PM  Lisa  <a href="mailto:kuhlfaye@yahoo.com.sg">kuhlfaye@yahoo.com.sg</a>  Anchorage, AK, US  Anonymous User</p>	<p>On-site consumption should be legal &amp; so should cafés that allow us to do it there too</p>
<p>10/25/2017 11:00:33 AM  Stephanie Johnson  <a href="mailto:Cinmngirl70@gmail.com">Cinmngirl70@gmail.com</a>  Anchorage, AK, US  Anonymous User</p>	<p>I support onsite consumption.</p> <p>The people of Alaska voted to regulate cannabis like alcohol, but we are constantly having to weigh in on things that should have happened by now, while the MCB seems to be actively trying to find ways to extend prohibition.</p> <p>There is still no legal place to consume, if you are not a home OWNER. Reckless drivers under the influence can be prosecuted, just like drunk drivers.</p> <p>Just do the right thing, already!</p>
<p>10/25/2017 10:49:06 AM  Alex Gagne-Hawes  <a href="mailto:alextdteeth@gmail.com">alextdteeth@gmail.com</a>  Fairbanks, AK, US  Anonymous User</p>	<p>I support public consumption. I think marijuana should be made easy to use and alcohol should be further restricted. The evils done by alcohol are everywhere visible. The benefits of marijuana industry are already apparent. Stop protecting the immoral racket of liquor licenses and violent bars!</p> <p>I support public consumption of marijuana without any restrictions. It is appalling to me that voters in Fairbanks still have to deal with foot-dragging government appointees, after two successive referendums (one state, one local) in which an emphatic majority have stated, Yes, we want legal marijuana!</p>

Submitted By	Comment
	<p>A nearby intersection has two bars, which in the past year have seen regular (every weekend) police activity, including assaults and a murder. The parking lots regularly host fights between patrons and security personnel. The liquor board doesn't care, rebrand the bar, keep the liquor licensee in their racket. The same intersection has a marijuana dispensary. Zero police activity. Why are we persecuting the "good guy"? Meanwhile a local theater company, because of the state-sponsored monopoly, must jump through appalling hoops to offer limited refreshments at intermission. This protectionism and cronyism is odious! Instead of preventing competition, your agency should be creating economic options.</p> <p>I support public consumption of marijuana without any restrictions!</p>
<p>10/25/2017 8:43:38 AM Cheryl E Nollan <a href="mailto:cherinollan@gmail.com">cherinollan@gmail.com</a> Anchorage, AK, US Anonymous User</p>	<p>I talked to a couple different tourist this past summer in the park downtown. They were laughing how's it's really only legal for residents because the tourist can't smoke anywhere. They didn't want to bring it home on the plane but they wanted to buy from the stores because of the novelty of it .</p> <p>The tourist need a place to sit back and enjoy their vacation. They are paying the highest prices for marijuana in the country! It would also keep them out of the parks!</p>
<p>10/25/2017 4:26:40 AM Steve Adams <a href="mailto:smokey3@gci.net">smokey3@gci.net</a> Fairbanks, AK, US Anonymous User</p>	<p>I fully support onsite consumption of marijuana.</p>
<p>10/25/2017 2:46:09 AM Anchorage, AK, US Anonymous User</p>	<p>I support public consumption.</p>
<p>10/24/2017 9:02:41 PM Samuel Benson <a href="mailto:benson@higherperspectives.com">benson@higherperspectives.com</a> Wasilla, AK, US Anonymous User</p>	<p>I support the proposed regulations for the marijuana retail store onsite consumption endorsement.</p> <p>The way the laws are currently written, citizens and tourists do not have a place to legally consume cannabis outside of a private residence. This is especially difficult for tourists. We are literally forcing tourists to break the law by giving them no legal place to consume their cannabis products.</p>



Submitted By	Comment
	<p>If we are attempting to regulate marijuana in a similar fashion to the way alcohol is regulated, then we need to give cannabis users a safe and friendly environment to consume; similar to how alcohol users can purchase alcohol at bars and restaurants.</p> <p>All of that aside, this set of regulations would generate even MORE revenue for the state through taxation and it would definitely cause a bump in tourism for our state. Leading to more revenue for all businesses involved.</p> <p>Thank you for your time.</p>
<p>10/24/2017 5:50:07 PM Wasilla, AK, US Anonymous User</p>	<p>I don't support this, I want marijuana to be treated like alcohol or cigarettes.</p>
<p>10/24/2017 5:41:10 PM Bill Fikes <a href="mailto:bill@webmusher.com">bill@webmusher.com</a> Wasilla, AK, US Anonymous User</p>	<p>Alaska needs onsite consumption for a multitude of reasons. Setting aside the medical needs that Alaska refuses to recognize there are the social concerns of selling cannabis to travellers and then expecting them to find their own palces to smoke it, which currently almost assuredly involves breaking the law.</p> <p>We have "onsite consumption" for Alcohol in every bar and most restaurants in Alaska in spite of the known dangers will having people drink and drive. To create a double standard for cannabis, which is known to be far less of a threat to public safety than alcohol, would be truly hypocritical.</p>
<p>10/24/2017 5:12:18 PM Ron Holmstrom <a href="mailto:holmstrom@alaskalife.net">holmstrom@alaskalife.net</a> Anchorage, AK, US Anonymous User</p>	<p>I support public consumption.</p>
<p>10/24/2017 4:58:44 PM Oscar Seattle, WA, US Anonymous User</p>	<p>I support marijuana consumption in a retail store and designated public areas. We've always allowed businesses to have consumers try the product before using them in a lot of cases. Businesses should operate openly and show the product before selling items for quality assurance. Also people can buy a bottle from a liquor store and drink it openly in designated areas and private property. The ABC board agreed with the state to regulate marijuana products like they have done with spirits and beer. I think we'd open up more business and community relation events and ties if we break</p>

Submitted By	Comment
	<p>norms of what marijuana users are like. I know lawyers, doctors, and everyday people who enjoy and use marijuana both medically and recreationally. Most marijuana businesses and pro use people are responsible adults who understand and limit use and exposure to the public. Having places to safely consume and meet people is a fundamental and exciting new way of doing business and allowing tourists to be able to safely consume in a safe environment. Most of our tourist economy can profit largely on this ever growing industry and hope to see this proposal help the business succeed and our state profit from helping them and collect taxes for improved infrastructures and schools like we see in other states.</p>
<p>10/24/2017 4:16:39 PM Richmond, VA, US Anonymous User</p>	<p>I 100% support public consumption. I am also 100% supportive of Pot Luck Events being re-opened</p>
<p>10/24/2017 4:16:29 PM Ylka Ortega <a href="mailto:ylkaortega@gmail.com">ylkaortega@gmail.com</a> Anchorage, AK, US Anonymous User</p>	<p>I think that it is very important that we have public consumption areas for those that do not have a place to consume their cannabis. I think it is important as whenever I or any other out of towners come to town, there's no place for it now. Sometimes the need to use your medical marijuana is great because of pain, so it's an emergency.</p>
<p>10/24/2017 4:16:22 PM Peggy Peters <a href="mailto:peggypeters50@hotmail.com">peggypeters50@hotmail.com</a> Wasilla, AK, US Anonymous User</p>	<p>Hello, I AM Peggy Peters from North Pole, Alaska.</p> <p>I believe in cannabis. I believe that it has medicinal value and recreational value.</p> <p>I also believe that on-site consumption is a very good thing. The people have spoken. Loudly. But unless one is a local homeowner, after visiting a legal cannabis dispensary, one has no place to legally consume. That is so wrong. Why force those who buy legally to have to use illegally?</p> <p>I want those who come to Alaska (because cannabis IS LEGAL here), to be able to fully enjoy the experience. And more so, I want those who come for legal cannabis as medicine, to be able to eat their dose immediately.</p> <p>As written, these proposed changes are absolutely absurd.</p> <p>In NO other business would the law so tie the hands of the seller and the consumer.</p>

Submitted By	Comment
	Thank you sincerely, Peggy Peters 3569 Mandeville Loop North Pole, Alaska 99705
10/24/2017 3:53:03 PM Kendra <a href="mailto:Akladyk@gmail.com">Akladyk@gmail.com</a> Anchorage, AK, US Anonymous User	I support legal consumption!
10/24/2017 3:52:21 PM Gilbert Serrano <a href="mailto:gserrano605@gmail.com">gserrano605@gmail.com</a> Anchorage, AK, US Anonymous User	I support this new reg
10/24/2017 1:48:36 PM Felicia Lambeth <a href="mailto:felicialambeth@hotmail.com">felicialambeth@hotmail.com</a> Fairbanks, AK, US Anonymous User	Please do not allow onsite use of Marijuana. There are people that get dizzy just from the smell. Why should a neighborhood suffer from the very offensive smell of Pot. It's bad enough that they get odor from the grow operations.
10/24/2017 9:20:50 AM Unknown location Anonymous User	I am a resident of Ketchikan, AK and as a family we love to take walks downtown with our toddler. This has become increasingly more difficult with the legalization of marijuana. Even with the current laws banning public consumption when walking within 10 yards of either of the two marijuana dispensaries you are assaulted by the second hand smoke from people smoking marijuana either within or just outside the shops. If a law is passed to make this activity legal the situation will only get worse and smokers more brazen and embolden. The negative consequences of legalizing marijuana is well documented in studies since Colorado legalized, but despite the warnings that youth consumption increases exponentially Alaska chose to legalize and put youth at greater risk. If as a state we further put innocent children and citizens at risk by exposing them to second hand smoke then it will be a travesty. According to scientific studies, no HVAC system can satisfactorily clean the air of risks from second hand smoke so legalization of public consumption will put innocent people at risk no matter what restrictions are legislated to give the guise that it is safe.
10/9/2017 5:20:48 PM Ed Schofield	I was recently speaking to a local emergency EMT responder how was describing how

Submitted By	Comment
<a href="mailto:eschofield@seapahydro.org">eschofield@seapahydro.org</a> Unknown location Anonymous User	<p>dramatically the Ketchikan emergency response call numbers have increased over the last ten years of their career. They claim that ten years ago an average number of annual emergency calls was 150 and today the number is 2500 with over 90% being drug and alcohol-related . How long and how much worst does this disaster get before the general public wakes up and says enough. The financial cost has at some point will dictate the stopping point no doubt. It is time to put our efforts to decreasing the drug and alcohol problems not by making it hard to get not easier.</p>
9/14/2017 11:17:56 PM Christina A <a href="mailto:owner@alaskacannabustours.com">owner@alaskacannabustours.com</a> Unknown location Anonymous User	<p>Marijuana retail shops should be allowed to obtain an on-site consumption endorsement, as should other types of businesses. Tour companies, cafe's, restaurants, etc. should have the right to apply for an on-site consumption endorsement as well because these businesses can also prosper from this.</p> <p>Allowing cafe owners to open up a space for on-site cannabis usage will provide people with locations within the community that they can use marijuana among like-minded people and away from stigma. Because cannabis users would have the opportunity to relax and be contained in a cafe, restaurant, tour operation, etc., fewer individuals would be found using cannabis in public which will take a burden off of society.</p> <p>Please consider the possibility of expanding on-site consumption endorsements to other business types, rather than giving marijuana retail shops a monopoly over this incredible perk.</p> <p>Thank you for your consideration,  Christina A.</p>
9/1/2017 8:56:42 PM Unknown location Anonymous User	<p>Thank you for considering public commentary. Exceedingly it feels as though the world we live in disregards the voice of the people. That said, I'll be brief. On-site consumption is going to be a positive improvement on the social and economic state of affairs in Alaska. I believe it will an evolution within the national industry. Socially, folks will be able to partake in marijuana in a social scenario, like a bar, recreationally. They may also then be less</p>

Submitted By	Comment
	<p>inclined to consume marijuana in places that are not legal. Economicaly -especially in Alaskan tourism towns- many more visitors will be able to legally purchase and experience marijuana without having to risk legal consequences by consuming in public or smuggling it back aboard their cruise ship.</p> <p>That is all. I support this proposal and look forward to it's approval. Thanks again!</p>
<p>8/31/2017 2:57:21 PM Unknown location Anonymous User</p>	<p>Support on site! It is silly there is no place for people to go to legally!</p>
<p>8/25/2017 8:30:54 AM Michelle Unknown location Anonymous User</p>	<p>Hi</p> <p>I am for regulating MMJ like alcohol. Alcohol is drank or eaten. Bars have rules about smoking areas. We have anti-smoking laws for a reason. An outdoor smoking area (which is where smoking falls) should have fans, planned airflow and filters to provide minimal impact on people who pass by.</p>
<p>8/24/2017 1:00:21 PM Bernard Miller <a href="mailto:berniesbuddery@outlook.com">berniesbuddery@outlook.com</a> Unknown location Anonymous User</p>	<p>When you can purchase an ounce per day and leave with it, but not be allowed to leave with what may remains when leaving a smoke lounge just doesn't make sense.</p> <p>The thought of restricting the amount of edibles to a small portion or container limit again that doesn't equal the ounce limit of cannabis flower or concentrates is too limiting and counter to the needs and wishes of the public.</p> <p>If they get behind us and stop treating Cannabis as a danger we can grow and benefit everyone.</p>

**From:** Jim Ostlind  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Proposed Marijuana Onsite Consumption Endorsement: Comments  
**Date:** Friday, October 27, 2017 9:32:17 AM

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October 27, 2017

Alaska Marijuana Control Board,

I object to regulations allowing for onsite consumption of marijuana and marijuana product at licensed retail marijuana stores for the following reasons:

1. Current Alaska law allows four different marijuana establishment licenses: Cultivation, Manufacture, Testing and Retail. A Dispensary License was not created in the original legislation and this kind of establishment is not allowed. Attempting to allow onsite consumption by regulation is an improper use of the regulatory process. You do not have the authority to create a fifth marijuana establishment license category.
2. Retail licenses have been issued by local governments and the state for the specific purpose of product sale only. Local governments and their residents had the opportunity to voice objection based only on retail use issues. Never was the onsite consumption issue discussed or even considered. In many instances conditional use permits were granted based on retail product sales only. To now pass regulations to allow onsite consumption at establishments which were allowed on the basis of retail sales only is improper and unjustifiable.

James F. Ostlind

6754 Canaday Rd.

Salcha, AK 99714

**FROM THE DESK OF  
Shirley Parker  
5526 Tongass Ave.  
Ketchikan, Alaska 99901  
907-225-3492**

To: Marijuana Control Board

I am writing in regard to the Resolution Allowing for On-Site Consumption of Marijuana or Approving Designated Areas for On-Site Consumption in Licensed Retail Marijuana Establishments.

Ballot measure No. 2 specifically states it will ban the public use of marijuana. It does not differentiate between smoking and the consumption of edibles.

I am requesting as a concerned citizen of the State Of Alaska that this change be not made to current state law. If the people of Alaska wanted public consumption of marijuana they should have written it into the original law.

Should the Marijuana Control Board decide to change the law it should be put to the voters in a state wide election.

Sincerely,

Shirley J. Parker

**From:** JP Pellet  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public comment. Onsite consumption  
**Date:** Friday, October 27, 2017 12:43:03 PM

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**JP PELLET**

400 West 76th ave  
Anchorage, Alaska 99518  
907-885-7590

October 27, 2017

Dear AMCO,

I would like to provide my comments on the proposed regulations for the marijuana retail store onsite consumption endorsement.

Now that we have created a new industry in Alaska, it is vital for the success of this young industry to be provided with the necessary tools to succeed and thrive. Providing jobs for Alaskans and maximize revenue for the state.

Providing a designated area seems like a logical next step, especially for out of state visitors who comprises a increasing percentage of the clientele. But also as a safe and regulated place for local residents who do not want to expose their kids or neighbors to these adult activities.

Onsite consumption is a vital and necessary next step for the future of the industry and I would like to encourage you to adopt the proposed regulations for the marijuana retail store onsite consumption endorsement.

Sincerely,

JP Pellet  
Sent from my iPad



**From:** Ashley Peltier  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Opposition to Onsite Marijuana Consumption  
**Date:** Wednesday, September 20, 2017 12:31:44 PM

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I am writing to formally oppose onsite marijuana consumption. There is no way to protect employees from the effects of second-hand marijuana smoke. There is also currently no way to determine how someone is affected by the marijuana they consume before getting behind the wheel.

If people wish to consume marijuana they should do it at their home, where the law intended it to be consumed.

Please put this issue to rest.

Thank you,

Ashley Peltier  
Wasilla, Alaska

**From:** Paul  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Proposed regulations for onsite consumption of marijuana  
**Date:** Thursday, October 26, 2017 11:47:38 AM

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My comments to the proposed draft regulations for onsite consumption of marijuana. I am opposed to onsite consumption of marijuana in any form.

The initiative passed by the voters does not provide for licensing establishment for onsite consumption. It seems to me that the Board would be exceeding its authority to unilaterally create license for such establishments. Since it is still illegal to use marijuana in public including public buildings, there is really no way legally, to allow for such an establishment. If the Board could come up with a license for private clubs it would still be creating a health and safety hazard. The Lung Association and others have made it clear that there is no amount of ventilation that can mitigate the effects of second-hand smoke. Consider that in a beverage dispensary a designated driver can consume non-alcoholic drinks and be safe to drive. It defies logic and reason to expect a designated driver to be unaffected in an establishment where marijuana is being smoked. The Fairbanks North Star Borough does not regulate where a marijuana retail establishment can be located, so we have them in residential areas, near schools and churches. If consumption is allowed at retail establishments it is a logical expectation, that there will be impaired persons coming and going from these establishments at all hours between 8 AM opening to 5 AM closing.

No other state has allowed onsite consumption but, this proposed regulation would allow marijuana consumption in our neighborhoods and expect there would be no health and safety issues when these impaired consumers leave the site and somehow travel home. This proposed regulation is both beyond the scope of the initiative voted for by the people of Alaska and totally illogical from a health and safety position. Please do not allow onsite consumption in Alaska.

Sincerely,  
Paul G. Harris  
P.O. Box 55915  
North Pole, AK 99705  
Home Phone 907 488-1792  
Registered Voter

Sent from [Mail](#) for Windows 10

**From:** Christine Potts  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site Consumption  
**Date:** Friday, October 27, 2017 1:56:02 PM

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To the board.

I fully support legal and safe on-site consumption of cannabis.

If people are allowed to go into bars and drink alcohol responsibly, we should also be allowed to consume cannabis together in a safe place besides our own homes. High tech ventilation systems are available to keep the air clean. There are solutions to the "problems". Plus it gives our tourists a safe place to consume and encourages their purchase. Let's be honest, what the state really cares about is money. So why not increase cannabis revenue by allowing on site consumption?

I see alcoholics littering our streets. Stumbling out of bars and getting into cars to drive home or just to prowl the streets for the night. However, since the legalization of cannabis I have yet to see a scary and unruly group or even an individual person on solely cannabis be a single problem. The effects are drastically different. I'd rather have a city of peaceful stoners than the raging alcoholics we have now.

Thank you for your time.  
Christine Potts  
Anchorage - Midtown Resident

**From:** Michael Powell  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** public comments for On-site consumption regulations  
**Date:** Friday, October 27, 2017 12:27:22 PM

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Below are comments regarding the Marijuana Control Board proposed regulations regarding the retail store onsite consumption endorsement in 3 AAC 306.370 and 3 AAC 306.990. Due to the clearly documented hazards associated with secondhand smoke and particulates in public spaces, onsite consumption of products that will result in this condition in any public space is absolutely opposed. Further, the national Center for Substance Abuse Prevention (CSAP) clearly documents that policies that increase the exposure and normalization of drug and alcohol use in a community shall have a causal effect of increasing the use of these products among underage youth. Although it remains a personal choice to consume these products in a private place, it remains the responsibility of the public to protect youth from hazards in public spaces. Allowing public consumption of marijuana will increase access to marijuana and will increase youth prevalence or use of marijuana. Because we currently know that passing regulations that allow for onsite consumption will be directly responsible for this increase in youth prevalence it is negligent.

In regards to the draft regulations, there are specific errors associated with the practice of ventilation and the handling of toxic emissions.

**3 AAC 306.370 (a) 1**

The American Society for Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) is the preeminent authority clearly defining ventilation capacity. In a recent review of current ventilation system capacity they note that separately ventilated systems are not sufficient to control for the health hazards of secondhand smoke. This section should be scratched.

Further, a separate building will still require staffing, cleaning, and if designated for both smoked and edible consumption, will expose those consuming edibles to unacceptable health risk from secondhand consumption. Further, any staffing will be exposed to toxic and mind altering doses of chemicals emitted from smoked, vaporized, or aerosol product. These facilities will unavoidably produce hazardous off-gassing that cleaning, maintenance, etc. staff will be exposed to even when there is no active consumption occurring. This forces these facilities to violate **3 AAC 306.370 (b) (2) of this proposed regulation**. Leaving these rooms either unattended or partially visible through windows or cameras renders the already difficult task of monitoring these spaces for illegal consumption of product brought in from the outside essentially impossible.

**3 AAC 306.370 (c) (1) (B) (i), (ii), (iii)**

See note on ASHRAE ventilation standards above. These proposed ventilation standards have no realistic context to any known accepted standards published by any reputable authority, rather, are made up. They have no viable purposes towards assessing ventilation. Removing visible smoke from a room is not a measurable quality for ventilation standards. Having an engineer approve a ventilation system does not confirm the effect that system will have in removing toxic chemicals. These proposed regulations propose allowing exposure of unacceptable toxic pollutants in a workplace.

**3 AAC 306.370 (c) (1) (C) (ii)**

A secure door and a wall is not a sufficient barrier to prevent the transference of secondhand smoke and the accompanying toxic and mind-altering chemicals thus exposing workers to unacceptable work conditions.

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From Michael Powell  
[mrp26@caa.columbia.edu](mailto:mrp26@caa.columbia.edu)  
907-947-9635  
3208 Woodland Park  
Anchorage Alaska  
99517

**From:** Kris Thompson  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment In Support Of Onsite Consumption  
**Date:** Friday, October 27, 2017 4:09:48 PM

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Hello AMCO,

I appreciate the opportunity to voice my opinion on this supposed controversial issue. Onsite consumption should be allowed if places such as hoodoo, are able to provide liquor for consumption and sell a growler or 6 pack. There are many other places with tasting venues such as the brown jug, having a designated area for wine tastings and you are able to buy in bulk there after. I request to have the same right as liquor in the ability to consume at the retail's place of business and either take a cab, uber, or designated driver home. No problems have arose from cannabis sales especially in comparison to bars where the police are constantly responding to things like liquor fueled fights. Second hand smoke is far worse for you in bars than having a dedicated smoking room with proper ventilation. I have never smelled tobacco smoke outside of a bar unless it was the smell coming off my clothing. I thank you for the job well done legalizing and implementing the regulations while understaffed in a completely new industry. I would appreciate the support of the board in allowing me and many others the same opportunity as liquor in having onsite consumption.

Sincerely,  
Kris Thompson

**From:** Leah Neff Warner  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment on Onsite Marijuana Consumption  
**Date:** Friday, October 27, 2017 4:06:42 PM

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Dear Chairman of the Marijuana Control Board:

I am writing to respectfully oppose the Onsite Consumption Regulations draft. The basis of my opposition involves the known health risks of secondhand marijuana smoke and the implications of public smoking for generations ahead of us.

First, recent studies show that secondhand marijuana smoke contains many of the same cancer-causing and toxic chemicals as secondhand tobacco smoke, including: acetaldehyde, ammonia, aromatic amines, arsenic, benzene, cadmium, chromium, formaldehyde, hydrogen cyanide, isoprene, lead mercury, nickel, N-heterocycles, PAHs.[1]

A study from Wang, et al. (2016) published in the Journal of the American Heart Association concluded that secondhand smoke can exert similar adverse cardiovascular effects regardless of whether it is from tobacco or marijuana.[2]

Another study from Wang et al. (2016) indicates even brief exposure to secondhand marijuana smoke has immediate, adverse effects on the cardiovascular system, and the effects last longer than those seen with tobacco smoke.[3]

Second, there is no existing ventilation system known to filter out the toxic components of smoke. Therefore the proposed regulations around consumption area ventilation are useless for reducing health risks.

Third, allowing public onsite marijuana smoking undermines local smoke-free ordinances, and threatens the viability of future smoke-free ordinances in other communities without such protections currently.

Onsite consumption regulations send a strong message to Alaskans that concerns for health are not a priority. The precautionary principle should prevail: rather than allow onsite marijuana smoking until proven unhealthy, we should disallow until proven safe.

Please uphold the integrity of public policy and prohibit onsite marijuana smoking. Thank you for taking time to thoroughly review this important issue.

Sincerely,

Leah Neff Warner  
310 Irwin St.  
Juneau, AK 99801  
206-919-7961

- [1] Moir D, Rickert WS, Levasseur G, et al. A comparison of mainstream and sidestream marijuana and tobacco cigarette smoke produced under two machine smoking conditions. *Chem Res Toxicol*. 2008; 21(2):494-502
- [2] Wang X., et al. Brief Exposure to Marijuana Secondhand Smoke Impairs Vascular Endothelial Function. *Circulation*. 2014;130:A19538
- [3] Wang X, et al. One Minute of Marijuana Secondhand Smoke Exposure Substantially Impairs Vascular Endothelial Function. *J Am Heart Assoc*. 2016;5:e003858

**From:** Terrence Robbins  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment on Proposed On-site Consumption Regulations  
**Date:** Friday, October 27, 2017 4:18:29 PM

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Dear MCB,

I'm writing to you today to protest the proposed Marijuana Onsite Consumption regulations. I am bothered that, just because there are three commercial marijuana industry representatives on this five person committee, that you might feel like you don't have to listen to the Public Health and Public Safety board members, the vast amounts of submitted evidence and testimony showing that onsite consumption is a terrible idea, and overwhelming public opposition to onsite consumption submitted to your board the last three times you have attempted to pass these regulations. For the fourth time I will submit public comments to you and pray that you will show objectivity and compassion for the citizens that you were appointed to protect and not only the industry that hopes to profit from these regulations.

**About Ketchikan:**

In the small island town of Ketchikan we have been counting on the MCB to craft regulations that would protect us, from zoning to testing to sale. Imagine my disappointment upon learning that the MCB is pushing forward with allowing onsite consumption for the fourth time.

Ketchikan is a unique town in that we really have one skinny coastal road without many passing lanes, lined on one side by the ocean, and on the other by deep ditches and rock walls. It's 26 miles long and most of our residents drive it daily. We receive measurable precipitation an average of 270 days per year, visibility is poor much of the year, and injury accidents are commonplace.

Now take these environmental conditions and add 1,000,000 tourists visiting each summer. Our streets and highway become so congested that we must hire dozens of crossing guards to try to keep the tourists from being hit by cars. Our police and fire departments are heavily taxed each summer day responding to tourist -related medical emergencies.

**Onsite Consumption:**

When a person enters an alcohol establishment he/she understands that they can consume a specific amount of alcohol during a certain period and can then leave and legally drive home.. When a person enters a marijuana establishment and consumes ANY amount of marijuana product, they will be too impaired to safely and legally operate a vehicle for an unknown time, from 4-10 hours, but they may feel comfortable enough to drive anyway if they are a regular marijuana user or if the edible hasn't "kicked-in" yet. If a person is over-served alcohol in a bar and they drive away and then get into an accident which injures another person, they are often charged with felony assault for each injury, in addition to DUI. In some cases, the victims have successfully sued the bar/servers for overserving the driver. With onsite consumption of marijuana, EVERY customer is served until they are intoxicated, and technically over-served. It's shocking that the MCB would propose regulations that encourage the over-serving of marijuana, while, at the same time, discouraging the practice for alcohol establishments. Here is some data on intoxication and impaired driving:

- a. **Marijuana use increased the risk of becoming involved in a car accident at any level of severity by about 25 to 50 percent.** *Elvik, R., Risk of Road Accident Associated with the Use of Drugs: A Systematic Review and Meta Analysis of Evidence from Epidemiological Studies. Accident Analysis & Prevention, 2013. 60: p. 254-267*
- b. **A survey among 320 recent marijuana users showed that 87 percent of them reported an over 50 percent probability of future driving under the influence of marijuana, even after having been shown data on the increased crash risk.** *Jones, C., et al., Preventing Cannabis Users from Driving Under the Influence of Cannabis. Accident Analysis & Prevention, 2006. 38(5): p. 854-861.*
- c. **In 2016, over 38 percent of current California marijuana users aged 18 to 64 years old reported driving a vehicle within three hours of using marijuana.** *California Department of Public Health and California Tobacco Control Program, 2016 California Adult Tobacco Survey. 2016.*
- d. **Marijuana-related fatal car accidents surge in Washington state after legalization** <http://www.washingtontimes.com/news/2016/may/10/marijuana-related-fatal-car-accidents-surge-washin/>

**Economic Impact:**



Ketchikan's economy relies upon tourists spending money on shore excursions and shopping in stores. By encouraging the public consumption of marijuana/edibles we risk releasing hundreds of impaired people into our downtown core each day. It's also unlikely that they will spend the amounts of money in Ketchikan that they would if they weren't under the influence of marijuana.

**Public health and the will of the voter:**

1. The ballot measure, voted on and passed by the public, specifically prohibited the public consumption of marijuana. Your proposed onsite consumption regulations permitting public consumption contradict the will of the voters for the sole purpose of increasing marijuana sales by the commercial marijuana industry.
2. Secondhand smoke from marijuana is harmful to the health of employees and other patrons, just as secondhand smoke from tobacco products are, writing in language that pretends that there are mechanical methods to mitigate this danger is unethical.
3. Per *The Health Effects of Cannabis and Cannabinoids: The Current State of Evidence and Recommendations for Research* by the National Academies of Sciences, Engineering, and Medicine, released on January 12, 2017:
  - a. Recent cannabis use impairs the performance in cognitive domains of learning, memory, and attention. Recent use may be defined as cannabis use within 24 hours of evaluation.
  - b. A limited number of studies suggest that there are impairments in cognitive domains of learning, memory, and attention in individuals who have stopped smoking cannabis.
  - c. There is substantial evidence of a statistical association between long-term cannabis smoking and worse respiratory symptoms and more frequent chronic bronchitis episodes.
  - d. There is moderate evidence of a statistical association between cannabis smoking and higher forced vital capacity (FVC).
  - e. There is limited evidence of a statistical association between occasional cannabis smoking and an increased risk of developing chronic obstructive pulmonary disease (COPD) when controlled for tobacco use
  - f. There is limited evidence of a statistical association between occasional cannabis smoking and an increased risk of developing chronic obstructive pulmonary disease (COPD) when controlled for tobacco use.
  - g. The evidence is unclear as to whether and how cannabis use is associated with heart attack, stroke, and diabetes.
4. According to a recent study published in the *Journal of the American Heart Association*, secondhand marijuana smoke may damage your blood vessels even more than tobacco smoke.
5. Use of marijuana edibles in public can have tragic consequences as this recent news story shows. [http://www.sitnews.us/1216News/122716/122716\\_ketchikan\\_man\\_arrested.html](http://www.sitnews.us/1216News/122716/122716_ketchikan_man_arrested.html) I know this family, played softball with the victim, and had never witnessed anything to indicate that this tragedy could happen to them.

Thank you for the opportunity to share my voice, and please protect the people who live in, and visit, Ketchikan.

Terrence Robbins

Ketchikan, AK 99901



Tina Smith, CEO  
(907)727-2000  
t.smith@midnightgreenery.com

Marijuana Control Board  
Director McConnell  
AMCO Staff

November 24<sup>th</sup> 2017

Public Comment for Consideration by the Board

### **3AAC 306.370 Onsite Consumption for Retail Marijuana Stores**

Please allow me to go on record as saying I am in full support of this regulation packet as a whole. I do think some spots could be clarified as I interpret them. One or two, an interpretation could hinder logical business operations. Other than the few things I have listed this is a very solid start. Thank you for all your work on creating something we can actually work with. Seeing Packets like this continues to give me hope for the future growth of our industry. Please consider these following points when continuing.

**(a)(1)** I support starting these endorsements with no concentrate *currently*, knowing that it can be revisited and changed at a later date, once more data is gathered and the information warrants the change.

**(a)(2)(B)** There are multiple problems with limiting the purchase amount to only 10 mg edibles for Onsite

1. The crazy cost on the marijuana production companies creating the edibles is a real problem. When I researched what was currently being offered in the market, I could only find a handful of products that are currently packaged in 10mg packages or less. The vast majority being packaged in ranges of 15mg to 30mg. The current regulation states that no package may be over 50mg. That's what most have factored into package sizes, for the cost effectiveness of the consumer, as well as the production company.

This 10mg limit not only requires the manufacturers to repackage their products to be able to be purchased for onsite consumption, adding a whole new packaging cost, but also a \$250.00 charge for any products that they would like to petition to change packaging on. For one company alone, out of 19 Products, they are currently listing,



only four are packaged in 10mg or less packaging. Change fees alone are a bit of a bite to a new business, which ALL marijuana business are. When I noticed that by limiting the amount to 10mg it also limited what the brand new business can offer the consumer due to a VERY limited current market. This could be the perfect step, creating a new avenue for growth for a quickly growing industry. This limit could derail involvement for some. Admittedly it will be felt the hardest in small kitchens. I'm pretty sure that more then a few of our edibles manufacturers meet that demographic.

This cost may seem minimal to a board member in a passing moment among so much that is discussed in an MCB meeting. For non industry board members, may I suggest asking those in the industry seats, ask them; how many small companies they know currently that would be able to shoulder that cost of an extra 3+ thousand dollars. Then add the cost of the added packing and labeling that is required to be purchased. Most of these businesses have already taken drastic hits due to over regulation during startup phase.

New labels, new packages, adjustments in operations to accommodate a change in requirements, as well as the upwards of over \$3,000 for a blessing to change packaging on EVERY SINGLE ITEM. Cookies, brownies, salad dressings. You know the products because you have already approved them. Those people, those same products that you have already seen and approved, would all have to pay to come to see you, at least \$250 at the very least. .

2. Anchorage, as well as other cities in Alaska, has already adopted a current smoking ban that will require any onsite endorsements to offer edible consuming only. In a tourist environment, we must make onsite consumption more appealing rather then less! We want them to consume in a good safe environment, but honestly, no one will want to spend the kind of money that a 10mg market will require production companies charge.

Why would anyone pay that when they could buy multiple 50mg packages of cookies, and share them back on the tour bus.

The 10mg limit provides the consumer less incentive to consume in a safe regulated environment. One of the most important reasons to have onsite is to provide safe places to consume. For whatever the reasons one may seek it, from tourists, to locals enjoying cannabis with friends, or experimenting with a replacement for getting drunk on a Saturday. This regulation is not in the best interest of public safety.

Requiring manufacturers to provide new special packaging will make the price



difference fall on the consumer. Because it has come down to be bad for both consumers and the industry, I would suggest maintaining the 50mg edibles, requiring no new packaging.

I can support requiring the pamphlets that explain edibles and how to consume. That is all the parenting the adults going into these establishments will need. The effects of three shots of tequila has a more drastic effect than 50mg edibles in most adults who have consumed edibles more than 5 times. This is a perfect mg for a pleasant night for people like myself who medicate daily. If a new consumer were to consume 50mg, they **may** become uncomfortable, but they will not perish, and having trained staff to walk the through makes for a happier outcome for everyone.

**(a)(2)(C)** Food or drink that contains no alcohol or marijuana  
 ADD: *(except as provided under 306.370 (a)(2)(B))*

**(b)(11)** This is more of a clarification.

I read this to mean that games, even organized ones such as bingo or karaoke contests may be engaged in, as long as cannabis does **not** play a role in either the components of the game (i.e.: beer pong or joint rolling) or in the prizes for the games (i.e.: grand prize for big bingo game cannot be marijuana in any form).

I support this fully. It does need to be clarified however, because of 3 AAC 306.360 (d) which states that: "a retail store may not conduct promotional activities such as games or competitions to encourage sale of marijuana or marijuana products.". Many store owners currently believe this to mean that no games of any kind may be engaged in while inside a retail establishment.

Do these endorsement regulations supersede previous regulations? If not, simply changing the word "to" in 306.360 (d) to "that". Allowing for games as long as the games themselves are not contingent on the purchase of marijuana or marijuana product.

**(c)(B)(i)** The board must set what technical standards the electrical engineer will use in order to expect a licensed engineer to put a signature on it.

**(c)(C)(i)** Consumption area must include a smoke-free area for any employee monitoring the consumption area.

The way this is currently written does not allow for staff entering the consumption area to serve the needs of the patrons inside the consumption area. Whether it be to serve them drink or food, or step in and do basic daily cleaning and maintenance.





**(d)** States that an application for an onsite endorsement must contain the license number of the retail establishment that will be applying for the endorsement. This eliminates the ability to apply for both at the same time for new establishments. I am not sure that was the intent with this wording.

**(f)(6)** I would fully support adding a requirement to any literature to state or advise any consumer to consult a team member for any questions, or to help facilitate a safe ride home for the consumer.

**(g)** This regulation I feel only needs to be brought up as a reminder to the board. This is found in a few spots in the regulations and in the recent past there have been public comments that have been presented to the board after the deadline had passed on the premise that it was “something the board needed to hear”. Unfortunately, if it comes after the deadline, no the board does not need to hear it. Please keep the staff, Director, and Board within those already set regulations.

I have hopes that with an open mind and working together, the Board, Director, and the interested public can come together to create a solid base to the onsite consumption endorsement. One that maintains safety to the public, as well as a comfortable environment for consumers.

I look forward to discussing this further on the 14<sup>th</sup> and 15<sup>th</sup> of November during public testimony period.

I would also like to be added to the general Public testimony covering subjects not on the agenda.

Sincerely,  
Tina Smith  
CEO Midnight Greenery Enterprises  
Owner/Director CannaEd

**From:** William Rasmussen  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** 3 AAC 306.370 and 306.990 onsite consumption  
**Date:** Thursday, August 24, 2017 9:18:43 AM

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Absolutely opposed to allowing onsite consumption in the Talkeetna area.

I work in a gift shop and when someone comes in under the influence of either pot or alcohol, it becomes threatening to both customers and staff. This is true for shops and tour guides. Fortunately, the alcohol problem is mainly a night time issue when the shops are closed but the pot is being sold to mainly out of town customers during the day who then must drive home on the Spur Road and the Parks Highway. We get dozens of tour buses each day as well as a large number of auto, RV and van visitors that make the highways very busy during the summer months. Allowing on site consumption of pot happen in this remote town is a dangerous idea.

Please reject this proposal.

Bill & Janet Rasmussen  
HC 89 Box 8121  
Talkeetna, AK 99676  
(907) 733-2435  
cell (520) 370-2087  
[rasmussenwk@gmail.com](mailto:rasmussenwk@gmail.com)

**From:** Big Leaf Alaska  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I SUPPORT ON-SITE CONSUMPTION  
**Date:** Tuesday, October 24, 2017 2:23:10 PM

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I believe on-site consumption will allow significant economic opportunities for businesses. It will greatly increase tourism and be a revolutionary step in the right direction. Cannabis should follow the same guidelines as alcohol, and adults over 21 should be allowed to consume at a legal establishment. We need to continue to move forward in normalizing marijuana, and on-site consumption is that next phase.

Sincerely,  
Gracie Raymond

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Big Leaf Alaska



**From:** Tamara Reiser  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** onsite consumption  
**Date:** Thursday, October 26, 2017 7:29:04 PM

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Hello,

I am against onsite consumption of cannabis and cannabis products. I have read through the application process for retail establishments, and recently visited a few retail shops in Portland, Oregon while visiting relatives. What struck me is the amount of security measures for these establishments. Since there is both a large amount of cash and a valuable product in these stores the high security makes sense.

Both Portland stores that I visited had limited entry to the actual product section of their store. I'm hoping Alaska stores will be the same. I safety should be a concern here and encouraging onsite consumption encourages a social setting. We do not allow retail liquor stores to have onsite consumption, and we should not let retail marijuana stores either.

Thank you,  
Tamara Reiser  
Homer, AK



**From:** aaron\_richert@yahoo.com  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite marijuana consumption  
**Date:** Wednesday, October 25, 2017 5:23:54 PM

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I'm writing this email to comment on the proposed draft regulations for onsite consumption of marijuana. I'm concerned since there is no regulation at the State or Local level to keep these stores from being in or near our neighborhoods, but your regulations will allow people to drive to our neighborhood, smoke pot outdoors and then somehow get home. There is no logic to having onsite consumption venues for marijuana, which is why no state has done that.

They can buy their product and take it home.

This is a general public safety issue as well as a personal safety issue in my concern for my children.

Furthermore, as has been demonstrated in Colorado already, neighborhoods with marijuana dispensaries and/or onsite consumption allowance will cause housing the markets to plummet in those neighborhoods.

Please don't allow onsite consumption in our State. Please look out for the good of the people, and not what might bring in an extra dollar.

Sincerely,

Aaron Richert  
North Pole, AK

**From:** Christine Robbins  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** onsite consumption of marijuana  
**Date:** Friday, October 27, 2017 11:52:10 AM

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Erika McConnell  
Alcohol and Marijuana Control Office  
550 W. 7th Avenue, Suite 1600  
Anchorage AK 99501  
[amco.regs@alaska.gov](mailto:amco.regs@alaska.gov)

Hi my name is Christine Robbins 1340 Arctic Tern Dr Fairbanks 99712 First off I'd like to thank you for the opportunity to comment. I would like to submit to the Marijuana Control board regarding onsite consumption of marijuana that it NOT be allowed. There's quite a few good reasons why it shouldn't be allowed. 1. No statutory authority. I've read all of statute 17 and There's nothing that says it's allowed. If we wanted to do this the right way, it would be by a vote of the people. 2. It clearly states that there is to be No consumption in public and a \$100 fine if they're caught. AS 17.38.020 (4) 3. It Needs to be regulated like alcohol. This was the promise in 2014, but as yet it hasn't been. Nowhere can you buy packaged alcohol and drink it onsite. It's dangerous because consumer and seller are both prone to mistakes. 5. We would be the Only State to allow onsite consumption. Why hasn't any other state? Where's the research of what these other states have gone through as to why they wouldn't want that? Where's the analyst that you've called in to make this allowance that no other state has allowed? Our state isn't doing due diligence regarding the spread of such a controversial drug. What's the driving motivation behind flooding communities with psychotropic substances? Money? 6. We're going to see an increase in accidents involving marijuana impaired drivers which has always been the case in Washington and CO. If it were to be approved may I submit 1. It Needs to exclude concentrates/edibles. These can be wildly abused and are far more dangerous than smoking as they are higher in THC and stay longer in the body with longer effects. 2. Limitation for sales based on THC potency. Where's the regulation for the single most affecting factor of this drug? 3. Prohibit The removal of unused marijuana product purchased for consumption. 4. No sale of food or beverages with it 5. Transportation of patrons to and from the premises This will be yet another example how a drug will prove to be a burden on the taxpayer 6. Ventilation issues and spread of general stench. People delude themselves into thinking it can be contained or done away with, but anyone that's ever had to deal with tobacco smoke knows this just isn't so.

Thank you for your time, Sincerely,  
Christine Robbins

**From:** Terrence Robbins  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment on Proposed On-site Consumption Regulations  
**Date:** Friday, October 27, 2017 4:18:29 PM

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Dear MCB,

I'm writing to you today to protest the proposed Marijuana Onsite Consumption regulations. I am bothered that, just because there are three commercial marijuana industry representatives on this five person committee, that you might feel like you don't have to listen to the Public Health and Public Safety board members, the vast amounts of submitted evidence and testimony showing that onsite consumption is a terrible idea, and overwhelming public opposition to onsite consumption submitted to your board the last three times you have attempted to pass these regulations. For the fourth time I will submit public comments to you and pray that you will show objectivity and compassion for the citizens that you were appointed to protect and not only the industry that hopes to profit from these regulations.

**About Ketchikan:**

In the small island town of Ketchikan we have been counting on the MCB to craft regulations that would protect us, from zoning to testing to sale. Imagine my disappointment upon learning that the MCB is pushing forward with allowing onsite consumption for the fourth time.

Ketchikan is a unique town in that we really have one skinny coastal road without many passing lanes, lined on one side by the ocean, and on the other by deep ditches and rock walls. It's 26 miles long and most of our residents drive it daily. We receive measurable precipitation an average of 270 days per year, visibility is poor much of the year, and injury accidents are commonplace.

Now take these environmental conditions and add 1,000,000 tourists visiting each summer. Our streets and highway become so congested that we must hire dozens of crossing guards to try to keep the tourists from being hit by cars. Our police and fire departments are heavily taxed each summer day responding to tourist -related medical emergencies.

**Onsite Consumption:**

When a person enters an alcohol establishment he/she understands that they can consume a specific amount of alcohol during a certain period and can then leave and legally drive home.. When a person enters a marijuana establishment and consumes ANY amount of marijuana product, they will be too impaired to safely and legally operate a vehicle for an unknown time, from 4-10 hours, but they may feel comfortable enough to drive anyway if they are a regular marijuana user or if the edible hasn't "kicked-in" yet. If a person is over-served alcohol in a bar and they drive away and then get into an accident which injures another person, they are often charged with felony assault for each injury, in addition to DUI. In some cases, the victims have successfully sued the bar/servers for overserving the driver. With onsite consumption of marijuana, EVERY customer is served until they are intoxicated, and technically over-served. It's shocking that the MCB would propose regulations that encourage the over-serving of marijuana, while, at the same time, discouraging the practice for alcohol establishments. Here is some data on intoxication and impaired driving:

- a. **Marijuana use increased the risk of becoming involved in a car accident at any level of severity by about 25 to 50 percent.** *Elvik, R., Risk of Road Accident Associated with the Use of Drugs: A Systematic Review and Meta Analysis of Evidence from Epidemiological Studies. Accident Analysis & Prevention, 2013. 60: p. 254-267*
- b. **A survey among 320 recent marijuana users showed that 87 percent of them reported an over 50 percent probability of future driving under the influence of marijuana, even after having been shown data on the increased crash risk.** *Jones, C., et al., Preventing Cannabis Users from Driving Under the Influence of Cannabis. Accident Analysis & Prevention, 2006. 38(5): p. 854-861.*
- c. **In 2016, over 38 percent of current California marijuana users aged 18 to 64 years old reported driving a vehicle within three hours of using marijuana.** *California Department of Public Health and California Tobacco Control Program, 2016 California Adult Tobacco Survey. 2016.*
- d. **Marijuana-related fatal car accidents surge in Washington state after legalization** <http://www.washingtontimes.com/news/2016/may/10/marijuana-related-fatal-car-accidents-surge-washin/>

**Economic Impact:**

Ketchikan's economy relies upon tourists spending money on shore excursions and shopping in stores. By encouraging the public consumption of marijuana/edibles we risk releasing hundreds of impaired people into our downtown core each day. It's also unlikely that they will spend the amounts of money in Ketchikan that they would if they weren't under the influence of marijuana.

**Public health and the will of the voter:**

1. The ballot measure, voted on and passed by the public, specifically prohibited the public consumption of marijuana. Your proposed onsite consumption regulations permitting public consumption contradict the will of the voters for the sole purpose of increasing marijuana sales by the commercial marijuana industry.
2. Secondhand smoke from marijuana is harmful to the health of employees and other patrons, just as secondhand smoke from tobacco products are, writing in language that pretends that there are mechanical methods to mitigate this danger is unethical.
3. Per *The Health Effects of Cannabis and Cannabinoids: The Current State of Evidence and Recommendations for Research* by the National Academies of Sciences, Engineering, and Medicine, released on January 12, 2017:
  - a. Recent cannabis use impairs the performance in cognitive domains of learning, memory, and attention. Recent use may be defined as cannabis use within 24 hours of evaluation.
  - b. A limited number of studies suggest that there are impairments in cognitive domains of learning, memory, and attention in individuals who have stopped smoking cannabis.
  - c. There is substantial evidence of a statistical association between long-term cannabis smoking and worse respiratory symptoms and more frequent chronic bronchitis episodes.
  - d. There is moderate evidence of a statistical association between cannabis smoking and higher forced vital capacity (FVC).
  - e. There is limited evidence of a statistical association between occasional cannabis smoking and an increased risk of developing chronic obstructive pulmonary disease (COPD) when controlled for tobacco use
  - f. There is limited evidence of a statistical association between occasional cannabis smoking and an increased risk of developing chronic obstructive pulmonary disease (COPD) when controlled for tobacco use.
  - g. The evidence is unclear as to whether and how cannabis use is associated with heart attack, stroke, and diabetes.
4. According to a recent study published in the *Journal of the American Heart Association*, secondhand marijuana smoke may damage your blood vessels even more than tobacco smoke.
5. Use of marijuana edibles in public can have tragic consequences as this recent news story shows. [http://www.sitnews.us/1216News/122716/122716\\_ketchikan\\_man\\_arrested.html](http://www.sitnews.us/1216News/122716/122716_ketchikan_man_arrested.html) I know this family, played softball with the victim, and had never witnessed anything to indicate that this tragedy could happen to them.

Thank you for the opportunity to share my voice, and please protect the people who live in, and visit, Ketchikan.

Terrence Robbins

Ketchikan, AK 99901

**From:** Lance Roberts  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption regulations  
**Date:** Friday, October 27, 2017 8:00:18 AM

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To the MCB:

The following are my comments on the draft regulations for onsite consumption of marijuana.

I'm opposed to these regulations being added by a board. The 2014 initiative did not have this concept even in it for people to vote on. The legislature did not pass any statute allowing it. The MCB is only supposed to regulate based on what has been passed into law, not create their own by being creative and not calling a license type. It is patently illegal for you to pass these regulations and foist them on the public, especially where there are so many unknowns.

We would be the first state to implement regulations like these, and would be the experiment for the whole country, but as you know we don't have the budget to do the oversight that such an experiment would require.

The Lung Association has made it clear that no amount of ventilation will mitigate the toxic effects of marijuana smoke, and the police chiefs have pointed out the dangers to first responders. Our local Borough Assembly has passed a resolution in support of Smoke Free workplaces in our state, but that is impossible with these regulations. There is no way an employee can monitor the state of its customers through a window, and there will at various times have to be intervention from employees into the room where the smoking would be. There can also be no way to have a designated driver in a smoking facility, since it has been well shown that there are second-hand impairing effects from marijuana smoke.

The largest problem that will happen because of onsite consumption is the increase in drugged driving. Driving under the influence of marijuana has increased in the states have legalized it. Without designated drivers, and with the tendency of the marijuana community to think it's ok to drive drugged (as per testimony that has been given at the Assembly), and with many drug users spending all their cash on drugs, therefore not having money to use a Taxi or Rideshare, drugged driving will only increase.

Many of these establishments have been put in or near residential neighborhoods because of the cheaper land. These places can be open until 5 am, and these regulations allow smoking outside where the odor will affect the surrounding area. I would also note that the 2014 initiative specifically said that smoking in public would not be allowed, but you're advancing regulations to allow it.

In the end, there are no positive benefits to anyone except the marijuana business owners. It hurts the employees, it hurts the drivers in the community and it hurts the neighborhood these places are in.

Please just calm down and let us measure the effects of legalization for a while before jumping in to uncharted territory.

Thanks,

Lance Roberts  
PO Box 83449  
Fairbanks, AK 99708  
[Roberts.Lance@gmail.com](mailto:Roberts.Lance@gmail.com)

October 24, 2017

Dear Marijuana Control Board,

*I am opposed to the proposed regulation allowing for onsite consumption in marijuana stores.*

*I am opposed to allowing inhaled consumption of marijuana because I have concerns about the health impacts of secondhand smoke exposure. Secondhand smoke from marijuana and tobacco have been shown to have many of the same cancer-causing toxic chemicals. More than 33 individual carcinogens are present in both tobacco and marijuana smoke.*

*We used to try to filter out or ventilate secondhand smoke from smoking areas; now we know that doesn't work. The Board of Directors for the American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE), the international standard-setting body for indoor air handling devices, in 2013, amended the standard to add that marijuana smoke should not be allowed indoors. Ventilation and other air filtration technologies cannot eliminate all the health risks caused by secondhand smoke exposure.*

*I am opposed to allowing for ingested consumption of marijuana because I have concerns about public safety and driving under the influence. The proposed regulations would allow for up to 1 gram of marijuana to be consumed in one visit, and I think there are too many factors to adequately control the level of influence and protect public safety. Let's not normalize ingesting marijuana and then legally driving off in car. Let's not experiment with the lives of our children and the citizens of this state.*

*When I voted on the ballot initiative to legalize marijuana, I read that it would not be legal to use it in public, and to me public means not in any public retail establishment or club, not in any place where workers or others may be impacted without their choice. I want an Alaska that's known for its wilderness and natural beauty and not for marijuana cafes.*

*Thank you for making the right choice for Alaska. Vote no on proposed regulations to allow for onsite consumption in marijuana stores.*

Edy Rodewald, PhD  
7800 Upper Huffman Road  
Anchorage AK 99516  
907-500-2734

**From:** Kolbe Rose  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public comment in support of on-site regulation  
**Date:** Wednesday, October 25, 2017 6:07:51 PM

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I am a resident of Ketchikan, AK. I support the proposed regulations for on-site consumption for the following reasons.

- Tourists in Alaska need a safe, legal place to consume.
- Parents in Alaska don't want to have to worry about their children seeing or walking through clouds of smoke on hiking trails or on the street because people have no public place to consume.
- I believe cannabis should be regulated like alcohol and for that to be the case there should be the equivalent of a bar for cannabis users.
- With careful supervision so as to avoid over-consumption, I believe a smoking lounge could be a huge asset to towns with a tourist draw, it would be a destination as well as an encouragement for visitors to want to go eat and shop.
- It would generally draw the state of Alaska more revenue, tourist reputation, and ultimately boost our economy.

My desire is to see the state of Alaska flourish, and for people who partake in cannabis to have a comfortable safe space to consume, without violating the law or other people's personal preferences.

Kolbe Rose Pollock  
413.347.3760  
420 Front St  
Ketchikan, AK 99901

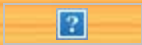


**From:** Michael Rowcroft  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Cc:** [Heather Aronno](#); [Leah Neff Warner](#)  
**Subject:** My Opposition to the proposed use of Cannabis on site in Marijuana stores.  
**Date:** Thursday, October 19, 2017 9:23:16 AM

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Pleas re-consider why this is not a valid proposal. The use of this drug is a private choice, however the use in public places makes it a health hazard to others who do not care to use the drug. Cannabis in low doses produces a mild euphoria and is mood relaxing substance, however in the higher doses of THC present in today's commercially available stock, the marijuana dose effects are magnified and hallucinogenic producing and may cause anxiety, paranoia and dissociation in some users. The impairing effects are also evident in the increased number of Cannabis related crashes and injuries. This State has enough problems with alcohol consumption in public places and this is the equivalent of automatically giving a Marijuana retailer the freedom to dispense and encourage consumption testing just as if you gave every Liquor Store the privilege of a Licensed Inspected Bar like area to consume their alcohol in the store. There needs to be some limits in freedom or we lose the freedom we do enjoy. The freedom to smoke your "Dope" does end where another person's lungs, air and brain begin. Please set the "Bar" higher than this impossibly difficult to control regulation proposal is leading.

Respecting Freedom of everyone,  
Michael Rowcroft, MAT, LPC, CDC II  
907-321-4697  
1006 Craig Street  
Juneau, Alaska 99801



This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)

**From:** greenyogi  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Cannabis onsite consumption  
**Date:** Friday, October 27, 2017 1:58:40 PM

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To whom it may concern,

I am emailing you in favor of onsite /public consumption for cannabis. I believe it is imperative that the community have a secure place to consume a product that is now legal and available to the public. Considering the businesses as well that now provide these products and services, should have the security of not facing legal ramifications regarding a legally sold or distributed product.

On another note entirely, for cannabis to be further explored as a medicine and therapy, as it is for so many individuals, we as a community need to develop a place and environment where cannabis is used as onsite consumption in a therapeutic / medicinal setting.

I understand if this is a new type of topic or request but all be it a very important one.

Thank you for your time  
Samantha

## **Basics of Ventilation: Why it Does Not Effectively Protect Nonsmokers from Secondhand Smoke**

*“Exposures of nonsmokers to secondhand smoke cannot be controlled by air cleaning or mechanical air-exchange” (U. S. Surgeon General Report, 2006, chapter 10, section 10)*

### **Ventilation Systems and/or Smoking Rooms**

These are ineffective and costly. **There is no safe level of exposure to secondhand smoke**, and there is no ventilation system that will prevent secondhand smoke from permeating nonsmoking areas. Ventilation sometimes removes odor and larger air particles, but cannot remove the harmful constituents of secondhand smoke. Smoking rooms offer no protection for employees who work in those areas, putting those employees at risk.

A "smoking room" exemption may even worsen an employee's health by concentrating all the smoking into one place. Even if no employee is required to work in a separately ventilated smoking room, the people who clean the room will be exposed to the secondhand smoke. Ventilation and/or HEPA filters **cannot** control the health effects from secondhand smoke.

*“To achieve [the minimum] risk would require in excess of one hundred thousand cubic feet per minute per occupant (50,000 litres per second per occupant), which would need tornado-like levels of airflow to achieve.”<sup>i</sup>*

### **Ventilation Does Not Effectively Protect Nonsmokers from Secondhand Smoke**

- Establishing a smoke-free environment is the only effective way to protect nonsmokers from secondhand smoke.<sup>ii</sup>
- There is no risk-free level of exposure to secondhand smoke. Even low levels of exposure can harm nonsmokers' health.<sup>ii</sup>
- Separating smokers from nonsmokers, cleaning the air, and ventilating buildings cannot eliminate secondhand smoke exposure.<sup>ii</sup>
- Conventional air cleaning systems can remove large particles, but not the smaller particles or the gases found in secondhand smoke.<sup>ii</sup>
- Current heating, ventilating, and air conditioning systems alone cannot control secondhand smoke exposure. These systems can distribute secondhand smoke throughout a building.<sup>ii</sup>
- The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), the preeminent U.S. standard-setting body on ventilation issues, has concluded that ventilation systems cannot remove secondhand smoke from indoor environments.<sup>iii</sup>
- Even separately enclosed, separately exhausted, negative-pressure smoking rooms cannot keep secondhand smoke from spilling into adjacent areas. In practice, employees are often required to enter such rooms in order to perform their job duties. Employees and patrons in such rooms are likely to be exposed to especially high levels of secondhand smoke.<sup>ii</sup>

**The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), concludes that:**

- It is the consensus of the medical community and its cognizant authorities that Environmental Tobacco Smoke (ETS) is a health risk, causing lung cancer and heart disease in adults, and exacerbation of asthma, lower respiratory illnesses and other adverse effects on the respiratory health of children.
- At present, the only means of effectively eliminating health risk associated with indoor exposure is to ban smoking activity.
- Although complete separation and isolation of smoking rooms can control ETS exposure in non-smoking spaces in the same building, adverse health effects for the occupants of the smoking room cannot be controlled by ventilation.
- No other engineering approaches, including current and advanced dilution ventilation or air cleaning technologies, have been demonstrated or should be relied upon to control health risks from ETS exposure in spaces where smoking occurs. Some engineering measures may reduce that exposure and the corresponding risk to some degree while also addressing to some extent the comfort issues of odor and some forms of irritation.
- An increasing number of local and national governments, as well as many private building owners, are adopting and implementing bans on indoor smoking.
- At a minimum, ASHRAE members must abide by local regulations and building codes and stay aware of changes in areas where they practice, and should educate and inform their clients of the substantial limitations and the available benefits of engineering controls.
- Because of ASHRAE's mission to act for the benefit of the public, it encourages elimination of smoking in the indoor environment as the optimal way to minimize ETS exposure.

See link below for details from American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE):

[http://www.ashrae.org/content/ASHRAE/ASHRAE/ArticleAltFormat/20058211239\\_347.pdf](http://www.ashrae.org/content/ASHRAE/ASHRAE/ArticleAltFormat/20058211239_347.pdf)

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<sup>i</sup> (James Repace, Fact Sheet on Secondhand Smoke, 1999) <http://repace.com/SHSFactsheet.pdf>

<sup>ii</sup> U.S. Department of Health and Human Services. [The Health Consequences of Involuntary Exposure to Tobacco Smoke: A Report of the Surgeon General](#). Atlanta, Georgia: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, Coordinating Center for Health Promotion, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2006 [cited 2006 Oct 23]. Available from: [http://www.cdc.gov/tobacco/data\\_statistics/sgr/sgr\\_2006/index.htm](http://www.cdc.gov/tobacco/data_statistics/sgr/sgr_2006/index.htm)

<sup>iii</sup> American Society of Heating, Refrigerating and Air-Conditioning Engineers. Environmental Tobacco Smoke: Position Document. Atlanta, Georgia: 2005 [cited 2006 Oct 23].

Updated December 2010

**From:** Douglas Sanvik  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On Site Consumption - Smoking Room Comment  
**Date:** Monday, September 11, 2017 8:10:37 PM  
**Attachments:** [Attachment-4-Ventilation2010-FINAL.pdf](#)

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Dear Sir/Madam:

I am re-submitting comments regarding smoking rooms for on-site consumption of marijuana. It's imperative that smoking only be allowed outside. Research has shown that while ventilation might reduce the smell of smoke in a room it can't remove all the carcinogens from the indoor air.

I am alarmed by proposals to allow smoking rooms for on-site consumption of marijuana. There is no safe level of second hand smoke and smoking rooms are not effective at removing carcinogens from the air.

I am strongly against allowing smoking rooms for on-site consumption of marijuana. That would be a giant step backward in the defense of public health.

I have attached information about smoking rooms that I would like to submit as back-up information.

Thank you for this opportunity to comment.

Sincerely,

Doug Sanvik  
PO Box 21774  
Juneau, AK 99802

**From:** Caleb Saunders  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption- comment  
**Date:** Friday, October 27, 2017 11:01:52 AM

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Dear AMCO,

I am writing in regards to the regulations project that is out for the marijuana retail store onsite consumption endorsement.

I believe that it is essential we provide a place for residents and tourist to consume their legal cannabis in a legal way. Before the MCB was formed the Alcoholic Beverage Control Board created a broad definition of what is “public” when it comes to marijuana consumption. With this definition in place I believe it forces the need to be providing a space that is legal and safe for people to consume.

With the goal of protecting health and safety of the public. How is it helpful to have the public consuming in a way that is frowned upon when we could provide a monitored and controlled environment? It adds another level to the transparency in the legal market when an adult with a legal product has a legal place to consume.

Thank you for your time,

Caleb Saunders

CEO – Green Jar

MVCBA - President

**From:** Will Schneider  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-Site Consumption Endorsement  
**Date:** Friday, October 27, 2017 12:09:46 PM

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Hello Marijuana Control Board,

I am writing to express my support for the regulation that would allow onsite consumption. As it is currently written (in statute and regulation) there are very few places where adults 21 and over can consume marijuana in Alaska.

In my opinion, this is a health and safety issue. Citizens that may not be able to consume in their residences because of landlord relationships, or because they don't want to expose their family members to marijuana.

Visitors from out of town have virtually no where to consume marijuana. Not only is Alaska potentially missing out on revenue from marijuana tourism, we are also forcing people to consume in places where they shouldn't be. People risk becoming criminals on their vacations by consuming marijuana in their hotel rooms or in public.

Allowing onsite consumption will provide a safe location for people to enjoy legal marijuana and marijuana products responsibly.

I think 3 AAC 306.370 (a)(1) and (b)(1) should be scratched or modify to allow the onsite consumption of marijuana concentrates. Certain people may prefer to consume marijuana concentrates instead of flowers or edibles. I don't really see how or why to regulate concentrates in the onsite consumption endorsement when it is a legal marijuana product that people can consume at their homes. In some situations less marijuana concentrate than marijuana flower is needed to reach the desired effect. People should be allowed to consume concentrates as part of the onsite consumption endorsement.

I thank your time and consideration,  
Sincerely,  
Will Schneider

CEO and Founder of Catalyst Cannabis Company  
Board Member Anchorage Cannabis Business Association

--

**Will Schneider**  
FOUNDER

**ANCHORAGE, ALASKA**  
**907-205-1181**

[CatalystCannabisCo.com](http://CatalystCannabisCo.com)



**From:** Matt Schoditsch  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** 3 AAC 306.370  
**Date:** Wednesday, October 25, 2017 11:45:06 AM

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Hello:

I would like to comment on the above considered change.

How is it ok to allow alcohol (horribly addictive and deadly) to be served all over the State at bars and night clubs but, cannabis is not? It would be great for everyone (especially disabled, like me) to have this option. I DO NOT want, or think, that alcohol should be allowed at cannabis consumption locations. Never the two should mix. I fully support the idea of this change!

I would also like to mention that it would be wonderful if the Board could consider making a medical marijuana provision and allow a small increase in plant count. The Colorado regulations on medical cannabis would be a great guide for this. Yield vs. plant count leaves no room for individuals to harvest enough finished product to get them through to the next harvest.

Thank you for the time and consideration.



**From:** Bruce Schulte  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption Regulations Project  
**Date:** Friday, October 27, 2017 3:50:00 PM

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Members of the Marijuana Control Board,

As you know, in November 2015, the MCB created a placeholder in the regulations for an onsite-consumption endorsement for Retail Store licensees.

This was done in response to significant feedback from individuals, travel industry groups, and local governments and was intended to address a very real problem faced by many Alaskan communities - that adult consumers of marijuana products had no lawful venue outside their home to consume the products they purchased.

I write today to urge you to follow through on that commitment and adopt, without further delay, reasonable guidelines under which such a licensed venue may operate.

Regards,

***Bruce Schulte***  
*Anchorage, AK*

**From:** Denali Smoke  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption Comments  
**Date:** Friday, October 27, 2017 8:29:10 AM

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I hope you folks can hitch up your britches and pass some reasonable regulations allowing onsite consumption. Cannabis is here to stay. If for no other reason than it is a safer alternative to tobacco and alcohol.

Treat cannabis like alcohol, allow places where people can get together and share a joint instead of pitcher of beer or bottle of wine. That's what the people of Alaska hired you to do.

Thank you for your contributions to the success of the legal cannabis industry.

Sincerely,

Keith A. Searles  
Editor and Publisher  
Denali Smoke: A virtual entity advocating for Alaska's cannabis consumers.



Virus-free. [www.avg.com](http://www.avg.com)

**From:** Susanna Serino  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Please do not allow on-site marijuana consumption  
**Date:** Wednesday, October 25, 2017 6:42:51 PM

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Dear Erika McConnell,

I am writing this email after just discovering that the FNSB will be voting on the on-site consumption of marijuana. I am very concerned about the prospect of people arriving at these shops and stores, consuming the drug, and attempting to drive away. Please also consider the risk of having impaired users attempting to walk down busy streets. I do not feel it is safe or responsible to allow this without at least the same regulation as alcohol establishments are held to. I strongly urge the Marijuana Control Board and the FNSB to make the safe, responsible decision to protect our families and the general public. Please do not allow on-site marijuana consumption.

Sincerely,

Susanna Serino  
584 Slater Ave  
Fairbanks, AK 99701

Sent from my iPhone

**From:** danny slane  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite marijuana consumption  
**Date:** Thursday, October 26, 2017 8:00:19 AM

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Allowing onsite consumption is not a good idea. We have a lot of pot smokers and growers here in Fairbanks, which you already know from your statistics. These retail stores are popping up everywhere and I have one in my neighborhood, (One Hit Wonder). It's on the Parks Highway and I have to drive past it daily to get to town and back home again. Right across the street is a liquor store, Gold Hill. Right next to Gold Hill is a jail, half way house. And across the street, right next to the pot store is a bar, the Blue Loon. One business down from the jail and Gold Hill is a distillery, Ursa Major.

This small area is saturated with booze and pot. Liquor store, jail and distillery on one side of the highway, bar and pot shop right across the street. It's crazy and we have enough incidents already. Why allow pot smoking and entice people to get high on weed, then allow them to drive away?

The public didn't vote for onsite consumption, you should not support it. You would endanger my life and others by allowing this. There will be an increase in drugged drivers. This is a public safety issue. No on onsite consumption!

Danny Slane  
PO Box 70922  
Fairbanks, AK 99707

**From:** Terry Snyder  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 4:16:04 PM

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I would like to submit testimony the the board is collecting regarding onsite consumption of marijuana on behalf of myself only.

I think it is premature for the state to allow for onsite consumption. While I am not personally against the legalization of marijuana (I moved to Alaska in the 70's when it was legal) I think it is irresponsible of the state to allow any second hand smoke in the workplace even if workers are aware it is present for several reasons.

- The investment into the science of the effects of marijuana to the public has not been done to the state should always be conservative in its regulation when it comes to the safety and health of people.
- The effects on individuals varies wildly and there is not conclusive evidence that it would be a safe practice to be allowed for the same reasons we do not let people sample liquor they intend to buy at liquor stores.
- Alaska can not afford at this time the possible costs of what will results in increased enforcement, investigative and legal costs to a strained public safety department.

It is only prudent to take the advantage to see how other states much more advanced in the experience of legislating marijuana for the public.

Respectfully,

Terry Snyder  
Palmer. Alaska

**From:** 8719 46th ave. w. 28  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** [SPAM] Support the Proposed Regulations by the Marijuana Control Board  
**Date:** Saturday, September 30, 2017 5:55:48 AM

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,

I am writing in support of Alaska's Marijuana Control Board proposed new regulations to section 3 AAC 306 of the Alaska Administrative Code to regulate onsite adult cannabis consumption at retail facilities.

Under these proposed regulations, on-site consumption areas must be separated from a retail facility via either a separate building, a secure door with a separate ventilation system, or by the establishment of a designated outdoor smoking area. Consumers will not be permitted to bring their own cannabis into the site, but instead may only consume limited quantities of cannabis purchased at the retail facility. Tobacco use will not be permitted on the premises.

The current practice of allowing adults 21 years of age to legally purchase marijuana, while not providing consumers with legally defined public places or establishments to ingest it, is a burden for both citizens and for law enforcement. Licensing and regulating the social use of cannabis will limit the unwanted use of cannabis in non-designated public spaces.

I urge you to support this necessary proposal.

8719 46th ave. w. 28  
dwsolomon984@gmail.com  
8719 46th ave west  
bradenton, Florida 34210

**From:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** FW: Onsite Consumption  
**Date:** Thursday, September 21, 2017 7:45:05 AM  
**Attachments:** [CommentonDraftRegs.pdf](#)

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**From:** Rory Spurlock [mailto:roryspur7@gmail.com]  
**Sent:** Wednesday, September 20, 2017 10:30 PM  
**To:** Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>  
**Cc:** Rory Spurlock <roryspur7@gmail.com>  
**Subject:** Onsite Consumption

It only makes good business sense to allow onsite consumption.

For anyone visiting the State and buying cannabis, there is currently no where they can legally consume the product which makes no sense. Unhappy tourist, unhappy business. Also, enabling onsite consumption would reduce the downtown alleyway, sidewalk scent of cannabis by taking the smoking indoors instead of the only other means for them.

Thanks,  
Rory Spurlock  
Anchorage AK  
AK Resident for 35

**From:** Katie Steffens  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I Oppose Onsite Consumption of Marijuana  
**Date:** Thursday, October 26, 2017 3:31:42 PM

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To the Alaska Marijuana Control Board:

I am a **strong opponent** of onsite consumption of marijuana in any form including but not limited to smoking, vaping, and eating.

Marijuana is not alcohol and should not be treated like it. Marijuana is a substance that does not have a way to immediately test the amount of impairment after consumption. There is not an existing test that is timely for enforcement to use when pulling driving suspects over. Allowing this product to be publicly consumed puts pedestrians, cyclists, and drivers alike at risk. Alaska has seen too many people victimized due to drug and alcohol abuse combined with driving; we don't need anymore.

Onsite consumption of marijuana is a guaranteed headache for the future, especially if smoked or vaped. It is a well-known fact that ventilation systems are not able to completely remove second-hand smoke from the air whether it's from marijuana, tobacco, or vapes. Because marijuana is not federally legal, the research on the effects of secondhand smoke from marijuana are limited. What we do know is that marijuana smoke contains many of the cancer-causing substances and toxic chemicals as tobacco smoke does. Anchorage has a smokefree indoor workplace ordinance. Smoke is smoke. Marijuana cannot be the exception to the rule.

Alaska will be making the right choice by not allowing onsite consumption of marijuana products. There will be more healthy and safe people because of it.

Thank you for your time and consideration.

Best,  
Katie Steffens



**From:** George Stewart  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Please Vote NO on Indoor Marijuana Consumption  
**Date:** Thursday, October 26, 2017 4:04:36 PM

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**For a number of Medical reasons - Please Vote NO on Indoor pot consumption.**

- 1) Indoor inhalation of any smoke - including Marijuana causes lung disease- to the consumer and anyone else in the environment**
- 2) It will cause the person consuming to have toxic driving problems on the way home**
- 3) Anyone else in the environment cannot be protected.**
- 4) Indoor consumption of Marijuana is illegal in Anchorage - please make it that way for the entire state - PROTECT LUNG HEALTH !!!!**

**George L Stewart, MD**

**From:** Jane Stinson  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On Site Consumption  
**Date:** Friday, October 27, 2017 3:58:12 PM

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Enlighten Alaska has been operating a legal retail marijuana store in Anchorage since February 2017. We are strong supporters of onsite consumption in Alaska. During the summer months our tourists commented on the illogical situation of buying a cannabis product, but not providing a place for consumption, except the privacy of someone's Alaskan home. Tourists are forced to risk using their products in rental cars, hotel rooms, and outside areas in the general public.

Now that cannabis is legal, consumers need a safe place to consume. Our state voted to regulate marijuana like alcohol. Cannabis, like alcohol is a socially stimulating product; and just like the local bars, it's important for cannabis consumers to have regulated cafes that support this industry. Onsite consumption provides a controlled environment for local residents and tourists to enjoy marijuana.

The legal marijuana industry is important to the state's economy, and onsite consumption is essential to the industry's success. Please adopt the proposed regulations for the marijuana retail store onsite consumption endorsement.

**From:** Jim Stogsdill  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comments on smoking in retail shops  
**Date:** Thursday, October 26, 2017 12:19:47 PM

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Thank you to the Board for allowing me to comment on smoking marijuana on the premises of retail marijuana shops. I am opposed to this option based on the effects it could have on public health. It has already been highly documented that smoking is harmful to ones' lungs, whether by direct consumption or by second hand absorption. No matter if the source is tobacco, wood smoke or marijuana, toxins and carcinogens are released. Lung health may be compromised. Secondhand marijuana smoke contains many of the same toxins and carcinogens found in directly inhaled marijuana smoke.

We as a society have recognized the scientific evidence of the harms of tobacco smoke and have reduced the public areas where smoking is allowed. Why would we not react the same to marijuana smoke? Please consider the position of both the American Cancer Society and the American Lung Association and reject the amendment to allow smoking on the premises or retail marijuana shops.

Thank you,  
Alyson Stogsdill  
Kasilof, AK  
907-398-3235

**From:** Mike Stoltz  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Oppose Approval of Regulations  
**Date:** Thursday, August 24, 2017 5:59:20 AM

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I oppose approval of the below listed regulations.

Who will control marijuana consumption regulations in unincorporated areas of Alaska and Mat Su Borough in particular.

Mat Su Borough has 80,000 plus people living without local law enforcement.

**Marijuana Control Board proposed regulations--marijuana retail store onsite consumption endorsement**

NOTICE OF PROPOSED CHANGES TO THE REGULATIONS OF THE MARIJUANA CONTROL BOARD REGARDING THE ADDITION OF AN ONSITE MARIJUANA CONSUMPTION ENDORSEMENT TO THE RETAIL MARIJUANA LICENSE

The Marijuana Control Board proposes to adopt regulation changes in 3 AAC 306 of the Alaska Administrative Code, dealing with onsite marijuana consumption endorsements for retail marijuana establishments, including the following:

- (1) 3 AAC 306.370 proposes to allow retail marijuana licensees to apply for an onsite consumption endorsement if certain conditions are met.
- (2) 3 AAC 306.990 proposes to define “marijuana consumption area” and “retail marijuana store premises.”

Mike Stoltz

PO Box 202

Talkeetna, AK 99676

Sent from my iPhone



March 30, 2017

Office on Smoking and Health  
Centers for Disease Control and Prevention  
4770 Buford Highway NE, MS F79  
Atlanta, GA 30341

Katie Reilly  
State of Alaska Division of Public Health  
3601 C Street, Suite 756  
Anchorage, AK 99503

Ms. Reilly,

Per your request, I am submitting this statement of the scientific evidence regarding currently available scientific information on secondhand exposure and marijuana smoking. For the record, I am not submitting this statement for or against any specific legislative proposal.

**Health Effects of Secondhand Exposure to Marijuana Smoke**

The long-term health effects of secondhand exposure to marijuana smoke have not been extensively studied, and research in this area is ongoing. Generally, there are health risks associated with combustion and subsequent inhalation of its emissions. Whether from burning tobacco or marijuana, toxins and carcinogens are released from the combustion of these materials. Inhaled smoke from marijuana contains many of the same toxins, irritants and carcinogens as tobacco smoke.<sup>1,2</sup> Further, secondhand smoke from combusted marijuana has been found to contain the same toxins and carcinogens found in inhaled marijuana smoke.<sup>3,4,5</sup>

There are recent findings that breathing secondhand marijuana smoke could damage heart and blood vessels as much as secondhand tobacco smoke.<sup>6</sup> Further, emerging research indicates that even brief exposure to secondhand marijuana smoke has been shown to have immediate, adverse effects on the heart.<sup>7</sup>

**The Health Effects of Secondhand Exposure to Tobacco Smoke**

While the research on the health effects of secondhand marijuana smoke is ongoing, the existing evidence on secondhand tobacco smoke is well documented. In adults, secondhand tobacco smoke exposure causes stroke, lung cancer, and coronary heart disease, as well as reproductive effects in women, including low birth weight.<sup>8</sup> Children who are exposed to secondhand tobacco smoke are at an increased risk for sudden infant death syndrome (SIDS), acute respiratory infections such as pneumonia and bronchitis, middle ear disease, more frequent and severe asthma, respiratory symptoms, and slowed lung growth.<sup>8</sup>

In 2006, the Surgeon General's Report on *The Health Consequences of Involuntary Exposure to Tobacco Smoke* concluded that there is no risk-free level of secondhand tobacco smoke exposure.<sup>9</sup> Separating smokers and nonsmokers, using designated smoking areas, cleaning or filtering the air, and using separately ventilated areas do not work.<sup>9</sup> Furthermore, in 2010, the Surgeon General's Report on *How Tobacco Smoke Causes Disease* reaffirmed the conclusion that there is no risk-free level of exposure to tobacco smoke.<sup>10</sup> The report and subsequent findings also documented how the complex mix of chemicals in tobacco smoke causes disease, including finding that cigarette smoke contains 7,000 chemicals, 250 of which are toxic and nearly 70 of which cause cancer.<sup>10</sup>

### **Preventing Secondhand Exposure**

We know what works to prevent the harms of secondhand smoke exposure, based on the evidence from tobacco. In 2006, the Surgeon General concluded that eliminating tobacco smoking in indoor spaces is the only way to fully protect nonsmokers from secondhand smoke exposure.<sup>9</sup> In 2009, the World Health Organization's International Agency for Research on Cancer reiterated these findings, concluding that smokefree policies lead to substantial declines in secondhand smoke exposure, citing air quality improvements of up to 90% in high-risk settings, such as bars.<sup>11</sup>

### **Conclusion**

The existing evidence on the health effects of secondhand smoke exposure to marijuana is limited, and research is ongoing in this area. Recent studies demonstrate that exposure to secondhand marijuana smoke exposure can have adverse health effects on the heart. Additionally, we know that secondhand marijuana smoke contains the same toxins and carcinogens found in inhaled smoke from marijuana. As states and communities consider public health interventions to protect the public from involuntary exposure to known health risks, clean air free from smoke from any source remains the standard to protect health.

Sincerely,

Brian A. King, PhD, MPH  
Deputy Director for Research Translation  
Office on Smoking and Health  
Centers for Disease Control and Prevention

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<sup>1</sup> Tashkin DP. Effects of marijuana smoking on the lung. *Ann Am Thorac Soc*. 2013;10 (3):239-247.

<sup>2</sup> Moir D, Rickert WS, Levasseur G, et al. A comparison of mainstream and sidestream marijuana and tobacco cigarette smoke produced under two machine smoking conditions. *Chem Res Toxicol*. 2008; 21(2):494-502. doi:10.1021/tx700275p

<sup>3</sup> Moore, C., et al. Cannabinoids in oral fluid following passive exposure to marijuana smoke. *Forensic Sci Int*, 2011. 212(1-3): p. 227-30.

<sup>4</sup> Cone, EJ, et al. Non-smoker exposure to secondhand cannabis smoke. I. Urine screening and confirmation results. *J Anal Toxicol*, 2015. 39(1): p. 1-12.

<sup>5</sup> Zarfin, Y, et al. Infant with altered consciousness after cannabis passive inhalation. *Child Abuse Negl*, 2012. 36(2): p. 81-3.

<sup>6</sup> Wang X., et al. Brief Exposure to Marijuana Secondhand Smoke Impairs Vascular Endothelial Function. *Circulation*. 2014;130:A19538

<sup>7</sup> Wang X, et al. One Minute of Marijuana Secondhand Smoke Exposure Substantially Impairs Vascular Endothelial Function. *J Am Heart Assoc*. 2016;5:e003858

<sup>8</sup> U.S. Department of Health and Human Services. *The Health Consequences of Smoking—50 Years of Progress: A Report of the Surgeon General*. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2014.

<sup>9</sup> U.S. Department of Health and Human Services. *The Health Consequences of Involuntary Exposure to Tobacco Smoke: A Report of the Surgeon General*. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, Coordinating Center for Health Promotion, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2006.

<sup>10</sup> U.S. Department of Health and Human Services. *How Tobacco Smoke Causes Disease: A Report of the Surgeon General*. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2010.

<sup>11</sup> International Agency for Research on Cancer. *Handbook of Cancer Prevention: Evaluating the Effectiveness of Smoke-free Policies*. Geneva, Switzerland: International Agency for Research on Cancer, World Health Organization, 2009.

**From:** Marge Stoneking  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment in Opposition to Proposed Regulation\_Marijuana Retail Store Onsite Consumption  
**Date:** Tuesday, October 03, 2017 8:41:41 AM  
**Attachments:** [CDC Letter of Evidence on Secondhand Smoke and Marijuana Alaska 3.30.pdf](#)

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American Lung Association in Alaska is opposed to proposed regulations allowing inhaled consumption of marijuana onsite in retail marijuana stores. The mission of the American Lung Association is to save lives by preventing lung disease and improving lung health. We are a science-based public health organization, and as such are including a letter of evidence from the Centers for Disease Control and Prevention regarding secondhand marijuana smoke in addition to our own comments.

Secondhand smoke from marijuana has many of the same chemicals as smoke from tobacco, including those linked to lung cancer. Secondhand smoke from combusted marijuana contains fine particulate matter that can be breathed deeply into the lungs, which can cause lung irritation, asthma attacks, and respiratory infections, in addition to the beginning of lung cancer. Exposure to fine particulate matter can exacerbate health problems especially for people with respiratory conditions like asthma, bronchitis, or COPD. Additionally, new studies have found that breathing secondhand marijuana smoke could damage blood and blood vessels as much as secondhand tobacco smoke, increasing the risk of having a heart attack.

No type of ventilation system will protect workers and patrons from the effects of secondhand smoke or aerosol. In the proposed regulation, the licensee would be required to provide a ventilation plan approved by a mechanical engineer to apply for an onsite consumption endorsement. Ventilation may reduce odors and visible smoke, but will not protect human health from fine particulates and toxins. Even high-quality ventilation systems will not prevent marijuana smoke or aerosol from moving from the consumption area into other areas of the retail store. A building must be completely smokefree to eliminate the health effects caused by secondhand smoke or aerosol.

The American Society for Heating, Refrigeration, and Air Conditioning Engineering (ASHRAE) is the organization that develops engineering standards for building ventilation systems. ASHRAE now bases its ventilation standard for acceptable indoor air quality on an environment that is completely free from secondhand tobacco smoke, secondhand marijuana smoke, and emissions from electronic smoking devices. CITATION: ANSI/ASHRAE Standard 62.1-2013, Addenda 2015 - Ventilation for Acceptable Indoor Air Quality. ta, GA: American Society of Heating, Refrigerating, and Air-Conditioning Engineers, Inc. Atlanta, GA: American Society of Heating, Refrigerating, and Air-Conditioning Engineers, Inc.

<https://www.ashrae.org/File>  
Library/docLib/StdAddenda/62\_1\_2013\_2015Supplement\_20150203.pdf<[https://www.ashrae.org/File%20Library/docLib/StdAddenda/62\\_1\\_2013\\_2015Supplement\\_20150203.pdf](https://www.ashrae.org/File%20Library/docLib/StdAddenda/62_1_2013_2015Supplement_20150203.pdf)>

The U.S. Surgeon General's Report, "The Health Consequences of Involuntary Exposure to Tobacco Smoke," (2006) also concluded that there is no risk-free level of exposure to secondhand smoke; ventilation and other air cleaning technologies cannot eliminate exposure of nonsmokers to secondhand smoke; and that comprehensive smokefree workplace policies are the only effective way to eliminate secondhand smoke exposure in the workplace.

**As Alaska considers public health policies to protect the public and workforce from involuntary exposure to health risks, clean air free from smoke from any source remains the standard to protect health.**

Seventy-nine percent of Alaskans polled by American Cancer Society Cancer Action Network in 2016 support protecting Alaskans from secondhand marijuana smoke in workplaces and public places.

Please consider the science and the opposition of Alaskans, as noted in the poll above and in previous iterations of public comments on this issue, of which there have already been three with the preponderance of public comments in opposition.

**Marge Stoneking** | Executive Director



500 W Intl Airport Rd, Ste A  
Anchorage, AK 99518  
907.644.6404  
[www.lung.org](http://www.lung.org)



[www.savedbythescan.org](http://www.savedbythescan.org)

**From:** Becky Stoppa  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** say no to onsite consumption  
**Date:** Friday, October 27, 2017 1:51:53 PM

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I'm writing to urge the Marijuana Control Board to maintain the existing law that prohibits onsite consumption of marijuana in pot shops. I have several concerns about the public health harms that allowing onsite consumption could create, including the potential to increase the number of people driving under the influence and exposing nonsmokers to secondhand marijuana smoke. Secondhand marijuana smoke would put nonsmokers at risk for many of the same health harms that result from secondhand tobacco smoke. According to the American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE), ventilation does not fully eliminate the toxins found in secondhand smoke, regardless of whether that smoke comes from a traditional cigarette or marijuana. Please help protect the health of all Alaskans by maintaining the existing law that prevents onsite consumption of marijuana in potshots or other public places.

Sincerely,  
Becky Stoppa  
3250 N Tungsten Dr.  
Wasilla, AK 99654



**From:** Sig & Arlene Strandberg  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Statement of Opposition to State Marijuana Control Board of Authorization of On-Site Consumption Where Sale of Marijuana Occurs....  
**Date:** Thursday, October 26, 2017 11:26:29 AM

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Erika McConnell  
Alcohol and Marijuana Control Office  
550 W. 7<sup>th</sup> Avenue, Suite 1600  
Anchorage, AK 99501

October 25, 2017 Statement by Sigvald J. & Arlene C. Strandberg

We oppose the State Marijuana Control Board adopting any rules, regulations, advisories of any sort, that allow, permit, or acquiesce to, use of any marijuana product on the premises where the sale of it occurs, whether indoors or on open air areas adjacent to the retail business. An Onsite consumption facility operated by the retail outlet encourages “having one for the road.” Driving out onto the public highway or street addled by marijuana introduces a new danger to the public. It will double the number of people inebriated and incapacitated to a varying degree out on the public ways. In effect we will face the prospect of an increasing number of “double drunks” on our highways.

The 2014 marijuana legalization initiative contained no provision for adoption by the Marijuana Control Board of regulations in the Alaska Administration Code permitting on premises consumption of marijuana products (including cookies and cakes). The legislature has not given the Marijuana Control Board authority to address this question. Therefore, the Fairbanks North Star Borough Assembly should oppose the MCB adopting regulations permitting retail onsite consumption. Regulations are for the purpose of interpreting and making specific existing laws. Unless the legislature enacts a measure that the Governor signs or allows to become law without his signature, giving the MCB authority to regulate licensed retail marijuana business on site consumption, or, in the absence of this new authority, the State’s Attorney General issues a formal opinion clearly affirming the ability of the MCB to adopt regulations under existing law covering onsite consumption, the Assembly, under its Zoning Authority, should pull any marijuana retail operation zoning permit where the permittee allows onsite consumption.

**From:** Sig & Arlene Strandberg  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** 10-27-17 Comment and Protest on proposed 3 AAC 306.370 allowing retail marijuana licensees to apply for an onsite consumption endorsement.  
**Date:** Friday, October 27, 2017 4:14:40 PM

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## 10-27-17 Comment and Protest on proposed 3 AAC 306.370 allowing retail marijuana licensees to apply for an onsite consumption endorsement.

We challenge and protest the legality of proposed 3 AAC 306.370 that would allow retail licensees to apply for an onsite marijuana consumption endorsement. This is predicated on the statute authorizing retail marijuana establishments specifically providing for both a retail marijuana premises and on the same premises for a marijuana consumption area. The necessary precedent in Alaska Statutes is separate specific authority (NOT IN STATUTE NOW) for retail marijuana licensees to operate an adjoining/on premises consumption space. Other states have enacted statutory schemes that couple marijuana retail operations with conditional endorsements. That is, other states authorize and distinguish between retail establishment sales of marijuana products and separate on premises space for the consumption of purchased marijuana products. The Alaska Statutes currently do not provide the legal means by which retail licensees may obtain an endorsement for on premises consumption of marijuana products.

Sigvald J. & Arlene C. Strandberg



Virus-free. [www.avast.com](http://www.avast.com)

**From:** Bailey Stuart  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption Public Comment  
**Date:** Friday, October 27, 2017 12:13:41 PM

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Dear MCB members,

I am writing to you in regards to the regulations project creating onsite consumption regulations for marijuana retailers. As a retailer, I see the need for my customers to consume in a safe and regulated atmosphere. We especially saw this during the height of tourism. We saw many visitors to Alaska wanting to abide by Alaska State Law but were placed in a predicament that almost everywhere they were staying were public places with no smoking laws. They did not want to break the law. We should not put our visitors to our beautiful state in a position where they have to break a law in order to consume a legal substance in Alaska. It is important to the success of our legal marijuana industry that our consumers have a safe place to consume.

There are many benefits to adopting the proposed regulations for our consumers. Taken into account the need for tourists and visitors to have a place to consume without being a nuisance to anyone else. We should have a place where local residents can consume without exposing their children to adult activity, or neighbors to their cannabis use. It will provide a controlled environment for people to enjoy cannabis in a communal public way, just like alcohol, without creating a disturbance to the public. And will eliminate the need for a visitor to Alaska to have to consume in public streets or in public parks.

Thank you for taking the time to read this. Please consider the following and continue to work towards onsite consumption regulations.

Bailey Stuart  
COO - Green Jar

**From:** Jennifer Summers  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Marijuana Onsite Consumption - Public Comment  
**Date:** Thursday, October 26, 2017 2:23:24 PM

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Marijuana Control Board  
550 W. 7<sup>th</sup> Ave., Suite 1600  
Anchorage, AK 99501

Dear Marijuana Control Board members,

Thank you for the opportunity to provide written comments on the Marijuana Control Board's proposed regulations to allow onsite consumption of marijuana at retail stores.

Breathe Free Anchorage Coalition's (BFANC) mission is to *improve community health by eliminating exposure to secondhand smoke and aerosols and reducing nicotine addiction*. Our coalition represents many organizations and programs throughout Anchorage, including: Alaska Native Tribal Health Consortium, Southcentral Foundation, American Lung Association, Rural Alaska Community Action Plan, University of Alaska Anchorage, Alaska Pacific University, American Cancer Society Cancer Action Network, Volunteers of America, and others, as well as individual concerned citizens. Our coalition leads public health initiatives, events, research and evaluation projects with the goal of improving the health and quality of life for Anchorage residents.

Below is a list of Breathe Free Anchorage Coalition concerns, many of which have been raised in coalition meetings over the last year and half, as the Marijuana Control Board continues to try and advance regulations to implement the Alaska Marijuana Ballot No. 2(2014); including regulations that consider allowing onsite consumption in marijuana retail businesses.

- Ballot Measure 2 was clear: the public consumption of marijuana was intended to remain illegal until subsequent legislative action directed otherwise. The language in the ballot measure, voted on by the public and now enacted in AS 17.38.040, **does not** allow for public consumption of marijuana. To date, no other state has allowed, through legislation or regulation, this activity.
- Secondhand smoke causes lung cancer in adults who have never smoked. Even brief secondhand smoke exposure can damage cells in ways that set the cancer process in motion. As with active smoking, the longer the duration and the higher the level of exposure to secondhand smoke, the greater the risk of developing lung cancer. The fine particles and toxic chemicals in both marijuana and tobacco secondhand smoke also **cause** lung irritations and increased risk for asthma, lung inflammation, bronchitis, and COPD exacerbations.
- Secondhand smoke exposure **can** also damage heart and blood vessels and lead to heart attack and stroke. Even brief exposure to secondhand marijuana smoke has been shown to have immediate, adverse effects on the heart.
- The draft proposed regulation requires the business to maintain a smokefree area for employees to monitor the consumption area, but it is unrealistic to require the business to keep employees away from smoke while working, and workers would still be exposed to

marijuana smoke that can seep through doorways and vents, as well as when they enter the consumption area. This undermines the goals of the existing smokefree ordinance, and in the absence of evidence that marijuana smoke is *not* harmful, would treat two similar substances differently.

- The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) publishes national indoor air quality standards, and has for several years stated that there is no acceptable level of *environmental tobacco smoke* (ETS) *to be considered having safe indoor air*. They find that:
  - There is no existing ventilation system that can sufficiently remove these particles from the air.
  - An indoor smoking ban is the only way to ensure adequate air quality.
  - More recently, ASHRAE *added marijuana smoke and e-cigarette vapor* to this list.
- The current proposal includes ventilation requirements for establishments that allow smoking, which is ineffective and **will not address** the health impacts of exposure to secondhand marijuana smoke according to ASHRAE,. Therefore, the current proposal will **not** be effective in protecting workers or the public against the toxins in secondhand smoke.
- The proposed regulations also allow for an outdoor onsite consumption area — BFANC is concerned about the impacts of exposure/inhalation adjacent to outdoor areas, including surrounding businesses, sidewalks, parking lots, and neighborhoods. As such, allowing outdoor consumption on premises would **not** be consistent with the intent of the Municipality's smokefree ordinance.
- BFANC is concerned about the implications of the proposal to allow onsite consumption of marijuana at retail stores as it impacts Anchorage's smokefree indoor air ordinance (AMC 16.65.010) which has been established for ten years and is effective and popular. Keeping our workplaces and public places, including bars, restaurants and similar establishments, free of secondhand smoke is a critically important health protection for workers and patrons at these establishments. Permitting smoking of marijuana, which involves smoking or vaping plant material similar to the process of smoking or vaping tobacco, **would** create an inconsistent policy and lead to jeopardized enforcement of smokefree policies.
- BFANC members are also concerned about what happens to customers after leaving the consumption area, particularly if they are inexperienced with marijuana use and/or have overconsumed: Will intoxicated customers drive home? What about consuming edibles, which can take several hours to work through a person's system? The regulation allows consumption of 1 gram of marijuana in one sitting, which is a **significant** amount for one person in a two-hour visit. What public safety impacts will local authorities have to deal with from drugged driving?

In closing, Breathe Free Anchorage Coalition members do not support the proposed regulations to allow onsite consumption of marijuana at retail stores, and we hope the Marijuana Control Board does not support them as well.

Sincerely,

Jennifer Summers, Chair  
Breathe Free Anchorage Coalition

**From:** szklarz9@gmail.com  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** marijuana retail store onsite consumption  
**Date:** Thursday, October 26, 2017 9:03:29 PM

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Ms. McConnell,

Thank you for reading this. Knowing you are busy, I will try to be as brief as possible.

I'm writing this email to express my comments on the proposed draft regulations for onsite consumption of marijuana. I'm concerned since there is no regulation at the State or Local level to keep these stores from being in or near neighborhoods, but your regulations will allow people to drive to our neighborhood, smoke marijuana outdoors and then somehow get home. It makes no sense to endanger more lives by having onsite consumption venues for marijuana, which is why no state has done that. It makes much more sense for them to only be able to buy their product and take it home.

There are numerous reasons why this would be extremely hurtful in our state. Here are just a few of them.

1. The effects from those consuming marijuana and then being around the public can be devastating, especially if the user were to drive which sadly often will be the case. Below I listed some of these symptoms. People who are intoxicated like this should not be on our roads!
  - According to the National Institute of Drug Abuse,(NIDA) a few of the symptoms of those who use marijuana, can have are:
    - impaired body movement and coordination
    - difficulty with thinking and problem-solving
    - impaired memory
    - hallucinations
    - delusions
    - psychosis
    - paranoia
2. The Lung Association and others have made it clear that there is no amount of ventilation that can mitigate the bad health effects of second-hand smoke from any source. Removing visible smoke is insufficient to protect health. NIDA states in their U.S. government publication that **secondhand marijuana smoke** can do as much damage to the heart and blood vessels.
3. To allow these impaired people to consume marijuana at public establishments makes absolutely no sense. With alcohol you can have a designated driver drinking their own non-alcoholic drink, however that is not possible in a smoking facility. The second hand

smoke impairs the “designated driver” as well.

4. Several of these retail establishments are near residential neighborhoods, if this atrocity were to happen, people going there specifically to get intoxicated, and then somehow getting home.
5. It's illegal to smoke marijuana in public and that includes public buildings and outdoors. The 2014 initiative didn't have any license for onsite consumption, so it wasn't voted in by the voters, and the legislature has never added it as an option. It's just the MCB, that has decided to make their own law, and it would ultimately take a court case to stop the regulations if they implement them.
6. Not only wasn't it in our legalization initiative, it isn't allowed in any of states that legalized pot. The MCB is making us the experiment, with no way of knowing the full ramifications.
7. There has already been a definite increase in the drugged driving rate in ours and other states that have legalized marijuana, allowing people to consume on-site will only increase that rate.

Please help not to have more lives ruined by this atrocity!

Thank you again for caring for the people of Alaska and seeking to do what is in our best interest.

Sincerely,  
Mr. John Szklarz  
Eielson AFB

October 5, 2017

Larry Taylor, Jr.  
1320 Water Street  
Ketchikan, Alaska 99901

Dear Marijuana Control Board Members,

I am a retired air quality engineer from the Anchorage Air Pollution Control Agency.

I respectfully submit comments on proposed regulation 3 AAC 306.365 for onsite consumption of marijuana at licensed retail stores.

I am against allowing smoking of any sort inside business establishments.

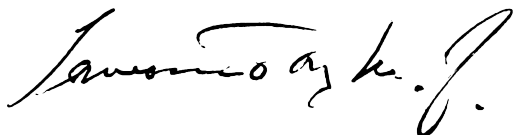
Despite clear language prohibiting public use of marijuana contained in Ballot Measure 2 when it passed in 2014, the Marijuana Control Board continues to re-interpret regulations and statutes in a way that would allow for on-site consumption in marijuana businesses.

While a community might have a local or borough-wide smoke-free ordinance for tobacco smoke or e-cigarettes, it would not protect employees within their jurisdiction from secondhand marijuana smoke at work. This not only threatens the health of the employees who work at these businesses, it also threatens the effectiveness of the local smoke-free ordinances and years of progress in creating smoke-free communities across the state.

Everyone has the right to breath clean air. After passage of the Anchorage Smoke Free Workplace Ordinance employees at businesses where smoking had been discontinued were grateful for the protection of their health provided by this law. Why ruin their faith in government by circumventing all of the efforts we went to affording them this benefit? The argument that employees can get a job someplace else may mean moving to another town. How would you feel about having to do that yourself? Hard to do, right? So they either have to stop working or suffer the consequences. THAT is cruel and unusual and should be a choice employees do not have to make. Everyone deserves to breath clean air.

Thank you for your consideration in supporting worker and public health.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Taylor, Jr.", with a stylized flourish at the end.

Larry Taylor, Jr.



**From:** Heather Thomas  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 11:10:32 AM

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I support onsite consumption for Alaskan businesses. Cannabis consumption areas should be available to tourists and residents so that we can consume safely and out of public eye. I believe that private businesses should be able to decide if they want to allow consumption on site without a license if they have an area that is out of public eye and well ventilated, like a back deck or room with a heavy duty air filter.

If the board does go ahead with allowing smoking cannabis at cafes and retail shops, I support that.

I also feel that consuming edibles and vaporizing on site should not be regulated because those forms of consumption do not impose on other people's space and rights.

A retail store's premises should by definition include any back deck or space that they pay for.

A cannabis consumption area should by definition be any space designated for smoking or vaping that is well ventilated. There should also be security to keep underage consumption from happening.

Adults need a place to consume safely together and having designated spaces to do so is something Alaska needs.

I hope that a new license type will soon be available for cannabis cafes/consumption areas. Pot Luck Events was open for 2 years without violence or any other problems, and their 8000 members proved that there is a need for this kind of space.

Please allow onsite consumption for cannabis.

Thank you  
Heather Thomas

**From:** Kris Thompson  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment In Support Of Onsite Consumption  
**Date:** Friday, October 27, 2017 4:09:48 PM

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Hello AMCO,

I appreciate the opportunity to voice my opinion on this supposed controversial issue. Onsite consumption should be allowed if places such as hoodoo, are able to provide liquor for consumption and sell a growler or 6 pack. There are many other places with tasting venues such as the brown jug, having a designated area for wine tastings and you are able to buy in bulk there after. I request to have the same right as liquor in the ability to consume at the retail's place of business and either take a cab, uber, or designated driver home. No problems have arose from cannabis sales especially in comparison to bars where the police are constantly responding to things like liquor fueled fights. Second hand smoke is far worse for you in bars than having a dedicated smoking room with proper ventilation. I have never smelled tobacco smoke outside of a bar unless it was the smell coming off my clothing. I thank you for the job well done legalizing and implementing the regulations while understaffed in a completely new industry. I would appreciate the support of the board in allowing me and many others the same opportunity as liquor in having onsite consumption.

Sincerely,  
Kris Thompson

**From:** Mark Thorson  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption Comments  
**Date:** Thursday, October 26, 2017 5:19:35 PM

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I support the regulations to establish onsite marijuana consumption at retail establishments.

Changes I would recommend to the proposed regulations are as follows;

- 1) The one gram of flower limit for consumption is too low. It should be 3gms for flower and 20 mg for consumables.
- 2) Unused product to be removed should not be costly to the establishment. Repackaging should be inexpensive, small amounts are what we are talking about, keep it simple.
- 3) A smoke free area for employees seems a bit much and an expense not necessary for the establishment, it already is required to have ventilation that seems more than adequate.
- 4) Local governments should not be allowed to disapprove licenses, to an already established recreational store. Another layer of approval and review seems redundant and frankly over the top. Regulate it like alcohol, you buy a beer at a bar, they expect you to sit down and drink at your leisure. It seems unfair to some business that possibly could be denied. Seems ripe for corruption at the local level.
- 5) Patrons of recreational shops should be allowed to take purchases into a consumption area and use the product, have it resealed, and be able to remove it, whatever the quantity. As long as they don't exceed consumption levels for flower and edibles. You buy 10 grams, go to the consumption area, use 1 or 2 grams. Repackaged and you are out the door.

Thank you for the ability to comment.

**From:** jack tobin  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** onsite consumption  
**Date:** Tuesday, October 24, 2017 3:00:11 PM

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dear MCB:

the issue of onsite consumption has been debated now for a long time. I understand the political strategy of waiting until your opponent loses steam, and i think this is an embarrassing thing to witness.

to the issue of employees being harmed:

this is a false argument. police officers, the military, construction workers, oil drillers- there are many occupations where a person may be harmed in their labors.

this is the united states. we let adults choose which dangers they exposed themselves to.

A few years ago a good friend of mine was killed when a crane wire snapped. he was impaled by a roof truss. Despite the tragedy of it all, i don't remember anyone claiming injustice. we are adults and when we took the job we knew the dangers. in fact, it could easily be argued that we were in fact PAID to take those risks.

I imagine anyone that gets a job where people smoke cannabis knows that they will be exposed to the smoke. adults make these decisions.

I strongly caution the MCB from making decisions regarding which occupations are allowed to make personal risk assessments.

I strongly urge the mcb to protect a citizen's rights to freedom.

I also strongly urge the MCB to follow the law. "regulating it like alcohol" was not merely a campaign slogan. that is the spirit of the law- that they should be regulated similarly. allowing adults to sit in a bar and take the health risks they are free to take is part of this law.

if you allow for onsite alcohol consumption, how can the prohibition of onsite consumption be compared?

a thinking person could only call it hypocrisy, or even more prohibitionism.

best regards, josh tobin.

**From:** Benjamin Toche  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** New Consumption Regs  
**Date:** Wednesday, September 27, 2017 9:01:39 PM

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Control Board,

Allowing folks to consume on the premises is a good idea. Regulate things as if the establishment were a drinkery. Allow for cutting off patrons if they seem too stoned. Let the same rules apply as if it were a bar setting. Have places of consumption employ an excise tax on products sold so that, like a bar, people would pay more for products consumed therein would bring greater revenue to the state/municipality.

Note: This is not just some stoner rant of "hey man let us do what we want" but that actual citizens are replying in a decent way that will advance our communities. C'MON MAN.

Thanks,

-BT

**From:** Dawson Tozier  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite marijuana consumption  
**Date:** Wednesday, October 25, 2017 10:30:10 PM

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Hello,

I am writing to comment on the proposed draft regulations for onsite consumption of marijuana. I'm concerned about the potential for marijuana retailers to open stores where people can smoke pot outside and then attempt to safely drive home. There are pot growing businesses within a quarter mile of my home, which causes concern for my children and family's safety. I am also concerned with the air quality, as my home is in the Fairbanks North Star Borough Non-Attainment area for PM2.5 which restricts wood stove and wood burning appliances that produce smoke on poor air quality days. The heavy smoke causes lung/ breathing problems for certain people. I find the smell of pot to be very repulsive even far worse than coal smoke. Marijuana smoke lingers in the air as attested by the smell when you drive past businesses that produce pot, and we are not yet even into the season when we are required to restrict wood burning due to poor air quality, so what will it be like during those non- attainment days? We don't let people drink alcohol at the store where they purchase it, why would we let marijuana be consumed at retail sites. If people are going to use it take it home and keep the smell inside their own home. Please DO NOT allow onsite consumption in our state or our borough.

Sincerely

Dawson Tozier

**From:** Cathy Gleason  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Turnagain Community Council Comments RE: Onsite Marijuana Consumption Draft Regulations  
**Date:** Saturday, October 14, 2017 8:44:00 PM  
**Attachments:** [10-14-2017-TurnagainCC-MJOnsiteConsumptionComments-Marijuana Control Board.pdf](#)  
[AK Dept. HHS Presentation - May 15 2017.pdf](#)  
[CDC Letter of Evidence on Secondhand Smoke and Marijuana Alaska March 30, 2017.pdf](#)  
[Dittman-Survey-ACS-CAN-Alaska-Opinion-Survey-Results-Jan.-29-2016.pdf](#)

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Marijuana Control Board,

Please accept the attached comments (and supporting documents) from the Turnagain Community Council. Our organization is composed of volunteers who live, work or own property within the Turnagain neighborhood in Anchorage.

If you have any questions or need clarification on any of our comments, please don't hesitate to contact me.

Sincerely,  
Cathy L. Gleason  
Turnagain Community Council Acting President  
907-248-0442  
[cathy.gleasantcc@yahoo.com](mailto:cathy.gleasantcc@yahoo.com)

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# TURNAGAIN COMMUNITY COUNCIL

c/o Federation of Community Councils  
1057 West Fireweed Lane, Suite 100  
Anchorage, Alaska 99503

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TO: Marijuana Control Board  
FROM: Turnagain Community Council  
DATE: October 14, 2017  
RE: **Comments on Proposed Regulations for Onsite Marijuana Consumption**

*The following comments were approved by Turnagain Community Council at its October 5, 2017, meeting, with a vote of 9 Yes, 0 No.*

Members of the Marijuana Control Board:

Thank you for the opportunity to provide comments on the proposed new section to the State of Alaska Administrative Code (3AAC 306.370) that would allow onsite consumption of marijuana at retail stores.

Even though the Turnagain neighborhood in Anchorage does not currently have any marijuana retail establishments, we are interested in voicing our concerns, as potential impacts from onsite consumption may affect all neighborhoods — not just those where retail establishments are located — and these retail onsite consumption sites, if allowed, will be in areas where Turnagain residents choose to work or visit within our city.

O. Our neighborhood is adjacent to Spenard Rd., and just down the road from Midtown Anchorage, where several retail stores have already opened. If onsite consumption becomes part of these establishments, our residential neighborhood may experience spillover impacts, such as drivers under the influence heading home on Northern Lights Blvd. or Spenard Rd.

**The Turnagain Community Council (TCC) is concerned about the public safety and public health impacts of this proposal as well as increased costs for implementing this new marijuana consumption license activity, as expressed in the following comments.**

**1. TCC is concerned about the implications of the state's proposal to allow onsite consumption of marijuana at retail stores, and in the process weakening or undoing Anchorage's current smokefree indoor air ordinance (AMC 16.65.010).**

Keeping our public places in Anchorage, including bars, restaurants and similar establishments, free of tobacco smoke is a critically important clean air/health protection issue for the public and, in particular, for workers at these establishments. Permitting smoking of marijuana, which involves combusting plant material similar to the process of smoking cigarettes, could re-open public discussion about the tobacco smokefree ordinance, or invite legal challenges from the tobacco industry by creating an inconsistent policy about indoor smoke. Many other states and cities around the U.S. already recognize that smokefree laws benefit everyone, including businesses, and TCC is glad to live in an ordinance-mandated smokefree community in Anchorage.

The draft regulation requires the business to maintain a smokefree area for employees to monitor the consumption area, but it is unrealistic to require the business to keep employees away from smoke during their entire work shift, and workers would still be exposed to marijuana smoke when they enter the consumption area. This undermines the goals of the



existing clean air/smokefree ordinance, and in the absence of evidence that marijuana smoke is *not* harmful, would treat two similar substances differently.

While the science on the health effects of marijuana is still limited, there are studies demonstrating that *tobacco and marijuana smoke have similar carcinogenic properties, which suggests that exposure to secondhand smoke from either product poses health risks to customers, workers and others in nearby areas where secondhand smoke is released into the air.* (See March 30, 2017, Center of Disease Control attachment, which states, “...**breathing secondhand marijuana smoke could damage heart and blood vessels as much as secondhand smoke.**”)

The state should not allow residents or visitors to be subjected to the potentially harmful effects of secondhand exposure to marijuana smoke from onsite retail consumption establishments.

**2. The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) publishes national indoor air quality standards, and has for several years stated that there is no acceptable level of environmental tobacco smoke (ETS) to be considered having safe indoor air. They find that there is no existing ventilation system that can sufficiently remove these particles from the air, and that an indoor smoking ban is much more effective to ensure adequate air quality. More recently, ASHRAE added marijuana smoke and e-cigarette vapor to this list.**

The current state regulation proposal includes ventilation requirements for establishments that allow marijuana smoking, but if existing technology cannot completely eliminate odors or particulates within or outside of the consumption area, *ventilation will not address the health impacts of marijuana smoke and would therefore not be effective protection against exposure to secondhand smoke.*

**3. The proposed regulations also allow for an outdoor onsite consumption area. TCC is concerned about the impacts of exposure to/inhalation of marijuana smoke in outdoor areas, including surrounding businesses, sidewalks, parking lots, other public areas, and neighborhoods.**

While smoke would dissipate faster outdoors, it would still expose others to the odor and inhalation of secondhand smoke in the surrounding area, and *it is unclear how this could possibly be controlled in an unenclosed, permitted, outdoor smoking area.*

**4. TCC is also concerned about what happens to customers after leaving the onsite consumption area, particularly if they are inexperienced with marijuana use and/or have over consumed:**

Will intoxicated customers drive home after taking a large dose? What about consuming edibles, which can take several hours to work through a person’s system? The regulation allows consumption of one gram of marijuana in one sitting, which is a significant amount for one person in the space of two hours. What public safety impacts will local law departments have to deal with from drugged driving, given that most people use vehicles to get around, and there may be many inexperienced people trying these products? TCC is concerned that *without the equivalent of a Breathalyzer to establish whether someone is driving under the influence of marijuana, it will be difficult for police to accurately and fairly assess drivers’ level of intoxication.*

We are also concerned about the possibility of problems around marijuana consumption location closing time, similar to “bar break,” when alcohol establishments close for the night. While marijuana seems less likely to produce violent behavior, several people leaving an establishment who are still feeling the effects of marijuana consumption could create a higher risk of behavior from intoxication, such as involvement in a vehicle accident.

**5. Another potential public safety concern is exposure to secondhand smoke for police, fire, and EMS staff that may need to enter a marijuana establishment designated consumption area for a consumption-related incident or an unrelated public safety/health-related incident.**

If inhalation of concentrated amounts marijuana smoke in an enclosed area has sufficient potency to create a “buzz,” this could impact first responders’ ability to do their jobs in this enclosed area, or require wearing ventilation equipment while in the consumption room. At least one Alaskan community has expressed concern about onsite consumptions. See *Alaska Journal of Commerce*, “Homer City Council will reconsider marijuana business on spit,” September 10, 2017. (Link to article: <http://www.alaskajournal.com/cannabis#.WbYtta2ZOuV>)

**6. TCC is concerned about the increased cost of implementing a new marijuana onsite consumption license activity as well as who would have to cover additional expenses to the community.**

Unfortunately, *the community (in our case, the Municipality of Anchorage and its residents) may be asked to bear many of these onsite consumption implementation expenses.* In this current, tight budget climate, asking local governments to cover higher inspection and enforcement costs related to onsite marijuana consumption will put more of a strain on limited community resources — and possibly require residents to cover the cost of appropriate inspection/enforcement-related tasks associated with this activity.

**7. Ballot Measure 2, passed in 2014, which legalized commercial production and sales of marijuana, included a specific list of licenses — none of which were intended to allow onsite consumption, and specifically banned marijuana consumption in public places.**

There does not appear to be a legal basis for creating a new license activity in regulation, where it is not supported in statute — and allowing onsite marijuana consumption would conflict with the 2014 ballot measure’s specific ban on public consumption. *TCC requests that the Marijuana Control Board seek legal opinions on these matters — and provide these opinions to the public — to avoid creating a regulation not supported in statute.*

*Turnagain Community Council concludes with the following:* A Dittman public opinion survey (2015-16) conducted for the American Cancer Society Cancer Action Network posed a question about Alaska passing a law prohibiting smoking indoors in public places — ***including prohibiting the smoking of marijuana in public places.*** Results: 79% in Favor, 18% Opposed, 3% Unsure.

Sincerely,  
Cathy L. Gleason  
Turnagain Community Council Vice President & Acting President

*Supporting documents attached with our email letter submittal to the Marijuana Control Board:*

- Alaska Department of Social Services, Division of Public Health, May 2017, presentation about the health harms of marijuana smoke and the ineffectiveness of ventilation against indoor smoke.
- Department of Health & Human Services, Centers for Disease Control’s March 30, 2017, letter citing collected evidence to date about exposure to secondhand marijuana smoke and health impacts.
- “Alaskan Opinions Regarding Statewide Smoke-Free Workplace Law” Dittman survey (December 2015-January 2016)

# Health Concerns Related to Onsite Marijuana Consumption

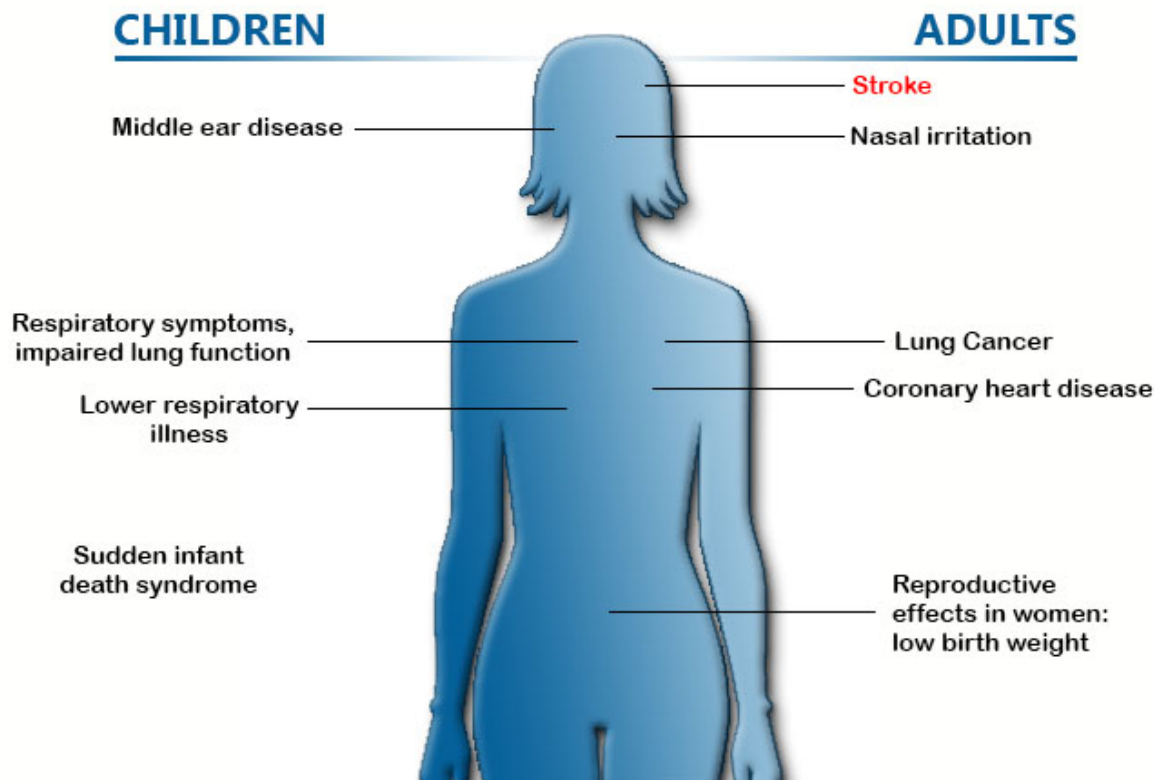
State of Alaska Department of Health & Social Services  
Division of Public Health

Marijuana Control Board Meeting  
May 15, 2017

# Introductions

- Joe McLaughlin, MD, MPH  
State Epidemiologist and Section Chief,  
State of Alaska Section of Epidemiology
- Eliza Muse, MSc Health Care Policy & Management  
Deputy Program Manager  
State of Alaska Tobacco Prevention & Control Program
- Katie Reilly, MPH  
Injury Prevention Program Manager  
State of Alaska Injury Prevention Program

# Health Effects of Secondhand Exposure to Tobacco Smoke



Source: U.S. Department of Health and Human Services. The Health Consequences of Smoking—50 Years of Progress: A Report of the Surgeon General. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2014.

# Secondhand Marijuana Smoke

- Secondhand MJ smoke contains many of the same cancer-causing toxic chemicals as secondhand tobacco smoke
  - E.g., acetaldehyde, ammonia, aromatic amines, arsenic, benzene, cadmium, chromium, formaldehyde, hydrogen cyanide, isoprene, lead mercury, nickel, N-heterocycles, PAHs
- In 2009, the CA OEH Hazard Assessment added MJ smoke to its Proposition 65 list of carcinogens and reproductive toxins
  - It reported that at least 33 individual constituents present in both marijuana smoke and tobacco smoke are carcinogens

## Sources:

Moir D, Rickert WS, Levasseur G, et al. A comparison of mainstream and sidestream marijuana and tobacco cigarette smoke produced under two machine smoking conditions. Chem Res Toxicol. 2008; 21(2):494-502

“Evidence on the Carcinogenicity of Marijuana Smoke.” Reproductive and Cancer Hazard Assessment Branch, Office of Environmental Health Hazard Assessment, California Environmental Protection Agency. August 2009.

# Cardiovascular Disease and Lung Irritation

- Secondhand MJ exposure impairs blood vessel function
  - Even brief exposure to secondhand MJ smoke has been shown to have immediate, adverse effects on the heart
  - Secondhand MJ smoke exposure had a greater and longer-lasting effect on blood vessel function than exposure to secondhand tobacco smoke
  - Secondhand MJ and tobacco smoke are likely to have similar harmful health effects, including atherosclerosis, heart attack, and stroke
- Fine particulates in MJ smoke → lung irritation and increased risk for asthma attacks, respiratory infections, bronchitis, and COPD exacerbations

Sources:

Wang X, et al. One Minute of Marijuana Secondhand Smoke Exposure Substantially Impairs Vascular Endothelial Function. J Am Heart Assoc. 2016;5:e003858

Wang X., et al. Brief Exposure to Marijuana Secondhand Smoke Impairs Vascular Endothelial Function. Circulation. 2014;130:A19538



# Ventilation and Air Filtration Insufficient

- “No other engineering approaches, including current and advanced dilution ventilation, ‘air curtains’ or air cleaning technologies, have been demonstrated or should be relied upon to control health risks from ETS exposure in spaces where smoking occurs”
- “The only means of eliminating health risks associated with indoor exposure is to ban all smoking activity”
- In 2006, the US Surgeon General concluded that there is no risk-free level of exposure to secondhand smoke

## Sources:

1. American Society of Heating, Refrigerating, and Air Conditioning Engineers, Inc ([ASHRAE](http://www.ashrae.org)). Position paper: environmental tobacco smoke. Atlanta, GA: ASHRA; 2005, reaffirmed in 2016. Available at: [http://www.ashrae.org/doclib/20058211239\\_347.pdf](http://www.ashrae.org/doclib/20058211239_347.pdf)
2. U.S. Department of Health and Human Services. The Health Consequences of Involuntary Exposure to Tobacco Smoke: A Report of the Surgeon General. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, Coordinating Center for Health Promotion, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2006.



# Precautionary Principle

- Given
  - Well-established causal relationship between secondhand tobacco smoke exposure and serious adverse health outcomes
  - Similarities in MJ and tobacco secondhand smoke composition
  - Ventilation/air filtration do not prevent exposure
- The burden of proof and responsibility
  - Should not be placed on public health to establish a causal link between secondhand MJ smoke and serious adverse health consequences before laws are enacted to prevent occupational exposure
  - Should be placed on anyone in favor of onsite public consumption to prove that secondhand MJ smoke is safe to their employees (and customers) before laws are enacted to allow secondhand MJ smoke exposure in the workplace

*Note: Under the Occupational Safety and Health Administration Act, employers have a general duty to provide a safe workplace free of recognized hazards.*

# Lessons from Tobacco Control

- Smokefree policies have been proven to reduce prevalence and exposure to secondhand smoke
- Marijuana regulations related to smoking should be modeled on tobacco control which has successfully worked to protect workers from harmful exposure to secondhand smoke

# Smokefree Policies in AK

- Many local communities have strong local laws protecting Alaskans from exposure to SHS
- These local laws also help people quit tobacco by making it more difficult to use these products
- Therefore, these laws are changing social norms and acceptability of smoking in public

# Tobacco Smokefree Policies

Currently the vast majority of Alaskans, including those who smoke, agree with the following:

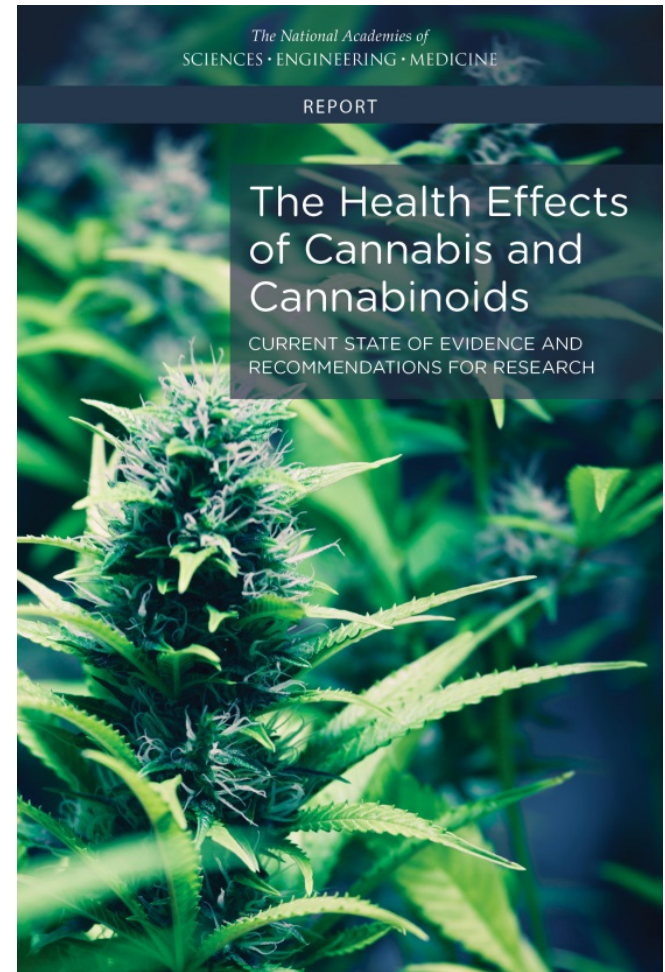
- Secondhand smoke is harmful (93% all adults and 85% smokers)
- ALL indoor work areas should be smokefree (88% and 76%)
- People should be protected from secondhand smoke (90% and 84%)
- Smoking is not allowed anywhere inside the home (91% and 75%)
- Enforcement challenges

# How does marijuana affect driving?

- Slows reaction time and decision-making abilities
- Impairs coordination, distorts perception, memory loss, and problem solving difficulty
- Greater risk if MJ and alcohol combined

Source: CDC, What You Need to Know About Marijuana Use and Driving Fact Sheet, 2017  
<https://www.cdc.gov/marijuana/pdf/marijuana-driving-508.pdf>

“Substantial evidence of the statistical association between cannabis use and increased risk of motor vehicle crashes”



Source: National Academies of Sciences, Engineering, and Medicine. 2017. *The health effects of cannabis and cannabinoids: Current state of evidence and recommendations for research*. Washington, DC: The National Academies Press.



## Fast Facts

- The number of self-reported marijuana users is increasing. In 2014, there were 7,000 new users of marijuana per day.<sup>4</sup>
- 13% of nighttime, weekend drivers have marijuana in their system; this is up from 9% in 2007.<sup>5</sup>
- After alcohol, marijuana is the drug most often linked to drugged driving.<sup>6</sup>

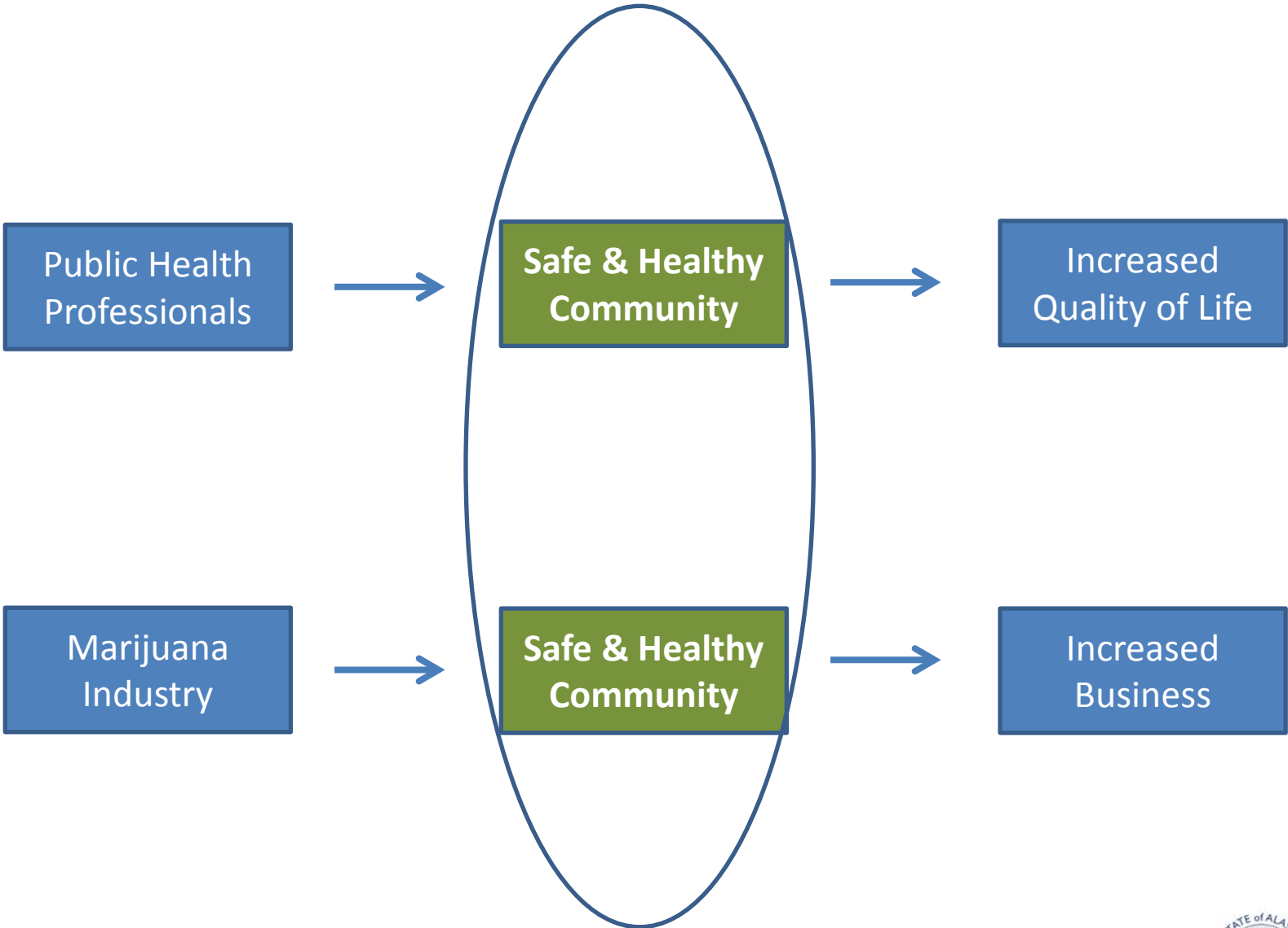


Source: CDC, What You Need to Know About Marijuana Use and Driving Fact Sheet, 2017  
<https://www.cdc.gov/marijuana/pdf/marijuana-driving-508.pdf>

# Driving Under the Influence of Cannabis

- Marijuana impairs skills needed to drive safely  
→ increase the risk for motor vehicle crashes
- The National Roadside Survey reported an increase of drivers with marijuana in their system during 2007–2014





# Contact Info

Dr. Joe McLaughlin, MD, MPH  
[joseph.mclaughlin@alaska.gov](mailto:joseph.mclaughlin@alaska.gov)

Eliza Muse, MSc Health Care Policy & Management  
[eliza.muse@alaska.gov](mailto:eliza.muse@alaska.gov)

Katie Reilly, MPH  
[katie.reilly@alaska.gov](mailto:katie.reilly@alaska.gov)



March 30, 2017

Office on Smoking and Health  
Centers for Disease Control and Prevention  
4770 Buford Highway NE, MS F79  
Atlanta, GA 30341

Katie Reilly  
State of Alaska Division of Public Health  
3601 C Street, Suite 756  
Anchorage, AK 99503

Ms. Reilly,

Per your request, I am submitting this statement of the scientific evidence regarding currently available scientific information on secondhand exposure and marijuana smoking. For the record, I am not submitting this statement for or against any specific legislative proposal.

**Health Effects of Secondhand Exposure to Marijuana Smoke**

The long-term health effects of secondhand exposure to marijuana smoke have not been extensively studied, and research in this area is ongoing. Generally, there are health risks associated with combustion and subsequent inhalation of its emissions. Whether from burning tobacco or marijuana, toxins and carcinogens are released from the combustion of these materials. Inhaled smoke from marijuana contains many of the same toxins, irritants and carcinogens as tobacco smoke.<sup>1,2</sup> Further, secondhand smoke from combusted marijuana has been found to contain the same toxins and carcinogens found in inhaled marijuana smoke.<sup>3,4,5</sup>

There are recent findings that breathing secondhand marijuana smoke could damage heart and blood vessels as much as secondhand tobacco smoke.<sup>6</sup> Further, emerging research indicates that even brief exposure to secondhand marijuana smoke has been shown to have immediate, adverse effects on the heart.<sup>7</sup>

**The Health Effects of Secondhand Exposure to Tobacco Smoke**

While the research on the health effects of secondhand marijuana smoke is ongoing, the existing evidence on secondhand tobacco smoke is well documented. In adults, secondhand tobacco smoke exposure causes stroke, lung cancer, and coronary heart disease, as well as reproductive effects in women, including low birth weight.<sup>8</sup> Children who are exposed to secondhand tobacco smoke are at an increased risk for sudden infant death syndrome (SIDS), acute respiratory infections such as pneumonia and bronchitis, middle ear disease, more frequent and severe asthma, respiratory symptoms, and slowed lung growth.<sup>8</sup>

In 2006, the Surgeon General's Report on *The Health Consequences of Involuntary Exposure to Tobacco Smoke* concluded that there is no risk-free level of secondhand tobacco smoke exposure.<sup>9</sup> Separating smokers and nonsmokers, using designated smoking areas, cleaning or filtering the air, and using separately ventilated areas do not work.<sup>9</sup> Furthermore, in 2010, the Surgeon General's Report on *How Tobacco Smoke Causes Disease* reaffirmed the conclusion that there is no risk-free level of exposure to tobacco smoke.<sup>10</sup> The report and subsequent findings also documented how the complex mix of chemicals in tobacco smoke causes disease, including finding that cigarette smoke contains 7,000 chemicals, 250 of which are toxic and nearly 70 of which cause cancer.<sup>10</sup>

### **Preventing Secondhand Exposure**

We know what works to prevent the harms of secondhand smoke exposure, based on the evidence from tobacco. In 2006, the Surgeon General concluded that eliminating tobacco smoking in indoor spaces is the only way to fully protect nonsmokers from secondhand smoke exposure.<sup>9</sup> In 2009, the World Health Organization's International Agency for Research on Cancer reiterated these findings, concluding that smokefree policies lead to substantial declines in secondhand smoke exposure, citing air quality improvements of up to 90% in high-risk settings, such as bars.<sup>11</sup>

### **Conclusion**

The existing evidence on the health effects of secondhand smoke exposure to marijuana is limited, and research is ongoing in this area. Recent studies demonstrate that exposure to secondhand marijuana smoke exposure can have adverse health effects on the heart. Additionally, we know that secondhand marijuana smoke contains the same toxins and carcinogens found in inhaled smoke from marijuana. As states and communities consider public health interventions to protect the public from involuntary exposure to known health risks, clean air free from smoke from any source remains the standard to protect health.

Sincerely,

Brian A. King, PhD, MPH  
Deputy Director for Research Translation  
Office on Smoking and Health  
Centers for Disease Control and Prevention

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<sup>1</sup> Tashkin DP. Effects of marijuana smoking on the lung. *Ann Am Thorac Soc*. 2013;10 (3):239-247.

<sup>2</sup> Moir D, Rickert WS, Levasseur G, et al. A comparison of mainstream and sidestream marijuana and tobacco cigarette smoke produced under two machine smoking conditions. *Chem Res Toxicol*. 2008; 21(2):494-502. doi:10.1021/tx700275p

<sup>3</sup> Moore, C., et al. Cannabinoids in oral fluid following passive exposure to marijuana smoke. *Forensic Sci Int*, 2011. 212(1-3): p. 227-30.

<sup>4</sup> Cone, EJ, et al. Non-smoker exposure to secondhand cannabis smoke. I. Urine screening and confirmation results. *J Anal Toxicol*, 2015. 39(1): p. 1-12.

<sup>5</sup> Zarfin, Y, et al. Infant with altered consciousness after cannabis passive inhalation. *Child Abuse Negl*, 2012. 36(2): p. 81-3.

<sup>6</sup> Wang X., et al. Brief Exposure to Marijuana Secondhand Smoke Impairs Vascular Endothelial Function. *Circulation*. 2014;130:A19538

<sup>7</sup> Wang X, et al. One Minute of Marijuana Secondhand Smoke Exposure Substantially Impairs Vascular Endothelial Function. *J Am Heart Assoc*. 2016;5:e003858

<sup>8</sup> U.S. Department of Health and Human Services. *The Health Consequences of Smoking—50 Years of Progress: A Report of the Surgeon General*. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2014.

<sup>9</sup> U.S. Department of Health and Human Services. *The Health Consequences of Involuntary Exposure to Tobacco Smoke: A Report of the Surgeon General*. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, Coordinating Center for Health Promotion, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2006.

<sup>10</sup> U.S. Department of Health and Human Services. *How Tobacco Smoke Causes Disease: A Report of the Surgeon General*. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2010.

<sup>11</sup> International Agency for Research on Cancer. *Handbook of Cancer Prevention: Evaluating the Effectiveness of Smoke-free Policies*. Geneva, Switzerland: International Agency for Research on Cancer, World Health Organization, 2009.

# Alaskan Opinions Regarding Statewide Smoke-Free Workplace Law

survey conducted for:



by:



# Methodology

- Fielded: December 30, 2015 to January 7, 2016
- Sample:
  - Statewide
  - n=800 Registered Alaska Voters
  - Interview quotas by location, age and gender
- Interview Method:
  - 75% landline, 25% cell phone
  - Live interviewers
- Weighting:
  - Based on most recent Alaska voter statistics
  - Highly representative sample in terms of age, gender, education, income, political registration and geographic location
- Margin of Error:
  - $\pm 3.46\%$  at 95% confidence interval for total sample

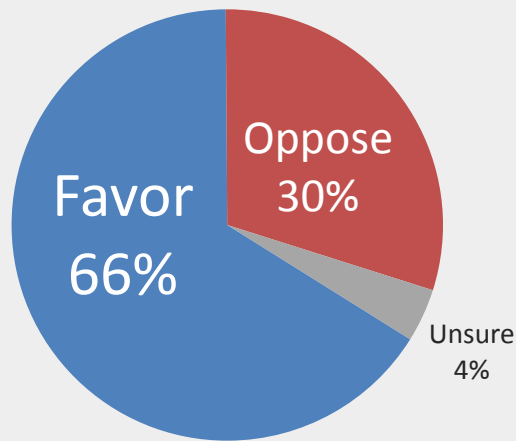


# Detailed Findings

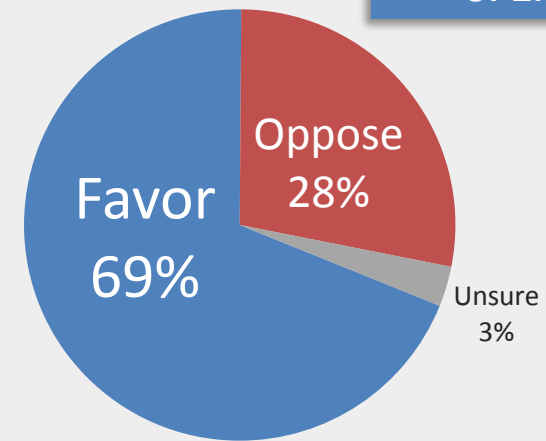
# Statewide Smoke-Free Workplace Law

*As you may know, there is currently no statewide law in Alaska that prohibits smoking indoors in public places, only local ordinances in some parts of the state. Would you favor or oppose a statewide law in Alaska that would prohibit smoking indoors in public places, including workplaces, public buildings, offices, restaurants and bars?*

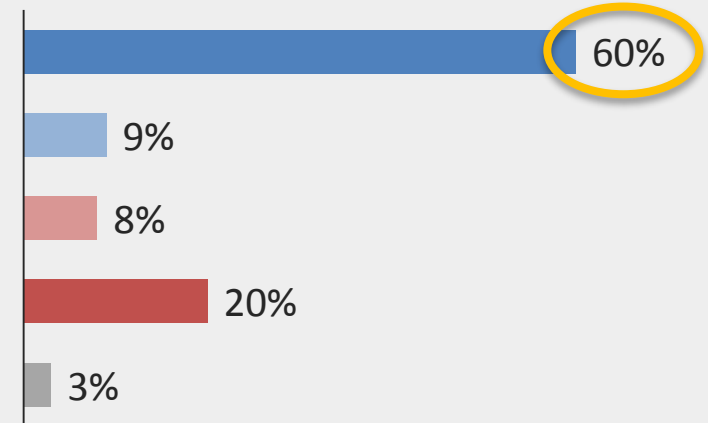
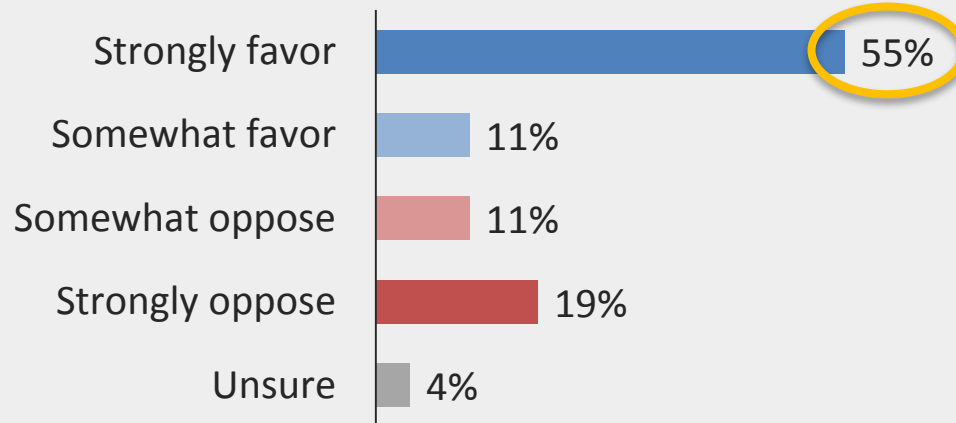
**2012**



**2016**



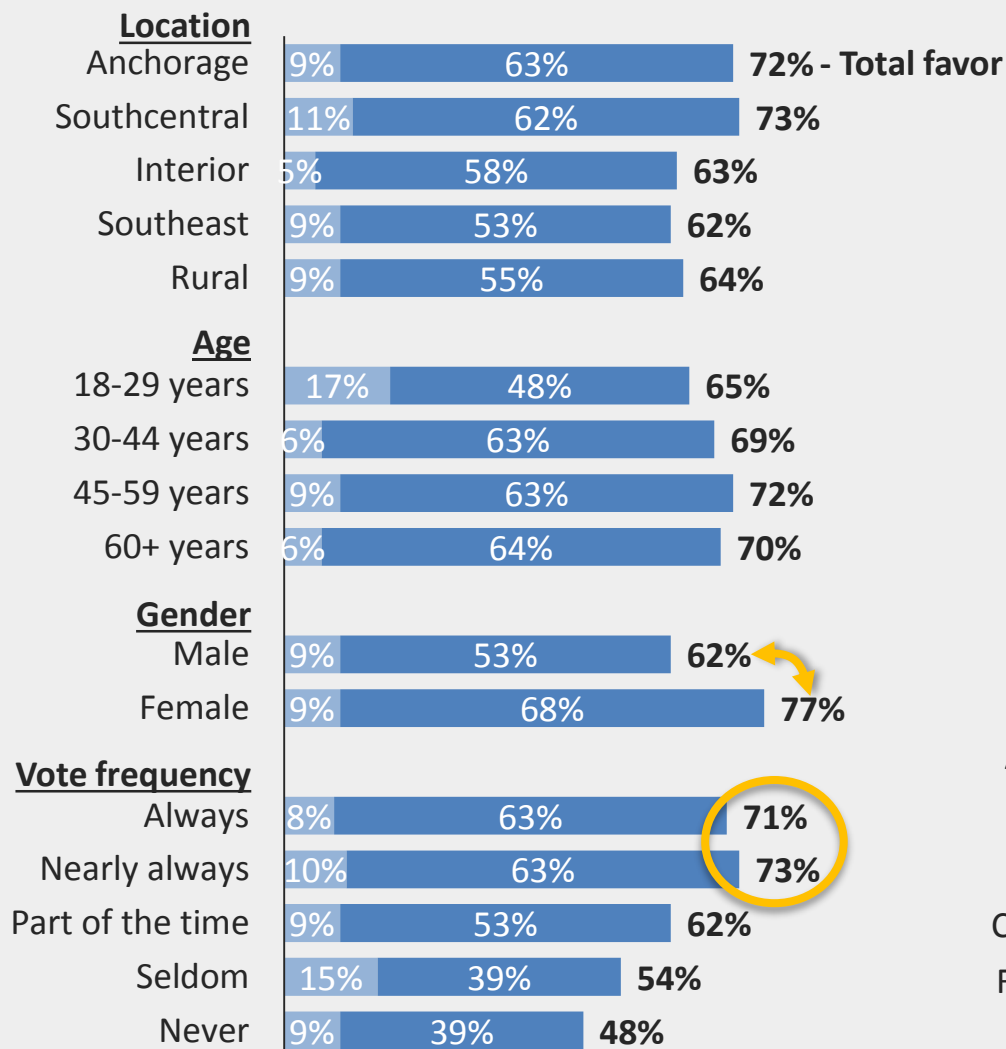
**Favored by margin  
of 2.5-to-1**





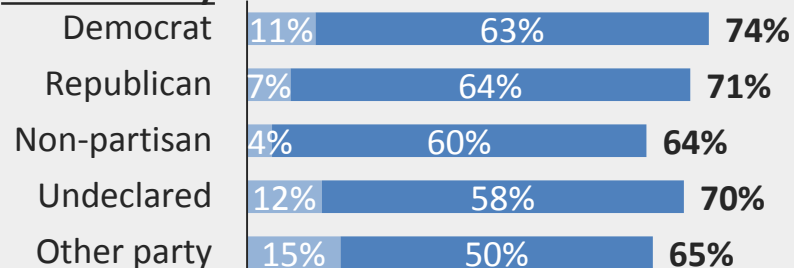
# Statewide Smoke-Free Law, cont'd

■ Somewhat favor ■ Strongly favor

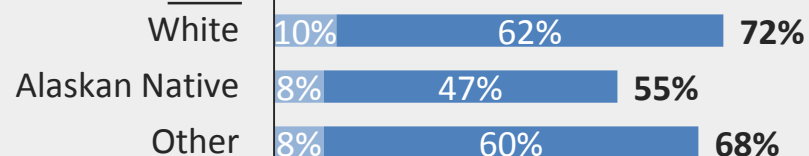


There is broad support for a statewide smoke-free workplace law, and in most demographic subgroups the majority of Alaskans “strongly favor” it.

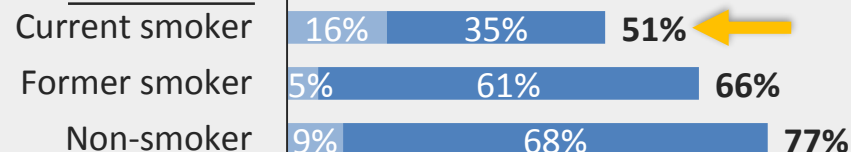
## Political Party



## Race



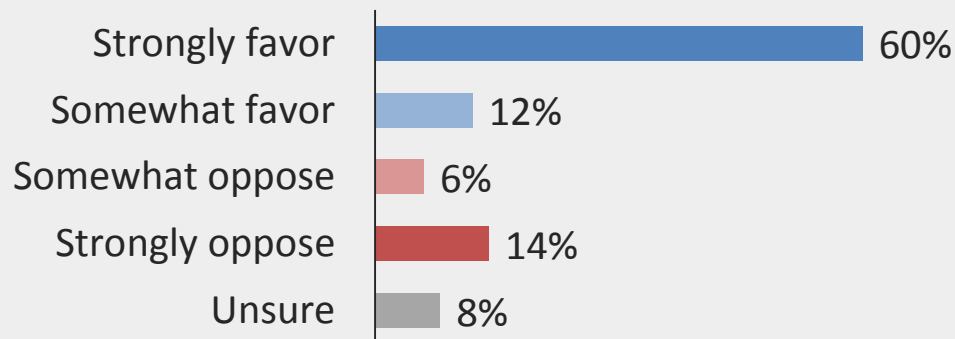
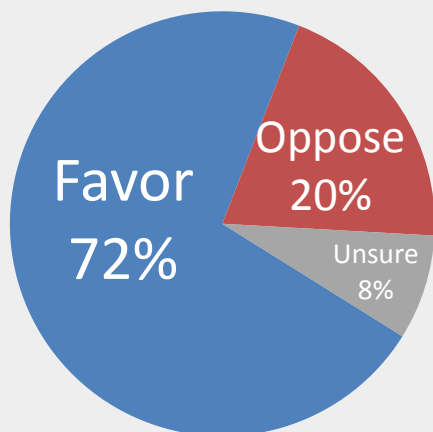
## Tobacco use



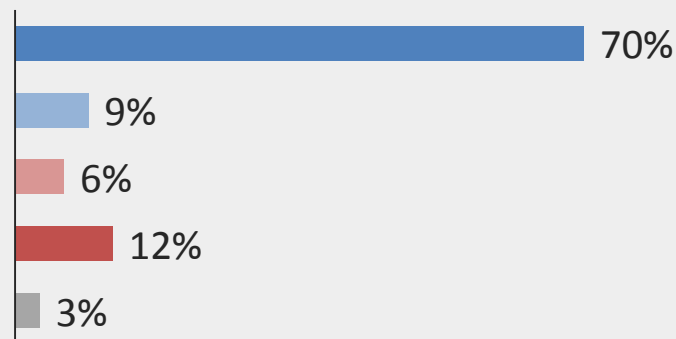
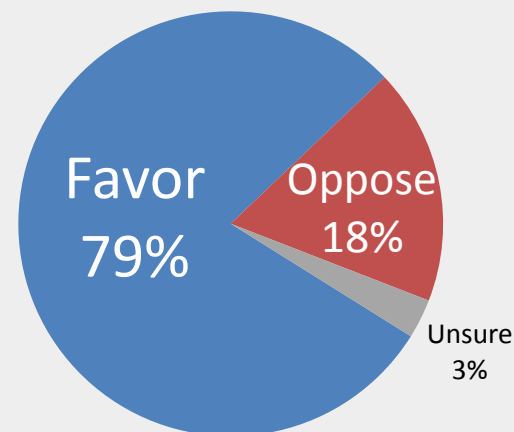
# E-Cigarettes and Marijuana in Smoke-Free Law?

*If Alaska passes a law prohibiting smoking indoors in public places, including workplaces, public buildings, offices, restaurants and bars, would you favor or oppose including electronic cigarettes, or e-cigarettes, in that law, so that the use of electronic cigarettes would not be allowed inside places that are smoke-free? ...What about the smoking of marijuana?*

## E-Cigarettes in Smoke-Free Law

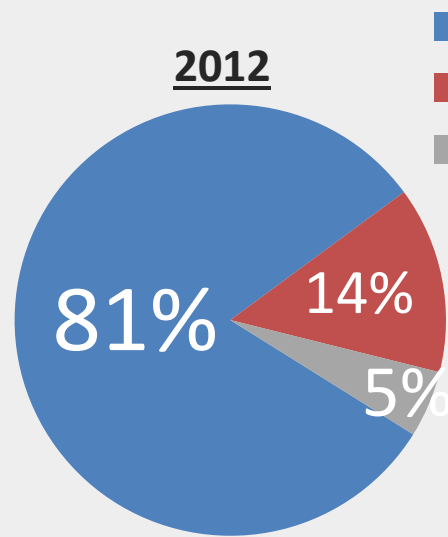


## Marijuana in Smoke-Free Law

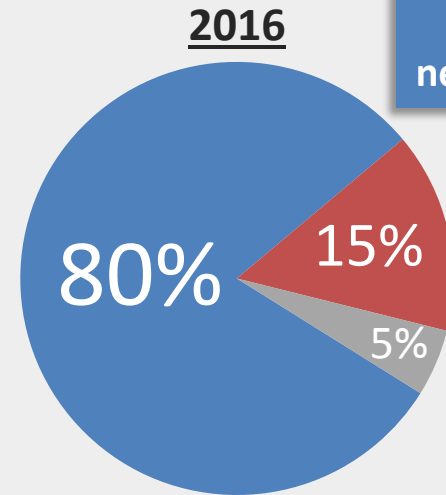


# Smoke-free issue affect your vote?

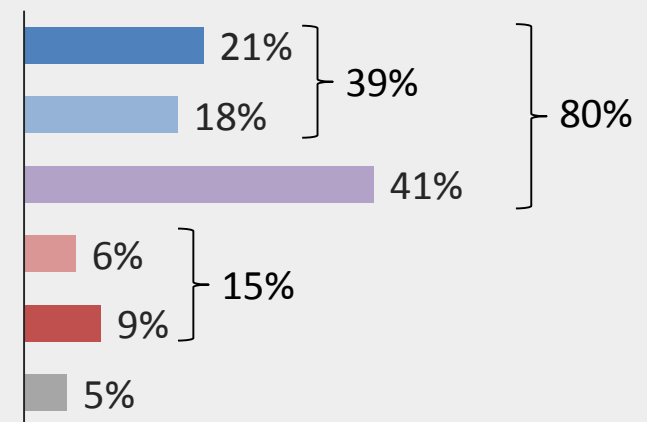
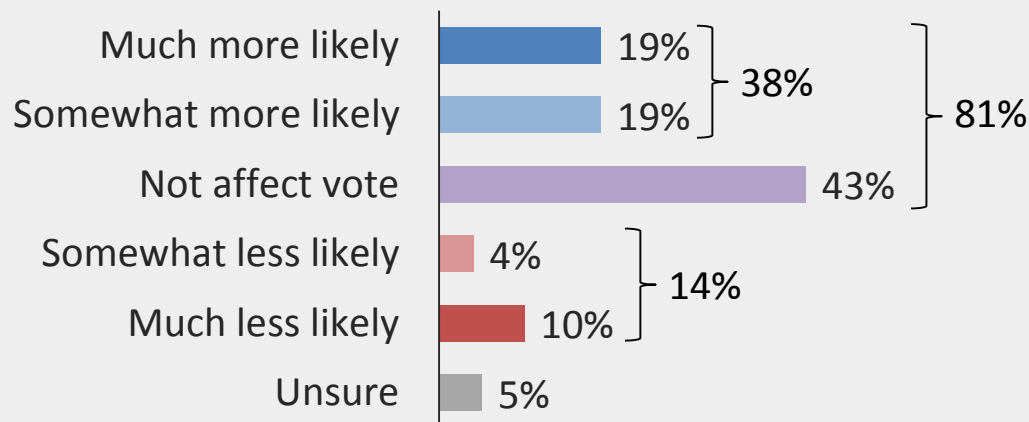
*Would you be more likely or less likely to vote for a candidate who supports a law that would prohibit smoking indoors in public places and workplaces in Alaska, or would their opinion on this issue not affect your vote?*



- More likely/no affect to support of candidate
- Less likely to support candidate
- Unsure

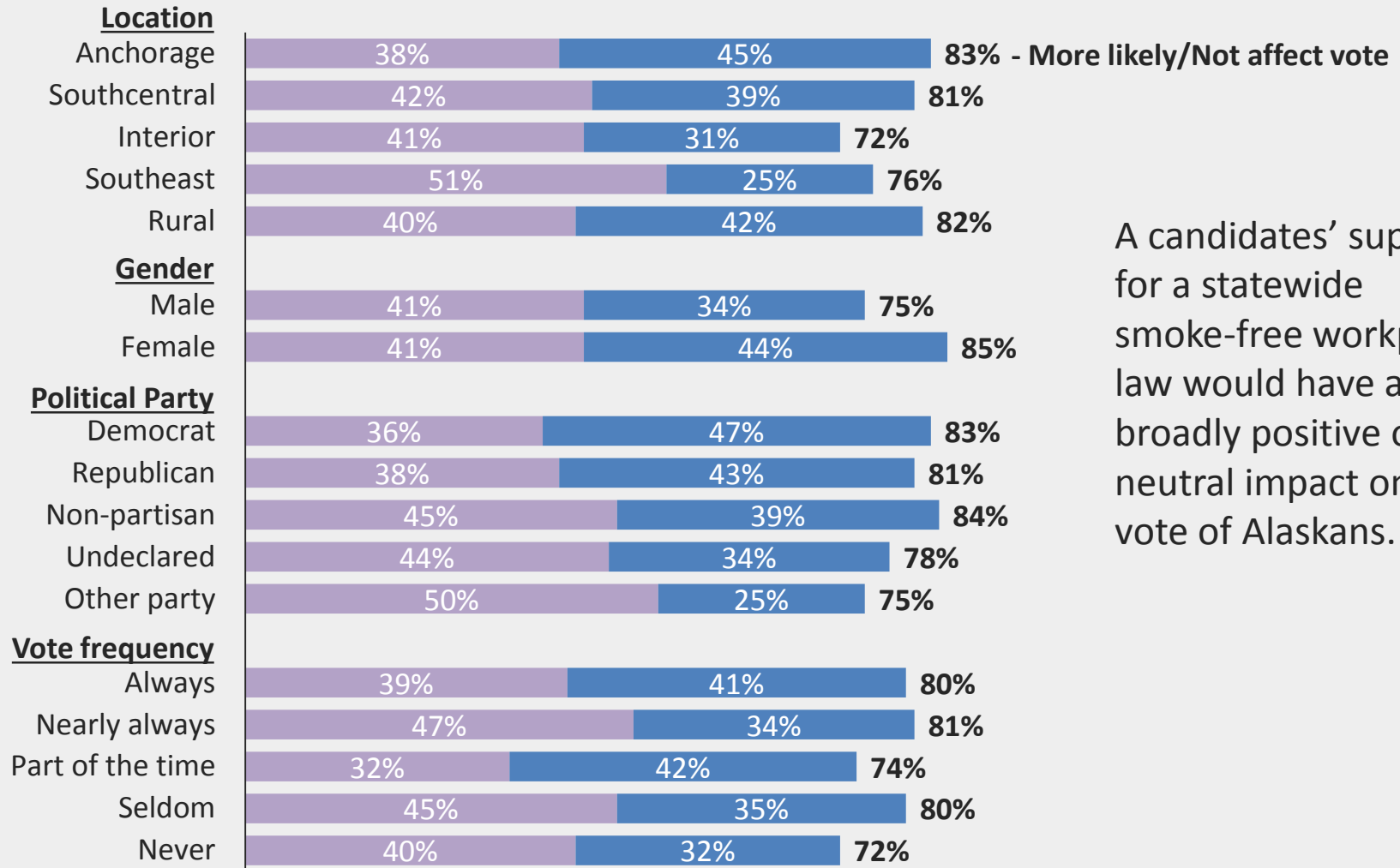


Over 5-to-1  
positive or  
neutral impact



# Smoke-free issue affect your vote? cont'd

■ Would not affect vote ■ More likely to support

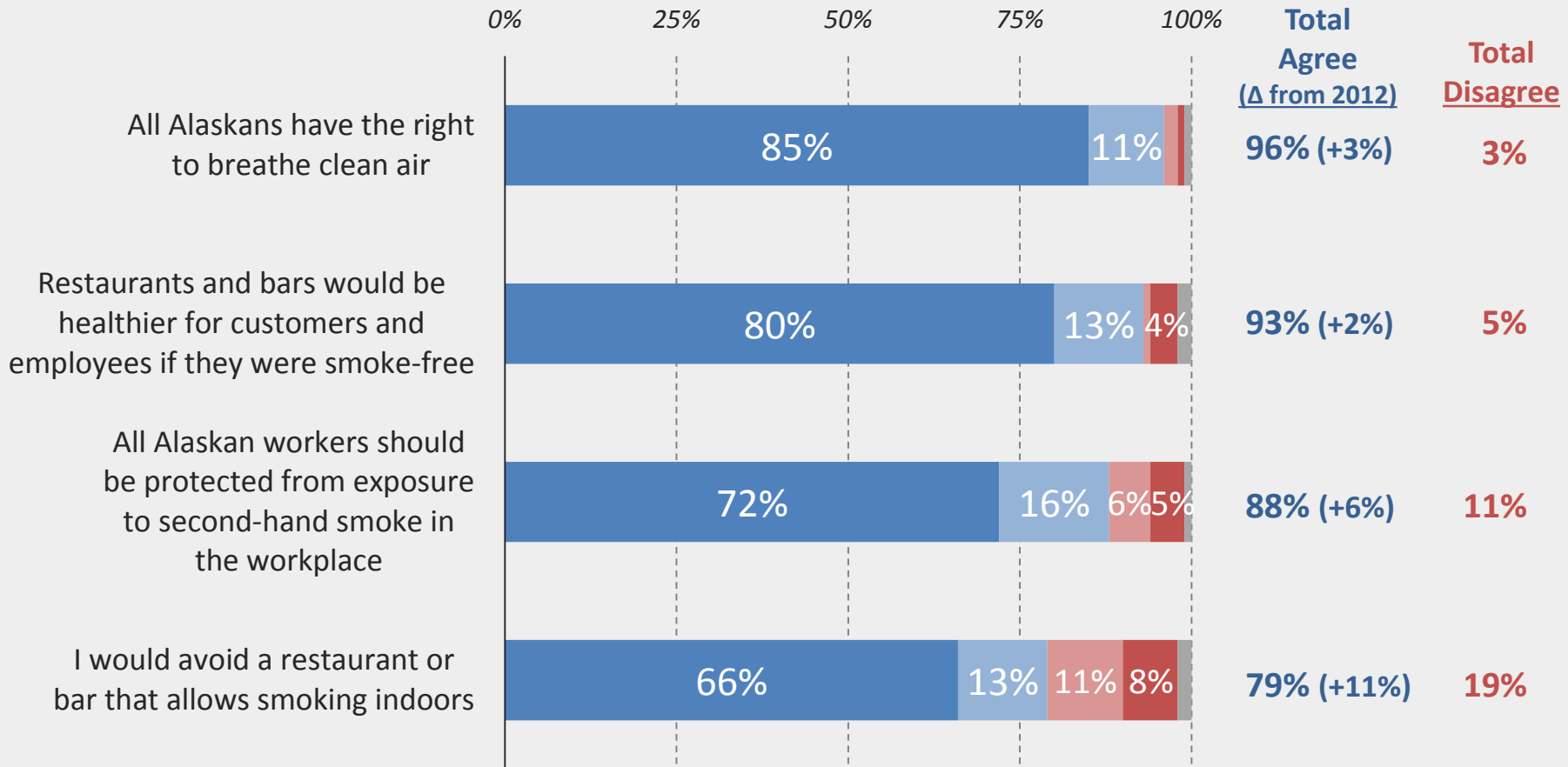


A candidates' support for a statewide smoke-free workplace law would have a broadly positive or neutral impact on the vote of Alaskans.

# Messaging

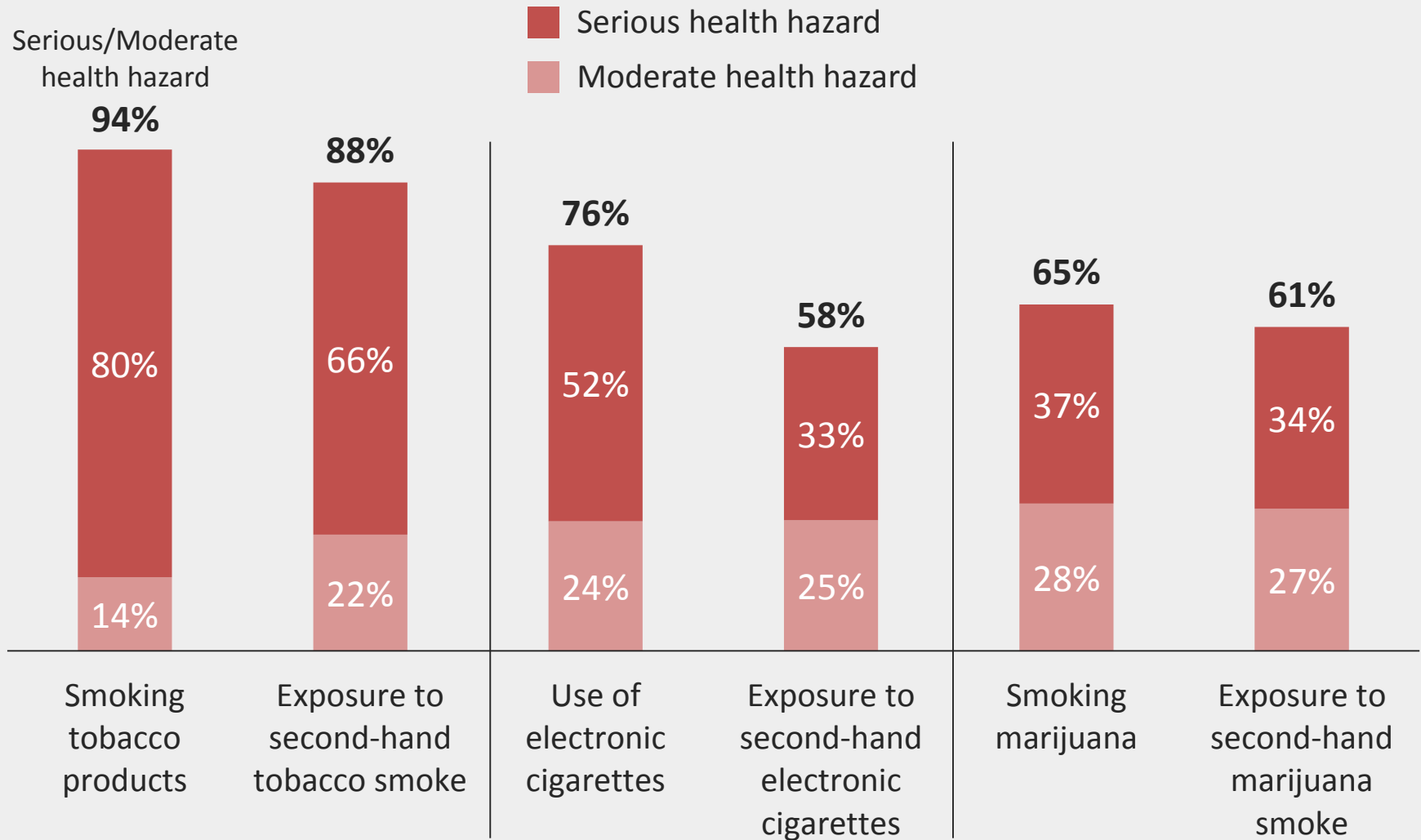
Please tell me whether you personally agree or disagree with each of the following statements...

■ Strongly agree
■ Somewhat agree
■ Somewhat disagree
■ Strongly disagree
■ Unsure



# Perceived Risk

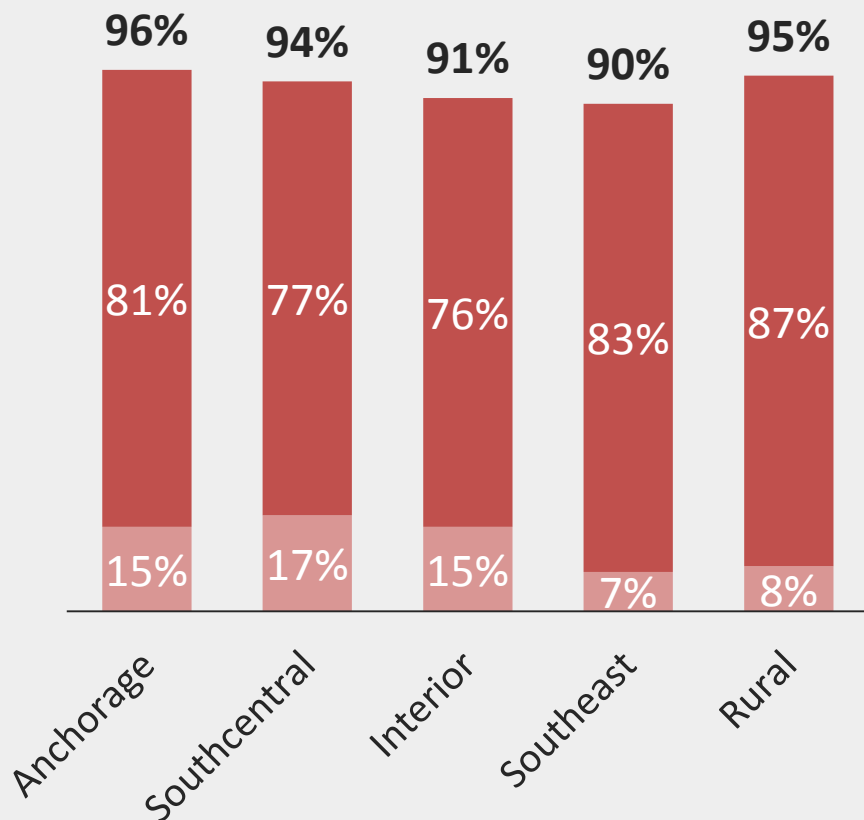
Please tell me whether you feel each of the following is a serious, moderate, or minor health hazard, or no health hazard at all.



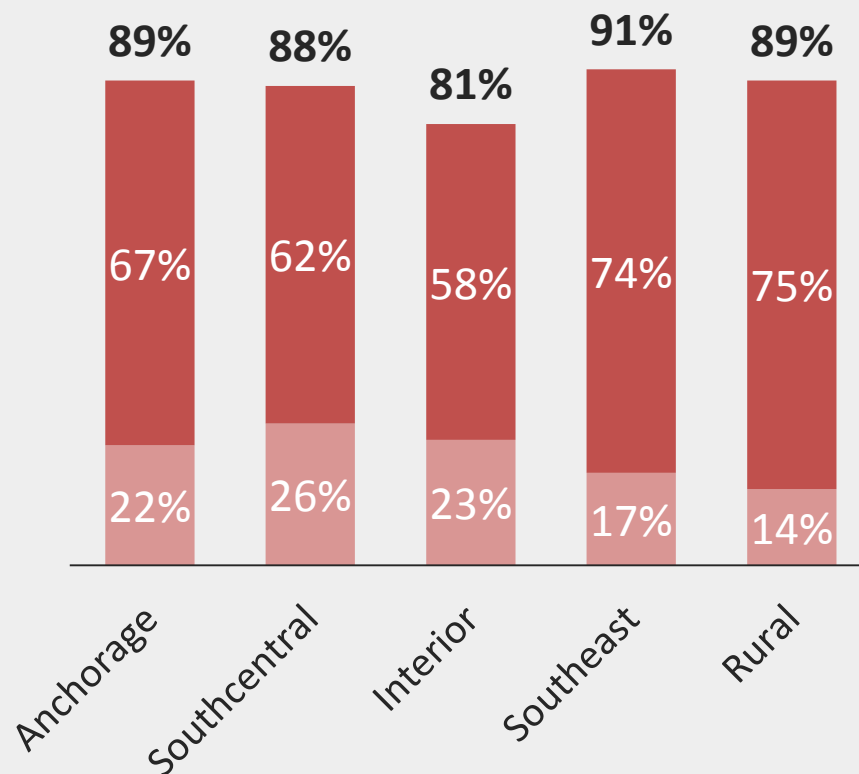
# Perceived Risk by Location

- Serious health hazard
- Moderate health hazard

Smoking tobacco products



Exposure to second-hand tobacco smoke

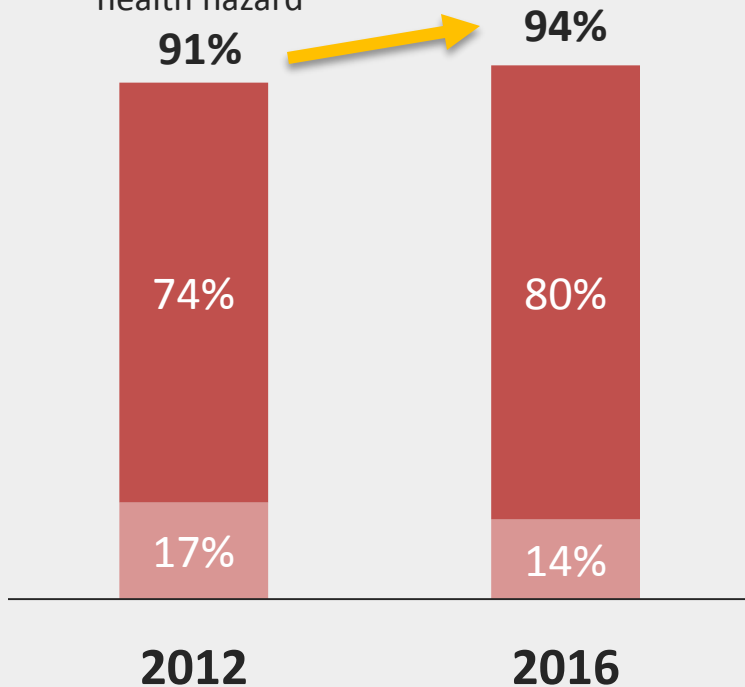


# Tracking Perceived Risk

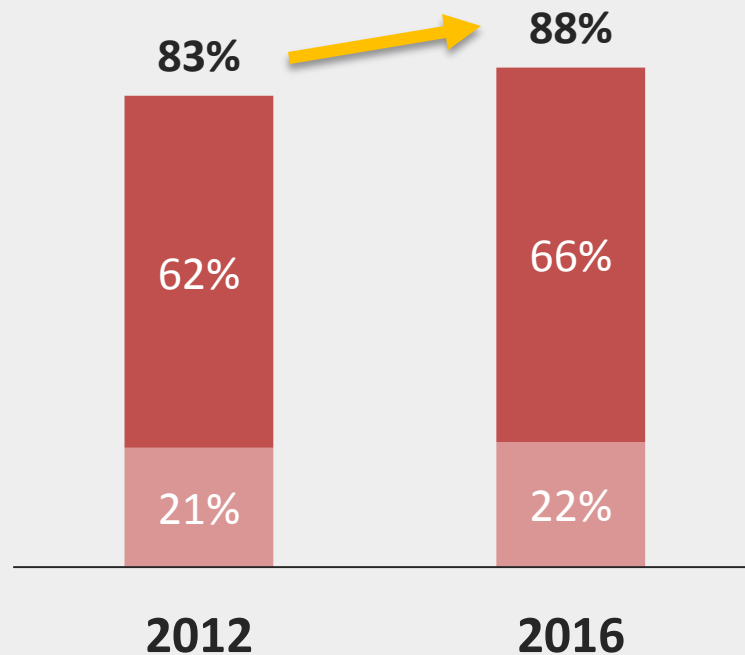
- Serious health hazard
- Moderate health hazard

## Smoking tobacco products

Serious/Moderate health hazard



## Exposure to second-hand tobacco smoke





# Takeaway

- Alaskan views are in strong alignment with the priorities of the American Cancer Society Cancer Action Network.
  - Across all measures that can be tracked, opinions have become even more favorable.
- A large majority of Alaskans (69%) support a statewide smoke-free workplace law.
  - Support is strong and consistent across all demographic subgroups, including location, age and political party. Even a slight majority of smokers (51%) support the law.
  - Similarly large percentages support including e-cigarettes (72%) and marijuana (79%) in a smoke-free workplace law.
- Thirty-nine percent (39%) of Alaskans say they would be more likely to vote for a candidate who supports a smoke-free workplace law. Fully four-out-of-five Alaskans (80%) say a candidates' support for the law would have a positive or neutral impact on their vote.
- The percentage of Alaskans who report smoking and exposure to second-hand smoke as a serious or moderate health hazard is near absolute (94% and 88%, respectively), and perceived risk has increased slightly since the last measurement.
  - A large majority also view the smoking and second-hand exposure of e-cigarettes and marijuana as a serious or moderate health hazard.

**From:** Beth Valentine  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Marijuana onsite consumption  
**Date:** Saturday, August 26, 2017 11:08:27 PM

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Hello Alaska Marijuana Board,

I would like to object to the purposal of the onsite consumption endorsement for retail marijuana shops. I feel this is completely against better judgement of our state. It is one thing to allow a person to consume a beer or two and they are not impaired by doing so. But to consume marijuana would mean that by eating or smoking they would be stoned and completely impaired. I don't understand how the state government is thinking that this is good practice or even safe practice. It goes against traffic laws, flying laws, boating laws and medical laws, needless to say it's against good moral judgement. Why on earth would you allow someone to consume something that makes them impaired and release them into the public. At the hospital you can't even drive yourself home if you had a drug that day that made you impaired. You can't fly, you can't drive a boat and you sure as hell should not be driving a car under the influence of marijuana. I realize it's not your job to control that but you are completely encouraging people to break the law by allowing them to consume onsite.

You also are putting huge liability on all our tour operators in our small town of Talkeetna to make judgement calls on people who have smoked marijuana or seem high. This is so ridiculous that your board should be ashamed of even considering the vote. Also who runs a check on your board because it sure seems there is conflicts of interest with so many people on your board that have interests in the marijuana business. In most situations of boards, members cannot be involved with outside business of things they are voting on or they excuse themselves. Not such with yours.

I hope that when there are vehicle injuries to innocent people and the person that came from a pot shop hit them, your board will get sued because this is ridiculous to allow onsite consumption. You are not acting in the best interest of our state but only of yourselves.

Thank you and I hope you will listen to the objections.

Sincerely,

Beth Valentine  
PO Box 270  
Talkeetna, AK 99676

Sent from my iPhone

**FROM THE DESK OF  
Bobbi Keuken  
2128 First Ave  
Ketchikan, Alaska 99901  
920.246.0456**

October 27<sup>th</sup>, 2017

To: Marijuana Control Board

I am writing in regard to the Resolution Allowing for On-Site Consumption of Marijuana or Approving Designated Areas for On-Site Consumption in Licensed Retail Marijuana Establishments.

Ballot measure No. 2 specifically states it will ban the public use of marijuana. It does not differentiate between smoking and the consumption of edibles.

I am requesting as a concerned citizen of the State Of Alaska that this change be not made to current state law. If the people of Alaska wanted public consumption of marijuana they should have written it into the original law.

Should the Marijuana Control Board decide to change the law it should be put to the voters in a state wide election.

Sincerely,

Bobbi J. Keuken

**From:** tammywalter907  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption  
**Date:** Wednesday, October 25, 2017 1:50:54 PM

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I am a business owner here in Fairbanks. My husband and I have a limited Cultivation business. I believe that it is important for onsite consumption to be endorsed so that people have a safe place to consume. There is zero reason not to approve onsite consumption with all of the regulations that have been set in place. I think we all feel this was supposed to be regulated just like alcohol so why is it that marijuana establishments cannot have onsite consumption?

Thank you,

Tammy Walter  
Owner  
GreenDreams Cultivation

Sent from my Verizon, Samsung Galaxy smartphone

**From:** Leah Neff Warner  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment on Onsite Marijuana Consumption  
**Date:** Friday, October 27, 2017 4:06:42 PM

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Dear Chairman of the Marijuana Control Board:

I am writing to respectfully oppose the Onsite Consumption Regulations draft. The basis of my opposition involves the known health risks of secondhand marijuana smoke and the implications of public smoking for generations ahead of us.

First, recent studies show that secondhand marijuana smoke contains many of the same cancer-causing and toxic chemicals as secondhand tobacco smoke, including: acetaldehyde, ammonia, aromatic amines, arsenic, benzene, cadmium, chromium, formaldehyde, hydrogen cyanide, isoprene, lead mercury, nickel, N-heterocycles, PAHs.[1]

A study from Wang, et al. (2016) published in the Journal of the American Heart Association concluded that secondhand smoke can exert similar adverse cardiovascular effects regardless of whether it is from tobacco or marijuana.[2]

Another study from Wang et al. (2016) indicates even brief exposure to secondhand marijuana smoke has immediate, adverse effects on the cardiovascular system, and the effects last longer than those seen with tobacco smoke.[3]

Second, there is no existing ventilation system known to filter out the toxic components of smoke. Therefore the proposed regulations around consumption area ventilation are useless for reducing health risks.

Third, allowing public onsite marijuana smoking undermines local smoke-free ordinances, and threatens the viability of future smoke-free ordinances in other communities without such protections currently.

Onsite consumption regulations send a strong message to Alaskans that concerns for health are not a priority. The precautionary principle should prevail: rather than allow onsite marijuana smoking until proven unhealthy, we should disallow until proven safe.

Please uphold the integrity of public policy and prohibit onsite marijuana smoking. Thank you for taking time to thoroughly review this important issue.

Sincerely,

Leah Neff Warner  
310 Irwin St.  
Juneau, AK 99801  
206-919-7961

- [1] Moir D, Rickert WS, Levasseur G, et al. A comparison of mainstream and sidestream marijuana and tobacco cigarette smoke produced under two machine smoking conditions. *Chem Res Toxicol*. 2008; 21(2):494-502
- [2] Wang X., et al. Brief Exposure to Marijuana Secondhand Smoke Impairs Vascular Endothelial Function. *Circulation*. 2014;130:A19538
- [3] Wang X, et al. One Minute of Marijuana Secondhand Smoke Exposure Substantially Impairs Vascular Endothelial Function. *J Am Heart Assoc*. 2016;5:e003858

**From:** Linda Wendeborn  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comments Marijuana Consumption Cafe  
**Date:** Friday, October 27, 2017 2:00:33 PM

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To Whom It May Concern:

I support the regulations to establish onsite marijuana consumption at retail establishments.

Changes I would recommend to the proposed regulations are as follows;

- 1) The one gram of flower limit for consumption is too low. It should be 3gms for flower and 20 mg for consumables.
- 2) Unused product to be removed should not be costly to the establishment. Repackaging should be inexpensive, small amounts are what we are talking about, keep it simple.
- 3) A smoke free area for employees seems a bit much and an expense not necessary for the establishment, it already is required to have ventilation that seems more than adequate.
- 4) Local governments should not be allowed to disapprove licenses, to an already established recreational store. Another layer of approval and review seems redundant and frankly over the top. Regulate it like alcohol, you buy a beer at a bar, they expect you to sit down and drink at your leisure. It seems unfair to some business that possibly could be denied. Seems ripe for corruption at the local level.
- 5) Patrons of recreational shops should be allowed to take purchases into a consumption area and use the product, have it resealed, and be able to remove it, whatever the quantity. As long as they don't exceed consumption levels for flower and edibles. You buy 10 grams, go to the consumption area, use 1 or 2 grams. Repackaged and you are out the door.

Respectfully submitted.

Linda Wendeborn

**From:** Plato Aristocles  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption  
**Date:** Wednesday, September 27, 2017 10:10:43 PM

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I would like to comment on proposals regarding 3 AAC 306.370 and 3 AAC 306.990 about onsite consumption. I think that it is in the states best interest to pass this proposal and the Marijuana Control Board would be foolish to dismiss it. I live in Juneau, a major tourist destination, and I see what the current law is doing to tourists and locals alike. Since the legalization of marijuana in our state, thousands of people have come to experience the new green rush, only to be told that there is nowhere for them smoke or consume, discouraging future visitors and investment. It is NOT in our best interest to persecute and prosecute visitors to our fair state for partaking in a legal activity, and the absence of safe consumption areas in the area is a major loophole in the current law. This proposal is an opportunity for Alaska to be an innovator, to be the first state with onsite consumption in the US. These spaces could be an economic boon and a wonderful opportunity. Regarding concerns about noise level and public disruption, I do not believe that this will be an issue. Marijuana will not cause rowdiness and chaos the way alcohol would. I see these places very differently than bars, more like lounges, with board games, TV, and video games. If the regulations allow it, I think that food and drink should also be allowed to be served in these spaces. I implore you to seriously consider this proposal for both visitors to our state and residents who can not smoke in their homes for whatever reason, or just those who wish to partake socially, as it is a very communal activity for some. This is a social and financial issue that we have the opportunity to solve. Thank you.

--

Quinn White



**From:** Laura Wilbanks  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comment in favor of proposed on-site marijuana consumption rules  
**Date:** Friday, August 25, 2017 11:41:29 AM

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Hello,

My name is Laura Saldarriaga. I am a 7 year stroke survivor and I'm a huge advocate of marijuana legalization in the state of Alaska. Before legalization, I was not able to go and purchase my medication (marijuana) even after having a medical recommendation from a doctor here in Alaska. The fact that I can go down to a store now and have access to safe medicine that WORKS for my condition, is huge for me and my quality of life. I have recovered more in the short amount of time that these establishments have been open than I have in seven years on meds. I no longer take medications like tramadol, flexril, tizinadine, Xanax, or topimax to manage my pain and neurological damage.

I am inclined to write AMCO a letter in support of on-site marijuana consumption. While I have heard the concerns of the supporting/opposing sides, I feel that on-site marijuana consumption can be done safely. In fact, upon looking at the proposed regulations it is still being proposed to be regulated in a way that is not comparable to alcohol or cigarettes.

The people in this industry have been bending over backwards to meet all of these regulations and if you over regulate something to the point that it cannot survive, it will not stand a chance.

This is also a huge opportunity for the tourism industry because most tourists are faced with the issue of, "Where can I smoke my pot if my hotel does not allow it?" The last thing we need to do is be ticketing tourists. We need to provide a safe place for everyone.

The other issue I would like to point out is that some of us are also parents. My marijuana use is hidden from my child and will continue to be hidden because of how young and impressionable she is. That leaves me with the dilemma of having nowhere to safely use marijuana when my pain gets unbearable. I guess I could always hide in the woods on my property but that does not give me dignity as a person with a serious disability. Crouching in the bushes behind my house to relieve pain is insulting to me.

If a cannabis café were an option for someone like me, I would take full advantage of it. I would have no problem asking my husband drop me off so that I could safely consume. Now with Uber and Lyft active in Fairbanks, there are more safe options for people to get home safely if they are under the influence of any substance.

If you want to uphold the voter will, you will have to work hard to do exactly that. As a voter, I do not feel as though that is being done. I understand that as we progress as a state, we find more and more issues regarding how exactly we can do that and I truly believe that Alaskans are trendsetters and some of the smartest and most talented people on the planet. We have a huge opportunity here. I hope that the state will still take the position of supporting this growing market and I hope that on-site consumption will be approved.

Thank you for taking the time to read my comments on the issue at hand.

Sincerely,  
Laura Saldarriaga

Sent from my iPhone

**From:** Lacy Wilcox  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment on Marijuana Control Board proposed regulations--marijuana retail store onsite consumption endorsement - Support  
**Date:** Friday, October 27, 2017 9:38:01 AM

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Dear MCB and AMCO Staff,

I am writing in to support the regulations as drafted. Below are some of my reasons:

1. People who choose to use cannabis, either recreationally or medicinally, with friends, should be allowed to consume in communal settings which will be regulated, secure, and on-camera.
2. Allowing for groups of people to consume together is an excellent way for people to further their understanding and ensure their safety as some are more experienced than others. Usage data may also be observed in these settings.
3. Cannabis is an adult-use only substance and many responsible parents who want their children to wait until legal age prefer to not consume at home.
4. Many Alaskans do not have a residence that allows consumption, such as multi family dwellings, pioneer or veterans homes, apartments buildings or condo units.
5. Public health and safety would be better served with cannabis cafes. Unlike alcohol, cannabis does not generally cause people under the influence to act irresponsibly, nor to commit acts of domestic violence.
6. This is a freedom of choice issue which harms no-one and potentially puts millions of dollars into state coffers through industry taxation.
7. There is no credible evidence that second-hand cannabis smoke, unlike tobacco smoke which is laden with toxic chemicals, causes lung damage.
8. Many parents would appreciate not having to walk through clouds of smoke on our Alaskan sidewalks.
9. Contractors and ventilation experts/technicians would appreciate the income from the build outs of these high tech systems. This provides jobs!
10. Visitors to Alaska, would have a place to safely consume the products they are legally allowed to purchase. It is not fair for us to offer legal product to an adult, collect their tax money, but offer them no place to consume

without subjecting them to civil fine or potential criminal penalty.

11. The definition of public should be fairly applied. Let's compare: Public nudity is not allowed, however we have strip clubs; public nudity is not allowed, however we have locker rooms at fitness centers; open containers are not allowed, however we have carve outs for festivals-party buses – convention centers, etc.; public urination is not allowed, however we offer public restrooms.

Thank you,  
Lacy Wilcox  
Juneau, Alaska

Sent from [Mail](#) for Windows 10

**From:** Ben Wilcox  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment in Support of Proposed Onsite Consumption Regulations  
**Date:** Friday, October 27, 2017 12:55:45 PM

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Dear AMCO Board and Staff,

I am writing you today to voice my support of the proposed Regulations for Onsite Consumption Endorsements. I am a Cannabis consumer both for its medical benefits and recreationally, A partner in a licensed Cannabis business and a parent with a 6mt old, a 15 yr old and an 18 yr old under my roof. Because of this I do not consume in my home. When I do I partake on my porch which depending on the time of year can be seen from 6-9 households, At least 4 of which are homes with minors. I am also visible from the street which has a fair amount of foot traffic all year long. The point I'm trying to make is in the interest of keeping it out of public view wouldn't it be more appropriate if I had a place I could go and consume that doesn't expose anyone walking by or sitting on their porch to my activities. I am but one of probably thousands of households who face the same problem, Some because of children residing in their homes, Some due to rules governing apartments and condos, Some cant due to their spouses careers(Police, Fire, Military,Miners, Federal workers etc). All of which must put their actions on public display simply to be responsible parents, tenants or spouses.

A whole lot of time was spent during the rule making process deciding how to keep children from being exposed to this substance. Wouldn't it make sense that providing a space where like minded adults can consume out of public view would do more to accomplish this goal than forcing hundreds probably thousands of Alaskan adults to partake in their yards, on their patios or hiding in nooks and crannies. Here in Juneau we know that the Indoor Smoking Ban has pushed tobacco smokers onto our sidewalks in droves, forcing parents and Non-smokers to be constantly exposed to clouds of smoke any time they walk downtown. Is this better protecting the public and my children than having them back in the bars with like minded adults. I think not.

I am a bit confused that recently the focus has shifted from keeping it out of sight and away from our children to protecting the workers. How did that come about?

The proposed regulations impose stringent ventilation requirements that would most likely provide a healthier environment than walking down Juneau's sidewalks. Burning meat has been shown have carcinogenic elements yet thousands of restaurant employees work those jobs with ventilation, Hundreds of jobs in Alaska are associated with welding which produces toxic fumes but its allowed with proper ventilation. I could go on but I am sure you get the point. If we don't allow Onsite Consumption there wont be hundreds of workers to protect because there wont be any jobs available.

So can we please get back to the original mission and focus on keeping it away from the children.

I see the only way to guarantee that is to vote in favor of Onsite Consumption Endorsements.

Thank you for your time and attention,

Benjamin Wilcox

Founding Partner Top Hat Cannabis/ Top Hat Concentrates- Juneau Alaska  
(907) 419-0065

P.S. This doesn't even touch on the needs of 200k +Cannabis consuming visitors we get in Juneau each year.

**From:** Marissa Wilson  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public comment on onsite consumption  
**Date:** Monday, October 16, 2017 12:02:47 PM

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To the Marijuana Control Board,

I am a commercial fisherman and activist for community health. My life revolves around the truth of food as medicine, food as a social connector, and food as an indicator of how we interact with our planet as a species. Marijuana absolutely falls within that scope.

Alaska, the "last frontier," needs to shift from its habit of resource extraction to being a frontier for innovation. Our state budget needs it and our landscape needs it. Onsite consumption of cannabis will boost revenue at state and local levels from the swells of tourists already visiting from around the world, and will provide an opportunity for locals to partake in an innocuous recreational activity (and alternative to alcohol, which I personally find to be far more dangerous and destructive) in a way that helps to dispel false stigmas about the medicine.

Anyone who thinks that onsite consumption will endanger communities is quite likely ignorant of the number of people who already incorporate cannabis into their daily routines in order to function in society more comfortably, whether for physical, mental or emotional reasons.

Marijuana is medicine. It also provides an opportunity to increase and diversify revenue for the government and for citizens.

Help Alaska be a leader in cannabis reform by allowing onsite consumption at licensed retailers. The rest of the world will inevitably follow -- to be a front runner is the only position I want to see our state.

Thank you for your consideration and for your service to the Board,

Marissa Wilson  
Homer, AK

**From:** Mark Woodward  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Friday, October 27, 2017 1:11:40 PM

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I am in favor of onsite consumption, and would like to state some final comments in addition to my previously submitted comments:

1. There is strong support for cannabis as a whole not only statewide (through recent ballot measures) as well as nationwide (a recent [Gallup poll](#) stated 64% of Americans favor legalization, the highest figure ever recorded). Furthermore, the poll stated that for the first time a majority of Republican voters were in favor of legalization. If that is not enough political firepower, our own US Rep. Don Young is a founding member of the [US House Cannabis Caucus](#).
2. Southeast Alaska DOES run on the economic engine of the tourist industry, and having a legal place to consume is crucial to keeping this industry robust. First of all, the current "unwritten" policy of the cruise ship towns seems to be a "don't ask, don't tell" approach. For example, in Ketchikan there was only 1 ticket that the city police department issued during the 2017 summer season, and it was early in the morning and written to a local; if the police force had wanted to strictly enforce the law then they would have had to issue thousands of tickets. So why didn't they? I firmly believe it was because in writing those thousands of tickets, a negative view of Ketchikan would have formed within the cruise ship industry. Thus we put the police force in a no-win situation, and that is not fair to them. Let's help them by providing a legal, safe place for the tourists to go. It's regulated, controlled, and allows cannabis to be consumed by those tourists in a spot that other tourists to have to be around if they don't want to. Right now that is not the case, as a Facebook video (Amiee Shull, posted Sept. 11, 2017: "Walked around the corner upstairs in my building and found this dude smoking pot...") posted from Ketchikan this summer showed a tourist consuming cannabis within an indoor strip mall. He was quickly yelled at, and ran from the premises, but there were children around.
3. It's not just the tourists who want the lounges - local do too. Not everyone can go to their home and consume cannabis: some live in rentals and are not permitted, while others have told us they have families, and not only don't want to smoke in the house but also don't want to be seen smoking outside the house. Therefore a great solution would be our lounge, a safe, legal place to go. I know there are some who will argue about impaired driving after consuming, and I would agree. I would also add that there is a reason Ketchikan approved Uber/Lyft in a recent election - people want cheaper options for public travel. Thus a local could consume at our location, and then have plenty of options that DON'T include driving. In fact, our store is considering have an Uber account just for our local customers who feel to impaired for diving but live to far to walk.
4. This industry is making the state and local governments money, and onsite consumption is just a natural progression of this market. Again, our state is ready for this, and will soon be followed by Nevada and California, two similar tourist-based states like ours, in providing onsite consumption. We can be a great leader through our proposed onsite regulations, and so it's time to allow the local governments to decide if they want this or not.

-Mark Woodward

**From:** Beverly Wooley  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comments Regarding Proposed Changes to The Regulations Of The Marijuana Control Board  
**Date:** Wednesday, October 25, 2017 3:18:20 PM

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Dear Marijuana Control Board:

I strongly oppose all sections of the currently proposed regulation 3 AAC 306.370 allowing for onsite inhaled consumption of marijuana at licensed retail marijuana stores. Everyone has the right to breathe smoke-free air.

Currently proposed regulation will greatly undermine years of hard work by Alaskans to secure passage of local comprehensive clean indoor air laws in their communities. These laws protect the health of workers, patrons and visitors by ensuring the right of all citizens to breathe clean, smoke-free air in businesses and public places. I live in Anchorage and have worked in public health in Alaska for over 30 years. I have seen firsthand and health research has clearly shown - the devastating consequences of secondhand smoke. I voted in favor of Ballot Measure 2, in part, because I believed legalizing edible marijuana provides more accessible smoke-free consumption options for marijuana users and a healthier alternative to inhaling marijuana smoke, including secondhand.

I strongly oppose any regulation(s) that would allow sell for consumption on the premises marijuana bud or flower. Allowing consumption of marijuana bud or flower on the premises of the retail marijuana stores puts workers, patrons and visitors at increased risks of the adverse health effects of inhaling secondhand marijuana smoke. No person should have to choose between their health and a good job.

Science has repeatedly documented the health damage and costs of secondhand smoke from tobacco. Recent studies have demonstrated that secondhand marijuana smoke contains many of the same cancer-causing substances and toxic chemicals found in secondhand tobacco smoke as well as fine particulate matter. Exposure to fine particulate matter can cause lung irritation, asthma attacks, increased likelihood of respiratory infections, and worsened health problems especially for people with respiratory conditions like asthma, bronchitis, or COPD. Secondhand marijuana exposure also impairs blood vessel function. Secondhand marijuana smoke likely has similar harmful health effects as secondhand tobacco, including atherosclerosis (partially blocked arteries), heart attack, and stroke.

Any proposed ventilation regulations requiring ventilation system sufficient to remove visible smoke and/or odors is not adequate to protect the health of workers and patrons. Ventilation system can remove the sight and smell of smoke, but even high-quality ventilation systems have proven ineffective in keeping the hazardous toxins in marijuana smoke, vapor or aerosol from traveling throughout a building. Prohibiting onsite inhaled consumption of marijuana in retail marijuana stores is needed to protect employees, patrons and visitors from the negative health effects caused by secondhand smoke.

In summary, I oppose allowing inhaled consumption of marijuana in retail marijuana stores because of the



devastating effects of secondhand smoke, the inability of ventilation systems to effectively remove the hazardous toxins and particles from the smoke, and the right of all people to breathe clean air. Allowing inhaled consumption of marijuana in retail marijuana stores also undermines the years of hard work by local communities to secure passage of local comprehensive clean indoor air laws. Please protect the health of all Alaskans – ensure their right to smoke-free businesses.

Please support smoke-free, clean air for workers, patrons and visitors in businesses – *prohibit onsite inhaled consumption of marijuana in retail marijuana stores*. Thank you for your consideration regarding this important health issue.

Beverly K Wooley

2073 Dimond Drive

Anchorage, AK 99507

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Beverly Wooley

[wooleybk@gmail.com](mailto:wooleybk@gmail.com)

907-830-5503

**From:** Sheri Ymbert  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** No onsite consumption!  
**Date:** Monday, October 23, 2017 11:17:15 AM

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Onsite marijuana consumption will raise the instances of driving under the influence and the public, especially children, being exposed to second-hand smoke. This will only hurt our community! My son died in a car accident after his father decided to smoke marijuana and drive. It is a dangerous drug that is harder to monitor than anyone can expect. There are several ways to use marijuana that seem undetectable because you cannot always smell it. We need to stand as a community AGAINST onsite consumption!!

Sheri Ymbert  
Special Education Teacher  
ASD

**From:** Kanoe/Ayme Zantua  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** In support of the On-Site Regulation  
**Date:** Friday, October 27, 2017 1:57:19 PM

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Hello,

I am writing in support of On-Site consumption for these reasons below.

We have many tourists that come to Alaska especially during the summer. Ketchikan saw 1 million tourists this year just from cruise ships. Of course there are a good number of visitors off these ships that are wanting to buy legal cannabis. As we all know, the cruise ships do not want cannabis brought onto their ships. So where do they smoke what they've just purchased? It makes absolutely no sense to offer a product to consumers that they can buy, but cannot use anywhere legally.

The law states that marijuana should be regulated like alcohol, but that is not really how it is being done. You can find a bar in any city in Alaska and walk in and sit down and have a beer or a shot of hard liquor. Yet, there are no places for a person to sit down and smoke a bowl or a joint with a friend unless it is in a private residence. Which again is great for people that live in the community, but its kind of a big middle finger to all of the visitors to Alaska that would like to partake. Especially the cruise ship passengers since all cruise lines have stated that they do not want it on their ships and will kick people off the ships if they are caught with it.

Stores lose sales because there is no on-site consumption as well. I know not all stores are able to provide it, but there are stores like mine that have rooms ready to go that are equipped with industrial smoke eaters that will clean the air in the room so people are not just sitting in a smoke filled room like in many bars.

I researched smoke eaters for many hours over multiple days before deciding on one to purchase for my retail store. The smoke eater installed in our potential on-site room is able to clean the air in up to a 1200 sq ft room. Our room is only 300sq ft. It also has three types of filtration to clean most any particles it comes into contact with. As well as three speeds to suck in the smoke for cleaning. So I believe the air quality will remain good in that room at all times.

Even if my store was not equipped to provide on-site consumption, I would still be in support of it because it is a necessary thing. By not allowing it, you are pretty much telling the cruise ship passengers and visitors staying in hotels that do not allow cannabis to go smoke illegally in the street. Because that is what is currently happening in Ketchikan and probably most towns in Alaska.

I hope you will move forward on this regulation and approve on-site consumption for retail stores throughout our state. Thank you for your time.

- Kanoe Zantua  
Cannabis Corner - Ketchikan, Alaska

**From:** Mark Stoneburner  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support on site consumption! Thank you for your time.  
**Date:** Friday, October 27, 2017 7:38:28 AM

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**From:** Heather Arkell  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Friday, October 27, 2017 7:35:50 AM

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As peaceful, law-abiding citizens, we have the right to assemble. Now that Cannabis is legal, we deserve a place out of the shadows to congregate and consume.

Thank you,

Heather Arkell anchorage resident !

Sent from my iPhone

**From:** Samantha Beard  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Wednesday, October 25, 2017 12:01:28 PM

---

I am writing to state that I am in favor of in-site consumption for marijuana in Alaska and Anchorage.

Samantha Beard  
525 W. 19th Ave.  
Anchorage AK 99403  
503 347-5130

**From:** Star Fish  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** SUPPORT ONSITE CONSUMPTION  
**Date:** Thursday, October 26, 2017 6:22:14 PM

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I support public use and/or onsite consumption of cannabis.

Cannabis is no more intoxicating than alcohol, with few adverse reactions. People should be able to sample product, and consume in public establishments much like bars.

Best regards,  
Jordan Beckerman

**From:** Johanna Pohland  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site cannabis consumption  
**Date:** Friday, October 27, 2017 2:05:18 PM

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To Whom it May Concern,

I just want to cast my vote/opinion that on site cannabis consumption should be legal.

As cannabis is legally allowed to be sold and distributed in Alaska, there should be safe places in which people can consume it and socialize while doing it. We can do all this with alcohol, I feel that cannabis should be treated and regulated the same way.

Thank you for your time.

Sincerely,  
Johanna Pohland  
907-360-8860



**From:** Diana Redwood  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** No on-site smoking consumption  
**Date:** Friday, October 27, 2017 9:19:15 AM

---

Hello,

I am writing to ask the Board not to allow on-site smoking of marijuana. This would go against our existing smoke free indoor air laws and be a detriment to health.

Thank you for your time and attention.

Diana Redwood

Anchorage, AK

**From:** Gail Schiemann  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I am opposed to the proposed regulation allowing for onsite consumption in marijuana stores!  
**Date:** Thursday, October 26, 2017 3:36:27 PM

---

Dear MCB:

We know that secondhand marijuana smoke and secondhand tobacco smoke contain many of the same toxins and carcinogens. I am opposed to allowing inhaled consumption of marijuana in stores. I have COPD from my job and these stores are workplaces. I have concerns about the health impacts of secondhand smoke exposure. This is not what Alaskans voted for! Ventilation and smoking rooms will not protect employee's health.

Thank you in advance for caring about Alaska's workforce.

Gail Schiemann

**From:** Eric Troyer  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Marijuana onsite use proposal  
**Date:** Wednesday, August 23, 2017 8:02:29 AM

---

I believe that marijuana retail outlets should be treated the same as alcohol retail outlets. I don't see any reason that the two should be treated differently, except that smoking marijuana should be covered similarly to smoking cigarettes.

Eric Troyer

Alaska pot regulators open comment on onsite use proposal  
[http://www.newsminer.com/news/alaska\\_news/alaska-pot-regulators-open-comment-on-onsite-use-proposal/article\\_36f674bc-a9a1-55c5-a54a-9a1a5991ecbe.html](http://www.newsminer.com/news/alaska_news/alaska-pot-regulators-open-comment-on-onsite-use-proposal/article_36f674bc-a9a1-55c5-a54a-9a1a5991ecbe.html)

**From:** Tim Adger  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Wednesday, October 25, 2017 5:09:50 AM

---

I support onsite consumption at marijuana cafes in Anchorage, AK

Sent from my iPhone

**From:** Wandew@mtaonline.net  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comments  
**Date:** Wednesday, September 27, 2017 8:20:28 PM

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We have a lot of grow operations opening in neighborhoods. Can you make it so that if consumption is allowed, it can't be in a subdivision of any kind. In commercial area only.

Have a set amount of businesses per population.

Indoor smoking should have adequate ventilation with charcoal filters to cut down on odors outside the building.

No one under 21 allowed in building.

No living quarters attached to smoking area.

Grow operations use a lot of electricity. It should be mandatory to have renewable power like solar and wind.

Thank you  
Dewey Bitler  
Wandew@mtaonline.net

**From:** Robborland66@gmail.com  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I SUPPORT ON-SITE CANNABIS CONSUMPTION  
**Date:** Friday, October 27, 2017 12:37:11 PM

---

Dear AMCO,

I fully support on-site cannabis consumption. We need to give tourists and visitors a place to enjoy our state's fine cannabis products. Thank you for your consideration.

Rob Borland

Sent from my iPhone

**From:** Kaleigh Pannone  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-Site Consumption  
**Date:** Friday, October 27, 2017 8:11:45 AM

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To whom it may concern,  
I am an Alaskan voter, local business owner, and mother. I support on-site cannabis consumption. The people voted to regulate cannabis as alcohol and that is what we would like to see.  
Kaleigh M. Bowden

**From:** Brandon  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Friday, October 27, 2017 10:14:46 AM

---

I support onsite consumption of marijuana.

Sent from my iPhone



**From:** Kayelayn Brendel  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support onsite cannabis consumption.  
**Date:** Wednesday, October 25, 2017 1:14:30 PM

---

I support onsite cannabis consumption. I think if done right, it can be safe and incredibly financially beneficial to our community. Especially when considering tourist season.  
Thank you.

Sent from my iPhone

**From:** Brusuelas, LeeAnn M  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Keep Alaska smoke free  
**Date:** Tuesday, October 24, 2017 7:21:57 AM

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Hi,  
Please keep Alaska public spaces a clean space free from smoking regardless if tobacco or marijuana products. We have enjoyed having smoke free places for years and would greatly appreciate maintaining this. Thank you.

*LeeAnn Brusuelas*

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This message is intended for the sole use of the addressee, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the addressee you are hereby notified that you may not use, copy, disclose, or distribute to anyone the message or any information contained in the message. If you have received this message in error, please immediately advise the sender by reply email and delete this message.

**From:** Susan Carver  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comment in favor of proposed rules for on-site marijuana consumption  
**Date:** Thursday, August 24, 2017 12:07:38 PM

---

As an Alaskan, I support having on-site retail spaces for consumption of marijuana by smoking, vaping or ingesting edibles.

Sincerely,  
Susan Carver  
6820 W Captain Hook Dr  
Wasilla, AK 99623  
ssncrvr@yahoo.com

Sent from my iPhone

**From:** Chip  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site consumption at marijuana stores  
**Date:** Friday, September 01, 2017 11:10:08 AM

---

On-site consumption of marijuana at retail marijuana stores should be allowed. To legalize the use of a substance, but prohibit the act of using it, is absurd and must be remedied.

**From:** Christopher Frost  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site consumption.  
**Date:** Friday, October 27, 2017 10:30:55 AM

---

As an Anchorage citizen, I wanted to express my desire for on site consumption of Marijuana to be allowed. I want to smoke like drinkers can drink.

Additionally, I believe that it would increase tourism revenue in a time of economic struggle. If you want to buy marijuana in Alaska but you're staying in a hotel, how are you supposed to smoke it.

Thank you for your time.  
Christopher Frost

Sent from my iPhone

**From:** timothy clark  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support on site consumption on cannabis!  
**Date:** Wednesday, October 25, 2017 2:26:15 PM

---

A.M.C.O. members. I support on site consumption of cannabis. I live in Alaska and pay taxes. I demand that the A.M.C.O. members follow the will of the voters and APPROVE ON SITE CONSUMPTION OF CANNABIS. Thank you. Sincerely, Tim Clark

**From:** JAMES CLIFTON  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Smoking marijuana on site  
**Date:** Tuesday, October 24, 2017 7:48:08 AM

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I believe that they should buy it and take it home to smoke (I'm not against smoking in your home) but when they smoke on site, how are they getting home, most will probably drive and that is why I am against smoking anywhere other than at home.  
Thanks

**From:** Camille Clum  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption- I support  
**Date:** Friday, October 27, 2017 10:25:39 AM

---

As peaceful, law-abiding citizens, we have the right to assemble. Now that Cannabis is legal, we deserve a place out of the shadows to congregate and consume. I support onsite consumption.  
Thank you,



**From:** Cody Christ  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site consumption  
**Date:** Friday, October 27, 2017 12:25:23 PM

---

I support onsite marijuana consumption in Alaska.

--

**Cody Christ**

Inventory/Packaging Specialist  
Enlighten Alaska

**From:** Carmen John Croas  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comment in favor of proposed on-site marijuana consumption rules  
**Date:** Saturday, August 26, 2017 10:11:59 AM

---

Please pass regulations to allow the consumption of cannabis.

**From:** Lindsay Cross  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On Site Consumption  
**Date:** Friday, October 27, 2017 10:00:37 AM

---

I fully support onsite consumption.

**From:** Joe Darnell  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Oppose on site consumption  
**Date:** Friday, October 27, 2017 4:29:20 PM

---

I just want to say I oppose on site consumption, it violates the law that was voted on!

Joe Darnell  
Wasilla

**From:** Amy Lou  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comment in favor of proposed rules for on-site marijuana consumption  
**Date:** Thursday, August 24, 2017 11:51:11 AM

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I really don't think there's anything wrong with cannabis. God grows it man makes alcohol which kills. Cannabis doesn't kill it heals. I'm in Louisiana and we need it here, for many reasons. It really does help ppl .

Thank you,  
Amy Davidson

**From:** Sophie Dye  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 4:18:49 PM

---

I support onsite consumption for retail stores. I believe it is crucial for the success of the marijuana industry in Alaska and will give tourists a safe place to consume.

Sincerely,

Sophie Dye

**From:** ej  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Re: on site consumption  
**Date:** Friday, October 27, 2017 10:43:44 AM

---

I support on site consumption

**From:** Keeton Fagnani  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support public consumption  
**Date:** Tuesday, October 24, 2017 7:37:26 PM

---

I support public consumption of cannabis and cannabis cafes.

With the legalization of recreational marijuana, it's only a matter of time.

Find a way to reasonably tax the service and/ or product, and do something for the deficit.

If people can walk down the street smoking tobacco, it should be the same with cannabis. If people can walk into a bar and get drunk, it should be the same with cannabis.



**From:** Gregory Fries  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Second hand substance  
**Date:** Monday, October 23, 2017 1:43:16 PM

---

While I support decriminalization of all substances plus education, treatment and rehab programs to prevent and remediate abuse thereof, I add that one component of abuse is the imposition of secondary effects, including second hand smoke, risky driving while intoxicated, etc., imposing health and safety risk and discomfort to others.  
Sent from my iPhone

**From:** Hannah Knapp  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On Site consumption  
**Date:** Friday, October 27, 2017 8:58:34 AM

---

I am in support of on site consumption.

Sincerely,

Hannah Frost

Sent from my iPhone

**From:** Marie Gaze  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site Consumption  
**Date:** Wednesday, October 25, 2017 2:11:48 PM

---

I support on-site Cannabis consumption and believe that it is a key component in ensuring that the industry is successful for business owners as well as the State of Alaska.

Sent from my iPhone

**From:** Kyle George  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public consumption  
**Date:** Thursday, October 26, 2017 6:36:03 AM

---

I support public consumption of cannabis.

**From:** Nancy Greem  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption support  
**Date:** Friday, October 27, 2017 12:43:35 PM

---

amco.regs@alaska.gov!

“I fully support legal and safe on-site consumption of Cannabis”

**From:** Everret Hamilton  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Date:** Wednesday, October 25, 2017 9:26:07 AM

---

I support onsite consumption of cannabis and wish the state of Alaska would make it legal and regulate it like alcohol.

**From:** Miss. Rhonda  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Wednesday, October 25, 2017 6:02:19 PM

---

I would like to have a place to meet like-minded people to consume cannabis with. As a responsible adult and consumer I should be allowed to have a place to go.

Alcohol kills.

R. Howard  
North Pole Alaska  
[Sent from Yahoo Mail on Android](#)

**From:** Sabrina Hunt  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support Onsite Consumption  
**Date:** Friday, October 27, 2017 7:31:30 AM

---

As peaceful, law-abiding citizens, we have the right to assemble. Now that Cannabis is legal, we deserve a place out of the shadows to congregate and consume. We have a history of being less rowdy, loud and violent than patrons of bars.

Thank you,  
Sabrina Hunt



**From:** Sylvia Kurzmann  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** In favor  
**Date:** Friday, October 27, 2017 4:08:47 PM

---

I am in favor of on site consumption of marijuana. I am an RN and I don't consume any form of marijuana, but I believe it is good for business and our state needs business.

Thanks,  
Sylvia Kurzmann

**From:** insanecane68  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 3:55:46 PM

---

I support on site consumption! !

Sent from my T-Mobile 4G LTE Device

**From:** Eugene Isabella  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 9:02:49 AM

---

I approve of on site cannabis consumption.

**From:** Phillip Izon II  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption  
**Date:** Friday, October 27, 2017 1:25:11 PM

---

“I fully support legal and safe on-site consumption of Cannabis”

**From:** Cynthia Izon  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site cannabis consumption.  
**Date:** Friday, October 27, 2017 1:35:06 PM

---

“I fully support legal and safe on-site consumption of Cannabis”

Sincerely,  
Cynthia Izon

Sent from my iPhone

**From:** Jenelle Sauvageau  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** RE: on site consumption  
**Date:** Friday, October 27, 2017 12:35:11 PM

---

I support onsite consumption.

Jenelle Sauvageau

**From:** jfrink  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On sight cannabis consumption  
**Date:** Wednesday, October 25, 2017 3:36:16 PM

---

Hello, as a resident of Alaska I'm In favor of on-sight cannabis consumption. I'd like to see the issue addressed so our citizens and tourist have a safe place to consume and In turn help this growing industry continue to thrive.

Thank you

**From:** Laura Jolicoeur  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 1:17:05 PM

---

I am in support of Onsite Consumption of Marijuana.  
Laura Jolicoeur  
Valdez

Sent from my iPhone



**From:** Anna Jolley  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site marijuana consumption in Talkeetna  
**Date:** Thursday, August 24, 2017 8:33:24 AM

---

I am a business owner, nurse and mother of four in Talkeetna Alaska. We do not want on-site marijuana consumption in our town! Please ban all on site marijuana consumption. Anna Jolley

**From:** Buffie Jones  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Thursday, October 26, 2017 2:46:16 PM

---

I approve of onsite consumption in the state of AK.

Sent from my iPad

**From:** Kiara Kaitchuck  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site Consumption  
**Date:** Friday, October 27, 2017 7:56:21 AM

---

Good morning!

I am writing today to show support for on-site consumption. Thank you for your consideration.

Regards,

Kiara Kaitchuck

**From:** kottonmouthking18@yahoo.com  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support  
**Date:** Friday, October 27, 2017 2:39:28 PM

---

I support on site consumption  
Sent from my iPhone

**From:** Sylvia Kurzmann  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** In favor  
**Date:** Friday, October 27, 2017 4:08:47 PM

---

I am in favor of on site consumption of marijuana. I am an RN and I don't consume any form of marijuana, but I believe it is good for business and our state needs business.

Thanks,  
Sylvia Kurzmann

**From:** Samantha Laudert-Rodgers  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site Consumption  
**Date:** Friday, October 27, 2017 7:42:08 AM

---

I am writing this today in support of on-site consumption. Thank you for your consideration.

Sincerely,  
Samantha Laudert Rodgers

**From:** lifeintheak  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 7:50:33 AM

---

I support on site consumption.

**From:** Richard Losche  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** No Smoke  
**Date:** Monday, October 23, 2017 10:54:02 AM

---

No Smoking of any kind.

Richard Losche

Sent from [Outlook](#)



**From:** michael lujan  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Date:** Thursday, October 26, 2017 3:21:18 PM

---

I oppose the proposed regulation allowing onsite consumption in marijuana stores.”

Get [Outlook for Android](#)

**From:** Rebecca Lynch  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support onsite consumption  
**Date:** Friday, October 27, 2017 12:55:16 PM

---

- gives tourists legal places to smoke
- gives smokers a place to socialize (like a bar, but no fights)

**From:** Darci Lynn  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 7:44:10 AM

---

Cannabis consumers need a safe, legal and regulated place to consume their legally bought items. Tourists have no legal place to smoke, most apartment dwellers, anyone who doesn't own their own place basically are forced to break the law everytime they go to consume, again, their legal and taxed cannabis products. Thank you.

**From:** Stephanie Martin  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site consumption comments  
**Date:** Friday, September 15, 2017 9:55:24 AM

---

I support the proposed on site regulations!

Sent from my iPhone

.

**From:** Shelley McCallister  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support onsite consumption  
**Date:** Friday, October 27, 2017 7:19:48 AM

---

I support onsite consumption.

Sent from my iPhone

**From:** Kevin McGuire  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** In support of onsite consumption regulation  
**Date:** Friday, October 27, 2017 7:59:53 AM

---

Responsible Cannabis users need a safe a legal place to use

Revenue for the state and job opportunities

**From:** martin meadows  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** PUBLIC COMMENT IN SUPPORT OF ONSITE CONSUMPTION REGULATION  
**Date:** Wednesday, October 25, 2017 9:17:19 PM

---

WE THE PEOPLE voted to regulate marijuana like alcohol I believe onsite consumption should be legal for the following reasons

- tourism industry, because the tourist on cruises have no place to consume it
- alcohol is consumed in a public setting and is regulated
- gives people a comfortable place to safely enjoy their purchase

Sent from my iPhone

**From:** Don Miller  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 4:19:39 PM

---

I support on site consumption of cannabis and cannabis based products.

Thank you

Donald H. Miller



**From:** Kasondra Morin  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On Site Consumption  
**Date:** Friday, October 27, 2017 8:54:09 AM

---

I SUPPORT on site consumption.

--

Everything has beauty, but not everyone can see it.  
~Kas~

**From:** Dawn Morse  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment: Onsite consumption  
**Date:** Friday, October 27, 2017 1:56:15 PM

---

Hello,

I support onsite cannabis consumption.

Thank you,

Dawn Morse  
907.444.2847

**From:** misty nemec  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 3:35:40 PM

---

I fully support on site consumption

**From:** Harry Brod  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comment in favor of proposed on-site marijuana consumption rules  
**Date:** Friday, August 25, 2017 4:25:47 PM

---

Dear Board Members:

Please ensure that workable rules for on-site marijuana consumption are passed. Pot is a much safer intoxicant than alcohol and people should have the opportunity to consume pot outside of their home in a social setting. Cannabis Cafes would be increase tourism in our state.

--

Harry Brod  
907-351-2710  
[harrybrod@gmail.com](mailto:harrybrod@gmail.com)

**From:** Greg Buczak  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Wednesday, October 25, 2017 1:47:54 PM

---

Hello,

I'm am writing to you in support of onsite consumption. I believe that the citizens of Anchorage, as well as our tourists (which as you know is huge business to our great state) needs to have safe, regulated place to consume marijuana products. This will also help keep it off the street and out of the presence of minors. Also with the debt our state is in and with a rising and alarming crime rate we are seeing, this will potentially create more jobs for our residents. Thank you for your time.

Greg Buczak

Sent from my iPhone

**From:** C D  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** For Onsite Consumption (second attempt)  
**Date:** Friday, October 27, 2017 10:58:38 AM

---

(second attempt) Hello, I am for onsite consumption. After reviewing the proposed regulations I do think there should be a few changes.

3 AAC 306.990- The maximum quantity for all products should be increased. If were going to pass onsite consumption then don't ruin the experience for all customers. People come in all shapes and sizes and tolerance levels. It should be at the discretion of the employee managing the onsite area, as well as the customer as to how much they prefer to consume. Similar to a liquor establishments. Secondly I do think there should be a place where you can smoke a joint and have a beer provided the establishment has all required licensing. Other than that I think the regulations look good. I'd like to say thank you for bringing this industry to fruition and everything you've done to work with communities to develop regulations that work for all. -Thanks, Chuck Cartier (jr.)

**From:** Cecelia Donelson  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support onsite consumption  
**Date:** Wednesday, October 25, 2017 2:10:56 PM

---

I'm supporting onsite Cannabis consumption. I'm involved with the tourist industry and to have Cannabis legal and available to the tourists only then to inform them that really there is NO PLACE for them to use their purchase is not good. And then to inform them they can't take it on the train, plane or cruise ship...WOW how wrong is that!

Cecelia Donelson

Sent from my iPhone

**From:** James Fejes  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** SUPPORT ONSITE CONSUMPTION  
**Date:** Thursday, October 26, 2017 6:53:05 PM

---

To Whom it may concern:

I support public use and or onsite consumption of cannabis.

The effects of cannabis are less volatile than that of alcohol. If we have decided to regulate cannabis as we do alcohol then people should be able to consume product in identified public establishments similar to clubs, bars and breweries.

Thank you for your time.

Best regards,

James Fejes, Jr.



**From:** Marina Komkov  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption  
**Date:** Friday, October 27, 2017 3:47:43 PM

---

Dear AMCO officers and board members:

I am writing in support of onsite consumption of marijuana in Alaska. Please adopt the proposed regulations for the marijuana retail store onsite consumption endorsement.

Regards,

Marina Komkov, AIA, NCARB, CDT  
Partner, Alaska Registered Architect  
ICEFALL ARCHITECTURE  
P: 907-727-4437  
E: [marina@icefallarch.com](mailto:marina@icefallarch.com)

**From:** Rob Landers  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Tuesday, October 24, 2017 6:12:34 PM

---

To whom it may concern,  
I support onsite consumption. Please dont draft the rules to be too prohibitive or restrictive either. Practical would be nice.

Thanks,  
Robert Landers  
Business Owner, Community Council Member,  
PTA member

[Sent from Yahoo Mail on Android](#)

**From:** Jami Norman  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support public consumption  
**Date:** Thursday, October 26, 2017 5:19:36 AM

---

I support public consumption.

**From:** Larry O'Kelley  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I sit consumption  
**Date:** Friday, October 27, 2017 12:03:03 PM

---

All,

I would like to show my support for onsite consumption. The people voted for it. Please respect the vote.

Larry O'Kelley  
907-575-2447

**From:** Sophie Dye  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 4:18:49 PM

---

I support onsite consumption for retail stores. I believe it is crucial for the success of the marijuana industry in Alaska and will give tourists a safe place to consume.

Sincerely,

Sophie Dye

**From:** Don Miller  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Friday, October 27, 2017 4:19:39 PM

---

I support on site consumption of cannabis and cannabis based products.

Thank you

Donald H. Miller

**From:** Onestop  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Wednesday, October 25, 2017 1:35:31 PM

---

I am all for the on-site consumption of Cannabis! We need to give these people a safe place where they can partake in their medicine, and keep it off the streets!

**From:** Joe Darnell  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Oppose on site consumption  
**Date:** Friday, October 27, 2017 4:29:20 PM

---

I just want to say I oppose on site consumption, it violates the law that was voted on!

Joe Darnell  
Wasilla



**From:** Edward Osmanski  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Date:** Friday, October 27, 2017 12:35:41 PM

---

Hello,

My name is Edward and I'm a budtender at a local shop here in anchorage and I support onsite consumption. Please consider the positives instead of focusing on the negative. As long as it is something that is regulated and controlled.

**From:** Erin Palmer  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support legal Cannabis  
**Date:** Friday, October 27, 2017 1:58:02 PM

---

I fully support legal and safe on-site consumption of Cannabis.

Thank you,  
Erin Palmer

**From:** Kayla Palmer  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Date:** Friday, October 27, 2017 3:42:54 PM

---

I fully support legal and safe on-site consumption of Cannabis

**From:** Eileen Patterson  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-Site Consumption  
**Date:** Friday, October 27, 2017 2:56:29 PM

---

I fully support legal and safe on-site consumption of Cannabis

Adam Patterson  
adamepatt28@icloud.com  
9077073796

**From:** Amber Peltier  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Thursday, October 26, 2017 7:22:01 PM

---

I oppose the proposed regulation allowing onsite consumption in marijuana stores

Amber Peltier

**From:** Rachelle  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Opposition to Marijuana insight consumption  
**Date:** Wednesday, October 25, 2017 1:33:55 PM

---

I oppose the proposed regulation allowing onsite consumption in marijuana stores!

Sent from my iPhone

**From:** Richard Smith  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption areas  
**Date:** Wednesday, October 25, 2017 8:26:19 AM

---

I support regulated onsite consumption areas for marijuana retailers. Use of this product is by nature social and allowing the consumption of it in retail establishments will further normalize the activity. That is a good thing in my opinion.

Sent from my iPad

**From:** Terry Roberts  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public comment in SUPPORT of the On-Site Regulation  
**Date:** Friday, October 27, 2017 1:53:57 PM

---

I support on-site consumption because I believe adults who wish to use cannabis should be allowed to consume with friends in a safe & secure place. Visitors from out of state need a safe place to consume cannabis that they are legally allowed to purchase.

Thank you,  
Terry Roberts  
1866 Pandora Dr  
Fairbanks AK 99709



**From:** alaskaprecisiongm  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Friday, October 27, 2017 8:57:05 AM

---

I'm speaking for onsite consumption. We definitely need a place for people to smoke cannabis. I think it will keep people from using it in public .

Rocky b.

Sent via the Samsung Galaxy S8+, an AT&T 4G LTE smartphone

**From:** w  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** I support on site consumption  
**Date:** Friday, October 27, 2017 2:54:58 PM

---

I support on site consumption for cannabis in Alaska.

Thanks,

William Rodgers

**From:** Jonathan Schumacher  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Thursday, October 26, 2017 10:27:56 AM

---

I support onsite consumption, as a medical patient it would be nice to interact with others again who I would never meet anywhere else and share information on Cannabis and its healing properties.

Thank You,  
Jonathan J. Schumacher Jr.

**From:** Tyler Shamburg  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site consumption  
**Date:** Thursday, October 26, 2017 8:52:01 AM

---

To whom it may concern,

My name is Tyler Shamburg, and I support public consumption.

Tyler

Sent from my iPhone

**From:** Bob Shears  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comment on proposed regulation to allow onsite consumption re: 3 AAC 306.370  
**Date:** Friday, October 27, 2017 10:00:05 AM

---

In the spirit of the ballot measure to regulate like alcohol, I support this proposed regulation.  
Comment also that onsite advertising is benign and should be allowed in the consumption area.

Robert Shears  
Barrow, Alaska

**From:** Holly Sheldon Lee  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** OPPOSITION TO ON-SITE CONSUMPTION  
**Date:** Thursday, August 24, 2017 11:09:42 AM

---

I am against allowing the consumption of marijuana on-site at State licensed establishments.

Holly Sheldon Lee  
P.O. Box 1  
Talkeetna, AK 99676  
(907) 232-4063

**From:** amber.l.shoemaker  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption  
**Date:** Thursday, October 26, 2017 9:50:40 AM

---

I support onsite consumption!

Sent via the Samsung Galaxy S7 active, an AT&T 4G LTE smartphone

**From:** Kevin Stow  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Date:** Friday, October 27, 2017 3:45:07 PM

---

I fully support legal and safe on-site consumption of Cannabis



**From:** Gretchen Strawn  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite Consumption of Cannabis  
**Date:** Friday, October 27, 2017 3:18:34 PM

---

To Whom It May Concern:

I am in complete support of safe and legal onsite consumption of cannabis and cannabis products.

Thank you for taking my input.

Gretchen Strawn  
PO Box 2236  
Palmer, AK 99645

**From:** sewilson907@gmail.com  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site consumption  
**Date:** Friday, October 27, 2017 1:30:45 PM

---

I am in favor of retail on-site consumption. There are no safe places for tourist to safely consume marijuana in the state, and locals are limited to privately owned property, with approval of property owner. Apartment and duplex-style living tenants are not able to consume marijuana without giving up their securities of privacy, by asking the property owner if they have permission.

Stephen Wilson

**From:** Carol Torrey  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Onsite consumption  
**Date:** Wednesday, October 25, 2017 10:08:56 AM

---

Should be allowed.

Sent from my iPad

**From:** Travis Smith  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Comments: on-site consumption  
**Date:** Friday, October 27, 2017 12:38:29 PM

---

To whom it may concern,

I fully support legal and safe on-site consumption of Cannabis!

Thank you,  
Travis Smith  
South Anchorage

**From:** Lily Werts  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On-site consumption  
**Date:** Friday, October 27, 2017 9:50:22 AM

---

Hello,

I am writing in support of on-site consumption. AMCO should develop regulations to allow it.  
Thank you for your consideration.

Thank you,

Elisabeth "Lily" Werts

**From:** Tom Williams  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** On site consumption  
**Date:** Monday, October 23, 2017 4:20:58 PM

---

I think the State should implement the regulation to allow on site consumption of Cannabis. I was in Amsterdam years ago where they have on site consumption and there seemed to be no problems with such places. It would be a great benefit for the State to tax and regulate these establishments.

Tom Williams Sent from my iPad

I support the cruise Regulations, I am  
A tourist in Alaska and would like  
A place to consume Legal Cannabis

RICHARD TATTOIE

602-741-0964

*Rich Tattoie*



Support for Onsite  
CANNABIS! TOURISM \$\$\$

Frank  
DALLAS, TX





I fully support and agree  
that ~~there~~ should be on-site  
consumption here in  
Ketchikan!!!

- Kym Leask



Ketchikan, AK  
617-4044

Hello. I support the onsite  
regulations as proposed by

AMCO.



Clara Stanley  
Ketchikan, AK  
99901

Hello. I support the onsite  
Regulations as proposed by  
AMCO. Janet Erickson Ketchikan AK  
907 617-1361



I support the onsite  
Regulations as proposed by  
ATMCO.

JOE MORENO  
LOS CRUCES, NM



TO AMCO:



I AM A TOURIST FROM

FLORIDA VISITING ALASKA AND  
SUPPORT ONSITE CONSUMPTION WHILE  
IN YOUR BEAUTIFUL STATE!

RANDALL Mc GILL

I support onsite consumption  
for all people over 21 yrs. old.

Paw Menechik  
KTA, AK



Hello, I support the Regs as  
proposed by A.M.C.O. for  
onsite consumption

Ryan Newman

Ketchikan, AK



I TRULY Support  
ON SITE Consumption  
So EASY Buy it Smoke it  
ENJOY IT  
Jeggs Snyder





Hello, I Support the  
Regulations; I'm a tourist  
in Alaska and would like  
a place to consume legal  
Cannabis. Brenda Brandt  
Minneapolis, MN



Hello, I Support the regulations as  
proposed by A.M.C.R for onsite consumption.

Westly A Arnett II  
Ketchikan, AK



I support onsite  
Consumption —



makes perfect  
sense !!

Meghan  
Ketchikan AK

Hello - I support the onsite  
regulations as proposed by  
AMCO.

Thanks

Sen

Orlando Florida



Hello, I support the  
Regs as proposed by AMCO  
for on-site consumption



Jaylor Monrow  
Asheville, NC

Hi, It's Been My experience<sup>09/16/17</sup>  
IN Seattle, that My hope  
FOR Mankind Be Restored  
AROUND "POT Shops."  
Where FOLKS of all  
demographics gather to Be  
PoLite and Greet each other. #

Heyo!



I support

on-site consumption  
of marijuana.

in Stoney Moose

Lindsey

Ketchikan Alaska

Hello, & support Regs  
as proposed by  
A.M.C.O. For onsite consumption



Don Wain

KTN. AK

99901



Hello, I support the Regs as  
proposed by A.M.C.O. For on site Consumption.



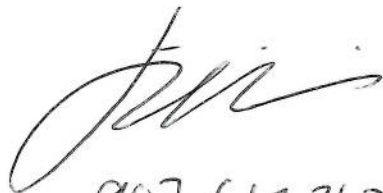
Mary Jane

Ketchikan, AK.



Hi, I support the onsite  
regulations as proposed by  
AMCO.

Jillian Piazza



907 617 3624



We support the Regs for  
Proposed "on site" consumption  
Do it ... soon!



Paul Vega

Houston, TX

I support the Regs  
IN / CV AS proposed  
by AMCO



Rich Jones  
CALIFORNIA

Hello, I Support the Regs as  
Proposed by A.M.C.O For on site consumption



Mr. Green

Ketchikan, AK

I support regs as  
proposed by A.M.C.O.  
for onsite consumption



Jensen  
Willingham  
Hillsborough  
NC.

Samples are Always  
Welcome!!

Ken Holt



I support the Regs as proposed  
by AMCO for "on site consumption"

Imong  
Squamish BC





I support the Regs as proposed  
by A.M.C.O. for on site  
consumption!!

Thank you!!

Jasmine Canhelli  
Ketchikan, Alaska  
😊



I support the Regs as  
Proposed By A.M.C.O. For  
On site consumption



Jeff Brawn  
Vancouver B.C  
Canada.

Hello I support The Reg's AS  
proposed by A.M.C.O.  
~~fees~~ for on site consumption

Deanna Lov



Ketchikan ASK

I Support on site Consumption of  
Marijuana



Josh Key  
Ketchikan, AK

ABSOLUTLY



Hutchinson! AL

Hello, I support the regs  
proposed by AMCO for  
onsite cannabis consumption

-Rich Suitor, tourist  
with Norwegian  
Pearl.



hello, I support the onsite regulations  
as proposed by AMCO.

-Brandon Greenstreet  
Ketchikan, AK



Hey, I support the Regs as  
proposed by A.M.C.O. Thanks



Thomas J. Copelan

ATN. AK.



Hello AMCO, I support the Regs  
set by Amco & would like a  
place to legally consume onsite.  
I am a tourist visiting AK.



California

I support the onsite regulations; I'm a tourist from AZ in Alaska and would like a place to consume legal cannabis. Alexandria Harty  
The properties of MJ are very beneficial and should be enjoyed by all



Hello, I support the  
Regs as Proposed by  
AMCO For on site  
consumption



hawn

S.F.

Hey I support the Regs  
in Alaska! on site smoking  
Paula Go to  
California

Hello,

We need more public  
Places to enjoy our meals  
Please add a smokers  
bar to the area!



- Rob

I Support THE REAS AS proposed BY  
A.M.C.O For onsite consumption  
also offsite would be good too!

Tim Kunes  
OLECON



I support on site  
consumption of legal  
marijuana



John Wright  
Naukati Alaska

I support the Regs as Proposed  
By A.M.C.O. for on site consumption



Joshua Ruffner  
Ketchikan AK.



I SUPPORT THE AMCO  
REGULATIONS AND THE  
WAY THIS IS SET-UP  
GARY AGUIAR  
408 603-~~1264~~



I am supportive of AMCO's proposed  
regs for onsite consumption in Alaska.

Lyle Jane

Rayson  
Utah



I support the on site regulations  
in Alaska.

Thank you



Ron Wynne  
Ketchikan, AK

Greetings! I am an  
Alaskan & I Support the  
Regulations as Proposed  
by A.M.C.O for  
on site Consumption  
Stacy Anderson  
Fairbanks AK!

Hello! I support the Regs as  
proposed by A.M.C.O for  
on site consumption.



Rowan Henderson  
Ketchikan, AK 99901

I Support the regulations as proposed  
by Alcohol & Marijuana Control Office  
for  
On-site Consumption.



Alexandra Kelly  
*Alexandra Kelly*  
Ketchikan, AK

Hello, I support the onsite  
regulations as proposed by  
AMCO - Joanna Thompson  
Hesperia, CA



I Support the onsite Regs  
Proposed by AMCO.



From  
*Cody Swartz*

Ktn. AK



Good morning, I support the  
on site regulations proposed by  
AMCO.



Florida

I Support the onsite regs  
proposed by AMCO. *Mark Tull*  
Seattle Wa.



I support onsite regulations for cannabis  
in Alaska.

Pat Schoenecker

Alaska, Wise.



ALOHA, I SUPPORT THE REGULATIONS AS  
PROPOSED BY A.M.C.O. FOR ON SITE  
CONSUMPTION

MAHALO,  
TAYLOR



HAWAII

I support on site regulations,  
and I support onsite consumption

✓ Hannah  
OK



Hello. I support the onsite  
regulations as proposed by

AMCO. Dorian Dundas



Huge Support  
For on Site Consumption!



Sasha 207 939 2525

Hella I support the onsite regulations as  
proposed by AMCO, STIPP.





I, STEVEN BLESSO SUPPORT  
ON SITE REGULATIONS TO CONSUME  
LEGAL CANNABIS CONSUMPTION.

STEVE BLESSO



907-303-6335



Dear folks,

if people can buy pot, they  
should have a legal place  
to consume it. It only  
makes sense.

Sincerely, Mariah Warren  
(a concerned citizen)



I ~~Consent~~ support  
on site consumption

99901  
Ketchikan AK



Hello I support on site  
consumption of Cannabis  
As proposed by A.M.C.O.



David i Rayner  
David L Ray

I Support the Regulations  
as proposed by A.M.C.O.

for on-site  
Consumption

Jeffrey Hudson  
Ketchikan, Alaska



I support the regs as  
proposed by A.M.C.O for  
onsite consumption



Leon Ruaro

Ketchikan, AK 99901

I Support the onsite  
the Regulations as proposed  
by AMCO.



Danny Tafford  
Tourist !!

I agree for an onsite  
consumption.



Lisa Hote



Hello

I support the  
regulation proposed  
A.M.C.O. for on site  
consumption.

Veronica Redifer  
Ketchikan, AK



Isit Kah Rado  
Support on Sight  
Consumption  
Ketchikan AK



Hello. I support the onsite  
regulations as proposed by  
AMCO.



K. Droke, Ketchikan AK

I support the regulations as  
proposed by A.M.C.O for onsite  
consumption.

Portland, Oregon

To whom it may concern

I support the onsite  
regulations as proposed by AARC.

We have family in Homer,  
but are from Portland Oregon.

Thank you.



Hello, I support Regs as proposed  
by AMCO for onsite consumption



Thank you

Larry Abel  
Juneau, AK.

Hello, I support the on-site  
consumption as proposed  
by A.M.C.O.



Danien Ramirez

Ketchikan, Ak.



Todd Williams  
Driggs, ID.

legal Cannabis,

Regulations for on-site consumption of

I'm in ~~the~~ support of

Hello There,



Good Day,

I am in support  
of onsite regulations  
as proposed by AMCO.



Maggie Boyle

Hello, I support the regs as  
proposed by AMCO for onsite  
consumption



Rich Banta  
New York, NY

HELLO, I SUPPORT THE REG  
AS PROPOSED BY AM.CO FOR  
ON SITE CONSUMPTION



HARRY MARTIN  
ETN, AK

I Support the Reg's as  
proposed by AMCO  
for on Site Consumption

Tisha Brisley  
Ketchikan, AK



i would love to return  
to Alaska on vacation IF  
i had a place to consume  
marijuana without breaking  
the law. i support AMCO.



Jennifer Hanser  
Las Vegas, Nevada

me & mine  
support AMCO.



on site

Gen P.  
Seattle, Washington

Hello. I support the onsite  
regulations as proposed by  
AMCO. Michael James Hueneka  
Ketchikan AK



To Whom It May Concern:  
I support the onsite  
regulations as proposed  
by AMCO.



Christina Buendia  
Ketchikan, AK  
local resident



I support the AMCO onsite  
consumption regs. I want on-site  
for Alaska. PLEASE ↓



Adrianna Saavedra  
505-681-0630

Hi,

I support the onsite regulations; I'm  
A tourist in Alaska And would like a place  
to consume legal cannabis.

Suzi Scibor  
914 420 7688



Hello I support the Reep as  
proposed by AMCO for on site  
consumption

Patty Chitel  
Ketchikan AK.



Hello, I support the onsite  
regulations as proposed by  
AMCO. I'm a tourist in AK  
and would like a place to  
consume legal cannabis.



Jaylene King  
Sacramento CA

I Support The Inside The Outside  
Regulations. I'm A Tourist In Alaska  
& Would Like A Place To Consume  
Legal Cannabis

-Robert Kirkland  
(907) 745-3547



I support the create reg.  
to smoke pot here in  
Alaska.

James Fowler  
FLORIDA



Hello, I support the onsite  
regulations as proposed by AMCO

Steve Souza  
Massachusetts HS



I Support onsite Regulations: I'm a tourist  
in Alaska and would like a place to consume  
legal cannabis

Stacy Smyer  
Massachusetts





Hullo,

I am a tourist visiting  
Alaska and would love  
to visit again if there  
was a place to consume  
Marijuana legally.



Thankyou

Steve Sims

Columbus, Georgia

I Support the  
Regs proposed  
by AMCO for on-site  
consumption. I think people  
Need a place to go!



Jellann  
K-town  
AK

I Support onsite Regulations  
Proposed by A.M.C.O.  
for on site  
Consumption

Brian Tucker  
Ketchikan, Ak



Hi I support HUREGS  
AS PROPOSED BY AMCO  
FOR ONSITE

SHELLA BIRD  
KTN, AK!



I support the Regs as  
Proposed by A.M.C.O for  
on site consumption.

Travis Hayes  
1200 Woodside AP. E



hello,  
I support the  
onsite Regulations  
Propose by AMCO.



Samuel Rames  
Columbus, Ohio

High I support the Regs  
as proposed by ANCO for  
on site consumption

  
Emil A. M.  
KFN AK



Hello, I support the Regs as  
proposed by AMCO for on-  
site consumption.

Rose



Ketchikan, AK.



Yes, I support the onsite  
consumption regulations as  
proposed.

Kathi Altom

Ketchikan, AK



Hello, I support the Regs.  
as proposed by A.M.C.O  
For ONSITE CONSUMPTION



Kira M. Booth  
Sitka, AK + Metlakatla, AK

Mike D. Baine  
KTA, AK

I support the Regs.  
by AMCO. for on site  
Consumption



Hello, I David Pomeroy I support  
on site Consumption



David Pomeroy



Hello ☺

I Support the Regs as  
~~proposed~~ proposed by A.M.C.O. for  
onsite consumption



Aurita Lopez  
Ketchikan AK ☺

-Thank

Hello! I support the  
Regs as proposed by  
A.M.C.O. for onsite  
consumption  
Cynthia  
Morup Ktn AK.

Hey, I to support the Regs  
as proposed by AMCO for on site  
consumption



Jeff Kenyon

Idaho

Hello. I support the onsite regulations as  
proposed by AMCO

- Jon Thomas



Hi,

I support on site consumption

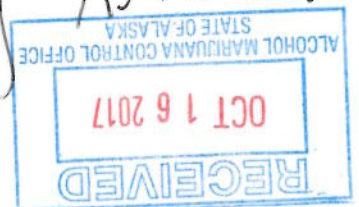
Reg Kalkins  
Anchorage, AK

*Reg Kalkin*



Hi, My name is Dean Garcia

I support the onsite regulations  
as proposed by AMCO.



Hi, I really support the Regs  
As Passed By Amco



Will J. Hanson

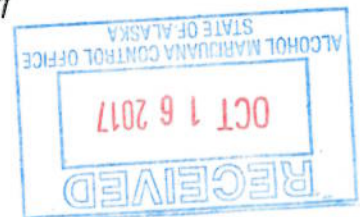
Ketchikan AK.

Hello! I support the onsite regulations as  
proposed by AMCO!

Stephen Stough

Wrangell AK 99929

907 982-7506



Hello -

I support the onsite regulations.

I am visiting and would

Love a place to consume

legal cannabis.

Lara Tved



I would like to be able to openly consume  
Cannabis.

10/6/17



My Name is Richard Cowie and I live and vote  
in Ketchikan, AK. I support on site consumption. The  
tourists need to smoke somewhere, if the tax dollars  
are going to keep rolling in.

9-13-17

*Richard Cowie*

366-258-6666



To AMCO:

I am a tourist to Alaska and would strongly support onsite consumption regulations. To be able to have a secure, legal place to relax & to ~~enjoy~~ support local businesses would be beneficial to not only myself but your community. Thank you for your consideration.



Hello, I support the Regs  
as proposed by A.M.C.O  
for onsite consumption

Asheville, NC



el support  
on-site inspection  
in Alaska

Under



KTA, ACR

Yes! Onsite  
Consumption

We want  
it now in AK



Jerry, POW

I Support on-site  
Consumption !!!



- Justine Samaniego  
Anchorage, AK

I Cabrana Support the  
Regs as proposed by AMCO  
For on site consumption ☺

Proud supporter!

*Cabrana*  
*Are*



9/14/17

Hello, My name's Rachel Savage, and  
as a non-drinker (only a pot smoker) I  
wish there was a "weed bar", so I can  
enjoy my weed <sup>with</sup> ~~alone~~ my friends. ~~and~~

I support the regulations as proposed  
by A.M.C.O. for onsite consumption

Rachel Savage

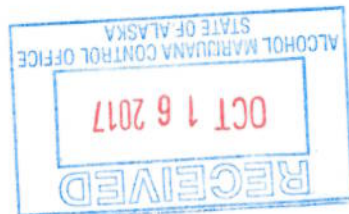
Fresno, CA

I support on site  
consumptions

Jacqueline Blair  
Alaska



Hello, I support the on-site regs as  
proposed by AMCO. People would  
benefit greatly from an on-site consumption  
business!



Turshia H.  
Ketchikan  
AK



I support the onsite consumption  
regs proposed by a.m.c.o.



Ben James  
Seattle Washington

Hey! I Support the Regs  
as proposed by A.M.CO. for  
On Site Consumption



Zen Moin

HELLO, I SUPPORT THE REGS  
AS PROPOSED BY AMCO.  
FOR ON SIGHT CONSUMPTION

MICHAEL BLAIR

KETCHIKAN AK



I would come back to Alaska  
to visit again if I had a place  
to smoke pot without breaking  
the law. I hate crime!



John Slater  
Payson, Utah

Hello,

I support the onsite regulations  
as proposed by Amco

-Kelsey Dangan  
Lake Tahoe, Ca



I Support the onsite Regulations,  
I am tourist in Alaska and would  
like a place to Consume legal  
Cannabis.



Christopher Craddock

719-494-2034

We support  
onsite regulations.



As a tourist in Alaska,  
and would like a place to consume  
legal cannabis.

J&B. Reynolds

Hello, I support the Regs as  
Proposed by A.M.C.O. For  
site consumption

~~Mary~~ Robert  
Strong





I support AMCO for  
onsite consumption.

Shelly Bartlett  
Wasilla, AK



VERO I SUPPORT THE REGS AS  
PROPOSED BY AMCO FOR ONSITE  
CONSUMPTION



*Kerry Stetwell*

I support the Amco  
on-site consumption regs.  
I want on-site for  
Alaska.



Gordon Amundson  
907-712-4789

To whom it may concern,  
I fully support the Regs as  
proposed by A.M.CO. for on site  
consumption.

Respectfully,

Tyler Vane

Phone 821-4208

Hutchinson, AK



I am a tourist in AK. I would love  
to support AMCO's onsite consumption regulations.



Christina  
AZ.

Chesite

Thank you!

Julie  
in  
Ketchikan



Hello, I support the Regs  
as proposed by AM.CO. for  
onsite consumption!



Hekey Fleming  
Ketchikan, AK.

I support the regulations  
as proposed by AMCO for  
on-site consumption!



Fernando M.  
Orlando, FL



I support the Regs as proposed  
BY AMCO for onsite consumption



Stennis Bishop

Ketchikan AK

HEY,



I AGREE W/

AMCO. &

SUPPORT

The onSite  
Regs for

Consumption.

Sean Tyton  
Seattle, WA

I am in support of the Regs  
proposed by ADKO for onsite  
consumption of Marijuana.

Thank you  
Ross Lyles  
Det. Michigan

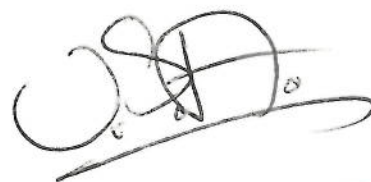


Hello I Support the  
Reqs as proposed by  
AMCO for outside  
consumption



Cheryl  
KTN AK

1 on a tourist is want to  
gooke feet is not break  
the law.

A handwritten signature in black ink, consisting of stylized, overlapping loops and a long horizontal stroke at the bottom.

Hello! I support the Regs  
as proposed by AmCO for onsite  
Consumption.



Iara Parrish  
Ketchikan, AK

I Support on site  
consumption @ Stoney mass



Derek  
Wollgast

Ketchikan  
AK

I SUPPORT ON-SITE CONSUMPTION!  
100%!

Scott Allen  
Ancit, Ark.





1 Support the Regs  
as proposed by A.M.C.O.  
for on site consumption



~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~  
Vega Bondita

This date reads on-site consumption.

Travis Thompson

Lindsey



Hello I support the onsite regulations of  
AS proposed by A.M.C.O. for  
onsite consumption

THE INDIAN  
SPRINK  
KETCHIKAN, AK  
(907) 201-7623



Hello, I, Joni M. Williams. Support the onsite  
regulations as propose by AMCO  
J.W.

Joni Williams 1132 Woodland Ketchikan Alaska  
99901



To Whom it may Concern,

I 100% Support the on-site usage  
of product within the Facility as proposed  
by AMCO ~~Maha~~ ~~Fuckers~~



Tony Johnson  
Retchikan AK

Hi -



I support the  
ON-SITE REGULATIONS  
As proposed by  
ANCO

Papua Mininini  
Ketchikan, AK

Hello I Support the  
Onsite Regulations as  
Proposed by Amco.

Justin Williams. Ketchikan,  
AK



I Support the onsite regulations;  
as proposed by AMCO

Dena Menicucci  
Ketchikan, AK





I support  
onsite regs as  
proposed by  
AMCO

-Conor  
Eckholm



I support the onsite  
regulations as proposed by  
AMCO



Gloria Ortiz, P.R.

Sept 6 / 2017

I support the on-site  
consumption of legal  
cannabis

Dr. Jacob  
Mensurkian

I'm a Tourist and would LOVE  
a place to Relax and consume Legal  
cannabis

Joe Warren  
California



and support the onsite regulations as  
proposed by AMCO. I'm a tourist  
and would definitely come back to visit  
to legally consume Cannabis.



Suzi Mansell  
Kansas City Mo

Hi,

Sept. 2017

My name is Erin Tauski ~

You need a place for us  
to do consumption when we  
are off the ship ~

503-381-7686 ASTORIA, OREGON



Hello. I Support the onsite  
regulations as proposed by AMCO.



Pct W.

907-723-1587

~~As~~ As a person who is prescribed medical Marijuana for spinal injury. An on-site Consumption offer would allow a safe place to use my medication. I full + support an on-site Consumption option



Eugene Zamali / MS



I Support on site Consumption  
for Alaska. Somewhere to  
sit + Enjoy would have  
been nice. Great Service!

Nicole Cronin NYC



I support  
on-site consumption  
for Alaska.

John Muñoz  
Denver CO



H. I Too SUPPORT THE  
ON SITE REGULATIONS AS  
PROPOSED BY AMLO  
I'm NOT A TOURIST.



*[Signature]*  
JON PATRICK SMITH

I support on-site  
consumption



W. G. Anderson

Hello. I support the onsite  
regulations as proposed by  
Amco Mary Jenkins, St, Louis

(907) 220-4364

Zacariah Vandal



I support the onsite regulations. I'm a tourist in Alaska and would like to enjoy it even more and consume marijuana safely and responsibly. Thanks!

Sabuni Strohmer



"Hello, I support the  
onsite regulations as  
purposed by AMCO."

Janet Grootenk  
Ketchikan, Alaska  
(907) 220-1086



Hello I spent ~ \$4  
Consumption. By Amco.



Robert Richard





I support onsite regulations.

I'm a tourist in Alaska  
and would like a place



to consume legal cannabis

— Mary Jenkins

907-828-9999

I support an on-site  
regulations smoking area.  
of cannabis.

Cheryl Vincent  
Seattle, WA



☺ Yes!

sounds like

a safe container

& smart move

for future information

& consumption on/of

sweet santa maria

medicina!

Thank you  
for all you do!



Thank you

AMCO

Support  
onsite



Shresth

KTN AK



I support  
on site



Scott Johnson  
Portland, OR

Hi,

I support the onsite Regs  
Proposed by AMCO.

Ben J.



(907) 821-2909

I support the onsite Regs.  
proposed by AMCO



(907) 220-6671

1 Support the Onsite  
Regs proposed by AMCO.



(907) 775-3615



Hello,

I support the onsite Regulations  
Proposed by AMCO.



JAN R JD

Ketchikan AK 99901

907 204 0749

I Support the onsite  
regulations as proposed by  
AMCO.

Michele Vitovich  
Ketchikan, AK  
(907) 204-0751



A report on the  
consumption  
of cannabis in  
Alaska



Fred Drake  
KTA, AK

Hello, I, Matthew Q. Wyatt, Support the  
onsite regulations as proposed by A.M.C.O

Matthew Q Wyatt 1132 Woodland <sup>MW</sup> Ketchikan AK 99901



Hello: I support onsite  
regulations as purposed  
by AMCO. John Jackson  
Juneau, AK



9/10/17

our Family & Friends are  
ALL for a onsite

Consumption for the Legal  
use of Marijuana in 2018.

*Daily Church*



*James C. ...*

9-9-17

Hello, I support the onsite  
regulations proposed by  
AMCO.

David Lovell

206-818-2611



Hello,

I support the onsite regulations proposed  
by AMCO



To  
AMCO

Shane Jasper  
Ketchikan, Ak.  
(907) 617-5069



To Whom it May Concern,

I, Kolbe Rose Pollock, support the onsite  
consumption regulations as proposed by  
Amco. I live here in Ketchikan, AK.  
Long Live Freedom.



I Fully support on-sight  
consumption because I  
much prefer the world filled  
with pot heads than opiod,  
alcohol, heroin addicts. Not  
one person has EVER O'Dd  
on marijuana.

-R. Ryan

017-0334

Hello! I Support the Regs as  
proposed. by AMCO



Forbes  
TN

I Support the Regulations as  
proposed by A.M.C.O.

Peter Parker

Nashville, TN\*



Hi There —

I support the Regs  
as proposed by AMCO.

Bill Nelson  
Eugene, Oregon