



April 18, 2018

**RE: CANNABIS LAND USE FRAMEWORK**

Dear Ms. Anne Stevenson and Mr. Colton Kirsop,

On behalf of NAIOP Edmonton, we would like to relay the comments of our members on the proposed Cannabis Land Use Framework and suggest alternatives.

Overall our members felt the regulations balanced the needs of this major new industry to open new stores in commercial areas, with the need to keep controlled substances away from areas where children would be present. Members were also satisfied with maintaining the current process followed for medical cannabis production facilities (in industrial areas) for legal recreational cannabis.

Industry felt that the separation distance of 100m between cannabis retail and alcohol sales was unnecessarily restrictive. Educational campaigns will be far more effective than a 100m (~1min walk) separation distance in “minimizing co-use.” In reviewing the city’s jurisdictional analysis, other municipalities including Calgary and Fort Saskatchewan did not propose this restriction. A 100m separation will cause additional municipal approval staff time, in an already highly regulated industry, without achieving any measurable goal.

We do believe that separating the uses in separate retail units is appropriate to ensure that the retailer has the proper education, security, and sales framework. This can be accomplished by amending the proposed bylaw to state that cannabis and retail units cannot share a demising wall.

Some members also felt that the 100m separation distance from all parks was more adequately covered by discretionary use, unless near playgrounds, school reserve, and municipal and school reserve. This would encourage more linear parks and free up areas such as those next to railtown park, and mill creek ravine which do not need to be restricted.

We look forward to your response to this letter and the ongoing relationship between the City of Edmonton and NAIOP Edmonton on this topic and upcoming topics which influence the commercial development industry in Edmonton.

Sincerely,

NAIOP Edmonton

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