

22 January 2018

City of Victoria
#1 Centennial Square
Victoria, British Columbia
V8W 1P6

Attention: Mayor Helps and Councillors

Re: Storefront Cannabis Retailer Rezoning Application, 1007 Government Street

Your Worship Mayor Helps and Councillors,

On behalf of our client, Government Street Properties Ltd., we would like to submit this rezoning application for a Storefront Cannabis Retailer. The proposed retail outlet will be located in an existing heritage building at 1007 Government Street. There will be no changes to the exterior façade and should we receive approvals, we will apply for a building permit for some tenant improvements.

Unlike other Storefront Cannabis Retail Outlets, we are hoping to receive approvals from City Council to operate in this location prior to completing tenant improvements and commence operations. We believe this location in downtown Victoria is strategic and meets the intent of your guidelines. The two policies that you have with respect to locations is the proximity of the location to schools and to other Storefront Cannabis Retailers.

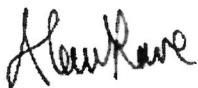
We understand that there is a school located in Nootka Court on Douglas Street. The Pacific School of Innovation and Inquiry is located at #100-808 Douglas Street next to the Noodle Box. This is an innovative school for students in grades 9-12. Although the distance of this school from property line to property line as the crow flies is only 117 metres, the walking distance from door to door is actually 350 metres. The configuration of both properties creates a distance much closer to each other than the actual distance between the two locations. Nootka Court is a "L"-shaped property with the Bug Zoo on the Courtney side of the property and the Pacific School of Innovation and Inquiry at the Douglas and Humboldt side of the property.

The location of 1007 Government Street also is a "L"-shaped property that stretches to 604 Broughton Street where the Ebizo Japanese Restaurant is located. There is no access to 1007 Government Street through the Japanese Restaurant. We understand the principle of protecting students from being too close to the Cannabis Retail Outlets and we feel that the actual proximity of the two locations far exceeds the intent of your policy.

The other policy is the proximity of the Storefront Cannabis Retailer to other Storefront Cannabis Retailers. The intent is to not have a Storefront Cannabis Retailer on every street corner and to not have Storefront Cannabis Retailers concentrated in neighbourhoods. The 400 metre distance between Storefront Cannabis Retailers in neighbourhoods works well puts a good distance between the retailers. As the density of people in neighbourhoods is less, it makes sense to keep the retailers further apart. We feel that with the density of people in the downtown core, the 400 metre distance may not be a relevant. As the downtown core is very compact, a Storefront Cannabis Retailer locations at Douglas and Yates could essentially take in an area from Wharf street to Vancouver and Fisgard Street to Humboldt. This in essence would provide one Storefront Cannabis Retailer for the entire downtown core if you take into consideration the 400 metre proximity. Our proposed location is 270 metres to the Trees Dispensary at 546 Yates Street if you were to take the path that a crow flies. If we were to walk from door to door, we would be 350 metres apart. We feel that this distance for a downtown location would be adequate in separating these retail stores as the downtown core is much denser than the neighbourhoods. A location at 1007 Government Street would meet the needs of locals and tourists alike.

Thank you for your consideration of this rezoning application. Should you have any questions regarding this proposal, please contact us at 250-360-2888.

Yours truly,



Alan Lowe, Architect AIBC
Alan Lowe Architect Inc.

cc. Government Street Properties Ltd.