

From: [Caleb Saunders](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: License Caps
Date: Monday, August 9, 2021 8:22:00 AM

When I look to the future with my hopes and dreams of what it could be for us I am filled with excitement for the possibilities. I grew up with the misguided belief that the government of our country was going to do what ever it likes regardless of how the people felt. The truth is that our government is still ran by the people. This was proven when Washington and Colorado legalized adult use cannabis sales in 2012. Alaskan and Oregon helped to further prove this when in 2014 we voted as a people to legalize and regulate adult use cannabis sales. It was a powerful moment for me when I realized that we do still have the power to stand together, and as a people we can demand our freedoms through the power of votes. These moments also marked the moments that my partners and I decided to put the "Art Supply Store" idea on the shelf for now, and focus on a new business idea of "Cannabis Retail Store." It is my dream to see the cannabis industry make changes that will help others to chance that american dream. We must make an inclusive economy that allows for innovation as new dreamers chase that american dream.

I still remember clearly sitting on my kitchen table with my heart pounding with excitement that we were truly witnesses change in our country. This had the potential to be another gold rush or .com boom. It was my generations chance to be able to leap forward and seize the American dream of pursuing life, liberty, and happiness. This is even more true for us here in Alaska as we have felt the boom of the gold rush and then the boom of the oil rush. The chance to join the gold rush or oil boom has long since faded and there are fewer, and fewer jobs in these industries for Alaska. There is however one industry that is on the rise and is creating jobs and new tax revenue. The time to join our state's budding cannabis industry and pursue that american dream of financial independence has not passed by. As each new company gains a license, comes online and hires new employees our state's economy is strengthened. We must work to expand and support the industries that are helping to keep Alaska open and operating through jobs and business grown. The rising tide of economy raises all ships, and attempting to sink ships won't bring in the tide.

When we think of sustainable practices we have to consider the people that will be affected after we take what we needed from a situation. The **definition of sustainable** is something that can be continued or a **practice** that maintains a condition without harming the environment. The environment of our economy if a very real thing that needs consideration as much as our ecosystem. There are those that believe this is the time to shut this new industry down and to start capping it's growth by putting a cap on licenses. This is an example of something that will not be sustainable and is a threat that

is coming from within and without the industry. There are current licensees and there consultants the industry looking to line their pockets by preventing others to get into business. This aligns up perfectly with those prohibitionists that have been attempting to stop cannabis industries growth. We must learn from alcohols prohibitionists history if we are to present a sustainable path for ourselves and for the generations that will follow us.

When they admitted the noble experiment of prohibition was a failure and allowed alcohol sales to begin again two things of note happened. First, politicians were quick to put in place license cap that were intended to temper the public's desire for libations. The result of this was to create special interest groups that are very interested in keeping any competition from the market. This has helped to make sure that only those of a specific group are allowed to enter the alcohol industry. Create an environment of pay to play has been part of the systematic racism that is elusive to the extreme creating an elitist view of who is allowed to participate. If license caps were to be placed on cannabis businesses it would only be to continue this elitist view that only a select group is allowed to participate and if you want to join that group you will need wealth already.

Secondly, Harry J. Anslinger needed new criminals to target so he worked to create them for his newly formed Federal bureau of Narcotics. From the beginning, Anslinger conflated drug use, race, and music. "Reefer makes darkies think they're as good as white men," he was quoted as saying. "There are 100,000 total marijuana smokers in the U.S., and most are Negroes, Hispanics, Filipinos and entertainers. Their Satanic music, jazz and swing result from marijuana use. This marijuana causes white women to seek sexual relations with Negroes, entertainers and any others." This is how the "enemies" of the drug war were created and we cannot simply allow this systematic racism to continue to exist in our laws and regulations. Minorities are still being arrested for the very thing that make my business "essential" during lockdowns. Making our rules exclusive and elitist is simply continuing on the systematic racism that was used to make cannabis illegal in the first place.

The pursuit of happiness is still an ideal of our country and is in fact the definition of the American dream. I have to fight to make sure our rules are inclusive and allow for the same opportunity for success that I was given. I cannot work to see rules that work to make other people loose just so some one can have a little extra money when they sell out.

We are in no need as a state or an economy to limit the potential for new businesses in our state.

From: [CED AMCO REGS \(CED sponsored\)](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: FW: License caps
Date: Tuesday, August 10, 2021 10:01:41 AM

Please add this email to the board's email.

Jane

-----Original Message-----

From: Will Brown <willbrown49@icloud.com>
Sent: Monday, August 9, 2021 9:33 AM
To: CED AMCO REGS (CED sponsored) <amco.regs@alaska.gov>
Subject: License caps

Please do not place a cap on licenses. Everywhere such licenses including sales of alcohol have been instituted it allowed those lucky enough to be licensed to turn around and sell what is suddenly a hot commodity.

Further I see no benefit to the state or to local communities in doing so. Please consider.

WL Brown
PO Box 111
Nenana

Sent from my iPhone

From: [CED AMCO REGS \(CED sponsored\)](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: FW: License cap
Date: Tuesday, August 10, 2021 10:03:53 AM

Please add this email to the board's email.

Jane

-----Original Message-----

From: Jennifer Woods <bushratsboutique@gmail.com>
Sent: Monday, August 9, 2021 7:07 PM
To: CED AMCO REGS (CED sponsored) <amco.regs@alaska.gov>
Subject: License cap

I am against a license cap on retail or cultivation's. Thank you Jennifer Woods

Sent from my iPhone

From: [AMCO Admin \(CED sponsored\)](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#); [Alcohol, CED AMCO \(CED sponsored\)](#)
Subject: FW: Public attendee feedback
Date: Tuesday, August 17, 2021 11:10:50 AM

From: Malan Paquette <malanpaquette@yahoo.com>
Sent: Monday, August 16, 2021 6:32 PM
To: AMCO Admin (CED sponsored) <amco.admin@alaska.gov>
Subject: Public attendee feedback

I listened to the Special Meeting today [Alcohol] Control Board, Ethics review, training type meeting.

And wanted to ad that, yes, people view the State of Alaska Online Public Notices. We see where there is a place to attach agenda and this/these boards don't. Some boards even note agenda items in the Public Notice which is most helpful in knowing what's to be discussed at a public meeting or special meeting.

And I attended other public meetings this month which didn't make call-in information available, so thank you for that.

And I appreciate the multi-disciplinary collaboration present at both board(s) meetings [MJ, Alcohol, and staff from DOL].

I attended telephonic.

Thank you.

Sincerely,

Ms. Malan N. Paquette, MA

From: [dollynda Phelps](#)
To: [CED AMCO REGS \(CED sponsored\)](#); [Klinkhart, Glen Edward \(CED\)](#); [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: Public comment for Aug 18 2021
Date: Tuesday, August 17, 2021 8:45:59 PM

Hello, please include for public comment on Aug 18, 2021

I would like to bring your attention to a very serious issue occurring right now in the cannabis industry that needs urgent attention. We have had long standing issues with testing from day 1, including incorrect testing practices, inconsistent test results, and even wrong results being issued.

At this time, since the most recent changes to lab practices, new Method Reporting Limits and new Limits of Quantitation have all affected overall potency of marijuana and marijuana products, as everything from virtually every cultivator and manufacturer is testing considerably lower (unless samples are being dishonestly boosted to get a higher number). Perhaps previous practices were wrong, perhaps previous results were inflated, but either way the consumers in Alaska have come to expect a certain potency with a certain price point. That magical potency number is no longer what it was across the board. Several issues arise from this occurring:

1. First off, a 10g sample of bud ground and homogenized does not in any way represent the potency of a harvest batch of bud. The potency percentage given to a harvest batch in reality does not in any way represent what each bud in the entire batch would test at. It is impossible. This has been faulty from day 1.
2. But this one magical number will determine the price of wholesale products and whether or not businesses can pay their bills and stay in business. A bud previously tested at 25% commands a much higher price than the same bud testing at 15%. Even though it's the same product, grown the same way, a single magical number decides if that product can even be sold.

3. Since the changes to lab practices, almost all results statewide are considerably lower. Prices are falling drastically while the product produced is the same and the cost to produce that product stays the same.

4. I have talked to several cultivators, all are saying the same thing: If consumers continue to buy based on a single, magical number produced by testing labs, many businesses will be out of business in a matter of months. Only those cheating the system for a higher number will survive.

5. Cultivators will be forced to be dishonest in order to stay in business. Some are talking about not even paying the excise taxes because they cannot afford to pay it any longer, some must sell everything to a manufacturing facility because it is testing too low to even sell to retail. Some successful cultivators are now taking on a second job outside of their business just to make ends meet. Eventually, all cultivators will fail leaving black market sales the only option.

The magical potency number was doomed to fail from the beginning, and it should. It is impossible to determine the potency of every bud in a harvest batch based off a homogenous 10g sample, or any amount of sample.

The current potency number also deceives the consumer as it does NOT represent the product being consumed. *A historical RANGE in potency from the lowest that strain has tested, to the highest that strain has tested is the most accurate method of reporting and provides the most accurate information to the consumer.*

Here is an example, Judy goes in to buy some cannabis for her arthritis, but she does not want to overdo it. She relies on an 18% test result labeled on the package, not knowing that the potency listed does not represent the bud she is about to buy. She doesn't know that strain has tested up to 27% but due to new lab practices it has tested at a much lower number, so she indulges. Only to find out later the bud she just smoked was far more potent than the 18% she was led to believe. Judy

is in trouble.

Retail stores have an obligation to educate their customers as much as possible about the products they are selling. Difficult to do with the current system we have.

The Marijuana Control Board is responsible for Public health and Safety protections when it comes to cannabis. Until regulation changes are made to represent a *range of potency* for each harvest batch instead of one false magical number, the Public will continue to be at risk of over consumption and cultivators will continue to struggle to stay alive. No cultivators = no product, no product = no industry. No industry = **STRONG BLACK MARKET.**

Please address this immediately, we have a few months at best before things really go south.

Thank you for your consideration,

Dollynda Phelps

From: [dollynda Phelps](#)
To: [CED AMCO REGS \(CED sponsored\)](#); [Klinkhart, Glen Edward \(CED\)](#); [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: Comments regarding testing issues
Date: Tuesday, August 24, 2021 2:12:15 PM

I would like to bring your attention to a very serious issue occurring right now in the cannabis industry that needs urgent attention. We have had long standing issues with testing from day 1, including incorrect testing practices, inconsistent test results, and even wrong results being issued.

At this time, since the most recent changes to lab practices, new Method Reporting Limits and new Limits of Quantitation have all affected overall potency of marijuana and marijuana products, as everything from virtually every cultivator and manufacturer is testing considerably lower (unless samples are being dishonestly boosted to get a higher number). Perhaps previous practices were wrong, perhaps previous results were inflated, but either way the consumers in Alaska have come to expect a certain potency with a certain price point. That magical potency number is no longer what it was across the board. Several issues arise from this occurring:

1. First off, a 10g sample of bud ground and homogenized does not in any way represent the potency of a harvest batch of bud. The potency percentage given to a harvest batch in reality does not in any way represent what each bud in the entire batch would test at. It is impossible. This has been faulty from day 1.
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Please address this immediately, we have a few months at best before things really go south. I would like to participate with the testing work group if possible, please keep me in mind.

Thank you for your consideration,

Dollynda Phelps
907-252-8026
Peace Frog Botanicals

From: [Marijuana Licensing \(CED sponsored\)](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: FW: McCarthy AK
Date: Tuesday, September 21, 2021 9:14:29 AM
Attachments: [image001.png](#)

Forwarding.



Jacqlene Drulis

Local Government Specialist
Alcohol & Marijuana Control Office (AMCO)
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501
(907) 334-2195

From: Kimberly Meck [mailto:mtak_2000@yahoo.com]
Sent: Saturday, September 18, 2021 10:27 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: McCarthy AK

To whom it may concern

I'm writing to express my strong stance against marijuana being sold in McCarthy AK. This small town is in the middle of a national park. Which puts it on federal lands. Marijuana is still illegal at a federal level. Being that the federal forestry and park service are providing the enforcement of laws., this makes no sense.

Sincerely
KimMeck

Love, Laugh, Live

If you touch someone's heart, your day was well spent.

--Thought of the week--

In our lives either you stay in the shallow end of the pool, or you go out in the ocean. Don't let fear stop you

From: [Alexandra Pepper](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: Retail to manufacturing transfer
Date: Monday, October 4, 2021 3:07:46 PM

To whom it may concern,

I would like to see the transfer of cannabis products from retails to manufacturing added to the regulations. That way if there is undesirable cannabis (whether undesirable buds or retail “waste” products such as trim) can be made into a concentrate and sold to consumers rather than destroying it and wasting resources.

Thank you for your consideration.

-Alexandra Pepper