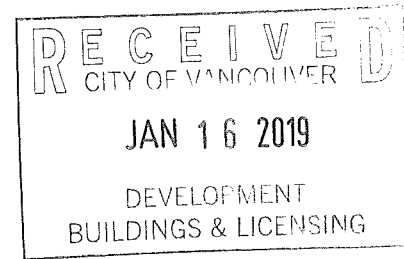


December 14, 2018

City of Vancouver
 Planning Department
 515 W 10th Ave
 Vancouver, BC
 V5Z 4A8



Re: Operational letter for Development Permit: 1108 Richards Street

Dear Sirs/Madams:

Please accept this operational letter as part of the application to seek a development permit for a WEEDS® store, at 1108 Richards Street location. Note that this store was part of a multiparty legal action against the City of Vancouver in which it and numerous other dispensaries sought to remain open on constitutional and Charter of Rights and Freedoms grounds. The decision was recently released and the Court found in favour of the City on the City's cannabis bylaws, but elected not to decide on the constitutionality of the federal cannabis laws. As the Court failed to decide this issue, among other things, the dispensaries have filed an appeal and are applying for a stay of the decision until the appeal is heard. We reserve the right to provide the City with additional information if any decisions are made in the appeal before the City responds to this application.

We include herein the requirements for the operational letter:

1. Proposed location:

- a. Civic Address: 1108 Richards Street, Vancouver, BC, V6B 3E6
- b. Legal Description: Strata Lot 7 Plan LMS1902 District Lot 541 Land District 1 Land District 36 UNDIV 1282/98528 SHARE IN COM PROP THEREIN TOGETHER WITH AN INTEREST IN THE COMMON PROPERTY IN PROPORTION TO THE UNIT ENTITLEMENT OF THE STRATA LOT AS SHOWN ON FORM 1 OR V, AS APPROPRIATE
- c. PID is 023-039-931
- d. Area-Jurisdiction-Roll: 09-200-029-138-608-04-0007
- e. Zoning Category: Downtown District
- f. Store Name: WEEDS®

2. Overview of proposed operation and services to be provided:

a. Proposed business operation:

The business will operate as a legal recreational retail Cannabis store with further

details outlined in this operational letter.

- b. Past business experience: WEEDS Glass & Gifts has been operating as a medical cannabis company for approximately five and a half years in Vancouver and across the country. We are Cannabis leaders in the community, with extensive knowledge, expertise and experience. WEEDS Glass & Gifts are a principled organization, our ethos having always been about safe access, the highest quality and efficacy product, and education. We have used years of feedback from clients to seek out and refine products that produce their desired results. Post- legalization, we believe that companies like ours with the know-how, who have demonstrated a long-term commitment to quality, purity and effectiveness, will be essential to the long term success of Canada's legalization of Cannabis and help position Vancouver as a cannabis centre of excellence.

- c. Staffing: The store will have approximately 21-22 staff pool to draw from. At any given time 3 staff are required on the floor, including a Manager. This number is increased during heavy traffic periods as follows to include up to 9 client service associates, depending on traffic.

- d. Products to be sold:
 - i. Legal Cannabis acquired through LCRB (dried cannabis, cannabis oil, cannabis seeds); and
 - ii. Cannabis accessories as follows:
 - 1. Glassware
 - 2. Papers
 - 3. Lighters
 - 4. Grinders
 - 5. Storage options
 - 6. Cleaning solutions

- e. Target Market: Neighbourhood residents and visitors who are of legal age to consume Cannabis and want to do so responsibly.

- f. Key business objectives:
 - i. Safe space to acquire Cannabis products
 - ii. Educated and well trained staff
 - iii. Promote a clean community and focus on safe streets for all our citizens

g. Hours of Operation:

- i. Proposed Hours of operation: 9 AM - 11 PM (seven days per week)

h. Name of Operator: This should also include the business name and contact information.

- i. Name of Operator: Don Briere

- v. Business Name: WEEDS Glass & Gifts Ltd.

3. Relaxation Rationale:

It is requested that the Cannabis retail zoning bylaw be relaxed for the WEEDS® store at 1108 Richards. The City of Vancouver, through the Board of Variance, has in the past allowed cannabis dispensaries to operate notwithstanding them technically violating the 300 meter distancing requirement, so there is precedent for this, including but not limited to Green Rhino on 2231 Granville Street. Given that precedent exists, we submit the rationale for each required variance as follows:

1. Proximity to Community Centre:

- a. approx 115m to Gathering Place community Centre; and

Relaxation Rationale: The Gathering Place, while a community centre, is not a community centre for or that focuses on children. The reason for the 300 meter distancing requirement from community centres is to keep cannabis retailers away from places frequented by children. The Gathering Place is primarily for seniors, low income people, homeless people. They do provide some services to vulnerable youth, but Weeds Glass & Gifts Ltd is scrupulous about ensuring that no one under age is permitted in their store. From a principled perspective there is no reason to strictly enforce the 300 m rule in this case.

- b. Approx 277m from Roundhouse Community Centre.

Relaxation Rationale: This store is very nearly 300 meters from the Roundhouse and that it would be unjust and unreasonable to force Weeds Glass & Gifts Ltd to close that location and lay off its staff over a few meters between it and the edge of the Roundhouse property, which is large.

4. Projected Number of Clients: We anticipate 15,000 to 20,000 transactions per month in the first year.

5. Names of Staff and Associated Accreditation/Certification: Staff will be identified and trained according to the Province's Cannabis Retail Store Terms and Conditions. Specific staff and their accreditation will be identified once the provincial referral has been given.

6. Parking and Loading Strategy: (including delivery strategy and frequency and vehicle size)

Maximum two (2) shipments anticipated per week via parkade, where there are two parking spots for the store. Delivery vehicles are standard minivans ie. Dodge Caravans. Deliveries arrive in several bins Approx 4-8 Bins or 3 to 6 cubic metres. Customer parking is on street (see site plan).

7. Venue Line-ups: (address queuing and how patrons/customers will enter/exit the venue (including how returns are processed))

The store design has 2 point of sale terminals. Lines will be structured using roped off guides and/or via instruction/management from sales associates, depending on the number of clients in the store. If the store is busy, additional sales associates will assist with serving customers, and having their purchase(s) ready for entering at the till. There is only one (1) front entrance through which customers enter and leave. Product is never handled by the customer until the purchase has been completed and a receipt is printed.

Customers looking to return product will be handled at any one of the point of sale locations in the store and will be required to complete a form that gathers the information required by Federal/Provincial/Municipal entities. Returned product will be handled according to regulations.

Sincerely,

Don Briere

President

WEEDS Glass and Gifts Ltd.