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**From:** Blake MacLeod [REDACTED]  
**Sent:** July 14, 2020 2:02 PM  
**To:** Mayor and Council <MayorAndCouncil@gibsons.ca>; Clerk <Clerk@gibsons.ca>; Tracy Forster <tforster@gibsons.ca>  
**Subject:** July 14th Public Inquiry - Venture Way Zoning Bylaw Amendment

Mayor & Council, Planning,

I am a resident of Gibsons living on Venture Way within site of the proposed, cannabis facility property. I am also aware of several existing cannabis growing operations on this street, including my immediate neighbour, and also others within the Town boundaries generally. It is common knowledge that the cannabis industry, and cannabis growing has become an integral component of the Sunshine Coast economy.

I am in favour of legalization, and have followed the process with interest, including landmark cases in the Supreme Court which have established and affirmed the Charter right of Canadians to grow or otherwise maintain access to cannabis for medical reasons. Leaving out my own, personal views around the positive and negative health effects of cannabis use, I want to address concerns specifically appropriate to this zoning bylaw amendment.

From what I understand to be true:

1) There is a proliferation of non-licensed grow operations operating in industrial zones in the area, almost none of which are growing medicinal quality product. Those that do, are responding to market demand, mostly serving seniors who use cannabis products as an alternative to highly addictive, and sometimes dangerous opioid drugs. These growers, and one or two retailers on the coast are operating at the fringes of Canada's (and BC's) legal landscape. They are assisting their clients to exercise their Charter right to access high quality, safe medicinal cannabis. Considering the high percentage of seniors living in our community, and due to other factors, these growers' and retailers' activities represent a long term, net gain for our community. I understand that the Provincial government is taking strides to mainstream medicinal cannabis regulations, including the legitimization of the craft growing cannabis industry in BC. There are a number of people on the coast considered expert in this field, and who would No doubt welcome the opportunity to brief staff and council, answer questions and respond to concerns.

2) Many existing, non-licensed grow operations in our Town are already here and supplying the recreational use market via the well established, underground economy. These operators mostly supply dried cannabis products for sale on the black market. It is a 'cash only' business, and includes employment for qualified, licensed trades people who, together with industry experts, build 'grow shows', and the 'trimmers', local crews of everyday folk who take the dried plant and quickly and efficiently turn leaves and bud into saleable products for producers. Local suppliers of construction materials benefit as well. Yes, it is an underground economy, but that cash earned returns to our community by way of local spending. There is a strong desire within the operators of this underground economy, that their businesses be legitimized as part of a nation wide community of craft growers, and of an industry segment that is regulated and monitored. At the moment the only way to legitimize as a recreational, dried cannabis grower is to apply for a Health Canada issued license, and this restriction limits options for scale...something craft growers need in order to grow their businesses and maintain quality product.

3) As with other industries operating under its purview, a Health Canada licensed cannabis producer (LP), which this applicant will presumably be, is required to meet stringent requirements and standards set by Health Canada around safety, security, quality of product, and impacts to community. The cost of installing and maintaining these standards must be, and in principle are part of the producers' business model. By this, Canada's licensed cannabis growers would theoretically operate on a level playing field ensuring competitiveness. In reality there are glaring gaps in way LP's are responding to the requirements, the most significant of which are the accidental, dangerous mislabelling, and the selling of contaminated or inferior product. In short, LP's have through misdeed, earned a bad rap among educated cannabis users. For this reason, habit, and the nature of convenience and predictability the underground economy thrives as ever it did.

4) Generally speaking, local craft growers are more connected to the community, at least it is trending that way as criminal organizations become less dominant. In this middle territory of still somewhat clandestine operations, the community of recreational and medicinal craft cannabis producers is, in reality better able to supply the needs of the community. Add to that, there is a far greater chance that the profits from cannabis sales, even those to markets on the mainland or farther through mail order, will be retained to be spent in the local communities up and down the Sunshine Coast.

5) "The LP business model has no heart." The focus of government licensed cannabis production as it exists today, is mostly that of publicly listed corporations operating within a cumbersome landscape of federal regulations, run on a large to massive scale. This capital investment, the promise of return, and the sheer size of each cannabis crop puts tremendous pressure to batch and profit from every production cycle. When plants become contaminated, the entire crop must be destroyed, all the growing medium sterilized or replaced, and the growing facility must be washed down with a bleach solution. This is painstaking work, and a very costly consequence. Too often the large licensed agro-cannabis company will move quickly to sell the product into the market.

The regulations for cannabis growing at that level is seemingly designed to disincentivize, or even exclude small to medium sized operations altogether. I am aware of a number of LP grows that were set up on the coast in early days of legalization, but cannot speak to the quality product. What I have heard, and this is via insider talk, but also reinforced by stories in the national media, is that the quality of cannabis produced by LP's is almost always, far inferior to what coasters can buy through the continuing relationships with local growers.

6) I have heard that it is very difficult to find renters for existing commercial buildings in industrial zones...unless the owner is willing to rent it for cannabis production. That said, if commercial lots are in such high demand for growers, then why are there two bare, and several other under utilized lots on Venture Way? Is having shoulder to shoulder cannabis production properties really the only response for our community?

Are there other zoning options available to the Town and property owners that respond to other, more pressing needs within the community? I believe in a free market economy that is held in check via forward looking policy. Should the Town pause on this, and look for way to enhance potential before deciding? Once this rezoning bylaw happens, this property title will acquire a new slate of rights. These will act to limit options as to what that better use might be.

Two options that don't include this specific zoning bylaw amendment...

There are fundamental questions for a community of largely progressive people to ask when deciding if a licensed cannabis producer, or any other cannabis producer for that matter is appropriate for this location at this time...or ever.

Option One - The nature of Gibsons is changing, and this prime location, so close to amenities and services would be far better suited, perhaps, to use that capitalizes on the livability and walkability of the area. Mixed use comes to mind, or perhaps multifamily, artist studio/loft apartment makes more sense. The zoning allows for that form now, but perhaps

the Town would consider an enhanced version to allow more density. Would the applicant be interested in changing direction and pursuing that?

It would see to make more sense, from an urban planning perspective, to locate industrialized, warehouse production facilities in less desirable areas.

Option Two - Considering the proliferation of recreational cannabis grow operations on the coast, nearby in Squamish and elsewhere in BC, shouldn't we decide to wait to see where the Provincial legislation goes before paving the way for another one here?

Might we be better off not enabling yet another cannabis producer until laws are streamlined enough that a grow operation like this one being proposed, can be zoning bylaw can be amended for medicinal quality cannabis production only?

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