



Mayor Helps and Council
City of Victoria
No.1 Centennial Square
Victoria, BC, V8W 1P6

19 April 2021

Re: Application for Cannabis Retail for 1150 Douglas Street

Dear Mayor Helps and Council,

The DRA LUC submitted a letter on this application on 19 October 2020 with regard to the rezoning. The concerns outlined in that letter remain unaddressed as the application moves to this stage.

The DRA LUC supported for the Staff's recommendation to decline the rezoning application to permit the use of a Storefront Cannabis Retailer. As observed by Staff, "the proposal is inconsistent with the *Storefront Cannabis Retailer Rezoning Policy*".

There are four properties within 400m of the subject property that have storefront cannabis retailer as a permitted use:

- 778 Fort Street is 177m away, is provincially licensed and has been operating at that location since 2014;
- 1402 Douglas Street is 216m away, is provincially licensed and has been operating at that location since 2015;
- 546 Yates Street is 160m away, non-operational and not provincially licensed; and,
- 826 Johnson Street is 370m away, has been operating as the Cannabis Compassion Club for 19 years at that location but is not provincially licensed.

Additionally, Staff point out that there is one independent high school, the Pacific Institute for Innovation and Inquiry that, at 170m away from the subject property, is within the 200m proximity requirement.

Proximity rules were established by Council to limit the number of Cannabis retailers to the point that the public is adequately served and operators do not need to sell to minors to make ends meet. There is a strong case that indicates a direct correlation between the viability of these businesses and compliance regarding sale to minors.

There is no shortage of ground floor retail properties for lease within the City and therefore no apparent impediment for the applicant to seek a location that complies with the current proximity rules. It is important that precedence is not set in relaxing these proximity rules

without a compelling rationale. We strongly encourage Council to uphold its wise decision to adopt the 400m proximity rule for Cannabis retailers and the 200m proximity rule for schools.

Retail cannabis operators are required to screen their windows to block the public's view into the retail units. These create "blank walls" along our streets. Ignoring the proximity rules increases the concentration of these operations in a small area, and in combination with other closed and empty retail units, adds to an increasingly uninviting and hostile streetscape with fewer eyes on the street.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ian Sutherland', with a stylized, flowing script.

Ian Sutherland

Chair Land Use Committee, Downtown Residents Association