

July 18 2025

Re: Modified Storefront Cannabis Retailer Rezoning

Dear Mayor and Council,

Thank-you for considering our rezoning application for a modified Storefront Cannabis Retailer Rezoning. Because our cannabis program is a harm reduction social service, but no zoning exists for this particular use of cannabis, we are applying for a modified Cannabis retail zoning with a covenant for this zoning only to apply to ‘distribution of cannabis as an ancillary use to harm reduction services.’

Background

This is a unique application in that we have been operating our Cannabis Substitution Program as part of our harm reduction and overdose prevention services since 2017. The principle of the service is that many individuals living in poverty and who use substances are able and interested in using cannabis as an alternative to street drugs when cannabis is free and/or significantly cheaper than street drugs. Small studies of our program have shown its effectiveness, and we continue to see how participants are able to make changes in their day-to-day lives based on the space and alternatives to illicit drug consumption that we provide.

Changes we observe in participants in our program include:

- Using less illicit street drugs
- Increased ability to eat and sleep
- More money to spend on food and rent
- Slower pace and increased ability to take part in support groups and contemplate steps towards increased health
- Time to access drug checking due to improved management withdrawal symptoms

With support from Island Health’s Chief Medical Officer, we applied for and received two consecutive Temporary Use Permits for this program, for the periods February 2020 through July 2022, and July 2022 through July 2025, ‘to permit the distribution of cannabis as an ancillary to harm reduction services.’

Due to the disproportionately large number of indigenous participants in our program (approximately 30% of participants), we have increased indigenous cultural supports for this program, including weekly wellness circles, and have supported the development of an indigenous board responsible for the delivery of the program. Other than these improvements in program delivery to indigenous peoples our program has remained relatively unchanged through these 7+ years of operation. Harm reduction and health education services on-site include:

- Daily support groups (including arts groups and health education groups on Hep-C testing/treatment, etc)
- Harm reduction supplies and training, including naloxone, safer sex resources, safer use resources
- Assistance with ID, referrals to legal aid
- Assistance with housing issues
- Assistance with health referrals
- Access to co-located drug checking
- Opportunities for volunteer tasks including street clean and street outreach
- Opportunities to develop facilitation and group leadership skills

During this time, we have maintained a quiet presence, with minimal impact on the sidewalk and surrounding street, and we have assisted many participants in finding meaningful connections and more healthy substance use alternatives to the daily grind of illicit drugs and associated survival strategies on the street. These successes are in large part due to our staffing model, which has a range of support staff available to assist participants with a wide range of needs, as well as an outdoor staff-person who ensures individuals are accessing our services or assisted in identifying where they are going next.

We have been a part of the North Park neighbourhood since 2006 (starting at Caledonia at Quadra, more recently at North Park at Cook) and are committed to continuing to be a positive contributor to the neighborhood. We are open to problem-solving and solutions-oriented discussions and working with the neighbourhood association in addressing any issues or misunderstandings that arise. There have been several clearly identified concrete problems that we have worked to implement solutions for immediately. There are a range of other concerns about individuals who access our services that are more about perceived risk of public disturbance than about actual impacts that we are unable to address other than through education and ongoing dialogue.

An example of a solutions-oriented discussion is the issue of visibility of individuals accessing our services at North Park; in particular, individuals waiting in line at our door before we open at 10:30am. To address this, we have asked service users/members to not wait in line and to not arrive before opening. We have a staff-person on-hand at 10am to remind members to not wait in line before the door opens at 10:30am. We also have a street ambassador who does a regular block check to ensure appropriate use of sidewalks by individuals who may be accessing our services. While some of these solutions are over and above (as many organizations and businesses have lines on the sidewalk before opening) we continue to be willing to address neighbor concerns so long as concrete problems are identified.

Other concerns we have heard, such as notions of increased instances of drug use, used syringes and increases in crime, are general statements we hear that have not been tied to specific concrete items we can observe or address, and that we believe are tied to stigma more than observable issues. We have two street teams daily doing syringe recovery and we have seen dramatic decreases in discarded syringes over the past three years. This is due both to a large increase in inhalation-based drug use and to availability of overdose prevention sites. We are seeing less discarded drug paraphernalia than ever before but continue to be diligent about recovering any discarded items we do find. Similar concerns regarding loitering by individuals who are visibly poor and intoxicated seem misplaced. We have not observed a rise in individuals inebriated in the surrounding area, but we have been quick to address health and social issues of individuals on the street when we see them.

To address misunderstandings about harm reduction and fears about people who are visibly struggling to survive, we have attempted to be very responsive to neighbor questions about our services, and continue to educate about harm reduction mandates, goals, and effectiveness. Overall we see an opportunity to destigmatize people who use drugs and who live in poverty as members of our neighborhood deserving of space and care, and more than capable of giving back to, and working in partnership with, our community.

We have been impressed this year by the community support and engagement we have seen, and in the respect for the neighborhood that our members have shown in their daily use of the space and in the broader neighborhood. We look forward to continuing to collaborate with the North Park neighbourhood in meeting the needs of all North Park residents, and with the City of Victoria in ensuring all residents are treated with dignity and care and have a place where they can feel welcomed supported and valued.

With our final temporary use permit ending in July 2025, and recognizing this service's longevity, success and positive neighbourhood impact, we are seeking rezoning to allow the continued delivery of this program at this location.

We are seeking three modifications or considerations in this rezoning:

1/ Covenant ~ Because our program is a social service, not a retail operation, we ask that the rezoning include a covenant that the rezoning be for 'distribution of cannabis as an ancillary use to harm reduction services.' This covenant meets the actual needs of our program while providing assurance to council that the service will continue in this format. With this covenant in mind, we ask that council take a lenient view as they have in the past with regards to proximity to cannabis retail services.

2/ Consultation requirement already met ~ Based on 5 years of operation at this site already, with very few complaints or incidences during this time, and based on already having done two rounds of community engagement for the two prior temporary use permits and having already established an on-going working relationship with North Park Neighbourhood Association, we feel that criteria for consultation has already been exceeded. We ask that this rezoning be approved without requirement for an additional round of consultation.

3/ Re-imburement of rezoning fees ~ both the previous TUP and current rezoning fees have been set at the much higher rate set for Cannabis retail (\$8,000 each time, while non-cannabis rezonings are typically less than \$2,000). As we have now paid this high-rate cannabis fee three times for our small not-for-profit services, we ask that council consider re-imbursing us for this 3rd round of rezoning costs.

Sincerely,



Jack Phillips, Director
Solid Four Directions Society