From:	Barret Goodale
To:	Marijuana, CED ABC (CED sponsored)
Cc:	Hoelscher, James C (CED)
Subject:	Re: Public comment pre-registration
Date:	Friday, January 19, 2018 2:54:27 PM

Good afternoon,

I wanted to follow up to my previous email to make clear that I misunderstood Chief Hoelscher. He was giving an example of why a one day holding period would not work by stating the AMCO employees do not work on the weekends. I thought he had said that it was the reason for the three day holding period. I was incorrect. I now understand that this was only an example and not the sole reason for this enforcement practice. I provided a suggestion of only destroying waste on weekdays in order to rectify this conflict. Lastly, Chief Hoelscher has in no way implied that I must provide the solution. I believe that he hopes licensees can work with the regulatory agencies in order to create solutions. With that being said, it is the encouragement from Chief Hoelscher to provide a solution, that is providing me with the courage to stand up publicly and try to make this industry better by modifying regulations so that regulatory authorities can prevent diversion while at the same time allowing cultivators to keep a clean environment and prevent a public health hazard. I hope that this clears up any misinterpretations of my previous email.

Sincerely,

C. Barret Goodale
GOOD Cultivation Manager
907-699-9478

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On Fri, Jan 19, 2018 at 1:54 PM, Barret Goodale <barret@goodalaska.com> wrote:

> I have been encouraged by Cheif James Hoelscher to bring forth a solution to the issue being caused by holding cannabis waste for three days before destruction. I would appreciate the opportunity to make a public comment to the board concerning AMCOs enforcement of a three day holding period for waste. AMCO has asked for the weight of all waste to be reported to them via email including the room of origin of said waste. After notification has been sent, the cultivator must store it in an unadulterated form for three days after the notification before being permitted to destroy the waste.
>
> First, I would like to request conformation that this is what the MCB intended when they adopted the regulations.
>
> Secondly, this three day holding period is bad agricultural practice. Three days of holding waste allows for the propagation of mold, mildew and other pests and disease which may be present on the plant material. The plant material must then be destroyed through grinding as per regs. This would aspirate and spores or bacterial cells, viruses or viroids that could be present and spread the contaminants. The holding period of three days posses a public health threat. Furthermore, This eliminates the foundation of integrated pest management. This would result in the likely hood of more cultivators relying on pesticides.

I would like to request a way to get rid of the three day holding period. I am open to suggestions. However, Chief Hoelsher was adamant that I provide a solution. Therefor, I would like to propose that when weighing the waste, a photo could be submitted with the weight of the waste to insure that the waste to be destroyed is indeed waste and not becoming diverted product. Every facility has cameras so if AMCO had any concern they could review the footage.

Finally, I would like to point out that it was clarified to me that the three day holding period is due to the fact that AMCO doesn't work weekends. Perhaps another solution would be to only destroy waste on weekdays. That way AMCO would always be able to respond or come to inspect the waste without requiring it to fester for three days.

Thank you for your consideration.

Sincerely,

C. Barret Goodale
GOOD Cultivation Manager
907-699-9478

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