




<b>Request for Decision</b>	
Meeting Date: October 16, 2018	
<b>Subject: Bylaw No. 2225 – A Land Use Bylaw Amendment respecting Cannabis Related Uses</b>	
<b>Recommendation:</b>	Option 2: That Council moves to adopt Second and Third Reading of Bylaw No. 2225, as Amended, Amending Land Use Bylaw No. 2070 to include Cannabis Related Business Uses and Regulations.
<b>Background:</b>	<p>The Cannabis Act is allowing for Cannabis use, sales, and related matters October 17, 2018 and opens the process for the Alberta Gaming and Liquor Commission (AGLC) to issue licenses for Cannabis related uses in Alberta. Edson Administration has consulted with the public over the summer and publicly advertised the first reading version of Bylaw No. 2225 Amending Land Use Bylaw No. 2070 to accommodate for these forms of business.</p> <p>In advertising of Bylaw No. 2225, the public has identified Land Use District C-3 (Highway Commercial District) was shown as an allowed area for this development, but not included in the draft Bylaw. Further, during the Committee of the Whole meeting October 8th, 2018 Council identified several adjustments which would align Bylaw No. 2225 more closely with the economic opportunities Council desired for Cannabis Related Business. Those adjustments have been included within the attached draft bylaw, and those changes include:</p> <ol style="list-style-type: none"> <li>1. Inclusion Cannabis Counselling Business &amp; Cannabis Store in the C-3 Highway Commercial District.</li> <li>2. Removal of Clause 86(10)(b), which restricted Cannabis Related Uses within 200m of Provincial, Federal and Municipal Government Offices.</li> <li>3. Adjustments to Clause 86(10)(e) removing "... operated by Alberta Health Services or..." so only Approved Hospitals maintain a 200m setback.</li> <li>4. Removal of 86(3) which restricted Cannabis Retail Sales from being located adjacent to a Drinking Establishment or a retail use approved for the sale of alcoholic beverages;</li> <li>5. Removal of Clause 86 (11) which created a 100m separation between a Cannabis Related Use and any other Cannabis Related Use.</li> </ol> <p>A map illustrating setback restrictions under Option 1 &amp; Option 2 has been attached, however both illustrations assume the addition of the C-3 Highway Commercial District will be addressed. The illustrations do not form part of the Town Land Use Regulations.</p>
<b>Legislation/Authority:</b>	Authority to administer Land Use and Development is provided for pursuant to The <i>Municipal Government Act</i> and the locally adopted Land Use Bylaw. The <i>Gaming Liquor and Cannabis Regulation</i> establishes additional local

	authority for setbacks from adjacent land uses, operating hours and other matters which may be addressed in a local development permit.
Strategic Plan Alignment :	<p><b>Diverse &amp; Strong Economic Opportunity:</b> Builds trust our process is equitable and unbiased towards business group.</p> <p><b>Vibrant &amp; Health Community:</b> Collaboration with other organizations to ensure the social well-being of the community</p> <p><b>Public engagement and Governance:</b> Promotes new business opportunity while maintaining the integrity of our policies developed in consultation with the community. Ensuring we are a government which is ethical and respectful of both the business and other landowners rights through consistency and transparency.</p>
Financial Implication:	N/A
Service Level/Staff Resource Implication:	If Option 1 is selected, direction has been provided to address applications on a 'first come, first served' basis. If the removal of restriction between Cannabis related uses is approved as shown in Option 2, no additional impacts to staff or appeal board resources is anticipated.
Consultation:	<p>Two open house sessions where held during the summer at the ends of July and August; 11 members of the public and potential business operators attended these meetings. A Survey was provided to the public via the Open houses, Town website and kiosks at the Civic Center, Rexall Place and Library between the dates of July 18, 2018 and August 29, 2018. 635 survey responses where received and have been compiled into a report including high level analysis of the findings to determine if changes to the draft were required. (Attached)</p> <p>Bylaw No. 2225 was advertised, and a Public Hearings set for October 16, 2018; one letter from the public was received. (Attached)</p> <p>Committee of the Whole occurred October 8, 2018 to discuss the matter of setbacks from other uses in more detail and the changes outlined in the draft bylaw reflect the public and Committee comments provided to Administration.</p>
Alternative(s):	<ol style="list-style-type: none"> <li>1. That Council approves Bylaw No. 2225 as originally provided at First Reading on September 18, 2018.</li> <li>2. <b>Recommendation-</b> That Council approves Bylaw No. 2225 with the amendments shown in the draft bylaw attached to Administrations Report, reducing setback restrictions on Cannabis related uses.</li> <li>3. <b>Defeat:</b> Council defeats Second or Third Reading for Bylaw No. 2225.</li> </ol>
Attachment(s)	<p>Amended Draft Bylaw No. 2225</p> <p>Constraints Maps – Illustrative purposes only</p> <p>Cannabis related uses survey summary report</p> <p>Public submissions</p>
APPROVALS:	
Originated By:	Martino Verhaeghe, Planning and Development Manager
Chief Administrative Office or Designate:	<p>Mike Derricott, CAO</p> 

## TOWN OF EDSON BYLAW NO. 2225



## TOWN OF EDSON BYLAW NO. 2225

A Bylaw of the Town of Edson in the Province of Alberta, pursuant to the provisions of the *Municipal Government Act*, being Chapter M-26 of the Statutes of Alberta 2000 and amendments thereto, to amend the Town of Edson Land Use Bylaw No. 2070 to include Cannabis Related Business Uses and Regulations.

WHEREAS it is deemed expedient and proper, under the authority of and in accordance with the Municipal Government Act, RSA 2000, Chapter M-26 and amendments thereto, to amend the Town of Edson Land Use Bylaw No. 2070, as amended; and

WHEREAS, the public participation requirements of Section 692 of the Municipal Government Act, RSA 2000, Chapter M-26, have been complied with;

NOW THEREFORE the Municipal Council of the Town of Edson, duly assembled, enacts as follows:

1. That Land Use Bylaw No. 2070, being the Land Use Bylaw of the Town of Edson is hereby amended as follows:
2. That in Section 6 Definitions, the wording "Does not include Cannabis or Cannabis Accessories" shall be added to the following definitions:
  - a. "BUSINESS COMMERCIAL"
  - b. "DRIVE THROUGH BUSINESS"
  - c. "HOME OCCUPATION"
  - d. "LIGHT INDUSTRIAL"
  - e. "NONCONFORMING BUILDING"
  - f. "PERSONAL SERVICE ESTABLISHMENT"
  - g. "PLACE OF WORSHIP"
  - h. "PRIVATE CLUB OR LODGE"
  - i. "PROFESSIONAL, FINANCIAL, OFFICE, AND BUSINESS SUPPORT SERVICE"
  - j. "QUASI-PUBLIC USE"
  - k. "REGIONAL BUSINESS OFFICE"
  - l. "REPAIR SERVICE ESTABLISHMENT"
  - m. "RETAIL ESTABLISHMENT"
  - n. "SECOND HAND STORE"
  - o. "SHOPPING CENTRE"
  - p. "WAREHOUSE"

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3. That in Section 6 Definitions, the following wording shall be added:
- a. "CANNABIS" – means cannabis plant, fresh cannabis, dried cannabis, cannabis oil and cannabis plant seed and/or any other substance defined as cannabis in the *Cannabis Act* (Canada) and its regulations, as amended from time to time and includes edible products that contain cannabis.
  - b. "CANNABIS ACCESSORIES" – means a cannabis accessory as defined in the *Cannabis Act* (Canada) and its regulations, as amended from time to time. This is deemed a Cannabis related use.
  - c. "CANNABIS COUNSELLING BUSINESS" – means a business that provides counselling on cannabis use by persons who are not medical professionals and has been authorized by provincial and/or federal legislation. Cannabis consumption, Cannabis Retail Sales, sale of Cannabis Accessories, and sale of any other Cannabis related products is prohibited in conjunction with a Cannabis Counselling Business unless the site has been approved as a Cannabis Store. This is deemed a Cannabis related use.
  - d. "CANNABIS FACILITY" – means a business where the primary use includes the growing, processing, producing, testing, destroying, storing, or distribution of cannabis. Recreational and medical production can occur on the same site that is authorized by Provincial and/or Federal legislation. This is deemed a Cannabis related use.
  - e. "CANNABIS RETAIL SALES" – means a retail store that is licensed by the Province of Alberta where Cannabis and/or Cannabis Accessories are lawfully sold to individuals who attend at the premises that is authorized by provincial and/or federal legislation. This is deemed a Cannabis related use.
  - f. "CANNABIS STORE" – means a premise for the display, resale, and storage of cannabis and cannabis related products which must have a Provincial retail cannabis license. A cannabis store is a stand-alone use, which means it cannot be combined with any other non-cannabis use and may only offer related services and products including Cannabis Retail Sales, Cannabis Accessories sale/rental, and/or Cannabis Counselling. Cannabis stores may occur in a multi-tenant building or as part of a mixed-use development provided the building requirements of the *Gaming Liquor and Cannabis Regulation* are met. This is deemed a Cannabis related use.
  - g. "PUBLIC HEALTH FACILITIES" - means a premise providing health care via the prevention, diagnosis, and treatment of disease, illness, injury, and other physical and mental impairments in human beings. They include hospitals, medical clinics, outpatient care centers, and specialized care centers, such as birthing centers and psychiatric care centers.

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4. That the following wording shall be added as Section 16(4):
  - (4) Cannabis Related Use Applications must include:
    - (a) A site plan, acceptable to the Development Authority, illustrating the location and separation distances from the proposed Cannabis related use to those uses listed under Section 86 of this Bylaw.
    - (b) The Application must include a Certificate of Incorporation for the business as evidence of incorporation in Alberta or extra-provincially registered in Alberta for the exclusive purpose of Cannabis Retail Sales or Cannabis Counselling with each application.
    - (c) A color photo of the existing storefront taken directly in front of the proposed Cannabis establishment, unless the proposal does not intend to alter the existing exterior of the building.
  
5. That the following be added as Section 86:
  - 86 Cannabis Related Use Development Standards:
    - (1) Cannabis Facility, Cannabis Store, and Cannabis Counselling Business are cannabis related uses and will not be considered a like or similar Use to any other commercial, industrial, residential, or institutional use;
    - (2) A Cannabis related use shall be the exclusive business use on the premises and may not be operated in conjunction with a non-cannabis related use;
    - ~~(3) Cannabis Retail Sales shall not be located adjacent to a Drinking Establishment or retail use which is approved for the sale of alcoholic beverages;~~
    - (4) All functions of the Use shall be fully enclosed within the Building;
    - (5) No Outdoor Storage shall be allowed on the Site;
    - (6) All garbage containers, waste material and loading facilities shall be fully enclosed within the Building and shall have a separate loading area;
    - (7) The Use shall not emit nuisances including, but not limited to odour, noise and light, that may have a negative impact to adjacent sites or the surrounding area;
    - (8) Drive through windows are prohibited, all sales must occur within the building, and no delivery services may be offered in conjunction with the business;
    - (9) The business name is to be prominently displayed in signage at all public access points of the Cannabis Related Use;

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(10) A 200m separation distance between Cannabis Related Uses and certain uses is required. This setback is measured in a straight line from the exterior wall of the building containing the Cannabis Related Use to the closest point of a property boundary containing any of the following specified uses:

- (a) Public Use and Parks;
- ~~(b) Provincial, Federal and Municipal Government Offices;~~
- (c) Daycare Facilities;
- (d) Schools and lands owned or designated for future school use; and
- (e) Public Health Facilities ~~operated by Alberta Health Services or~~ designated as an Approved Hospital.

~~(11) A 100m separation distance between a Cannabis Related Use and any other Cannabis Related Use is required.~~

(12) Hours of operation shall be no longer than 10:00 AM to 2:00 AM and may be for a shorter period as identified within a development permit, at the discretion of the Development Authority.

(13) All Cannabis related use permits will be referred to adjacent property owners within 200m of the site and the Royal Canadian Mounted Police for comment for a period of no less than 14 days, or longer as determined by the Development Authority, prior to issuing a decision.

6. That Cannabis Counselling Business be added to the following Districts as a Discretionary Use

- (1) C-1
- (2) C-2
- (3) C-3**
- (4) M-1A
- (5) M-1B
- (6) M-2
- (7) GSIC

7. That Cannabis Store be added to the following Districts as a Discretionary Use

- (1) C-1
- (2) C-2
- (3) C-3**
- (4) M-1A
- (5) GSIC

8. That Cannabis Facility be added to the following Districts as a Discretionary Use

- (1) M-1A
- (2) M-1B
- (3) M-2

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9. This Bylaw shall take effect on third and final reading.

READ a first time this 18 day of September, 2018.

\_\_\_\_\_  
Mayor

\_\_\_\_\_  
Chief Administrative Officer

READ a second time this \_\_\_\_ day of \_\_\_\_, 2018.

\_\_\_\_\_  
Mayor

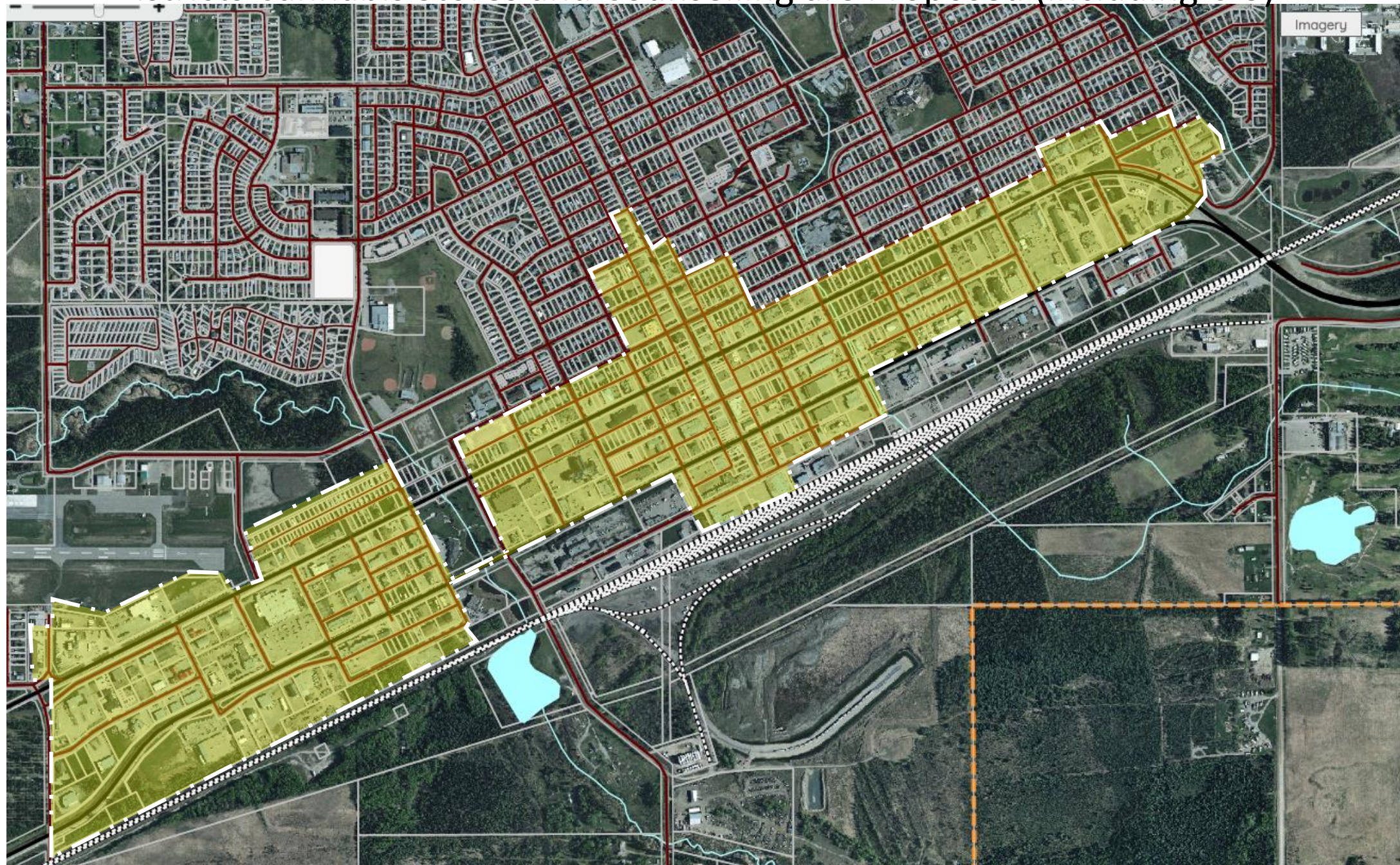
\_\_\_\_\_  
Chief Administrative Officer

READ a third time and finally passed this \_\_\_\_ day of \_\_\_\_, 2018.

\_\_\_\_\_  
Mayor

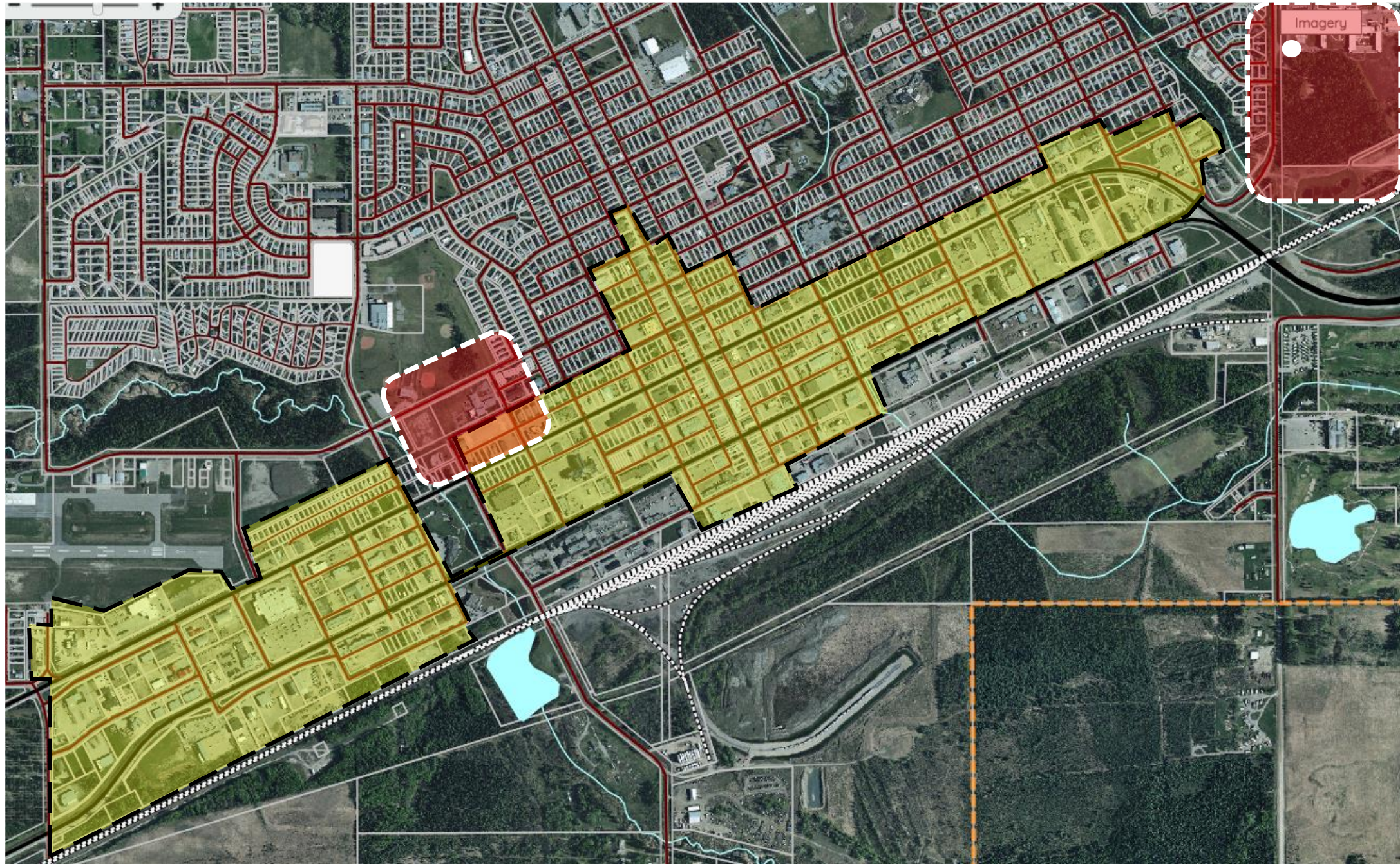
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Chief Administrative Officer

# Districts Cannabis Stores and Counselling are Proposed (including C-3)

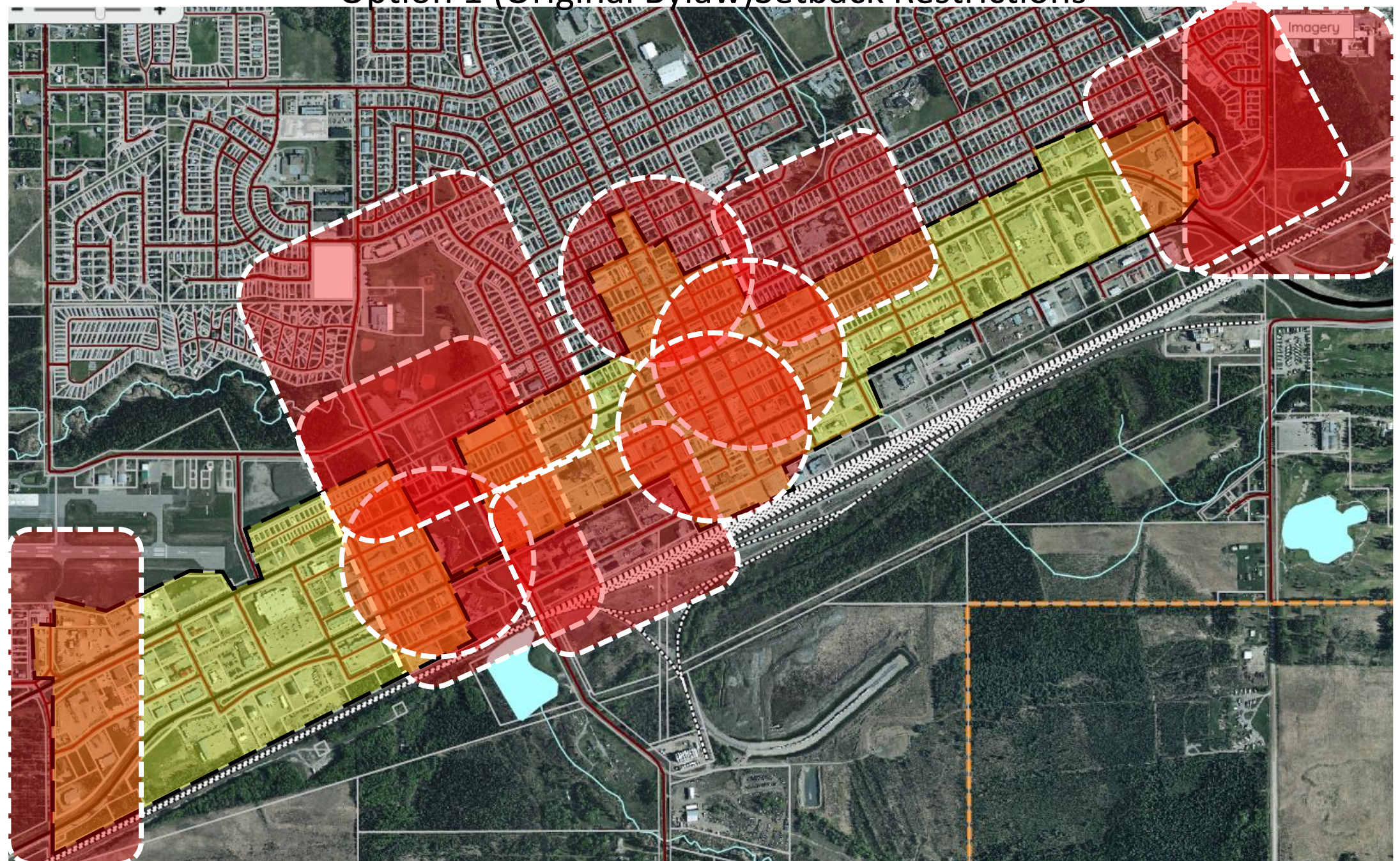




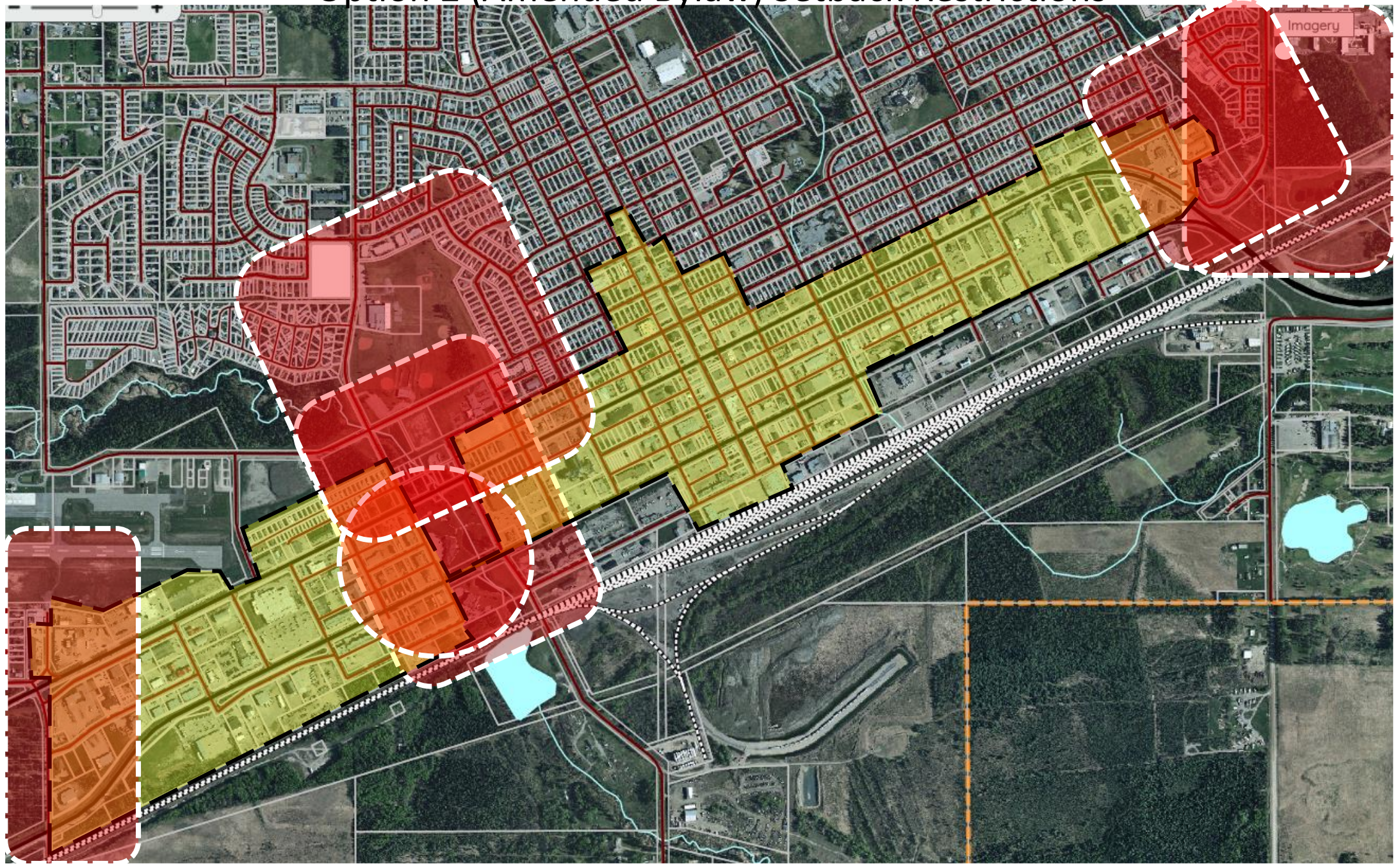
# Minimum Restrictions In Commercial District Under Gaming Liquor and Cannabis Regulation



# Option 1 (Original Bylaw) Setback Restrictions



# Option 2 (Amended Bylaw) Setback Restrictions





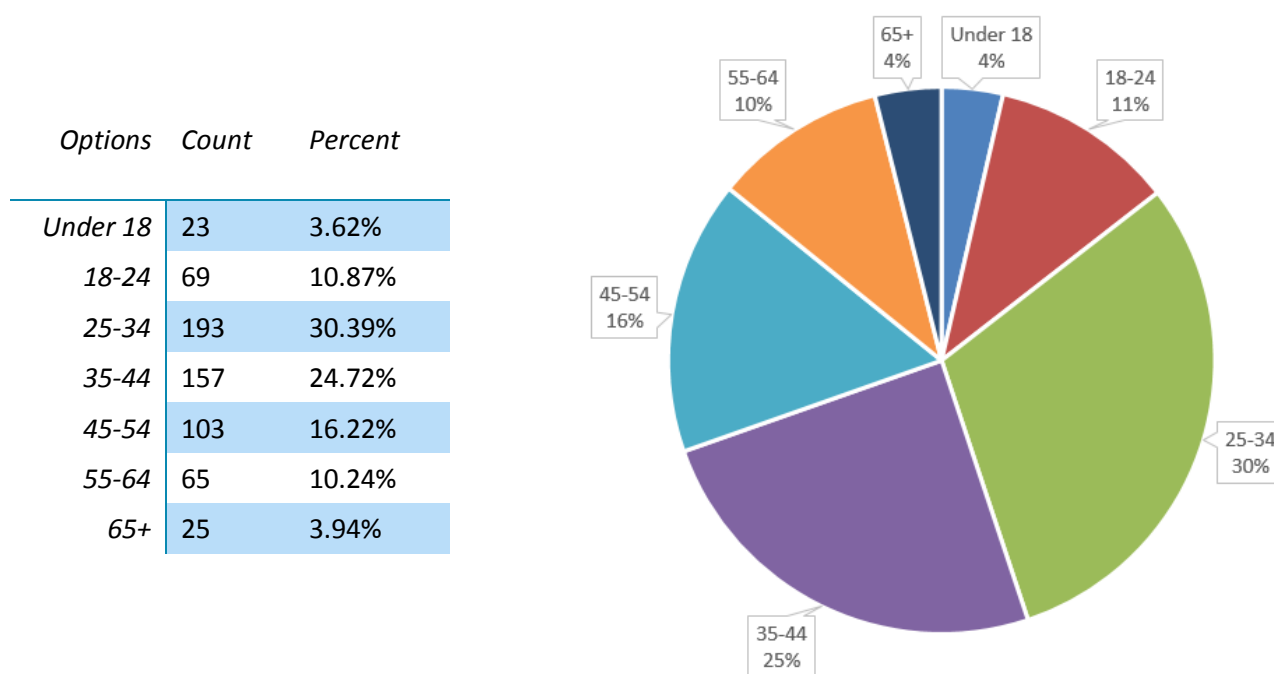
## Summary

The Survey was completed 635 times, which comprises approximately 10% of the population of eligible voters within Edson. The Survey was completed primarily by persons between the ages of 25-44 and 84% of respondents identified as a ratepayer within the Town. Generally, this population supports Cannabis legalization, accepts the proposed land use districts and 200m setback from non-complimentary uses is sufficient mitigate concerns and that growing facilities could be located in non-central industrial areas. One area where no clear consensus can be derived is on Cannabis Lounges, where Cannabis could be both bought and consumed, and this may be a subject which Council seeks to remove from this current bylaw for future consideration.

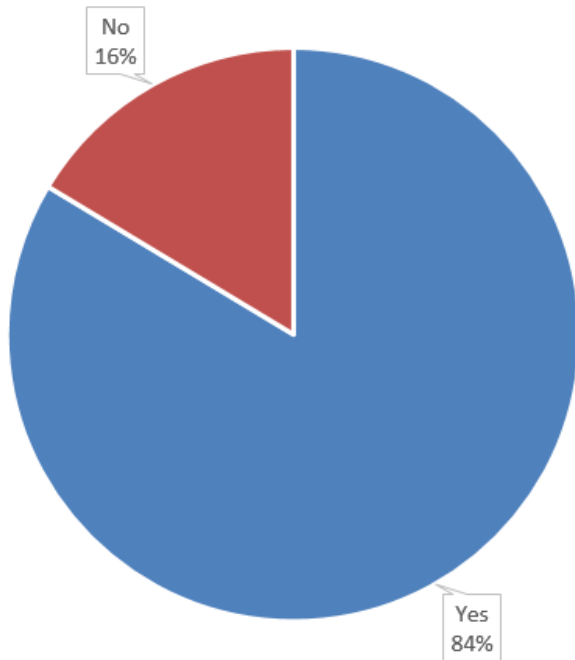
All feedback and comments submitted are presented below in their original unedited form.

### Q1: What is your age?

The Survey was primarily undertaken by the prime working age cohort (ages 25-54), comprising 71% of the 635 total responses

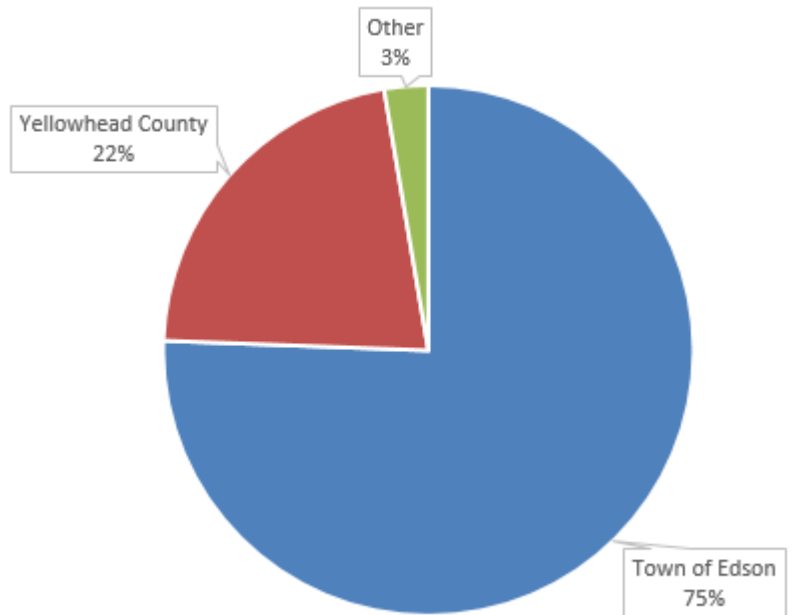


**Q2: Are you a Town of Edson resident or business owner?**



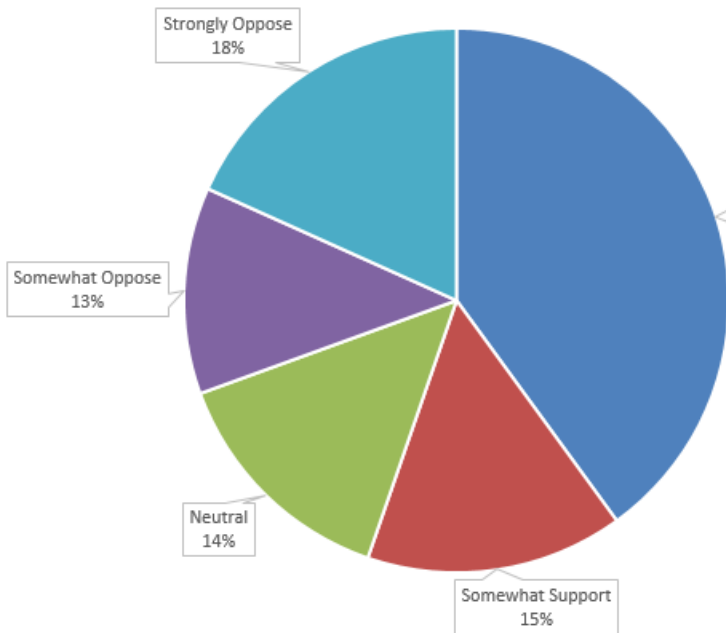
Options	Count	Percent
Yes	531	83.62%
No	104	16.38%

**Q3: Where do you reside?**



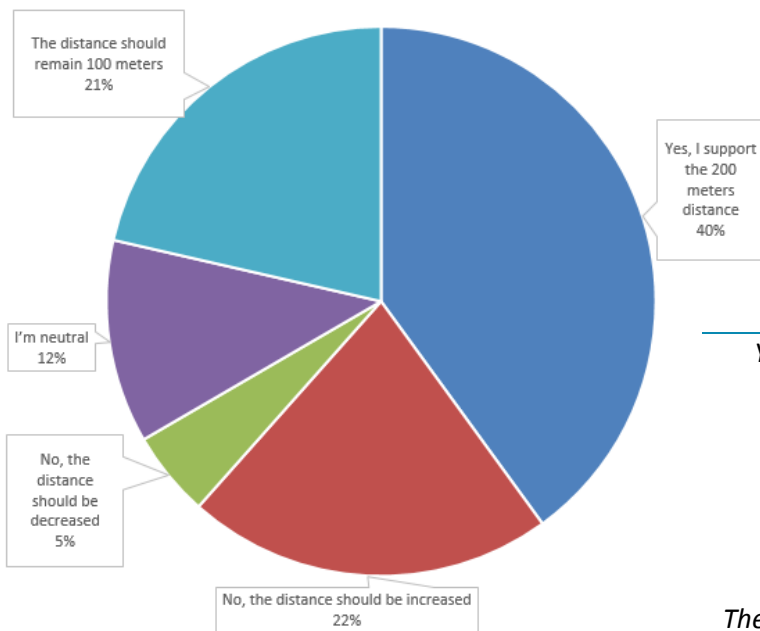
Options	Count	Percent
Town of Edson	480	75.59%
Yellowhead County	138	21.73%
Other	17	2.68%

**Q4: Recreational use of cannabis (marijuana), will become legal in Canada this fall. How strongly do you support the legalization of cannabis?**



Options	Count	Percent
<i>Strongly Support</i>	254	40.00%
<i>Somewhat Support</i>	97	15.28%
<i>Neutral</i>	90	14.17%
<i>Somewhat Oppose</i>	78	12.28%
<i>Strongly Oppose</i>	116	18.27%

**Q5: Government of Alberta requires that cannabis stores be separated a minimum of 100 metres from Provincial health care facilities, schools, and municipal reserve lands. The Town of Edson is proposing these separation distances be set at 200 metres. Do you feel this is a reasonable distance?**

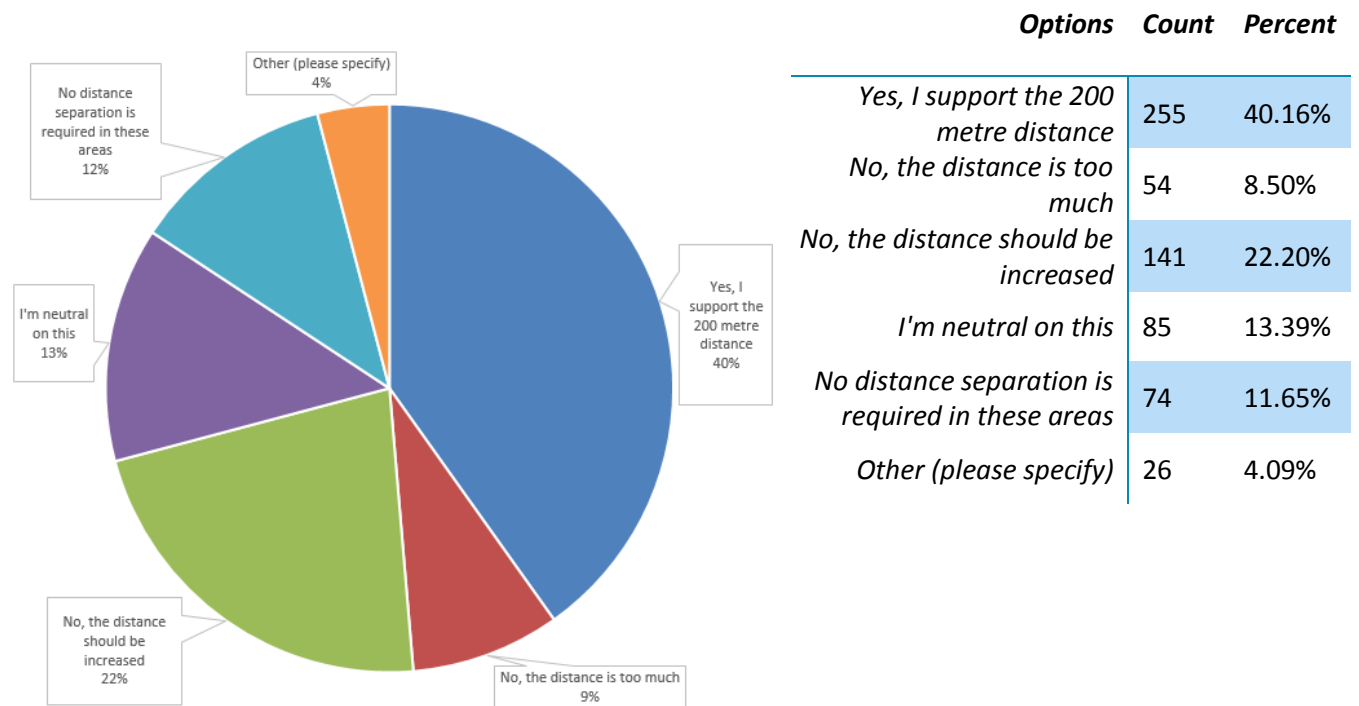


- 22% Feel the setback is insufficient.
- 66% Support 200m or less
- 12% Have no opinion and are therefore not opposed

Options	Count	Percent
<i>Yes, I support the 200 meters distance</i>	254	40.00%
<i>No, the distance should be increased</i>	137	21.57%
<i>No, the distance should be decreased</i>	32	5.04%
<i>I'm neutral</i>	76	11.97%
<i>The distance should remain 100 meters</i>	136	21.42%

**Q6: The Town of Edson is also proposing separation distances for cannabis stores be 200 meters from other cannabis stores, libraries, public parks, recreation facilities and daycare facilities. Do you support the 200-metre separation in these areas?**

62% of respondents support 200m separations from the listed uses or further. Comments relating to the same setback as alcohol retail would remove all setbacks as none are included currently within the Town of Edson Land Use Bylaw. One comment noted that the location of other Cannabis related uses should not restrict the placement of other Cannabis related business due to this being an limitation of business opportunity.



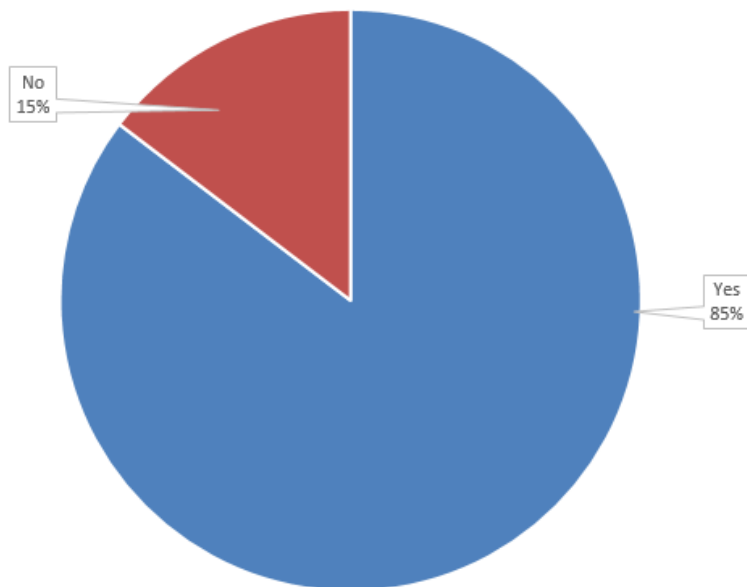
**Other (Please specify):**

- Why? Just use the same rule for liquor stores. There's little difference between the two substances, other than the smoke, and we're allowed to smoke much nearer to these locations than 100 meters.
- I support this distance for all locations except the other stores. I think this limits business competition
- Bla

**Q7: The Town of Edson is proposing cannabis retail sales and counselling facilities be located in C-1, C-2 and C-3 zones (Retail, Service and Highway Commercial). Do you support the allowable Land Use Zone for cannabis retail and counselling facilities?**

**Comments:**

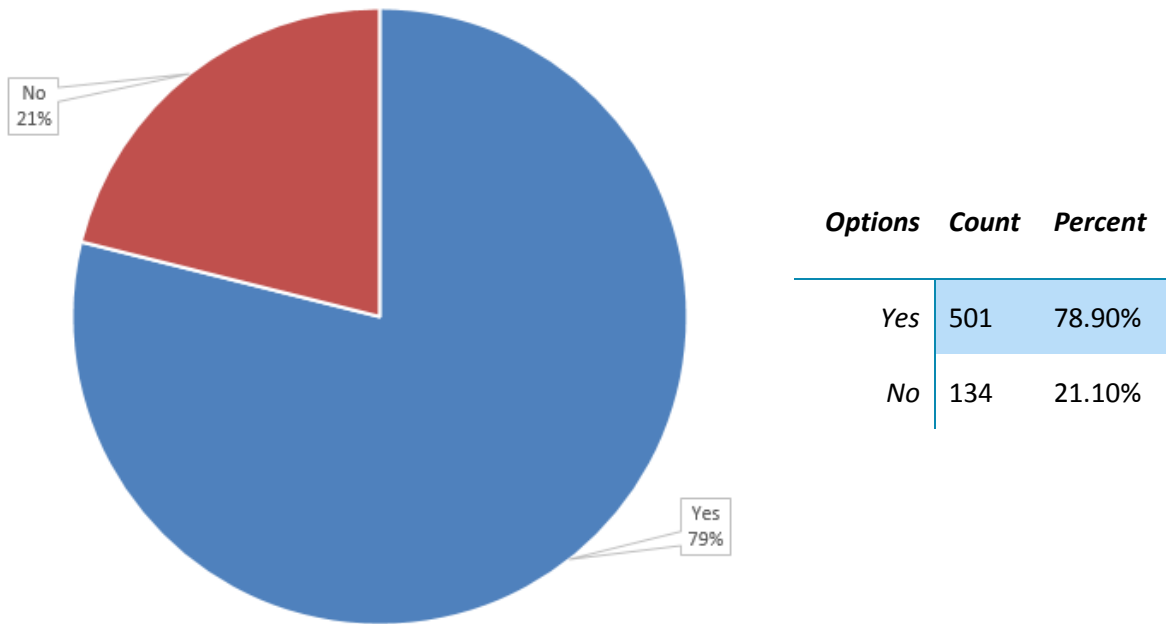
On the survey, you should provide the other designations rather than assumption of knowledge.	Counseling would be fine, we are going to need it. The increased mental health requirements are going to be substantial based on current research.
By the dump	Tucked away not on main street or highways
No stores allowed at all	Shouldn't be allowed in tiwn at all
Don't allow	Only M1 lands. We don't need them right in town
I don't know. Somewhere not easily available.	Hospital/pharmacies
I don't think people will walk into a facility if there is no privacy or remaining annomous	I would prefer not to have to walk by it while doing shopping on main street. The numerous smoke shops are enough.
In the county	Counseling should be available anywhere.
In edmonton	Highway commercial only
Peers	I completely disagree with the legalization of marijuana.
Anywhere is fine	It should only be sold for medicinal use.
Should not be highway commercial	No where near areas children may be
Not in town limits	None don't allow in out town
Nowhere	IM-1A zone. Keep it out of town
Bla	outside of Edson Town limits
None	Not in support of retail facilities.
Don't do it please	counseling facility is always a good idea
Give me options	Industrial area if at all.
None	Retail only



<i>Options</i>	<i>Count</i>	<i>Percent</i>
Yes	542	85.35%
No	93	14.65%



**Q8: The Town of Edson is proposing that cannabis growing facilities be allowed in M-1A zones (Light Industrial). Do you support the allowable Land Use Zone for cannabis growing facilities?**



**Comments:**

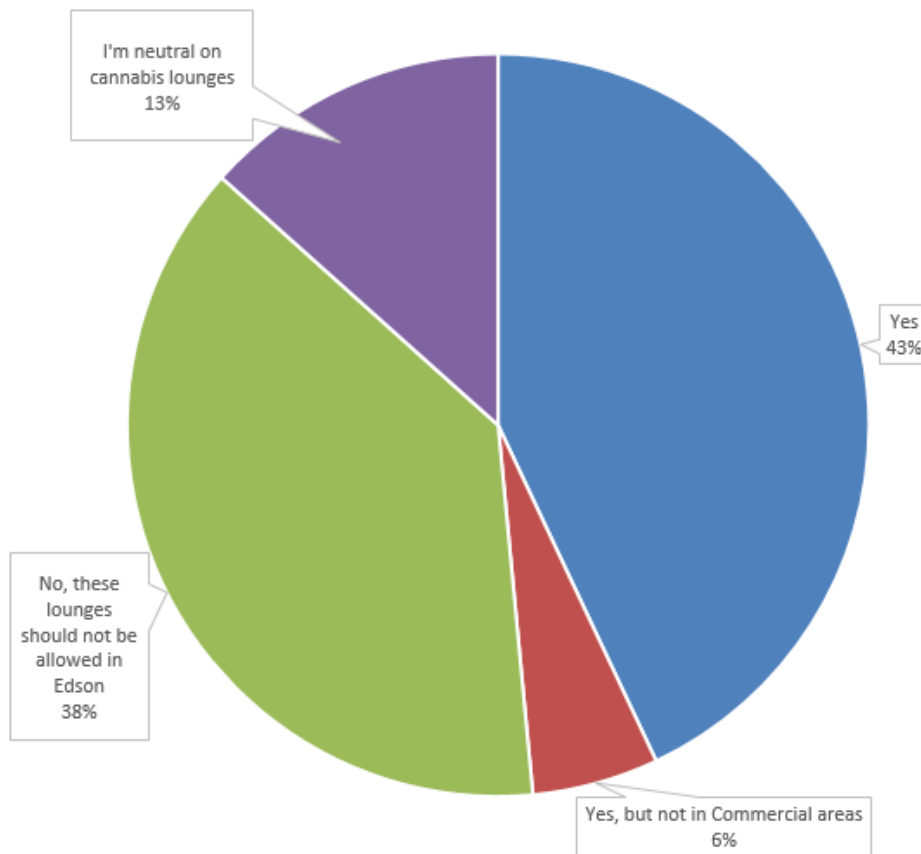
Commercial vs personal. Poorly worded question.	Out of town
Should be out of town limits.	Out of town
Don't build it	Out of town
Far from me	Unsure
No marijuana in Edson please	Agricultural only
Not in edson	Agricultural zones
Outside town limits. In the county several KMs from town	I thought that was what peers is ? Do we need one in edson ??
Agricultural land	Much further than town limits.
By the landfills	Out of town
I don't know. I don't want it anywhere	I don't know
Not here	It should only be grown for medicinal use
Personal (2 plant) growing must be permitted at home	As far away as possible
In the county	Farm Land

Edmonton	Outside town
Peers	Out of town, no grow operation should be allowed within town limits
Not in town	Should not be allowed in town or the surrounding county
Outside town limits	Not within town limits
No grow ops	County land not in town
Nowhere	Many miles outside of Edson
Nowhere	Nowhere in town
Bla	Not interested in having this in our community
Rural areas as long as neighboring properties are in in agreement	No growing within the tow limits
None	Further away so it is not so accessible to teens
Any area	none
	Heavy industrial
<p>the moon! This is the most dangerous and stupid move from our government. It is going to cause untold havoc to our society. How come suddenly no one talks about second hand smoke??? If someone drinks it doesn't effect me if I am near them but now I have to breathe in that stuff in public places????? Campgrounds, residences, parks???? have we really come to this?! A 'stoner culture'??? What about cannabis candies? How many children will be exposed to these? it already has been proven to harm development of brains? Again... total stupidity</p>	
I personally beleive cannibis grow locations should be out and away from the communities.	No where
Areas out if town not close to areas where people live	There is lots of agricultural land available for this type of use. Please keep it out of the town limits.
Out of town limits	None
Industrialized	None
I thought grow ops were granted licences and those were only a handful. We have grow op in Peers does this supply the towns cannibis or will it be from a grow op in another town city or province?	There are going to be more than enough grow facilities in Alberta. There';s already one in the Peers area. I don't support another within town limits.
In the County only	Why do we need another grow - op in the area when Peers already has one?

**Q9: If Provincial regulations allow, would you support the inclusion of cannabis lounges (for consumption of cannabis) in Commercial zones?**

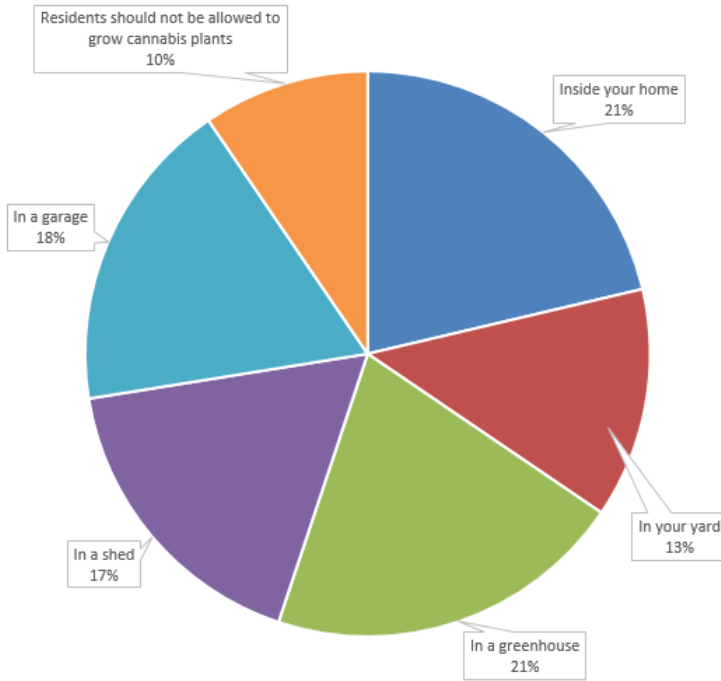
Cannabis Lounges are proposed within the current Draft of Bylaw 2225.

These uses are proposed to be located in Commercial Districts. There is a clear division on public opinion for this use spanning age groups and would also be the most likely to have impacts with regards to parking, operating hours and other more complicated social issues. As this is not currently a business model being approved by the Alberta Gaming and Liquor Commission, it could be removed and added by a future amendment once those rules and regulations are in place, if desired, without undue hardship to ‘in progress’ licensing applications.



<i>Options</i>	<i>Count</i>	<i>Percent</i>
Yes	273	42.99%
Yes, but not in Commercial areas	35	5.51%
No, these lounges should not be allowed in Edson	242	38.11%
I'm neutral on cannabis lounges	85	13.39%

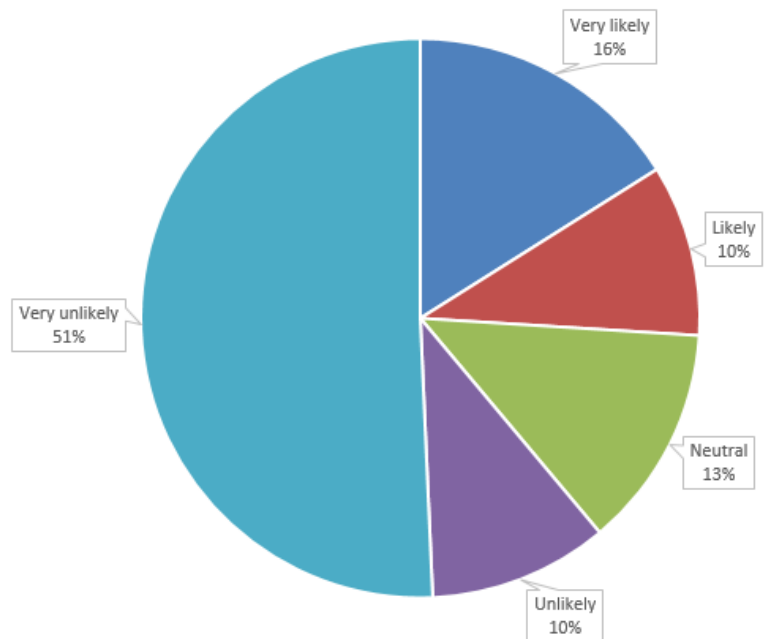
**Q10: Where do you think it should be acceptable for homeowners to grow cannabis plants? (check all that apply)**



Options	Count	Percent
Inside your home	398	21.32%
In your yard	246	13.18%
In a greenhouse	385	20.62%
In a shed	324	17.35%
In a garage	336	18.00%
Residents should not be allowed to grow cannabis plants	178	9.53%

**Q11: When cannabis is legal, how likely are you to grow cannabis on your property?**

Options	Count	Percent
Very likely	102	16.06%
Likely	63	9.92%
Neutral	82	12.91%
Unlikely	66	10.39%
Very unlikely	322	50.71%



October 5, 2018

Engineering and Planning Department  
605 – 50<sup>th</sup> Street P.O. Box 3600  
Edson, AB T4N 3T4

**VIA EMAIL:**

**Attention: Keri Mitchell, Development Officer**

**Re: Request to add “Cannabis Retail” to the list of discretionary uses in Zone C-3 (Highway Commercial);**

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## Background

We currently operate a Liquor Depot at 4524 – 4<sup>th</sup> Avenue, (the “Proposed Site”) in Edson, which has serviced the community in Edson since 2007. After ten successful years of operating from this location, the legalization of recreational cannabis has created a new opportunity to maintain our position as a premier retailer in Edson through a conversion of the store from liquor to cannabis retail sales. With over 25 years of experience in the retail sale of liquor, and a new partnership with Alberta’s largest cannabis producer, Aurora, we have positioned ourselves to be the most reliable, affordable and professional cannabis retail provider in the province.

This letter is a request to the Edson Engineering and Planning Department to add “Retail Sale of Cannabis” to the list of Discretionary Uses in Section 128 of Land Use Bylaw 2070. Section 128 of Land Use Bylaw 2070 deals with land that is zoned C-3, “Highway Commercial”. Zone C-3 is perhaps the most suitable place for cannabis retail stores to operate in Edson. It is in a commercial zone far away from schools, hospitals, day cares, and recreation centres, and other areas where children might gather. Other Municipalities in Alberta, including Edmonton, Lethbridge, Drumheller, Okotoks and Sylvan Lake have included cannabis retail stores as either a permitted use, or a discretionary use, in their Highway Commercial Zones.

Development Officers in Edson have mentioned that it is unlikely for Council to pass “Retail Sale of Cannabis” under Zone C-3, as Retail itself is already listed as a discretionary use. Furthermore, we were directed to submit a proposal to request the addition of Zone C-3 under the Cannabis Bylaw No. 2225 as a discretionary use, which could potentially increase the likelihood of Council approval. Highway Commercial Property Zone C-3 has as its general purpose, “to provide for a range of commercial uses to serve the traveling and local public using Highway 16<sup>1</sup>”; we believe

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<sup>1</sup> Land Use Bylaw 2070, Section 128, page 208.

the retail sale of Cannabis is consistent with the general purpose, and more importantly, addresses the concerns of the Province and the Town of Edson.

### **Reasons for Requesting Cannabis Retail be added to the list of Discretionary Uses**

The intention of the Provincial Government when implementing restrictions on the location of cannabis retail stores was to keep cannabis stores away from schools and hospitals. The Town of Edson has further expanded this list to include day care facilities and city-operated recreational facilities. The Proposed Site is not within the 100m provincial restriction, nor within to 200m municipal restriction, of any of these sites. As you can see in **Exhibit A**, our Proposed Site is 300m from Mary Bergeron School, 550m from Edson Public Library, 1,000m from the Edson Recreational Facility, and even further from the nearest Hospital or Daycare.

Our Proposed site, which is zoned in the Highway Commercial area, exceeds all of the criteria required of a Cannabis Retail store in Edson; the site is at least:

- 200 Metres from a School [Actual = 300 Metres];
- 200 Metres from a Daycare [Actual = 1,600 Metres];
- 200 Metres from a Hospital [Actual = 1,300 Metres];
- 200 Metres from a Library [Actual = 550 Metres];
- 200 Metres from a Recreation Facility [Actual = 1,000 Metres]; and
- 200 Metres from a Park [Actual = 300 Metres].

In addition, the Proposed Site is well-lit, inward-facing, and located in an established site with plenty of parking, access and traffic (See **Exhibit A**). It is a location that will meet the objectives of deterring crime and not attracting children. It is a location where Cannabis Retail Sales are intended to be located.

### **Our Plan for Cannabis Retail Stores**

We plan to open a Cannabis Retail Store in the Proposed Site as part of our chain of Cannabis Retail Stores across the province. We are an established company with over two decades of experience operating in the heavily regulated liquor industry.

The Proposed Site will be operated by Alcanna Cannabis Stores Limited Partnership. We are an Edmonton based, TSX listed public company and an active member of the community. Our affiliated companies have been liquor retailers in Alberta since privatization, under the operating names of Wine and Beyond and Liquor Depot. We operate 178 liquor stores in Alberta and 228 in total. We operate additional liquor stores in BC, Alaska and Connecticut. Last year, we processed just under 20 million transactions in our liquor business. Today, we have a thriving and diverse workforce, most of whom come from the immediate areas of our stores. In addition, we have put roughly \$5 million dollars back into the community in recent years. We are taking our experience and reputation as a first-class and responsible retailer into the cannabis space. We are building a responsible brand based on a history of building local

relationships and being trusted by regulators, landlords, communities and customers. We pride ourselves on working collaboratively with all regulators and promoting social responsibility. We will carry this on in Cannabis, going above and beyond regulated requirements in everything from store security to how we ID customers. Examples of how we will do this are with key card access technology in various “gates” in the store, magnetic and trackable locking systems for our display cases, and additional cameras. We create a site-specific security plan for each store. We also have a robust Loss Prevention team focused on mitigating risk and exposure for our employees and customers.

Our real estate focus is on large commercial developments with sophisticated landlords that prefer our upscale and mature concept. These types of locations are also important for employee and customer safety. **Exhibit B** is a concept photo of our retail store front. We have chosen to use inset screens in our front windows rather than masking to allow natural light to enter our stores. Our spaces are bright and clean by design. **Exhibit C** is a concept photo of the inside of our stores. The store is designed to be engaging to allow our highly trained customer experience representatives to provide meaningful service to our customers. **Exhibit D** is a concept photo showing our secured products in the store. Cannabis will be stored in our vault until it is ordered. All accessories are kept behind glass with a magnetic locking system. This store concept will be ahead of the curve and lead the market to responsible use and consumption of cannabis.

We want to bring cannabis into the open and help eliminate the black market and irresponsible sales by removing the stigma and aligning our store concept with other first-class retailers.

Thank you for your consideration of this matter.

Yours truly,

**Alcanna Cannabis Stores Limited Partnership**

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Kerry Rempel  
Senior Vice President, Real Estate  
*encl.*

**EXHIBIT A – Aerial View of Proposed Site and Street view of Proposed Site**





**EXHIBIT B – Concept Photo of our Retail Store Front**



# Store Front

Borealis banners behind exterior windows ensure compliance with regulators while allowing for nature light.

**EXHIBIT C – Concept Photo of Interior of our Retail Stores**



# Engaging Layout

Shoppers are free to explore and engage as they browse.

**EXHIBIT D – Concept Photo of Secured Product within our Retail Stores**



# Secure Product

Cannabis will be in a secure area managed by a Cannabis Experience Representative.