

Eighth Avenue Development Group Ltd.
Vancouver, Canada

January 25, 2017

City of Vancouver
City Clerk's Office
3rd Floor, 453 West 12th Ave
Vancouver, BC V5Y 1V4

Dear Sir or Madam:

**RE: RAILTOWN REZONING:
PROPOSED I-4 (HISTORIC INDUSTRIAL) DISTRICT
ZONING BY-LAW AMENDMENTS**

Eighth Avenue Development Group is a Vancouver-based company with an interest in the Railtown district. We write in regard to the proposed I-4 zoning amendments, to be considered by Council at Public Hearing on January 26, 2017.

While we are generally supportive of the objectives, goals and purpose of the proposed I-4 zoning amendments, we are concerned that the Manufacturing Uses, as defined in the proposed I-4 District Schedule, are too restrictive, do not reflect the evolving and successful nature of Railtown, and will ultimately hinder real employment growth in Vancouver.

Currently, City of Vancouver Industrial Zoning District Schedules permit "*Software Manufacturing*" as an Outright Approval Use. The proposed I-4 District Schedule removes this Outright Use, and replaces it with "*Creative Product Manufacturing*" (CPM), as a Conditional Approval Use. CPM specifically excludes software and digital manufacturing, which is now categorized as "*Digital Entertainment and Information Communication Technology*" - an Office Use instead.

The problem with this approach is that maintaining 50% industrial use (as now defined in the proposed I-4 By-law) will not, in fact, preserve traditional industrial jobs. The nature of industrial work is changing rapidly and dramatically, and many traditional jobs will soon be replaced by robotics and other technological advances.

In order to preserve and enhance real job growth, and to stimulate the economic development of the Railtown District, the following revisions to the proposed I-4 District Schedule are strongly suggested:

- Permit "*Software Manufacturing*" (as defined in the Zoning & Development Bylaw) as an Outright Manufacturing Use (per current Industrial Zoning Districts).



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In order to maintain the Industrial character of Railtown and to stimulate the revitalization of older buildings, the following provisions could be considered:

- Maintain ground floor area for traditional industrial, retail and restaurant uses, except for pre-1951 buildings, where office uses are also permitted.

“Software Manufacturing” (now described in the staff report as “Digital Entertainment and Information Communication Technology”) is very much in evidence in Railtown, and is indeed compatible with industrial land use, providing the city with needed business-serving activities. The proposed zoning changes may in fact render some existing businesses to be non-compliant.

The City of Portland, in its Planning and Zoning legislation describes its classification of “Industrial Office” use as follows:

“Their operations are less service-oriented...and focus on the development, testing, production, processing, packaging, or assembly of goods and products, which may include digital products such as internet home pages, media content, designs and specifications, computer software, advertising materials, and others. They primarily provide products to other businesses. They do not require customers or clients to visit the site; any such visits are infrequent and incidental.”*

- emphasis ours

We therefore request that, prior to enacting the I-4 Zoning District, the City:

1. add “Software Manufacturing” as an Outright Industrial Use; and
2. delete “Digital Entertainment and Information Communication Technology” as an Office Use, and add as an Outright Industrial Use.

We thank you for your consideration.

Regards,

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Ed Kolic
Principal



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