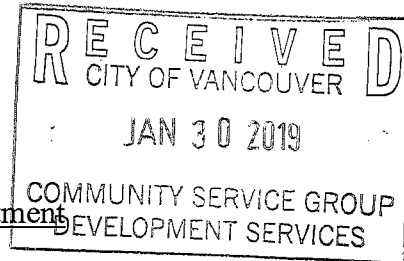


**BELIEVE VENTURES INC.**

January 8, 2019

City of Vancouver  
 Development and Building Services Centre  
 Ground Floor  
 515 10th Avenue  
 Vancouver, BC V5Z 4A8



Attention: Planning and Development Services Department

Dear Sirs/Mesdames:

Re: Operational Letter at 4423 Boundary Road, Vancouver, BC (the "Property")

1. Description of Operation

Believe Ventures Inc. is proposing a retail cannabis store at 4423 Boundary Road, Vancouver. We are targeting a large residential populated area which is underserved at the moment. There are very few CD-1 zoned properties in this area between Grandview Highway to the north, Kingsway to the south, Rupert Street to the west and Boundary Road to the east. With the closure of a mixed commercial building at 22nd Avenue and Rupert Street, there are very few CD-1 zoned areas that can service the residents in this area.

With the closest cannabis retail stores being located on Kingsway and Tyne Street and Kingsway and Rupert Street, both of which are two kilometers away, we can fill a void in this area.

2. Hours of Operation

Believe Ventures Inc. proposes to open between the hours of 11:00am to 9:00pm, 7 days a week.

3. Name of Operator

The operator will be Believe Ventures Inc. A formal DBA name has been undecided at this time.

4. Projected Number of Customers

We project based on current foot traffic of the building anywhere between six to eight customers per hour.

5. Number of Staff

At the time of opening, we will have two full time staff and four part time staff. Additional staff will be hired based on volume.

## 6. Parking and Loading Strategy

The building provides ample parking towards the south and loading areas at the backside building which face west. Public parking will be allowed in the parking lot and loading will be at the back of the building. Exterior doors service a loading area to the west facing side of the building. We expect to be utilizing the loading bay three to four times a week based on business needs.

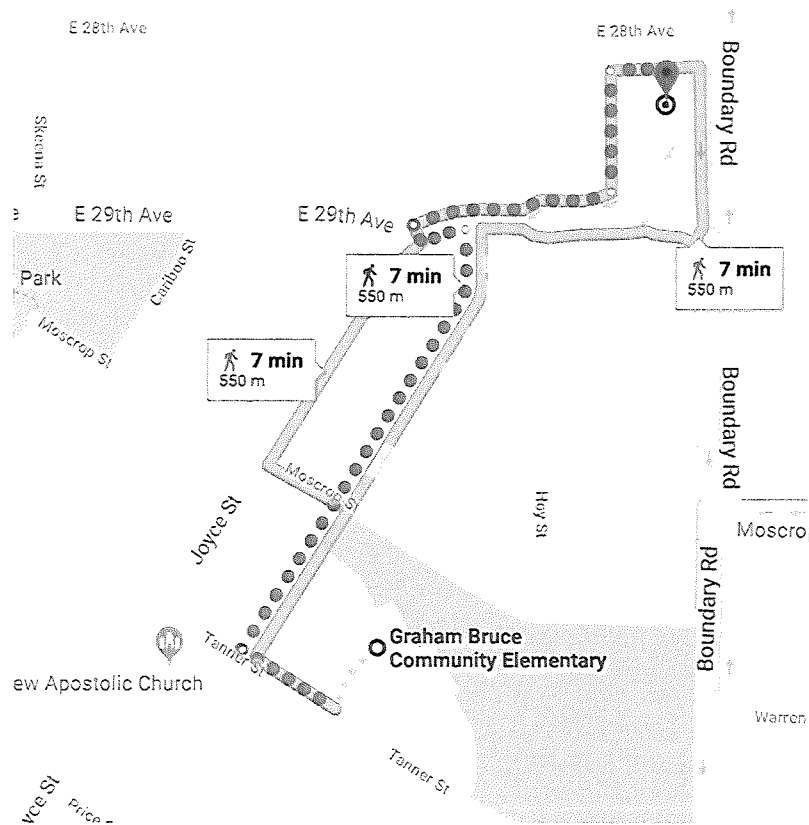
## 7. Relaxation Rationale

We understand that retail cannabis stores are to be 300 meters away from schools according to zoning and development bylaw (section 11.28.2). We seek to have this requirement relaxed. The closest school to the Property is Graham Bruce Community Elementary school. We estimate that we are around 280 meters away from the school, depending on how the distances are drawn.

The bylaw states that the distance is to be drawn from property line to property line. We believe this to be unfair as we are located inside a multi-use commercial building. A proper distance should be drawn from the entrance of the business to the entrance of the school. Furthermore, the school has a large outdoor field which causes the distance from property to property to seem even closer. If the distance was set from the entrance of the business to any entrance of the school building, we would be more than 300 meters away.

The way surrounding roads are configured, it is also difficult for vehicle and pedestrian traffic to access the Property. There are no pedestrian crossings on 29th Avenue other than one on Boundary Road and on Joyce street, both of which are quite far from Graham Bruce Community elementary. Vehicles are forced to drive south on Boundary Road because of a traffic island in the middle of Boundary Road. Vehicles dropping off and picking up school aged children are forced to turn on either Moscrop Street or Tanner Street and must go southbound, which is away from the Property.

We believe that the intention of the zoning bylaws was to prevent school aged minors from purchasing cannabis, both from viewpoint and also be accessibility. The geography surrounding the Property is elevated and you can not see the Property from Graham Bruce Community Elementary. Additionally, with winding roads and curved streets, it makes it quite inaccessible to children. Houses are in between the school and the Property as the surrounding area is mostly a residential area. Furthermore, the crossing of 29th Avenue makes it harder to reach by walking as you must cross Joyce Street to walk down 29th Avenue or walk down to Boundary Road and cross there. Taking into account the fastest walking route, it would take 7 minutes and it would be a 550 meter walk as seen below:



The 300-meter bylaw is a good objective rule, but should only be used as a guideline and applications should be reviewed on a case by case basis. If there was a level and clear field separating two properties, this would make sense. However, with the numerous residential houses and winding roads, the 300-meter bylaw does not make a lot of sense in this case.

We thank you for your time in reviewing this application. Should you have any questions regarding this application, please do not hesitate to contact the undersigned.

Yours truly,

BELIEVE VENTURES INC.  
by its authorized signatories:

*[Handwritten signature of Jonathan Wong]*  
Per: Jonathan Wong, President

*[Handwritten signature of Chin Wei Shih]*  
Per: Chin Wei Shih, Vice President