



April 1, 2025

Mayor and Members of Council
City of Victoria
Centennial Square
Victoria, BC V8W 1P6

Re: Cannabis Rezoning Application for 1555 Vancouver St., Victoria

Dear Mayor Alto and Council,

My name is Chris Clay and I'm the founder and CEO of Warmland Cannabis Centres, a provincially licensed cannabis retailer based in the Cowichan Valley. I'm writing today to introduce myself and Warmland in support of our rezoning application for a proposed licensed cannabis shop at 1555 Vancouver St. in Victoria's Central Park area.

Description & Background

The proposed cannabis retail store is an 820 square foot unit in the development known as 1008 Pandora, anchored by Save-on-Foods. The unit sits between Panago Pizza and Quesada Burritos & Tacos.

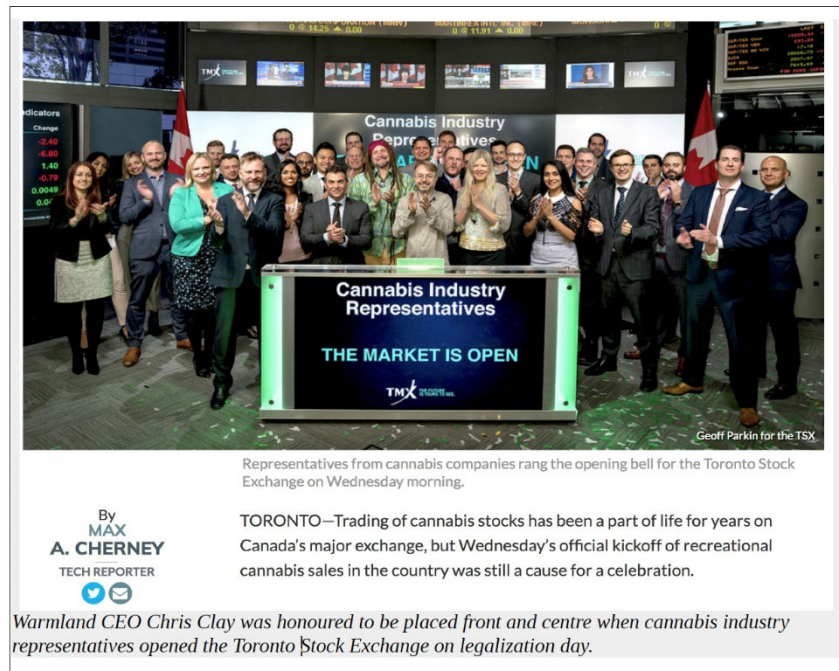
1008 Pandora is a mixed-use six-storey building with ground floor commercial units and 260 on site homes. We feel a licensed cannabis shop would make a wonderful addition to the building and to the neighbourhood and hope you will favourably consider our rezoning request.



Warmland currently operates three provincially licensed cannabis retail stores in Mill Bay, Cobble Hill and at Whippletree Junction, just south of Duncan. Aside from the proposed Victoria shop, an upcoming store in Chemainus is also awaiting rezoning and is expected to open this summer.



Personally, I've been a cannabis activist since the early 1990s and opened the country's first hemp store in London, Ontario in 1993. In 1995, I launched a constitutional challenge of the cannabis laws that reached the Supreme Court of Canada in 2002. I served on the boards of the BC Compassion Club Society in Vancouver and the Victoria Island Compassion Society (VICS) and operated Warmland Medicinal Cannabis Centre in Mill Bay from 2015 to 2018 (the shop closed just prior to legalization to transition to the legal market.)



City Policy

The proposed location complies with the city's Storefront Cannabis Retailer Rezoning policy except for item 2(b). According to a search by Sustainable Planning & Community Development, the shop would fall within the minimum 400m separation distance in relation to several properties zoned for cannabis retail use:

- 853 Cormorant Street (no cannabis store currently operating)
- 1400 Quadra Street (no cannabis store currently operating)
- 1040 North Park
- 1725 Cook Street

We feel that 1008 Pandora is a perfect location for a licensed cannabis store (a busy commercial unit near downtown with underground parking and several hundred residential units above) and strongly believe that a Warmland shop in Central Park will bring many benefits to the community regardless of the inability to meet the 400m guideline. We kindly request that council consider a variance under section 3 of the policy and evaluate our application on its overall merits.

Project Benefits & Amenities

Warmland's proposed 1008 Pandora location would create new downtown jobs (3-4 full-time positions and 3-4 part-time positions) and bring increased security to the area while having a light environmental footprint (Warmland has a comprehensive waste management program to reduce, reuse and recycle as much as possible while also using LED lighting and other technologies to reduce energy consumption.)



The shop would also provide an additional source of cannabis for residents and commuters from Canada's regulated supply, proven to be far safer than current black market cannabis. According to a new Health Canada study,

Only two legal products showed trace levels (0.01 parts per million [ppm]) of pesticides out of over 300 pesticide residues tested. In comparison, 94% of illegal samples had multiple pesticides, averaging 3.4 pesticides per sample, with a total of 24 different pesticides identified, some at very high levels... Although a few legal products tested positive for microbial contaminants, illegal cannabis products were found to have significantly higher levels of microbial contamination when compared to cannabis obtained from the legal market, often exceeding European Pharmacopeia (Ph. Eur.) limits. These included opportunistic pathogens... associated with respiratory infections such as Klebsiella spp. and Pseudomonas aeruginosa.

Source: [Cannabis Data Gathering Program: A comparison of legal and illegal dried cannabis products](#) (Health Canada, February 2, 2025)

Neighbourhood

The unit sits on Vancouver Street along a busy pedestrian/cyclist commuter route, in Victoria's Central Park neighbourhood. There are 260 homes above the commercial space, with many other apartment and condominium buildings within easy walking and cycling distance. Warmland seeks to serve building residents, Central Park residents, commuters (cyclists in particular) and residents from adjacent neighbourhoods (coming to do their grocery shopping and/or picking up some pizza or tacos next-door.)





Impacts

The proposed project, a small unit in a modern mixed-use building with commercial units and residential units above, would perfectly complement the surrounding area. It would also improve conditions in terms of security (see **Safety & Security** below). In terms of noise and activity levels, the new shop would not bring any notable changes.

Design & Develop Permit Guidelines

No exterior changes are planned for the unit aside from signage that conforms to municipal regulations. A building permit has already been issued for interior renovations and work is scheduled to begin this summer.

Safety & Security

1008 Pandora sits on the corner of Pandora Ave. and Vancouver St., on a high traffic pedestrian/cyclist commuter route. Its location alone provides a great deal of natural surveillance with its clear, unobstructed views, ample street lighting and a continuous flow of pedestrians, cyclists and drivers passing by. Also, the building and lot were completely redeveloped in recent years to create a mixed-use building that incorporates excellent lighting, visible walkways and entrances, and public meeting/seating areas.

The relatively small unit that Warmland has leased will see additional CPTED elements incorporated, including:

- Security cameras (interior & exterior) with back-up power and 60-day cloud storage (with video surveillance warning signs).
- 3M security film on glass windows & doors (with warning stickers).
- Centrally monitored security / fire alarm with cellular back-up and guard response plan (with warning stickers).
- On-site security guard during at least the initial months after opening. A security review will be conducted after 60 days to evaluate further need (or the lack thereof) for security guard services.

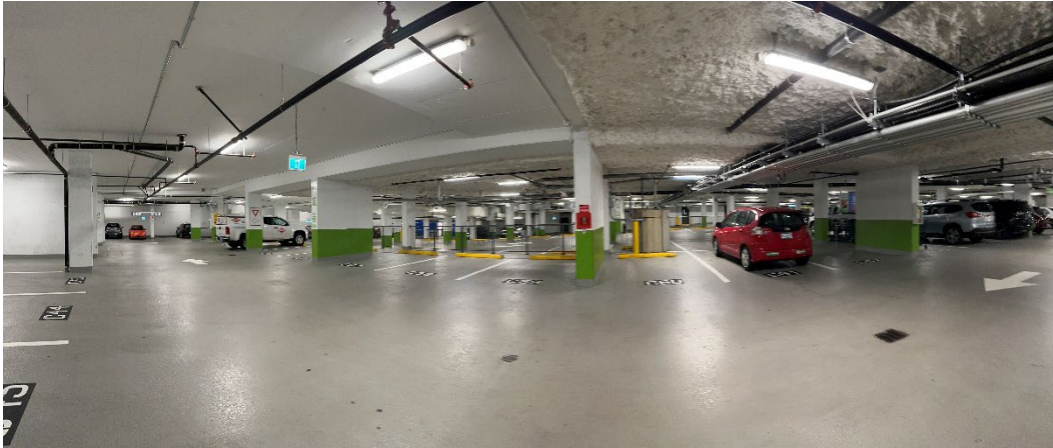
It's important to note that, as per provincial regulations, all products will remain out-of-reach of customers and will be stored in locked cabinets and locked display cases. For such a small unit, Warmland's Central Park location will bring an outsized contribution to overall security to the 1008 Pandora building and to the neighbourhood overall.

Transportation

It is our understanding, based on research by architect Carolyn Wilson, that the project meets all municipal vehicle and bicycle parking requirements. No additional bicycle parking is planned. 1008 Pandora was carefully designed as a mixed-use development with plentiful parking for bicycles as well as an underground parking lot. It also has an elevator and escalators and is



highly accessible to those with mobility issues.



Heritage

1008 Pandora was completed in 2020 and has no heritage significance.

In conclusion, I would like to thank you for your time and consideration.

Best wishes,

Chris Clay
C.E.O., Warmland Cannabis Centres

