

To:

Kendra Amaral, Kittery Town Manager
Bart McDonough, Kittery Town Planner

Comments concerning the proposed town ordinance on Medical Marijuana Caregivers, home occupation.

I am a cannabis caregiver in Kittery. I am involved in state and national cannabis educational and trade groups including the Medical Marijuana Caregivers of Maine, NORML, WomenGrow, Marijuana Policy Project and a small group of Maine professionals aimed at making education about cannabis for health more accessible to patients, doctors and people working in cannabis businesses. I have been growing for 5 years, first as a patient, then for family members and now as a licensed caregiver. I am passionate about growing safe, organic products for patients. I have a Maine Pesticide License and grow using organic compost and beneficial plants, insects and microorganisms in my garden instead of pesticides.

First, cannabis is here to stay. It will continue to be a growing, no pun intended, part of the Maine economy and life for a long time. National legalization is not far away. Most states have at least decriminalized and/or set up a system for medical use. Before 1930 over 80% of prescription medications contained cannabis. When cannabis became illegal in the 30's during the temperance movement along with alcohol prohibition, the doctor who was the head of the AMA fought for five years to keep cannabis allowed as a medication. The uses of medical cannabis are so varied and pretty amazing. With legalization the medical research on the effectiveness of cannabis for health and wellness is growing as well.

My main concern is that the town is being ruled by fear in making decisions about the future of the medical caregiver program. Medical cannabis is a really good thing. I first used it as a patient going through two years of chemotherapy for acute leukemia. It made it possible for me to go through treatment with much more comfort. It took away migraine headaches caused by the chemo that made it hard to function. Now, as a caregiver, I have seen many more people helped through a wide variety of medical problems by using cannabis: pain, sleep disorders, nausea, arthritis, weight loss and discomfort from illnesses and the side effects of cancer treatment. Studies confirm the use of cannabis lowers the use of opiates for pain. I am obviously a strong proponent of the caregiver process. Caregivers also serve patients in a way not often done in a larger retail setting. One goal of medical cannabis caregivers is to find a level of medication that works for patient health without causing uncomfortable intoxication. Dosage varies greatly from one person to another. Caregivers take the time to help people who want private informed help with how to use cannabis safely and comfortably for health.

My garden contributes to a reduction in environment pollutants and comes out way ahead with its carbon footprint. I grow a little inside to keep some strains going for the next year and to get plants started early for the outdoor growing season. I sell my product to a small group of patients and sell a portion of my crop to a medical company that makes fully tested, clean, precisely dosed medical products for patients. My crop is tested for mycotoxins, pesticides and heavy metals. It is clean and safe. My garden has very little if any negative impact on the surrounding area. I believe more education and not more rules are needed in understanding and living with cannabis in our community. I do understand your job in keeping cannabis retail stores under control in town and from not disrupting people's right for peaceful enjoyment of their homes. But I also believe it is important not to destroy jobs people have created for themselves and operated quietly for years.

Most caregivers, because of the way the state program is set up, are individuals doing all parts of their businesses pretty much themselves. Education and research, product development, packaging, record keeping, and customer service along with growing, harvesting, trimming

curing and sales all fall to one person. Maine has a strong tradition of supporting individual entrepreneurs. Caregivers work very hard to do what they do and not for a lot of money. There may be big money in cannabis but not necessarily for caregivers. Most people would not be caregivers if they didn't care about helping the people who are their patients/ customers. With unreasonable restrictions individual caregivers will not be able to stay in business. The town is close to putting small caregiver businesses out of business with this ordinance. The caregiver program has existed in Maine for almost 20 years. Many caregivers rely on their businesses for financial survival and have invested a lot of time, energy, capital and love in their businesses. We are the people who sign up to pay taxes, pay for the plants we grow and follow the ever changing rules and restrictions. You want to help caregivers stay in business. Black market sales are easier and more financially viable. Over restriction of legal cannabis programs helps create a thriving black market. Anyone in Maine can legally grow cannabis. It is not that hard to sell it. What is hard and getting harder is to sell it legally.

Outside/greenhouse growing is essential to caregivers. Growing under lights is financially viable only on a large scale. It is also an environmental disaster unless solar power is used. Growing cannabis inside is the Humvee of the plant world. Outside cannabis traps carbon from the atmosphere and releases oxygen. It is a huge plus for the environment. Outside growing does not use fossil fuels. We are talking about a flowering plant. While some people find the smell of cannabis objectionable, as many or probably more like or do not mind the smell. The smell of a mature cannabis flower comes from terpenes. These are the same terpenes found in almost all other plants and flowers. Citrus, lavender, and pine are all plants that produce high terpene levels. Other plants similar in smell to cannabis are totally legal to grow in any amount anywhere in Maine. Anyone who wants to can grow any amount of hemp. Hemp smells exactly like cannabis. They are the same plant family. Other plants have just as strong a smell. The blossoms on a very small orange tree I keep have a smell much stronger than any cannabis plant. Many herbs and flowers have strong terpene profiles. Why make it illegal to grow one plant outside but not all of them?

It is inequitable to not allow cannabis growing outside for caregivers when it can be grown by anyone else. A household with three adults with medical cards can grow a total of 27 plants outside totally legally without paying more than \$50 each for a medical card. That would include six medical plants and three recreational plants each. Anyone can allow medical patients to grow plants on their property. A caregiver growing 30 plants pays \$1,231.00 to the state and soon much more for the cost of equipment needed for state compliance. Caregivers also collect and pay sales tax and income tax on what they sell. The town should not penalize caregivers by charging them added fees or requiring too many unreasonable hoops to be jumped through. We are already doing that for the state. If the town wants to make added income from cannabis a local tax on retail sales would be the way to do it. Adding costs to medication seems unjustified.

Asking a gardener to only grow inside is like telling a lobsterman or woman that they can fish but just not on the water. Sure they could grow lobsters in tanks, but that is not how lobsters grow well, the lobsters would not be happy or healthy, and it would not be viable financially. Yes, some people might complain, but people complain about everything already. Lobster traps sitting in yards, the sound of the fog horn, nearby chickens are all complaints I have heard. Things most of us lifelong residents view as what makes Kittery special. I am much more offended by the smell of toxic scented dryer sheets in the air when I walk around town, the use of pesticides and unnecessary lawn chemicals by local government and homeowners, and private fireworks that disturb neighborhoods, terrorize pets and farm animals, and are a fire hazard.

The financial hardship of the new ordinance on caregivers should also be taken into account.

Many have invested a lot in their outside or inside gardens : Greenhouses, 6' fencing, raised beds or growing containers, soil development. The cost of equipment for processing, storing and drying cannabis is also a big investment. Also years of work have gone into developing healthy biospheres in the soil used to grow healthy plants and learning about the safe uses of cannabis for illness and health. New expenses coming down the line from the state include transponder tracking tags, a subscription to the METRC inventory system and the cost of daily updating compliance software . Also proposed are the requirement for security cameras with stored footage and exterior lighting. Most caregivers are not running retail stores but sell primarily to a small number of local patients. Caregivers add to the town economy by keeping cannabis dollars in the local economy. Adding yearly fees is excessive as a way to help the town as caregivers are already adding to the town economy. I could see a one-time electrical inspection and again with any major changes. But the cost of an annual inspection and recertification of a system that has already been installed by a master electrician seems unneeded and is not done to other businesses in town. Now with most growers using led lights for inside growing the fire risk is not very high. The biggest fire risk in cannabis is illegal extraction using highly flammable liquids. There is unfortunately no way to control who is doing this except by making safe legal extractions available to the public.

The cost added by town ordinances on caregivers is not a hard amount for a middle to large size business with retail stores to absorb as operating costs, but it will have a large impact to a caregiver micro-business. A caregiver working alone makes a fraction of what a retail location can make. Caregivers serve a unique and needed function. A lot of patients are first time users of cannabis going through serious health scares. If you or a family member becomes ill and needs cannabis working with an individual caregiver is the best way to approach it. Why does the town need to charge small caregiver operations any fee? How many occupations pay annual fees to the town for their businesses? The caregivers are already paying annual fees to the state and adding income and jobs to the town. Annual permitting by the town seems unnecessary for caregivers not operating retail stores. Again, we already do that with the state. I don't know how many occupations are required to pay double fees and have excessive town control.

My main concern with the ordinance is the timing. It would make more sense for the town to wait to see what the updated state rules are when the Office of Marijuana Policy completes them. The process is already well underway. It will probably eliminate the need for some parts of this ordinance. If the state rules are approved as written now they will already require locks, lighting and video surveillance even for caregivers without retail storefronts. Why would the town need to add the requirement of an alarm wired to the police station? It would seem unnecessary and just add more work dealing with false alarms for the police department.

Without caregivers growing for medical stores and other medical businesses there will be an extreme cannabis shortage within the state. This also fuels the black market and the illegal importation of questionable cannabis from other states.

The setbacks should be the same for daycares and schools as in state rules. If you are going to require a setback distance, keep it the same in every case. Earlier state guidelines required caregivers to be located at least 500 ft. from the nearest school or day care. The town is now suggesting that it be over 1000 feet in a straight line from the border of the school property to the door of the business but only 250' from a daycare. The town has already written an exemption from this rule into the ordinance by allowing a recreational cannabis retail store which will have hundreds of customers a week to operate only 250' from a state licensed daycare. Why would a daycare be any different than a school? This should be the same for every cannabis business or caregiver operation. These businesses have very little impact on schools. More traffic might be a problem with an adult use retail store. Why not make it 250' in every circumstance? Or remove this requirement. Fencing is already required. What happens

when someone opens a school or day care too close to an legal existing cannabis site? Will the existing business have priority? Also, anyone can grow their three personal recreational plants or six medical plants if they have a medical card anywhere in Maine, even right next to a school. It is unfair to impose this restriction on the caregiver program.

I do not understand the restrictions on the minimum and maximum size of a caregiver space that is available for patient visits. What is the reasoning behind this? It just doesn't make sense.

It is also very confusing if the town doesn't follow the state in their guidelines by only describing square footage of a grow and not the number of plants cultivated. The state allows for different guidelines about caregivers growing by square footage or growing by the number of plants. If you are growing a limited number of plants you should be allowed to have much space between as you want for the health of the plants. Growing many small plants close together is another allowed style of growing and that is the reason for square footage guidelines.

It is too restrictive to not allow caregivers to make changes in their garden sites, locations and sizes as their businesses change. This doesn't make sense. Caregivers are already restricted by the number of plants by the state.

The town should add guidelines requiring town employees inspecting caregiver locations to wear disposable PPE including head and foot-coverings and not visit more than one caregiver location without changing PPE in between. Caregivers have a right for bio-security on their farms. Inspectors going from one site to another without following these precautions is a violation of best farm management practices and very hazardous to the health of gardens.

As written, I believe it is a violation of personal rights at least and probably the law to inspect caregiver locations without notice or permission. Many caregiver locations are the personal homes of the caregivers. Not all the people residing in these homes are under the jurisdiction of the ordinances. The state guidelines do not include this type of infringement on personal privacy. The state guidelines require notice and any inspection to occur during normal business hours.

Let's be logical and not over do it out of fear. Remember the caregivers are the ones following the law. We have to put aside old stereotypes of what cannabis is. It is healthier and safer than many medications and extremely helpful for many illnesses. It has been used by people all over the world for thousands of years. Kittery residents have voted more than once in support of cannabis.

If you would like to learn more I recommend reading the book " Medical Cannabis, a guide for patients, practitioners and caregivers" by Michael Moskowitz, MD, MPH. I am also happy to answer any questions you may have. I hope you will give thoughtful consideration to my concerns. Thank you.

Wendy Turner
Seaweed Farm

Bart McDonough

From: Brandon Pollock <brandonpollock@gmail.com>
Sent: Monday, February 08, 2021 9:36 AM
To: Bart McDonough
Subject: Comments and Registration Request for 2/11 Planning Board Meeting

Good morning Bart, please see comments below relating to *Item 3 – Title 16 Land Use Development Code Amendments*. If you could also please register me to provide input during the meeting that would be appreciated.

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Please see below for comments relating to *Item 3 – Title 16 Land Use Development Code Amendments*. My name is Brandon Pollock, and I am the CEO of Theory Wellness – we are a cannabis company that has two operational Adult Use Marijuana Stores, located in South Portland and Waterville. We also have experience operating dispensaries in medical and adult use in Massachusetts. I very much appreciate the thoughtful draft as written, and respectfully submit the below input:

16.8.29 H.

In our opinion and experience, the maximum of only 1,000 square feet for the customer facing side of a dispensary suggested in this section is troublesome and most likely would lead to unanticipated negative consequences. For reference, our South Portland adult use marijuana store has approximately 3,000 sq. ft. of customer facing areas (reception room, sales floor, ADA bathroom).

First, we are all doing our best to navigate the risks and challenges of a global pandemic – forcing a retail business to attempt to carry out operations in an artificially tight space makes it difficult to ensure social distancing is followed.

Secondly, by restricting the square footage of customer facing areas, the Town would inherently limit the amount of customers that can be served during any single time, as the dispensary would not have enough space for appropriate numbers of point of sale stations. This is compounded by operating in COVID- 19 where sales stations must be six feet apart.

By not allowing a business to meet the needs of its customers, customers will be forced to wait outside, in potentially long lines. This forced restriction on throughput may lead to complaints from neighbors due to customers waiting in lines that may extend beyond the property of the dispensary. Furthermore, the restriction on throughput puts pressure on area parking, as customers waiting in line are unable to come and go in a timely fashion.

Like any retail business, there are certain times of the day and days of the week that are busier than others, and being confined to 1,000 sq. ft. of customer facing square footage would be inadequate to serve customers during those peak times.

Thirdly, this proposed restriction would lead to businesses devoting all customer facing square footage to reception and cashier space, eliminating any plans for customer education areas. This would be a missed opportunity – it is important, especially in the infancy of recreational cannabis, to

allow for businesses to have space to educate their customers on the safe and responsible use of cannabis. For example, in South Portland we have seating areas where customers can browse educational material. Along these lines, it would be difficult to justify providing ADA bathrooms to the public as that would reduce the already lower than needed space needed to conduct transactions.

My recommendation is to **strike 16.8.29 H.** and allow businesses to have the freedom to determine the customer facing square footage best suited to serve their customers.

16.8.29 K.

I would respectively suggest this provision only apply to Marijuana Cultivation Facilities and Marijuana Manufacturing Facilities. An Adult Use Marijuana Store has no additional electrical risks compared to any other retail business in Town.

16.8.29 L(2).

If the Town wishes to have parity with the State regulations, the days of video on hand should be forty five (45) days. All Marijuana Businesses will be required to have 45 days of continuous video footage on hand as mandated by the State.

Thank you for your consideration,
Brandon
CEO
Theory Wellness

February 8, 2021

Subject: Proposed marijuana ordinance

Dear Planning Board members,

Please accept this letter as part of the public comments regarding the proposed ordinance on recreational marijuana.

1. Sec 5.1.6.K, Ln 145 *“Certification from the Fire Chief that the location of the Marijuana Business on the subject Premises will not pose an undue risk of fire or other safety hazard.”* This stipulation should only apply to cultivation facilities and product manufacturing facilities using hazardous materials. Unless other retail stores in Town are required to adhere to this level of oversight, there does not appear to be a logical reason to compel marijuana retail stores to do the same. This comment holds true for Sections Sec 5.1.6.L.7, 16.8.29.J and 16.8.29.K.

Suggestion: Only require fire/safety oversight for cultivation facilities and product manufacturing.

2. Sec 5.1.6.L.3, Ln 151 *“Protocols for hiring and training employees;”* The Town’s regulatory authority should not extend to this level of operations for a particular business.

Suggestion: Delete this requirement.

3. Sec 5.11.10.B.1, Ln 179 *“Pre-application forms shall be made available starting on the effective date of this Ordinance.”* The effective date is not defined.

Suggestion: Define “effective date”.

4. Sec 5.11.10.B.1.d, Ln 186 *“Evidence demonstrating the applicant’s financial capacity to build out (if applicable) and operate the Marijuana Business (e.g., bank letter, letter of credit, loan commitment)”* A financial capacity requirement typically favors large businesses with existing operations. Start-up businesses typically secure funding after the pre-approval process.

Suggestion: Make evidence of financial capacity a part of the permit application process not the pre-application process.

5. Sec 5.11.10.C, Ln 207 *“Priority. Licenses for Marijuana Retail Stores shall be assigned priority based upon the date and time a completed pre-application was received by the Town”* A selection process that is solely based on first-come first-serve does not guarantee securing applicants who will best serve the Town’s interests. A selection

process with no merit criteria will limit Town citizens in favor of out-of-town and/or out-of-state applicants.

Suggestion: Incorporation merit-based criteria (i.e., residency) into the selection process.

6. Appendix A Table, Ln 299a “ADD Marijuana License Fees to Appendix A as follows:” The table listing the fee schedule for various licenses appears to only list “medical” establishments and not Adult-use licensure.

Suggestion: Except when designated as a Caregiver, remove the word “Medical” from the fee schedule.

7. Sec 16.8.29.B, Ln 379 “*Marijuana Businesses shall not locate within 1,000 feet of a public or private school measured from the main entrance or any customer entrance door of the Marijuana Business in a straight line to the property line of the protected use. Marijuana Businesses shall not locate within 250 feet of a state-licensed daycare...*” Why is there a difference between minimal distance to a school versus a daycare? If exposure to children is the issue at hand, should not this distance be consistent?

Suggestion: Stipulate that marijuana businesses shall not be located within 1,000 feet of schools and daycare facilities.

8. Sec 16.8.29.H, Ln 407 “*The area of any Marijuana Business accessible to customers shall be no less than 400 nor more than 1,000 square feet.*” Is there a reasoning for putting limits on store size? If a business can give good service in an adequate retail environment, why should the Town dictate how large or small a business can be?

Suggestion: Remove this restriction.

Bart McDonough

From: cmsmailer@civicplus.com on behalf of Contact form at Kittery ME
<cmsmailer@civicplus.com>
Sent: Monday, February 08, 2021 7:54 PM
To: Bart McDonough
Subject: [Kittery ME] Thursday's Public Hearing (Sent by Julie Cutting, Julie_cutting3@gmail.com)
Attachments: emerald_elevations_presentation_part_1.pdf; emerald_elevation_presentation_part_2.pdf; emerald_elevation_presentation_part3.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hello bmcdonough,

Julie Cutting (Julie_cutting3@gmail.com) has sent you a message via your contact form (<https://www.kitteryme.gov/user/3484/contact>) at Kittery ME.

If you don't want to receive such e-mails, you can change your settings at <https://www.kitteryme.gov/user/3484/edit>.

Message:

Bart,
Please forward to Drew Fitch
Thank You,

Julie

Mr. Chairman and Members of the Board

My name is Julie Cutting, I am writing to you in advance of this Thursday's public hearing on Kittery's proposed Marijuana Ordinance. We have a vision for a Retail Cannabis business, Emerald Elevation, that we hope to locate at 57 State Road in the BL-1 zone. Building owners, Jim and Carla Spencer, are supportive of having a marijuana business tenant at this location.

When first creating Emerald Elevation's concept, I did so with 57 State Rd in mind. I have a special connection to the building. In 2013, I was part of the first team to open and operate in their newly renovated Seaport Fish. I was hired to be their Executive Chef and created the Restaurant's concept and help design the Fish Market. Fast-forward to 2020-2021 and now I own Emerald Elevation and have been working for months to develop and move our concept forward with the help of a select group of professionals with years of experience in both retail and in the cannabis industry.

I love Kittery and throughout my life I have never moved far from the area. I take extreme pride in the quality of life afforded by Kittery and look forward to being a welcome addition to the Foreside area. The modern and upscale feel of my retail store will blend seamlessly with other businesses such as Beach Pea, Terra Cotta, Carl's, and the Golden Harvest as well as the other retail stores and restaurants already established in the neighborhood.

We believe that a limited number of marijuana retail stores are a good fit for the BL-1 zone and would add the following:

- Through Site Plan Review the Planning Board will conduct a thorough review of any proposed marijuana business and will set performance standards for marijuana businesses in BL-1, and in all other zones.
- Town Council has the ability through a licensing ordinance to cap the number of retail cannabis stores in any zone.
- Allowing Cannabis in the BL-1 zone would avoid clustering all retail marijuana in C1, C2 and C3. A dispersal of marijuana retail would assist with having this new industry blend with existing businesses in Kittery.

- Within the BL-1 zone there are already existing medical caregiver retail operations. These businesses have been operating without incident in the BL-1 zone for a long time now illustrating that BL-1 is an appropriate zone for marijuana retail.

I have attached a copy of our business plan for your review with the hope that you will see the upscale nature of our project and that Emerald Elevation will blend well into the BL-1 zone.

We thank you for your time in reviewing this email, along with our business plan, and are asking that a limited number of marijuana retail stores be allowed in the BL-1 zone.

Thank you all so much for your time and consideration in this matter.

Julie Cutting

Please note: Due to upload requirements of the town's email system. The presentation had to be broken up into three parts in order to be sent to you.

EMERALD ELEVATION BUSINESS PROPOSAL

EMERALD ELEVATION MISSION STATEMENT

Emerald Elevation's mission is to open and operate a modern, professional and inviting adult-use cannabis retail store, providing quality products and education to our customers, creating jobs, and giving back to the community, while strictly following state laws and guidelines.



THE POTENTIAL OF RETAIL CANNABIS



Retail cannabis is the next great business driver in Maine. In just the first two months of retail operation, eleven locations across the state have already created \$2.4 million in retail sales of cannabis products alone, not counting clothing, paraphernalia, and other other non-cannabis sales. At an average of more than \$100k per month, and an impressive average of roughly \$100 per square foot in revenue, each location stands to support as many as 12 jobs each, in just the very early days of adult-use operation.

What's the potential? The Portland Press Herald reports that sales of medical cannabis are on track to exceed \$260 million in 2020. For reference, sales of Maine potatoes have never topped \$200 million.

If adult use were to simply match medical use, we'd be looking at close to half a billion in revenue for the industry, approaching 1% of Maine's entire gross domestic product, and contributing as much as \$50m to the state budget along with 5,000 jobs.

How does that help Kittery? No one knows better the increase in property values and contribution to the town budget created by successful retail businesses.

Further, this is a high-end business. In November, the average retail sale at an adult-use shop was more than \$67, and that is with limits placed on purchase amounts due to short supplies. These are shoppers who are likely to sit down at our restaurants, shop at our outlets, and frequently return, considering the consumable nature of the product.

We are eager to become part of the wider retail community, where all of us benefit from more and frequent foot traffic - and the best part of retail cannabis is that, by law, all of the profits stay in the state of Maine, ready to be recycled back into the community.

**ELEVEN RETAIL
LOCATIONS HIT
\$2.4 MILLION
IN FIRST 2 MONTHS** +

**MEDICAL TO
EXCEED \$260
MILLION IN 2020** +

**\$50 MILLION
TO STATE BUDGET** +

5000+ MAINE JOBS +

OUR TEAM

Owner & General Manager / Julie Cutting-Kelley

Julie Cutting-Kelley was raised in Southern Maine and is a current resident of South Berwick. Julie takes incredible pride in being a local resident and feels a great sense of responsibility and bond to the community. Her proposed endeavor has been thoughtfully designed to enhance Kittery's esteemed retail reputation.

Currently, Julie is a local celebrity chef, TV personality and owner of the highly successful Cure Restaurant located in Portsmouth, NH, which has been in operation for over 7 years.

Legal Representation / Jill G. Polster, Attorney Cohen Law Maine / Portland, Maine

Jill G. Polster is a member of the Maine Cannabis Industry Association, Maine Municipal Association, and Cumberland Bar Association. She understands, as does Emerald Elevation, that anyone operating in the cannabis space is not in the cannabis business, but rather in the compliance business.



Brand Manager / Glen Halliday Founder / GHDESIGNCO / Gorham, Maine

Expert and highly respected Designer and Brand Manager currently at the head of GHDESIGNCO - a design firm that specializes in Maine Cannabis and Maine Beer branding.

Business Consultant / Jeffrey R. Cutting C-Port Enterprises / Portsmouth, NH

Jeffrey R. Cutting has 45 years experience in retail. In his last position as Vice President of Operations for Cumberland Farms convenience stores, Jeff oversaw the revitalization of 265 Cumberland Farms legacy units in the New England marketplace. He transformed them into the exciting new AIM Concept you currently see in many communities throughout Maine and New Hampshire today.

Accounting and Tax Compliance / Van Ballantyne Founder, Counting House Associates / Greenland, NH

Van holds a BS in Business Administration from the Whittemore School of Business and Economics and his MBA from Southern NH University. He is enrolled to practice before the Internal Revenue Service as an Enrolled Agent (EA).

HOW EMERALD ELEVATION WILL LOOK

Utilizing the natural light and beauty of the building's existing architecture, Emerald Elevation will be a modern, clean and open concept, age-restricted retail store.



HOW EMERALD ELEVATION WILL LOOK

Utilizing the natural light and beauty of the building's existing architecture, Emerald Elevation will be a modern, clean and open concept, age-restricted retail store.



HOST STAND

The Host Stand will be centered under the main indoor logo. Upon entrance, guests will be immediately greeted and their identification checked to ensure they are 21 years of age or older. Questions and needs will be evaluated and additional direction on how to purchase the product will then be given by team members.



MAIN RETAIL ROOM

The Main Retail Room will be located to the left hand side of the building and will feature various non-THC merchandise, including hats, sweatshirts, t-shirts, tote bags, hemp-infused beauty products (for both men and women), candles, local artwork, books, and much more.



BACK RETAIL ROOM

The Back Retail Room's custom-built shelves will hold hand-blown glass pipes, water pipes, rolling products, grinders, and trays.

THE FLOWER ROOM

The Flower Room will be located on the right hand side of the building. Less than one quarter of the retail floor will be dedicated to the actual sale of flower, vape cartridges, tinctures and rosin. These cannabis items will be encased in locked display stations with locked plexiglass display units on top at all times.

PROPOSED FORMERLY KENSIE'S RESTAURANT LOCATION 57 STATE ROAD, KITTERY, ME



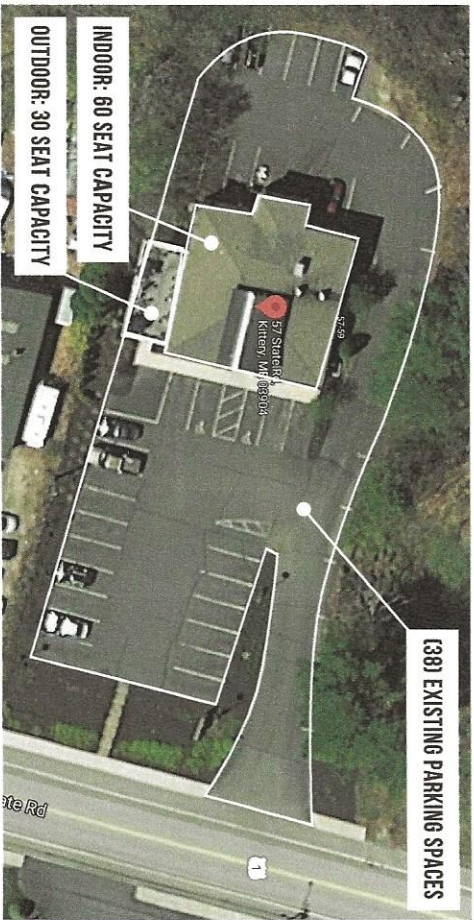
57 State Road in Kittery, is an existing and well-maintained commercial building with a spacious retail floor plan. The building is set back from State Road and includes a large parking lot with thirty-eight (38) existing parking spaces for guest and team member parking.

The existing parking lot is currently large enough to handle any additional peak traffic, any time of the year, as it was planned for a restaurant with capacity of sixty (60) seats inside and an additional thirty (30) seats outside during the summertime. Restaurant seating wait time calls for a minimum of 1 1/2 hours per car, per table in the lot for two (2) people. A group of four (4) people would call for 2 1/2 hours for a car to be in the lot. This traffic would actually be greater

than the use we are proposing. Emerald Elevation's concept would call for a 20 minute visit per car and should cause no additional queuing onto US Route 1 during peak seasonal traffic periods.

Emerald Elevation's web-based / retail store business model should not add an additional traffic burden to the area. The site is ideal for safe and easy entering and exiting of customers, with a clear view of on-coming and passing traffic.

Emerald Elevation's on-line store will schedule guest pick up of products during non-peak periods of the day, ensuring enough parking for retail in-store guest cars during peak sale periods and on weekends.



PAST USE: RESTAURANT

- 2 patron minimum of 1.5 hours per vehicle.
- 4 patron minimum of 2.5 hours per vehicle.

PROPOSED USE: RETAIL / CURBSIDE

- 2-4 patron average of 20 minutes per vehicle.

RESULT:

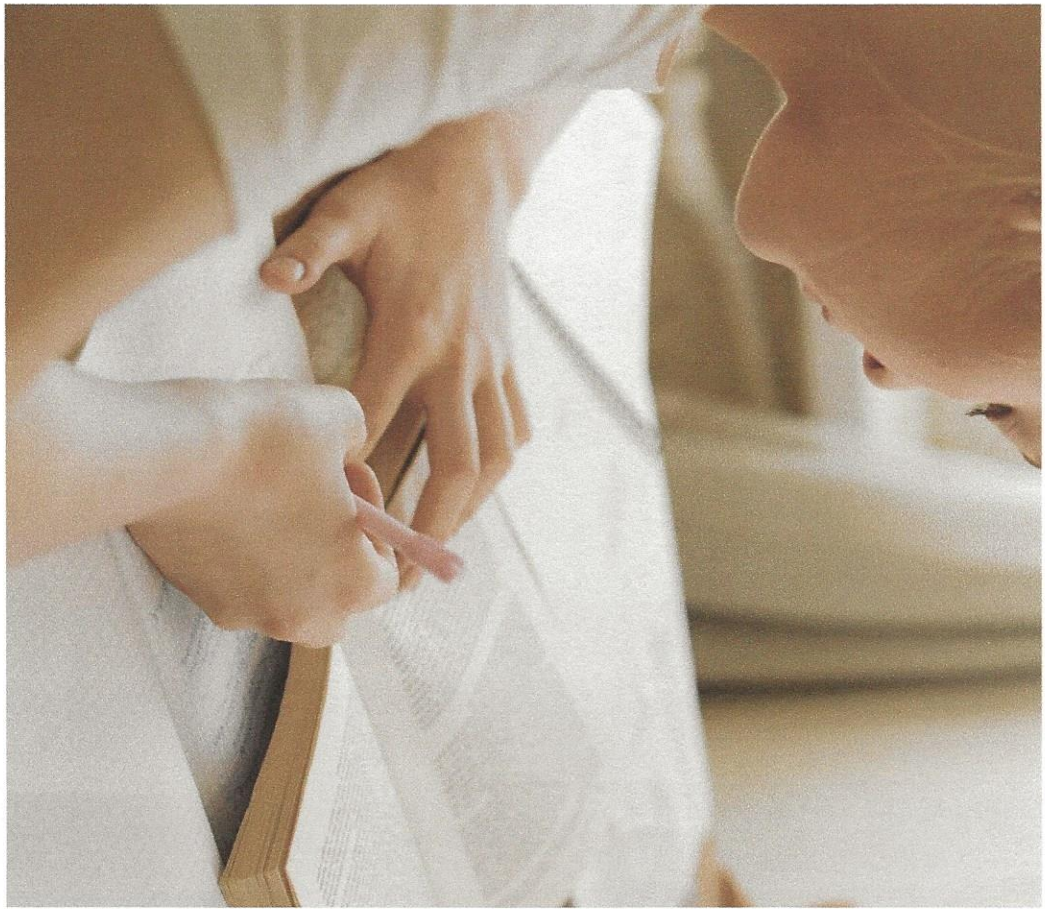
No additional queuing onto US Route 1 during peak seasonal traffic periods.

OUR GOAL IS TO BE A RESPONSIBLE RETAILER OF CANNABIS PRODUCTS

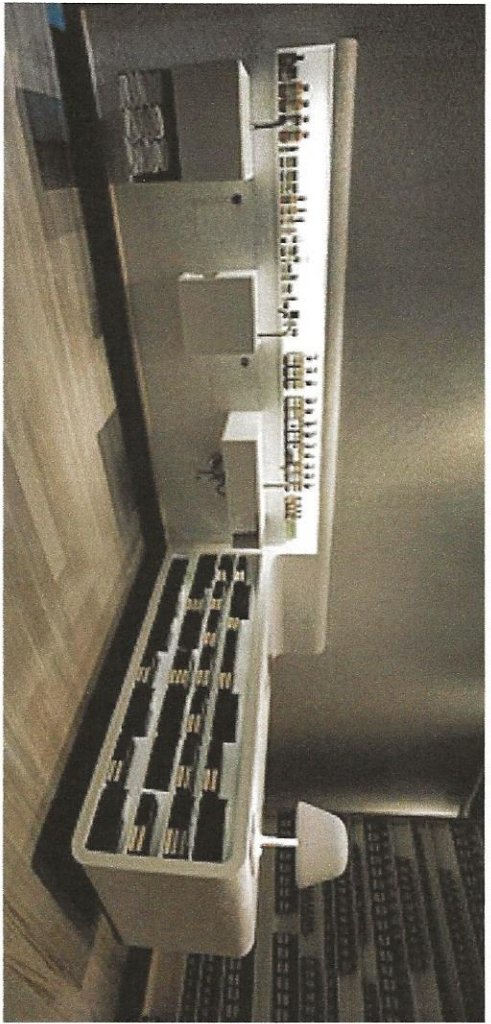
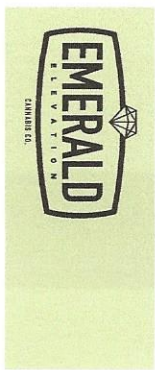


At Emerald Elevations, we understand that being a responsible retailer of age-restricted products is our number one priority and will adhere to all rules and regulation of the Office of Marijuana Policy. Using a "Belt and Suspenders" approach to sale of all age-restricted products, we will train all of our team members under the State of Maine Alcohol Server Program. This program, offered by the State of Maine, is an online service, available to all sellers of age-restricted products within the State of Maine. All required training material is available for review online prior to completing the online testing. Upon successful completion of the Program, each team member will receive a printable certificate. Completion of this Program will be a requirement of all team members prior to working their first shift behind the counter.

+ OUR STORE WILL ADHERE TO THE PRODUCT LIMITS IMPOSED BY THE STATE AND TO PROVIDE IN-STORE SIGNAGE FOR PROPER CHECKING OF CUSTOMER IDENTIFICATION TO PURCHASE PRODUCTS. WE WILL ALSO PLACE A WARNING ON ALL OF OUR CANNABIS PACKAGING STATING: "MAINE CANNABIS PRODUCTS ARE FOR YOUR ENJOYMENT WHILE VACATIONING IN THE STATE OF MAINE."



WHAT MAKES EMERALD ELEVATION DIFFERENT



MAINSTREAM

Emerald Elevation will be tastefully, professionally and modernly designed and in the trend of the “up and coming” mainstream cannabis culture.

HIGH-END

Emerald Elevation intends to complement and be a great addition to the overall shopping experience in Kittery -- drawing in high-end customers who will in turn spend additional time and money at other locally-owned businesses.

PRIDEFUL

Emerald Elevation will be a business the community wants, has asked for and can support with pride! Customers will be able to walk in with ease and confidence, knowing they will be receiving more than just a product, but having trust in their supplier, gaining knowledge of the product and creating a lasting relationship.

PROFESSIONAL

A major strength of Emerald Elevation will be our team! We are a hand- selected group of local business professionals who have a passion for the cannabis industry, experience, and drive to run a successful business.

SECURITY AND SAFETY

Security and safety will be of the utmost importance to Emerald Elevation's team.



A state-of-the-art camera system will be professionally installed in the parking lot, main entrance, each of the three (3) retail rooms, covering all four (4) corners, as well as in the back parking lot. A third-party security company will be used for real-time notifications to discourage potential trespassing and immediately alert the owner / authorities if it does occur.

In order to enter the Flower Room, an official employee must unlock a metal access door; only after the guest has been verified as an adult.

At frequently specified intervals, cash will be counted and then transported to a securely-located safe in the basement office, behind a locked door; in a room with no windows. Monies will then be transported to the bank by secure courier service at designated intervals throughout the week.

THANK YOU

IN CONCLUSION

Cannabis is here to stay, and Kittery residents have voiced their opinions and voted for adult recreational sales to be approved. Emerald Elevation is a business the community wants, has asked for, and can support with pride.

We understand that the Town of Kittery, ME is looking to limit the number of retail licenses, and we are asking Kittery to trust our vision and let us be one of the first businesses to open a retail cannabis store. We will set the bar high for others and show everyone how approachable, respectable and safe operating a cannabis store can be. While becoming an integral part of what the Town is trying to create in the Foreside extension, we will be a perfect fit in the live / work / walk / village feel you are looking for!

CONTACT INFORMATION

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