



25 April 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,

In reviewing the Director of Sustainable Planning and Community Development's report, we wish to provide additional information for your consideration.

Unlike other applications, our client is presently **NOT** operating a Cannabis Retail Outlet in this location and no Cannabis Retail Outlet will be opened there before it is legal to do so.

Our proposal is consistent with the Core Historic designation in the Official Community Plan, 2012 and is consistent with the Historical Commercial District designation in the Downtown Core Area Plan.

We are however, not consistent with Storefront Cannabis Retailer Rezoning Policy requiring storefront cannabis retailers to be 400 metres away from other retailers and not within 200 metres of schools measured as a crow flies and not by travel distance.

We understand that the policy has been varied for other Storefront Cannabis Retailers in the recent past. We also understand that this policy is the same for neighbourhoods as well as the Downtown core. Where the downtown core is more dense, and the population in the downtown core increases with workers, tourists and nightlife, we feel the distances between Storefront Cannabis Retailers could be decreased in the downtown core.

There are two independent schools located in Nootka Court on Douglas Street. The Pacific School of Innovation and Inquiry and the Elizabeth Buckley School are located at #100-808 Douglas Street next to the Noodle Box. Although the distance of these schools 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 and size 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 and 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 as relevant. As the downtown core is very compact, a Storefront Cannabis Retailer location 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 and would be away from the concentration of retailers surrounding City Hall further north.

Thank you for your consideration of this rezoning application. We trust that you will allow this application to move forward to a public hearing. We understand public hearings are being scheduled for September at this time and by the time this application is heard at Council, we would expect that a decision to legalize cannabis would have been ratified by the federal government.

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.

