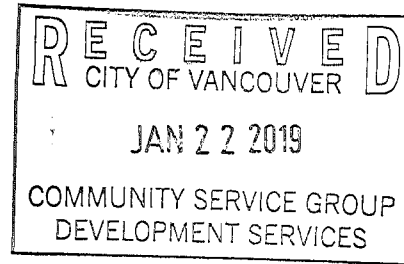


December 14, 2018

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



Re: Operational letter for Development Permit: 2580 Kingsway

Dear Sirs/Madams:

Please accept this operational letter as part of the application to seek a development permit for a WEEDS® store at 2580 Kingsway. 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: 2580 Kingsway, Vancouver, BC, V5R 5H2
 - b. Legal Description: Lot A Block 1 Plan VAP5441 District Lot 52 Land District 36 Except Plan REF PLAN 2407 OF LOT 16, & BLK 2
 - c. PID is 011-157-534
 - d. Area-Jurisdiction-Roll: 09-200-023-770-276-24-0000
 - e. Zoning Category: C-2
 - 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 herein.

 - b. Past business experience: WEEDS Glass & Gifts Ltd 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, reasonable access, high quality and efficacy, and education, environmentally friendly packaging. 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, pre-rolled joints)
 - ii. Glassware
 - iii. Papers
 - iv. Lighters
 - v. Grinders
 - vi. Storage options
 - vii. 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

- ii. Personal Address of operator: 13516 Rippington Road, Pitt Meadows, BC V3Y 1Z1
- iii. Cell: 604-866-6110
- iv. Email: don@weedsgg.ca
- v. Business Name: WEEDS Glass & Gifts Ltd
- vi. Store Name: WEEDS®

3. Relaxation Rationale:

It is requested that the Cannabis retail zoning bylaw be relaxed for the WEEDS® store at 2580 Kingsway. 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 Elementary School:

- a. approx 222M from John Norquay Elementary School:

Relaxation Rationale: Weeds Glass & Gifts Ltd is very strict about enforcing its 19+ only policy for people who wish to enter the premises. As with liquor stores, which are permitted to be 150 meters from schools, no child would ever be allowed into a WEEDS® location. This location is nearly 300 meters away (door to door shortest walking distance is approximately 450m and crosses busy Kingsway) and has been in operation for 4 years. In that time, there have been no incidents or alleged incidents involving minors. As well, in the area of the Kingsway stores, there are many schools, so the City is effectively creating a much larger cannabis retail free zone than the law intends. Further, the Kingsway store is such a distance from the school that no child would see into the store from the school and they would be unlikely to pass by, particularly as the store is across busy Kingsway street from the school in addition to being well over 200 meters away. A relaxation of the 300 meter distancing requirement is appropriate and requested for these reasons. The Kingsway store has had no complaints from neighbours or the community and had invested significant funds upgrading the premises.

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 garage. The store is allocated one (1) parking spot with a door in the garage that leads directly to the store. Delivery vehicles are standard minivans ie. Dodge Caravans. We anticipate deliveries to consist of 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.