THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Commerce, Community, and Economic Development

ALCOHOL & MARIJUANA CONTROL OFFICE
550 West 7th Avenue, Suite 1600
Anchorage, AK 99501
Main: 907.269.0350

November 21, 2017

Carol J Waldo
DBA: Glacier Bay Farms
Via email: waldogroup4@aptalaska.net

Re: Standard Marijuana Cultivation Facility License #12680

Dear applicant,

The AMCO Office is reviewing the documents submitted for the proposed marijuana establishment license referenced above. The following items need to be corrected and/or resubmitted**.**

- **MJ-00 Application Certifications**
  - The MJ-00 form you submitted for this application has the incorrect marijuana license number. Please fill out a new one with the correct information to include correct information stated on section 3. Please visit our website to obtain an updated version of MJ-00 that was just released https://www.commerce.alaska.gov/web/amco/MarijuanaLicenseApplication.aspx .

- **MJ-01 Operating Plan (re-do and re-submit for review)**
  - Your operating plan needs substantial improvement. Your answers do not reflect you have a thorough understanding of the statutes and regulations either in general or specific to the license type you are applying for. Please re-review Title 17.38 of Alaska Statutes and Chapter 306 of the Alaska Administrative Code both found on our website, re-do your MJ-01 Marijuana Establishment Operating Plan, and re-submit for review. You really need more elaborate detail on each box explaining how your establishment is going to meet the requirements of the statutes and regulations. The following are examples of what to watch out for when re-doing your operating plan (**these are examples but they are not the only things you need to address).**
    - Page 2: there is a log you need to maintain with certain information of the visitors being escorted into Restricted Access Areas. There is a ratio of licensee/employee/agent to visitor that must be followed.
    - Page 3, first box: incomplete answer. More detail that shows your thorough understanding.
    - Page 4: you need to explain how your exterior lighting is going to facilitate surveillance of the marijuana establishment. Who gets notified of any breach of security, what are the actions of that person to take in case of breach of security.
    - Page 5: your policies and procedures for preventing diversion of marijuana should include policies and procedures to prevent diversion of marijuana by employees.

- Page 7: how are you video cameras going to be placed in order to produce a clear view adequate to identify any individual inside the licensed premises, or within 20 feet of each entrance to the licensed premises, in the restricted access area and each entrance to the restricted access area, each point of sale area. How are you going to ensure that the locked and secure area where video surveillance recording equipment and records are stored will be accessible only to authorized personnel, law enforcement, or an agent of the board.
- Page 9: describe how you will prevent records and data, including electronically maintained records, from being lost or destroyed. The regulations talk about some of the records that licensees should keep. What are they? Will you back them up, if so, how?
- Page 11: will you be providing in-house training, other than making sure that employees have a current marijuana handler's permit? Please state it in the box.
- Page 12: incineration of marijuana on-site is not allowed. There is a notice to our office that must be given before rendering the marijuana waste unusable.
- Page 15: very incomplete answer. Re-read 3 AAC 306.470, 3 AAC 306.475, 3 AAC 306.750. ALSO, please provide a sample label (and logo if you will have one) showing how you will comply with these regulations.

- **MJ-02 Premises Diagram**
  - Your operating plan states you will have three buildings as the licensed premises. These buildings **must be** in a contiguous licensed premises, in other words, if you already don't have a fence enclosing these buildings, you will have to put one up. Furthermore, if you are going to be moving marijuana between buildings the areas in between the buildings will have to be restricted access areas. Please see the memorandum that was approved by the board in our September 2017 regarding this, you will find it on our website under Marijuana Control Board Meeting Documents, it is tab 4.
  - Please provide a very clear, sort of an aerial view map that shows the property in which the proposed licensed premises will be, what is in that property, and where these three buildings will be. We also need to see what surrounds the proposed licensed premises (use labels).
  - Please provide a diagram that shows the following:
    - The fence that will be put up enclosing the buildings that you will have under cultivation.
    - The licensed premises (use one color and label)
    - The restricted access areas within the licensed premises (use a different color and label)
    - Detailed interior layout of each building:
      - Entrances, walls, partitions, counters, windows, areas of ingress and egress, dimensions.

- **MJ-04 Cultivation Supplemental**
  - Page 4, first box: instead of saying that 740-guidelines will be followed, will you please explain describe how you will follow them.
  - Page 5: the answer here is confusing because I am not sure if you are addressing 3 AAC 306.455 and 3 AAC 306.465. So, will you please re-read both regulations and describe how you will comply with both regulations, but clearly delineating both answers.

- **MJ-07 Public Notice Posting Affidavit**
  - Did you post the Public Notice at another conspicuous location? The wood post in front of the property as your MJ-07 states does not qualify as a second location to do your public posting as required under 3 AAC 306.025(b)(1).
  - You will need to post your Public Notice at another conspicuous (e.i. the bulleting board of the supermarket, the post office) location for ten days. I will need a new MJ-07 filled out and signed in front of the notary with the information of the other conspicuous location.

- **MJ-09 Statement of Financial Interest**
  - The license type is missing in section 1. Please complete.

- **Proof of Possession for Proposed Premises**
  - The Statutory Quit Claim Deed submitted as proof of possession is not adequate. Please provide a legally binding lease in which only Carol J Waldo is who has right to possession of the proposed licensed premises. The legally binding lease must include:
    - An acknowledgment from the landlord/lessor that the premises will be used a marijuana establishment; and,
    - A disclaimer that the landlord/lessor will not remove from the premises or take possession of marijuana, and AMCO enforcement will be contacted (usually under the "Default" section).

If we do not receive your completions within 90 days, per 3 AAC 306.025(f), you must file a new application and pay a new fee.

Respectfully,

Jane Sawyer, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov