

PUBLIC ENGAGEMENT SUMMARY

From November 14 to December 13, 2017, the City of Edmonton hosted stakeholder workshops, open houses and an online survey to gather public feedback on cannabis legalization. The engagement activities were focused on four key topic areas to help Administration prepare for legalization:

- Where future cannabis stores should be allowed to locate
- What to consider for the application/licensing process for cannabis stores
- How smoking and vaping of cannabis in public should be restricted
- What key information stakeholders need to understand cannabis legalization better

This public engagement summary is focused on the feedback heard related to the land use impacts and location of cannabis retail stores. The following public engagement activities were held:

- An **online survey** available from November 14 to December 7, 2017 to gather input from Edmontonians about their opinions on different aspects of cannabis legalization. The survey was available through the Insight Community and the project website, and received over 4100 responses.
- Four **stakeholder workshops** throughout November and December, 2017 to discuss in more detail preparing for cannabis legalization. In total approximately seventy five people attended a workshop.
- Five **public open houses** throughout November and December, 2017 attended by over 600 people. At these open houses attendees could learn about and provide feedback on cannabis legalization.
- A three and a half week **circulation** to stakeholders to share the draft land use framework report and attachments for feedback. Administration emailed the draft land use framework to external stakeholders including the Edmonton Federation of Community Leagues, Business Improvement Areas, and members of the general public who had signed up to be on the cannabis legalization stakeholder list. The draft land use framework was also available during the circulation period on the City cannabis legalization webpage.

Find an overview of each engagement activity and the feedback received in the following pages.

CIRCULATION | February 23 - March 21, 2018

As part of the standard circulation process for proposed Zoning Bylaw changes, Administration emailed a draft of the committee report and attachments to over 600 external stakeholders, including:

- Members of the general public and the business community who had indicated their interest by signing up to be on the stakeholder list
- Edmonton Federation of Community Leagues and all individual Community Leagues
- Urban Development Institute
- Canadian Home Builders Association
- Business Improvement Areas
- Health organizations and non-profits
- Adjacent municipalities
- Public and Catholic School Boards

Stakeholders had the opportunity to provide feedback during the three and a half week circulation. Administration received 55 responses and their comments are summarized below grouped by common theme.

STAKEHOLDER GROUP	COMMENTS
Separation Distance from Alcohol	<ul style="list-style-type: none"> ● 32 stakeholders stated that the proposed 100 m separation distance between cannabis stores and liquor stores should be removed or significantly reduced for the following key reasons: <ul style="list-style-type: none"> ○ Liquor stores are located in almost all strip malls, shopping centres and commercial areas - requiring separation from them will severely limit the options for cannabis stores to locate in Edmonton ○ There is not a clear rationale for why these uses should be separated and it is not supported by research ○ No United States jurisdictions require this separation ○ Both substances will be legal and adults should be able to make informed decisions about using alcohol and cannabis

	<ul style="list-style-type: none"> ● 4 stakeholders either supported the proposed 100 m distance or wanted to see a larger separation between alcohol and cannabis stores
<p>Zones to allow Cannabis Retail Sales</p>	<ul style="list-style-type: none"> ● 2 stakeholders requested that the Cannabis Retail Sales use be added to the Business Industrial (IB) zone as it is typically located adjacent to commercial areas and on accessible roads, and allows a number of commercial uses already ● 4 stakeholders wanted to see Cannabis Retail Sales added to a specific Direct Control Zone to increase the opportunity for cannabis stores and reduce the costs for applicants to rezone sites themselves
<p>Other separation distances</p>	<ul style="list-style-type: none"> ● 11 stakeholders expressed support for the proposed separation distances between cannabis stores, parks, schools, and recreation centers ● 5 stakeholders indicated that they supported the 200 m separation between cannabis stores, while 1 stakeholder thought this distance should be reduced ● 3 stakeholders wanted to see larger separation distances between uses to align with information from Alberta Health Services ● 1 stakeholder thought that cannabis stores should be separated from day care/child care facilities ● 1 stakeholder thought that cannabis stores should not be treated differently than a drug store or liquor store when it came to separation distances ● 1 stakeholder thought that there should not be a separation distance between cannabis stores and parks

Online Survey | November - December, 2017

Introduction

To help prepare for cannabis legalization, City of Edmonton staff conducted an online survey from November 14 - December 7, 2017. The survey received over 4,100 responses (1,908 through the Insight Community and 2,213 submitted through the website). This survey provided an opportunity for the public to:

- Answer some key questions about cannabis retail stores
- Indicate how they feel about smoking and vaping cannabis in public
- Identify the main issues they are concerned about or want more information on related to cannabis legalization

Survey results related to cannabis retail stores are provided below.

CANNABIS STORE LOCATIONS

What kinds of locations in Edmonton are the best fit for cannabis stores?

64.8%	ON MAIN STREETS WITH A MIX OF COMMERCIAL USES AND ACCESS TO TRANSIT Ex - Whyte Avenue, 124 Street
55.5%	IN COMMERCIAL AREAS ALONG MAJOR ROADWAYS Ex - Stony Plain Road, Gateway Boulevard
40.5%	IN CENTRAL AREAS LIKE DOWNTOWN OR NEAR MAJOR LRT STATIONS Ex - Century Park, Clareview
34.2%	IN LIGHT INDUSTRIAL AND BUSINESS PARK AREAS
32.5%	SHOPPING CENTERS Ex - Kingsway, Southgate, Londonderry
32.4%	SMALL SCALE COMMERCIAL AREAS IN RESIDENTIAL NEIGHBOURHOODS
9.8%	I DON'T KNOW

SEPARATION BETWEEN CANNABIS STORES

I am concerned about how close cannabis stores will be to each other.

38.1%	AGREE
35.5%	DISAGREE
26.4%	NO OPINION OR DON'T KNOW

How far apart should cannabis stores be from each other?

32.1%	NO SEPARATION
3.6%	1 BLOCK APART
5.8%	2 BLOCKS APART
13.9%	½ KM (500 M) APART
30.2%	1 KM (1000 M) APART

SEPARATION BETWEEN CANNABIS STORES AND SENSITIVE USES

I am concerned about how close cannabis stores will be to places where children and youth gather

67.8%	AGREE
20.5%	DISAGREE
11.7%	NO OPINION OR DON'T KNOW

How far apart should cannabis stores be from schools, community centres, parks and playgrounds?

13.5%	NO SEPARATION
2.3%	½ BLOCK APART (75 M)
8.5%	1 BLOCK APART
16.5%	200 M
59.3%	MORE THAN 200 M

Stakeholders were able to add any additional comments they had at the end of the survey. Below is the number of comments related to specific land use issues. Six comments pulled randomly are listed to provide a sample of some of the opinions of survey respondents.

146 Comments about cannabis store locations and separation distances

88 Comments stating a desire not to over-regulate cannabis legalization

53 Comments about interest in allowing cannabis cafes/lounges

40 Comments about the cannabis application process and the impact of cannabis on the economy

“There is a head shop across the street and approx. ½ block from my neighbourhood library - if this location was to be a dispensary after legalization I feel that this is too close.”

“Cannabis outlets should be under the same rules as that of liquor stores as for distances from schools, etc. No-brainer. Places where recreational consumption can take place - same rules as that of alcohol. It would not be fair otherwise.”

“I am somewhat afraid that Pot Stores will be like liquor stores and be on every corner. While it may be legal, doesn’t mean it has to be easy to buy, after all we are not talking about groceries here.”

“In my opinion I believe that Cannabis use should be permitted anywhere that tobacco use is allowed, including Cannabis cafes. Cannabis does not cause people to be belligerent or violent and therefore I don’t believe it should be restricted like alcohol. Edmontonians should be allowed to enjoy recreational Cannabis responsibly in their city instead of restricting it or forcing it underground.”

“I would suggest distance between stores should allow approximately one or less than one store per neighbourhood. If set up correctly from the start, we can avoid concerns such as the concentration of liquor stores in certain areas of the city.”

“Don’t worry so much about where the stores are. Let a free market decide which locations serve the customers the best.”

Stakeholder Workshops and Open Houses November - December, 2017

Introduction

City of Edmonton Administration held four stakeholder workshops to discuss the legalization of cannabis. The workshops were organized around small table discussions facilitated by City of Edmonton staff. The following stakeholders were invited to each workshop:

- **Session One** - members of the REACH Cannabis Coalition, which includes representatives from law and bylaw enforcement, Edmonton Fire Rescue Services, the Edmonton Chamber of Commerce, and utility companies
- **Session Two** - members of Business Improvement Associations and human resources-related cannabis consulting businesses
- **Session Three** - general stakeholders that inquired with the City about cannabis legalization and provided their email address for engagement opportunities. The majority were individuals interested in opening a cannabis store after legalization.
- **Session Four** - members of health and non-profit organizations, stakeholders involved in medical cannabis, and Indigenous communities

City staff also invited the public to attend Engage Edmonton events on November 14, 16, 23, 30 and December 30, 2017. Engage Edmonton events were open houses held throughout Edmonton and open to anyone. At these open houses attendees could learn about and provide feedback on multiple City projects, including cannabis legalization.

Engagement Summary

Below is brief summary of some of the key points Administration heard at the stakeholder workshops and Engage Edmonton events. Detailed comments are provided in the following pages.

- **Cannabis store locations** - Stakeholders expressed a range of opinions on location, but many noted the need for good visibility and not confining stores to industrial or out-of-the-way locations.
- **Separation from cannabis stores** - Most stakeholders agreed that separating cannabis stores from schools was important. There were different perspectives on what other places cannabis stores should be separated from and how large the distances should be.
- **Cannabis store application process** - Many stakeholders noted the need for an efficient, fair process, the desire for clear communication and information sharing with applicants as soon as possible, and the need for good review of security measures at stores.
- **Notification for new cannabis stores** - Many stakeholders stated that notification processes for new cannabis stores should be the same as any other development type and to be cautious of creating another hurdle in the application process. A few stakeholders wanted to see notification for information purposes even if there was not an opportunity to protest a new store opening.

CANNABIS STORE LOCATIONS

Possible locations for cannabis stores

- Some stakeholders thought these locations would be appropriate for cannabis stores:
 - Strip malls
 - Main streets
 - Downtown
 - Malls
 - Streets like Whyte Avenue, Jasper Avenue, 124 Street, and Stony Plain Road
 - Anywhere liquor stores are allowed
 - Industrial areas
- Others thought that cannabis stores should be limited in entertainment districts like downtown and Whyte Avenue because the dangers of mixing alcohol and cannabis would create policing challenges
- The following criteria were thought to be important for deciding location
 - Areas with lots of foot traffic
 - Good visibility and eyes on the street
 - Commercial areas, not in the middle of residential neighbourhoods
 - Good parking access
- It was noted that cannabis stores could be a positive part of the community if they are well done and fit into the culture of the business area

Clustering cannabis stores

- There were different opinions about clustering cannabis stores together
- Some felt that this could create a destination where people would know where to go to access cannabis and it was separate from bars and nightclubs and easier to police
- Others were concerned about accessibility to stores and that clustering would require everyone to drive to purchase cannabis
- Some stakeholders thought spreading cannabis stores across the City to improve access would be a better model

	<ul style="list-style-type: none">● Some stakeholders noted that liquor and tobacco stores tend to cluster in areas with vulnerable populations and it is important to consider this when deciding where cannabis stores can be located<ul style="list-style-type: none">○ Need to consider the perception of stores clustered and how that normalizes cannabis use
The number of cannabis stores	<ul style="list-style-type: none">● There was concern about locating too many cannabis stores in main street or Business Improvement Areas and the potential negative connotations if there was lots of cannabis stores on one block, rather than a diversity of businesses● Some stakeholders want to see a limit on the number of stores that can open in Edmonton<ul style="list-style-type: none">○ Some felt a cap would allow the City to proceed with caution and see what the impacts are and that online sales would still allow access to cannabis even if there are not that many stores open at first● Some thought piloting a smaller number of stores to start, perhaps based on a certain number per population would be a good tactic● It was mentioned that if some municipalities in Alberta choose not to allow cannabis stores, Edmonton may see more store applications● Many stakeholders did not like the idea of a cap on the number of stores for the following reasons:<ul style="list-style-type: none">○ It could limit access, which would drive people to the black market○ It could result in a bad operator sticking around, instead of naturally being forced out if a better operator is allowed to open up nearby○ There will be different styles of cannabis stores catering to different markets so different kinds should be allowed near each other to serve different types of customers (daily user versus more boutique customer)○ It will be difficult to determine fairly who gets a license first if there is a maximum number permitted

- Instead of a cap, some stakeholders thought setting a maximum density of stores in an area would prevent clustering in stigmatized neighbourhoods, without being too restrictive on store locations
- Others thought that the number of stores should be dictated by the market

CANNABIS STORE LOCATIONS - SEPARATION DISTANCES

General comments on separation

- There was general concern that requiring too large of separation distances, or requiring separation distances from too many uses, could limit the possible location and number of cannabis stores
 - There was concern about forcing cannabis stores into industrial areas or other isolated areas of the city
 - Some mentioned that if cannabis stores have to be separated from alcohol stores or daycares it will drastically limit the location options, since there are so many of these businesses already existing in Edmonton
 - Others thought there should be no separation distances and we should let the market decide
- There were conflicting opinions about whether cannabis stores should be treated the same as alcohol stores or not when it comes to separation distances
 - Some suggested cannabis stores should be separated from additional uses than what alcohol stores must be separated from in Edmonton
 - Others stated that the minimum separation distances should be the same as what is in the Zoning Bylaw for alcohol stores
- Some stakeholders noted the need to consider harm reduction when deciding on separation distances and number of stores and to proceed with caution in order to understand the impacts of cannabis store locations on drug addiction and mental health
- Some noted that if separation distances are not strict then the operating rules for stores need to be more strictly regulated so that cannabis is not too heavily promoted and the amount of new users is limited

What uses cannabis stores should be separated from

- Many stakeholders were less concerned about cannabis stores being separated from each other
- There was agreement that separation from schools was important, but there were different opinions on what other uses cannabis stores should be separated from, including:
 - If they are separated from pawn shops, they should also be separated from cash or money lending businesses
 - Places that sell tobacco should also have separation distances to be consistent
 - Should be separated from liquor, tobacco, stores that sell pharmaceuticals
 - It is more important to be separated from junior and senior high schools as there is more of a draw for teenagers than from elementary schools or daycares where they are not allowed to leave the grounds anyway
 - Should not have to be separated from daycares
 - Look at other places children gather to potentially have separation distances
 - Need to define clearly what is meant by child care areas, and consider including daycares, after school care etc.

Suggested separation distances

- Different separation distances were suggested, including:
 - 100 meter separation from places where children and youth gather is not enough
 - Two to four kilometer radius from schools
 - Same rules as adult businesses
 - 150 meters away from liquor stores
 - 300 meter separation distance between cannabis stores
 - 500 meter separation like Vancouver between cannabis stores
 - 250 to 400 meter separation from schools
 - Use a simple metric such as one or two blocks apart
 - Tailor separation distances to the impact (smaller separation from daycares and parks and larger separation from schools)

CANNABIS STORE APPLICATION PROCESS

General thoughts on the application process

- Stakeholders shared their hope that the City will issue licenses to applicants that have everything together so that the permitted businesses will be successful and reflect well on the whole cannabis industry
- Many stakeholders wanted to see a process set up for accepting and reviewing applications for cannabis stores prior to July 2018, so that stores could open their doors when legalization happens and meet market demand
- Some stakeholders favoured a lottery system for awarding business licenses, while others were against a lottery system
- Many stakeholders were interested in a scoring system for cannabis licenses that awarded points based on a list of attributes, such as having financial backing organized, knowledge of the industry, good record check etc.
- Should look to other jurisdictions to learn what works well

Elements of a good application process

- There was concern that if the application process was too difficult it would push cannabis sales to stay in the black market
- Stakeholders stated they were looking for an application process that included the following elements:
 - Clearly outlined process that is closely followed
 - A way to check quickly if a location you want to open a store at will be a no-go or not (a list of automatic fails)
 - Information on what is required to be successful in getting a license
 - Clear communication with the applicant throughout the process
 - Guidelines for how long the permitting process takes
 - A list of of all required costs up front to help with securing financing
 - Affordable licenses
 - Well-trained staff
 - Requirement of a \$50,000 Letter of Credit per store
 - City review of applications that happens concurrently with provincial licensing process

	<ul style="list-style-type: none"> ○ An online system for processing applications ○ An online registry where applicants could indicate interest in different store locations
Fairness in the application process	<ul style="list-style-type: none"> ● There was a suggestion to limit the number of stores that can be opened by one operator/business owner to prevent monopolies <ul style="list-style-type: none"> ○ Another suggestion was to have a certain percentage of permits issued to larger corporations and a certain percentage issued to smaller mom and pop stores ● Some stakeholders suggested giving priority to Alberta business owners first in the application process ● There was concern that large established producers will open their own retail chains, which would be very difficult for small businesses to compete with ● There was concern about a market for selling licenses and some suggestions for preventing this: <ul style="list-style-type: none"> ○ The person applying for a cannabis store license needs to be the operator (not the owner of the location) ○ It should be illegal to assign a cannabis license to someone else ○ There should be a requirement to have a landlord's commitment
Store Design	<ul style="list-style-type: none"> ● There was debate over controlling the design of cannabis stores versus treating them the same as any other business in Edmonton <ul style="list-style-type: none"> ○ Some stakeholders thought store facades should not include flashing signs and should appear 'classy' ○ Some suggested tight sign regulations so that stores are discreet (similar to how they are designed in Denver, Colorado) ○ Other suggested opaque windows so that people are not able to see the product unless they go inside the store ○ Some noted that stores should not appeal to youth in any way ○ Others stated that it would be unfair and prevent an efficient licensing process to have extra design requirements for cannabis stores

	<ul style="list-style-type: none">● There was a note that stores should have HVAC and purification systems to deal with odours, even from dry cannabis● Some thought, if properly ventilated, tasting rooms should be permitted in cannabis stores● Stores should be handicap accessible
Security measures	<ul style="list-style-type: none">● There was lots of discussion around the security measures for new cannabis stores, including:<ul style="list-style-type: none">○ Using patron management plans similar to what is used for bars○ Require site security plans as part of the licensing process○ Require verifiable training of staff, such as a certificate program with safe serving knowledge○ Complete criminal record and background checks on everyone involved in the business and also affiliates to ensure there are not criminal connections○ Include internal area within stores where IDs are checked before you enter the area with cannabis products (buzz in option)○ Look at tracking clients or having a customer registry, although this does raise privacy concerns○ Stores should be designed to Crime Prevention Through Environmental Design (CPTED) standards● There was a caution though, that applicants should not be unfairly treated in the application process based on a past record and some indicated that if applicants had only possession charges, and not violent records, they should not be excluded from opening a cannabis store● Some noted that security is important because stores may face many robbery attempts● It was suggested that a liaison team be created with policy and industry on it to create and share safety guidelines

NOTIFICATION OF NEW CANNABIS STORES

General comments on notification

- It was noted that the City needs to look at the purpose of notification:
 - Is the point to affect the decision to permit a cannabis store or not?
 - Is it for information purposes only?
 - How do you deal with the public feedback if people are in opposition to a cannabis store opening?
- There was a suggestion that new cannabis stores could host a public session before or after opening to ensure transparency and deal with public misinformation

Support for notification

- Business Improvement Associations noted that they would like to be notified just for information purposes
- Some felt that 60 meters is too small of a notification area
- It was suggested that the cannabis industry should be notified of new store applications
- There was also a suggestion that community members should provide input on the number of stores in their neighbourhood
- There was a suggestion that there should be requirements for pre-consultation before stores open to have meaningful engagement with surrounding community

Concerns with notification

- Some stakeholders were concerned that every cannabis store application will be appealed by the public and that this would be a huge barrier to stores being successful
- Some suggested cannabis sales should be a permitted use in zones (uses that comply with all rules must be approved), rather than a discretionary use (Development Officer can decide to approve or refuse), so cannabis stores cannot be appealed by the public
- Stakeholders thought that the opportunity for feedback on the application should only be provided by those immediately impacted
- Many stakeholders noted that notification and signs for cannabis stores should be consistent with the City processes for other types of development
- Stakeholders stressed that cannabis stores should be treated the same for notification