The following provides a detailed applicant response to the **Application Review Summary for REZ00857 and DPV00245 for 350 and 360 Douglas Street** provided by the City of Victoria.

# Development Services Division Comments Area Planner: Rob Bateman: 250.361.0292

• The Official Community Plan (OCP) designates this location as Urban Residential which envisions multi-unit residential, including townhouses and row-houses, low and mid-rise apartments, with a residential character public realm featuring landscaping and street tree planting. Heights may generally range from three to six storeys with total floor space ratios generally up to 1.2:1. Additional density may be considered in locations that support the growth management concept in the OCP, such as in proximity to Urban Villages, Town Centres and Transit Priority Corridors, where public benefit is provided consistent with the objectives of the OCP and other City policies (max of approximately 2:1 FSR). See Section 6 of the OCP for more information on Urban Place Designations (please note that City-initiated amendments to the OCP were adopted by Council on September 7, 2023).

o Provide additional justification for how the proposal meets the Urban Place Designation policies. An OCP amendment may be required.

## RESPONSE:

We understand that an OCP amendment is not required, as noted in the follow-up email to Rob Batement on November 2, 2023 which included the requested additional summary of key public benefits, and additional response email from Rob Bateman on November 10, 2023.

City policy supports the creation and retention of affordable and rental housing. Please consider including on-site affordable housing with this proposal. Staff will recommend to Council that the rezoning include an amendment to add the lot to Schedule "N" – Residential Rental Tenure Properties. See Section 13 of the Official Community Plan and in the Housing Strategy for more information on City housing policy.

# RESPONSE:

We understand that the rental housing will be secured by the City, and support application of the Residential Rental Tenure through zoning or Housing Agreements, to be further discussed with staff.

• Economic analysis may be required to determine the amount of Community Amenity Contribution that this rezoning application can support. See the Inclusionary Housing and Community Amenity Policy for more information.

# RESPONSE:

An economic analysis has been initiated and the results of the land lift analysis are expected in mid-December 2023 or early January 2024 for submission to the City in support of the application.

# **Design Comments**

Revise the proposal for greater consistency with the Development Permit Area 16 objectives and guidelines. Please consider the following:

- Revise the proposed relationship with all street frontages to improve street vitality, pedestrian activity, safety and provide visual interest:
- o Locate low-rise buildings, such as townhouses, along Huntington Place and Avalon Road to provide a sense of enclosure along adjacent streets.
- o Set buildings back from the statutory right-of-way (SRW) by approximately 4m to provide space for a transition between the public sidewalk and the private patios and entrances. Porches, steps, alcoves or other design features should be provided to make transitions from the public sidewalk to the private residences (see Engineering Department comments below regarding SRWs).
- o Emphasize the proposal's entrances using architectural and/or landscaping features. Weather protection at front entries is also encouraged.

o Design building facades along streets to include architectural features that provide pedestrian interest, such as windows and doors. Large, blank featureless walls that are visible from the public realm are strongly discouraged.

#### RESPONSE:

The consideration of low-rise building forms along Huntington and Avalon has been explored in previous design iterations prior to this current application process, and the community did not support the proposals. Engagement with the James Bay Neighbourhood Association (JBNA) and the surrounding community helped shape the current site plan.

The articulated facade along Toronto street is setback from the SRW by 3.2m to 4.8m to create interest and break down the building massing. Projections including balconies, canopies, lintels, and cornices provide further interest to break down the massing. The setback is adequate to incorporate private porches with steps and planters that create a transition to the public sidewalk.

The parkade on Huntington, including the exit stair, is setback from the SRW by 0.5m. Due to the grading of the side, the parkade will project out of the ground between 0m to 1.5m and will be clad in brick and screened with landscaping. A decorative metal fence will be installed along the top of the parkade. The articulated building facade on Huntington is setback from the SRW by 1.0m to 3.8m.

Canopies have been provided at primary building entries facing Toronto Street and the southern amenity area. All facades have been animated with patios, balconies, windows, doors, and cladding treatments to ensure attractive development that integrates with the community.

• Reduce the perceived massing of the building. This could potentially be achieved by breaking up the proposed large building into multiple smaller buildings. Adjusting the current proposed building's articulation, stepping back upper storeys, and/or providing substantial breaks in the facade may also assist with this.

# RESPONSE:

The current proposal has implemented a number of design techniques to reduce the perceived massing of the building such as:

- Recessed balconies are used to divide the building into several masses along the streetscape.
- The first two floors of the building are treated with brick materials to create vertical hierarchy to the building and emphasize the pedestrian scale with a warm and high quality material.
- Material variation on the upper 4 floors further diminishes the mass and provides the impression of a 6th floor stepback. A structural stepback is not desired due to impact on energy efficiency and number of housing units.
- The building steps down to 4 storeys on the west side to transition to the traditional residential neighbourhood to the west across Huntington.
- The building embeds itself into the site on the west side, resulting in the appearance of a 5 storey building.
- Step back the upper storeys to enable sunlight penetration to the adjacent streets and parks.

## RESPONSE:

A building stepback has been used on the west side to reduce the building to 4 storeys along Huntington. Additional stepbacks have not been provided due to energy and building efficiency. Shifting planes in the facade results in details which increase thermal bridging and derate the effectiveness of the building envelope. Changes in material and wall thickness have been used to create a shift in plane and colour at the 6th floor, resulting in the visual perception of a stepback.

• Incorporate distinctive massing, building articulation, architectural treatments and landscaping at the street corners, particularly at the Douglas and Toronto Street intersection.

#### RESPONSE:

The treatment of the corners has been developed in consultation with the community and the JBNA's Design Review Committee to provide strong, distinctive massing at the corner of Douglas and Toronto Street. Building materials and balconies are used to create a presence that addresses the corner condition. Street oriented units have been added on the second floor (grade level) facing Douglas Street to further activate this street.

Revise the exterior building materials to be high quality, durable and capable of weathering gracefully.

All materials selected are high quality, durable, and demonstrate weather resistant qualities. Materials include brick and fibre-cement cladding.

- · Landscaping and Parking:
- o Provide more green space and trees on site to protect and enhance the urban forest and assist with stormwater runoff.
- o Increase the amount of usable outdoor space on the site by providing gathering places and clear path networks for pedestrians. Buildings should be connected and integrated with pedestrian-oriented open spaces, such as courtyards, gardens, patios and other landscaped areas.
- o Locate parking underground or to the rear of buildings to minimize the impact on streetscape appearance and to maximize ground level space for landscaping.
- o Provide landscape elements, such as planting or fencing, to visually break it up and screen surface parking from public streets.
- o Use high quality, permeable and durable paving materials in surface parking and pedestrian areas. Generally, asphalt should be minimized by integrating a variety of paving materials, or by use of alternate surface treatments. Paved surfaces with visual interest (e.g. eliminate curbs and/or use bollards, stamped concrete, unit pavers, etc.) should be provided.

#### RESPONSE:

Parking stalls have been removed along Avalon Road to increase opportunities for landscaping along this street. The parkade ramp has been relocated from along Huntington to the interior of the site to accommodate the requested SRW and increase opportunity for trees and landscaping.

Outdoor space has been implemented south of the new building, including a shared patio and landscape area. Overall the proposal introduces a significant increase of green space over the existing development. A new pedestrian connection has been provided south of the new building which connects Douglas Street to Huntington Place.

Below grade parking has been maximized to reduce surface parking. Expansion of the parkade is not viable because fire fighting and service access must be maintained to the existing buildings during construction. Surface parking is located on the interior of the site and surrounded with either building or landscape screening. A decorative metal fence has been provided along Huntington, which relates to other front yard fences provided in the community.

Pavers will be used throughout all new pedestrian areas. Asphalt is preferred for vehicle surfaces to create visual distinction between vehicle and pedestrian zones.

# Heritage Comments Heritage Planner: Kristal Stevenot: 250.361.0484

• The materiality needs to take more cues from the historic neighborhood and specifically the Avalon Huntington Heritage Conservation Area, which is almost exclusively wood siding. This is particularly important for the portion of the proposal located within the Heritage Conservation Area. Consider using high quality wood or wood-like cladding such as narrow hardi plank. Brick is not appropriate, and all materials used should be of high quality and durable.

# RESPONSE:

The wood siding treatment referenced in the community is a historic material used primarily on single family housing and smaller scale developments. Larger historic structures in the community such as the James Bay Inn and the South Park School utilized more permanent and durable materials such as masonry and stucco. The brickwork proposed takes cues from these historic structures. The treatment of the fibre-cement cladding (ie Hardi) has been revised from a panel to horizontal lap siding and vertical board and batten applications which are similar to wood cladding treatments used on other homes in the Avalon Huntington neighbourhood and the surrounding community.

• Improve the relationship of the proposal to Beacon Hill Park and Huntington Place through façade detailing and articulation that takes cues from the context, and greater street activation and relationship, such as increasing the number of units with direct access to the street.

The 2nd floor units (grade level) along Douglas Street have been revised to provide street oriented patios and entrances to better engage this street. All other main floor units are currently designed as street facing units. The masonry retaining walls, black metal fence, and generous landscaping creates private patio/yard spaces which respond to the character of yards adjacent to the development.

• Consider increasing the proposal's presence, such as through low scale townhome units, along Huntington Place to soften the transition to the Heritage Conservation Area, taking design and material cues from the homes along the street.

## RESPONSE:

Low rise along Huntington and Avalon has been explored in previous design iterations and the community did not support the proposals.

• More views are required to better understand the street experience, particularly the relationship between the proposal and the Heritage Conservation Area and Beacon Hill Park.

# RESPONSE:

Additional renderings have been provided. Refer to the presentation document submitted.

• Renderings are inaccurate and incomplete. There are discrepancies in colour, and the lack of visual detail does not allow for a full understanding of the façade design and it's fit within the heritage context.

#### RESPONSE:

Renderings, elevations, and plans are generated from the same digital model and are believed to be consistent and complete. Revised renderings have been provided to illustrate revised material treatments. Additional material provided in the presentation document is to be considered along with the drawing package.

# Please provide:

• Correct errors on the plans and ensure that all sheets are consistent with each other. For example, the main level units to the west of the lobby appear to have walls located in incorrect locations (Sheet DP2.03).

# RESPONSE:

Revised plans submitted for clarity.

More 3D renderings including views showing the proposed building from street level on each side.

## RESPONSE:

All sides of the proposed building are captured in the submitted renderings (see presentation package). Additional renderings have been provided for clarity.

Shadow Studies demonstrating shadowing impacts on the existing adjacent private properties and parks.

#### RESPONSE:

Shadow Studies are provided in the submitted CALUC Presentation document. The shadow impact of the new building is believed to be minimal and the building has been placed to mitigate impact on adjacent homes and community amenities. The two existing towers on the site are much taller than the proposed development. At most times, the shadow of the new building is largely within the shadow impact of the existing buildings (refer to orange lines on shadow studies).

• More information regarding the grade changes on site including the location and size of retaining walls (if required).

## RESPONSE:

A grading plan has been submitted.

• Information on what is being proposed in relation to accessible design (eg smooth routes throughout the site and to entrances).

#### RESPONSE:

Barrier free access is provided to all building entrances and site amenities

· Information on lighting and how it will avoid overspill.

#### RESPONSE:

Full cut-off site fixtures will be used. Site lighting poles will be kept low to control lighting. Refer to submitted plan E1 Site Lighting Layout.

• All mechanical and utilities indicated on the plans (eg gas meters, PMTs, ventilation shafts, grates and other above-ground mechanical or site servicing equipment). These should be located to minimize negative impacts on public or common open spaces.

#### RESPONSE:

Refer to revised drawing DP1.02 for location of PMT, ventilation shafts and grates. Locations are selected to minimize impact on street frontages. Meters will be located inside the parkade if permitted by utility providers.

• Information on the materials proposed on the visible undersides of building elements such as balconies and overhangs. They should be clad with exterior materials that result in a finished appearance and which complement the palette of exterior materials used on the rest of the building.

## RESPONSE:

Materials are noted on elevations. The underside of balconies will be clad in a wood grain metal soffit.

• NOTE: The Plan Check for the proposal has significant outstanding issues/ missing/ or incorrect information. Please ensure that your resubmission addresses these items. If you need clarification on any of the items contained in the Plan Check, please contact the Zoning Administration staff as noted on the Plan Check.

# RESPONSE:

Plan check items are addressed on updated plans.

# **Engineering and Public Works Department Comments**

Review comments provided below are divided into sections: Land Development, Transportation, Underground Utilities and Stormwater Management

Items that are recommended for Council consideration as a condition of rezoning and secured in a legal agreement (whether involving Land Development, Underground, Transportation, or Stormwater Management) are contained in the Land development Review section.

#### General

Letters of Engagement (Client-Engineer agreements): Please provide to the City letters of engagement (or Client-Engineer) agreement for all disciplines involved in works within the right-of-way. This should include (at minimum) the Civil Engineering consultant, Landscape consultant, Electrical consultant and others as necessary. The consultants engaged should provide a letter (agreement) which fully outlines their scope of engagement, and may also include items for which they are not engaged. The developer is responsible to ensuring that the consultants provide this concurrent with the resubmission.

# RESPONSE:

Letters will be provided as needed.

#### Land Development Review

Contact:

- •Primary Kevin Smitten, Sr. Engineering Technologist, at 250.361.0300, or email at ksmitten@victoria.ca or
- Secondary Brent Molnar, Supervisor of Land Development at 250.361.0300, or email at bmolnar@victoria.ca
- •General Engineering 250.361.0300 Central email at eng@victoria.ca

Approving Officer

No Subdivision nor Strata Title consideration identified or contemplated at this time. If the developer intends to consider the building as Strata or subdivide the portion of land specific to the new building, they are to approach the Approving Officer.

Conditions to be met prior to the Committee of the Whole:

• Please provide a conceptual civil/servicing plan. Please include preliminary BC Hydro design and please indicate the PMT location (if required). Please ensure that all existing infrastructure (including 3rd party such as BC Hydro, Telus, Shaw etc.) are clearly shown on the plans. • Please ensure the requested SRW's are shown clearly and are labelled across all plans

## RESPONSE:

A conceptual civil/servicing plan has been provided.

• Please note that urban design related comments under Development Services review may influence frontage requirements It is recommended that, as a condition of rezoning, and secured in a legal agreement which is registered prior to bylaw approval:

# RESPONSE: Acknowledged.

· All SRW's as requested by the Transportation Department

#### RESPONSE:

All SRWs are provided as requested.

• All TDM measures as requested by the Transportation Department to the satisfaction of the Director of Engineering.

RESPONSE: Understood. An updated Parking Study has been prepared.

• The Requirements of the Sanitary Attenuation Report be secured (if necessary) and be registered in a legal agreement.

RESPONSE: The applicant acknowledges the report is required and it has been included in the resubmission.

For Information prior to Building Permit Submission/Approval:

The applicant is financially responsible for frontage works to the centreline of the road to current City of Victoria standards (i.e., at the time of Building Permit), as per the Victoria Subdivision and Development Servicing Bylaw, and to the satisfaction of the Director of Engineering and Public Works.

o The Civil designer must show all existing survey monuments on all plan submissions (including 3rd party design / utility submissions) and is to note those monuments that will be impacted by the development and associated works. Any monument located within 0.5m of an area of works is to be considered destroyed. As per Bylaw 22-028; the City will charge the developer \$2,000 per impacted monument as a fee at the time of Building Permit (non-refundable). Please ensure that the Civil submission drawings include existing monument locations. o If anchor pinning is required to facilitate the construction of the building, an encroachment agreement is required if any pins are to be placed into the road right of way.

# RESPONSE: Acknowledged.

#### **Transportation Review**

Contact: Fred Billingham, Transportation Planner at fbillingham@victoria.ca

Conditions to be met prior to the Committee of the Whole:

•Please review the intersection assessments in the TIA and update to capture trips generated by the proposed development as well as existing residential units that will be diverted through Avalon/Douglas and Huntington/Toronto when the Toronto vehicle access is removed.

#### RESPONSE:

Revised TIA has been completed .

• Staff will recommend Council make the SRW's a condition of rezoning to help fulfill Council approved Official Community Plan objectives such as pedestrian accessibility and boulevards which support the long term viability of street trees. Staff note that the Avalon Road SRW as shown on the submitted plans, includes a number of vehicle parking spaces. No parking is permitted within 1m of the SRW. A plan revision is required.

## RESPONSE:

These parking stalls have been removed.

• The streets in the neighbourhood surrounding the site are restricted with resident parking only, or time limited parking. Please provide information about how existing resident parking, and construction worker parking, will be accommodated during the construction period.

#### RESPONSE:

Applicant will ensure that all vehicles currently located on site will be provided with alternative parking arrangements during construction. Offsite parking arrangements will be provided for construction workers during the construction process.

• Please indicate all proposed visitor and accessible parking spaces on both the surface parking, and parkade plans. The streets in the neighbourhood of the site are restricted with resident parking only, or time limited parking, and are close to areas of high parking demand, such as Beacon Hill Park. It is unlikely that it will be possible to rely on street parking to accommodate all visitor parking demand. A plan revision is required.

# RESPONSE:

Visitor and accessible parking stalls have been indicated on the site plan and floor plans. All visitor stalls have been provided at grade.

• As discussed at the pre-application meeting of August 31st, 2022, staff require that bicycle parking is provided as per Schedule C for all units on site, including those in the existing buildings. 67 additional bicycle parking spaces are mentioned for the existing residential units, however these do not appear to be shown on the submitted plans, only the 122 bicycle stalls within the new building. Please provide a secure, covered bicycle storage in line with schedule C requirements for the existing units, in addition to those shown for the new development. A comprehensive TDM program for both the existing and new residents will reduce the overall demand for vehicle parking on the site. A plan revision is required.

#### RESPONSE.

Two covered bike shelters have been added between the existing buildings and the new building to increase bike parking capacity in compliance with Schedule C. Plans of the existing buildings have been submitted; 67 of the existing storage lockers within the existing buildings will be designated for bicycle parking to address the existing bike parking deficit associated with the existing buildings, which were constructed before bike parking requirements were in place.

Bike Parking provided is as follows:

- 127 long term stalls in main floor bike room (new building)
- 56 long term stalls in shelters on site
- 55 long term stalls at P1 parking level

- 39 long term stalls at P2 parking level
- 68 long term stalls in current storage rooms of existing buildings.
- 29 short term stalls on grade
- Please illustrate and provide metric dimensions for the long term bicycle parking in all proposed areas with bicycle rack placements as shown in the example illustrations for bicycle parking included within Schedule C of the Zoning Regulation Bylaw rather than in individual boxes. Unfortunately, when illustrated in individual boxes as shown on drawing DP2.03 there is sometimes a misunderstanding that individual lockers are acceptable. Standard inverted u racks accommodate a wide range of bicycles and common bicycle rooms ensure the bike parking area is used efficiently and as intended. Please dimension cycle parking stalls and circulation aisles, to ensure there is sufficient space to accommodate the required cycle parking. A plan revision is required.

Standard U racks are provided. Typical bike stalls are 450mmx1800mm with a 1500mm aisle.

- At the time of review, there was insufficient information to complete a zoning plan check. The parking variance appears to be significant, and staff will likely recommend a TDM program that may include, but not be limited to:
- o Care share memberships and usage credits for all residential units
- o Provision of an on-site car share vehicle(s) and space, the number of vehicles recommended to follow further information on the parking variance proposed.
- o 10% of required long-term bicycle parking to accommodate oversized bicycles
- o 50% of required long-term bicycle parking has access to an electrical outlet
- o Long-term bicycle parking to be provide at the rates of Schedule C for both existing and future residential units
- o A bicycle maintenance station, with location to be identified on the next plan revision.
- o More details on the above TDM measures are required.

# RESPONSE:

39 oversized bike stalls have been provided at the P2 parking level. Refer to revised plans.

191 long term bike stalls have access to an electrical outlet, equating to 56%. These are located as follows:

- 97 in the new main floor bike room
- 55 at P1 parking level
- 39 at P2 parking level
- The proposed ramp providing access to the parkade exceeds the maximum grade permitted under Schedule C. Please see Section 26 of the Highway Access Bylaw and Schedule C Section 2.2(13) of the Zoning Regulation Bylaw for additional information. A plan revision is required.

# RESPONSE:

Ramps have been revised to 15% slope.

• Pedestrian orientated street lighting is required at the intersections of Douglas & Toronto, Douglas & Avalon and Toronto & Huntington. The applicant is advised to contact the City's Electrical foreman for further information on the equipment and connections required, and add these elements to the civil plan.

# RESPONSE:

Pedestrian-oriented lighting is provided. Refer to drawing E1.

• The legal agreements for the TDM programs will prohibit charging fees for the use of the bicycle parking areas, activation or use of car share memberships with the exception of those charged by Modo for typical vehicle usage, or for the use or assignment of BC Transit EcoPasses.

## RESPONSE:

Acknowledged.

- •Staff anticipate an increase in pedestrian movements around the site due to greater density, and the proposed parking variance, resulting in more residents walking or accessing transit nearby. Deficiencies in pedestrian accessibility have been identified on the four frontages surrounding the development site. Current sidewalk conditions do not meet current City standards or BC Active Transportation standards for pedestrian accessibility. Understanding existing site conditions (e.g. grade and pool on Douglas, existing trees), a tailored approach to addressing pedestrian accessibility on the site's frontages is recommended. As such, staff recommend that the following frontage works be required as a condition of rezoning. A concept plan is to follow. Based on the preliminary information provided in the landscape and civil plans, it is anticipated that frontage works will include: o Avalon: Avalon is a local road with a right of way width of 12.2m. Although the local road standard is 18m, mobility objectives can be met with a reduced right-of-way of 15m. An SRW of 1.4m is requested, which will be utilized for localized widening of the sidewalk around obstructions such as hydro poles and anchors, an accessible on-street parking stall, trees, and future inbounding of the sidewalk. The existing curb alignment, as well as the recently rebuilt sidewalk can be retained.
- o Toronto: Toronto is a collector road, with a right of way of 10.5m. Mobility objectives can be met with a right-of-way of 13.5m. A SRW of 1.5m is requested, which will be used to provide a 1.8m wide sidewalk inbounded at the inner SRW, and a minimum 1.5 tree'd boulevard. The retaining wall at the corner of Toronto and Douglas is to be removed, and this corner to be rebuilt to City standards.
- o Huntington: Huntington is a local road with a right of way of 12.5m. The local road standard is 18m. An SRW of 2.75m is requested, which will be utilized to provide a 1.5m inbounded sidewalk at the inner SRW, with a minimum 1m offset from the existing trees (to be retained). The existing curb is to be relocated approximately 0.6m eastwards to widen the curb-to-curb distance to 9m and provide space for on-street parking on both sides of Huntington.
- o Douglas: Douglas St is an Arterial Road and Greenway, with current sidewalk widths ranging from 1.5m to 2m with obstructions and no street trees. To bring the frontage in closer alignment with pedestrian accessibility standards and Official Community Plan objectives, and recognizing site constraints, the curb is to be relocated eastwards narrowing the roadway and removing on-street parking (Passenger loading zone to be retained), to provide a consistent 2m wide inbound sidewalk with min 1.5m curbside tree'd boulevard. The sidewalk is to be extended across Douglas's intersection with Avalon, to provide a driveway style crossing.

Revised SRWs and curb and sidewalk alignments have been provided.

•Parks staff have raised concerns regarding the potential impact on tree routes on Huntington Place if the proposed curb relocation is carried out. Exploratory excavations should be carried out to ensure roots will be protected, and if an impact is shown an alternative option of widening the sidewalk into the existing, roadway should be explored. This option would not allow for on-street car parking on the site's Huntington Place frontage.

## RESPONSE:

The parkade has been sited and designed to minimize impacts to existing trees wherever possible. Tree #'s 001, 002, 902-913 and 972 will require removal due to the proposed parkade location.

For Information prior to Building Permit Submission/Approval:

- o Building Permit conditions will include requirements that the applicant is financially responsible for full frontage replacement of curb, gutter, sidewalk, street lighting, drainage, asphalt to centreline, and boulevard to current City of Victoria standards.
- o Building Permit conditions will include requirements that the applicant is financially responsible for the removal and replacement of redundant driveway crossings with full height curb, gutter, boulevard and sidewalk.

# RESPONSE:

Acknowledged.

# **Underground Utilities Review**

Contact: Anhad Jolly, Utility Planning Technologist, at 250.361.0263 or ajolly@victoria.ca

Conditions to be met prior to the Committee of the Whole:

•Please provide a conceptual servicing plan for review. Please show all existing services to the property as well as any new proposed services for the new building.

## RESPONSE:

A conceptual servicing plan has been prepared.

A sanitary attenuation report is required. If attenuation is required, it must be shown on the plans prior to Committee of the Whole and staff will recommend that Council secure the commitment to attenuation through a legal agreement registered on title prior to final approval of the rezoning.

## RESPONSE:

The report has been provided with the resubmission.

For Information prior to Building Permit Submission/Approval:

- o The details of the approved Sanitary Attenuation report will be required to be met.
- o the applicant is required to retain the services of a Qualified Professional for any project requiring excavation and disposal of any volume of soil for the purpose of characterizing the soil and determining a suitable disposal facility. The soil assessment must include samples from proposed service trench locations, with a report to be provided to the City. This is required to allow the City to provide the most accurate estimate and to install the new services most efficiently. Additionally, soil from a property with a current or former BC CSR Schedule 2 Activity must comply with provincial soil relocation requirements, including the one-week notification period prior to soil relocation.
- o A Street Occupancy Permit from Transportation Engineering will be required for work in the roadway.
- o Prior to commencement of excavation or soil relocation, contractors shall be registered under Bylaw 14-071,

Schedule G: Code of Practice for Construction and

Development Activities. Contact Adam Steele, Stormwater Management Specialist, at 250.361.0318 or asteele@victoria.ca to register.

## RESPONSE:

Acknowledged

# Stormwater Management Review

Contact: Brianne Tenk, Stormwater Management Specialist, at 250.361.0443 or btenk@victoria.ca

Conditions to be met prior to the Committee of the Whole:

•Please incorporate stormwater treatment via expansion of planting areas on the surface parkade area, using stormwater flow-through planters or similar.

## RESPONSE:

Planting areas over slab have been expanded, but no stormwater planters or rain gardens are proposed over the parkade. There is insufficient soil depth over the slab to provide rain gardens that will handle surface runoff.

For Information prior to Building Permit Submission/Approval:

- o Green infrastructure is eligible for Rainwater Rewards Incentives, see www.victoria.ca/stormwater for more information.
- o Indicate on the Building Permit plan submission, in square metres, the:
- o Site impervious areas
- o Permeable surface areas (not including stormwater treatment areas)
- o Stormwater management details, including sq. m of impervious areas managed

#### RESPONSE:

Applicant will review for opportunities.

# **Parks Division Comments**

Contact: Eryn Buzza, Telephone: 778.247.0753 or at ebuzza@victoria.ca

Conditions to be met prior to the Committee of the Whole:

General Comments

•Under the B.C. Wildlife Act and the Federal Migratory Birds Convention Act, Great Blue Herons are a Blue-listed species and legally protected. Great care shall be taken when working near heron colonies. It is recommended that the developer contact the BC Ministry of Water, Land and Resource Stewardship, for laws, policies, standards and guidance on development near heron colonies. and Government of British Columbia's Develop with Care 2014: Environmental Guidelines for Urban and Rural Land Development in British Columbia. More information is available online at:

https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/laws-policies-standards-guidance/best-management-practices/develop-with-care.

•It is recommended that the developer contact the BC Ministry of Water, Land and Resource Stewardship to determine whether an environmental impact assessment is required.

## RESPONSE:

The team has reviewed the materials available through the Provincial Government with respect to development near the heron colony in Beacon Hill Park, and has discussed the project with professional biologists to understand the best practices for mitigating potential impacts. It is understood that efforts to minimize noise during the heron's nesting season between March and June are advisable.

•Ensure safe retention of tree #902 - 911, 913, 001, 002 and 969 (and 972 if possible), utilizing low-impact methods of demolition, excavation, and construction for the parkade, building foundation and landscape elements.

The parkade has been sited and designed to minimize impacts to existing trees wherever possible. Tree #'s 001, 002, 902-913 and 972 will require removal due to the proposed parkade location.

The retention of 969 will be dependent on the design and proposed finished grades of the street level porch, municipal sidewalk and retaining wall that are proposed within the critical root zone. We will review this impact once detailed grading information is provided for review.

•Include metric bar scales on all plans.

#### RESPONSE:

Bar scales have been added

# Tree Minimum

•Please ensure the lot will achieve at least the tree minimum once all replacement trees are planted. If not, then the owner must plant additional replacement trees to achieve at least the tree minimum on the lot. The tree minimum for each lot is specified in the Tree Protection Bylaw 21-035, Schedule E and is based on lot size. The subject property is approximately 8934m2 and requires forty-five (45) bylaw-protected trees on site which meet siting, soil volume, and species requirements outlined in Schedule E.

# RESPONSE:

We have included as many trees as will fit on the site given the soil volume requirements and extent of the parkade slab, resulting in a deficit of 8 (37 trees total). Cash in lieu is proposed for the 8 remaining Replacement Trees.

# Arborist Report

- •Please provide a complete arborist report, per the Tree Protection Bylaw No.21-035, Schedule C, including: o update tree table to reflect existing tree inventory and conditions and separate into bylaw-sized and undersized trees for ease of review and tree counting.
- o update tree table to accommodate safe retention of #902 911, 913, 001, 002 and 969 (and 972 if possible), along with a separate column noting the specific reason for each tree removal, as well as other relevant comments/notes/mitigation recommendations related to construction impacts.

Note: Ensure that any proposed tree removals comply with the Tree Protection Bylaw No. 21-035.

o include site photos that capture the context of inventoried trees on site and individual trees that require specific considerations (or conditions of concern) as outlined in the arborist report.

#### RESPONSE:

The parkade has been sited and designed to minimize impacts to existing trees wherever possible. Tree #'s 001, 002. 902-913 and 972 will require removal due to the proposed parkade location.

Efforts will be made to retain tree 969. This will be dependent on the design and proposed finished grades of the street level porch, municipal sidewalk and retaining wall that are proposed within the critical root zone. We will review this impact once detailed grading information is provided for review.

•Provide exploratory digging results, through a written report and photographs, to determine location of structural roots of trees along Huntington St. The purpose is to locate roots and determine anticipated impacts to trees should the Huntington St. frontage curb be shifted to the east (towards the trees). Refer to Transportation comments.

RESPONSE: A tree dig has not been conducted as the design does not support the retention of these trees.

- •Provide mitigation recommendations and low-impact methodologies for all work within protected root zones, in particular tree #969 (London plane, 55.5cm DBH) (and 972 if possible) and all trees along Huntington St. frontage, including:
- o outline low-impact methodologies for demolition activities, including removal of curbs and asphalt adjacent to tree #972, 969, 001, 002 and trees along Huntington St. frontage;
- o outline low-impact methodologies for parkade and building excavation, including vertical excavation and shoring, along with alternative foundations to minimize encroachment into protected root zones:
- o include low-impact construction methodologies for fences and other landscape elements near retained trees.
- o confirm existing retaining wall within protected root zones at Toronto St. and Douglas St. to remain in-tact. Provide mitigation comments and arborist supervision notes should the wall require replacement or repair.

RESPONSE: The parkade has been sited and designed to minimize impacts to existing trees wherever possible. Tree #'s 001, 002, 902-913 and 972 will require removal due to the proposed parkade location. The retention of 969 will be dependent on the design and proposed finished grades of the street level porch, municipal sidewalk and retaining wall that are proposed within the critical root zone. We will review this impact once detailed grading information is provided for review.

- •Outline key findings and recommendations of the arborist report within the Executive Summary, including:
- o note the reference IDs of bylaw-protected trees and municipal trees proposed for removal;
- o provide a brief description of anticipated impacts to tree #902 911, 913, 001, 002 and 969 (and 972), along with mitigation measures and other key recommendations to reduce construction impacts;
- o provide a tree impact summary, following the requirements outlined in the Tree Protection Bylaw No. 21-035, Schedule C. Refer to the example shown in Schedule C, Section 3(m); and,
- o provide a tree preservation and replacement tree summary, following the requirement outlined in the Tree Protection Bylaw No. 21-035, Schedule C. It must include a summary table counting replacement trees required, tree minimum, and calculating cash-in-lieu amounts. Refer to the example shown in Schedule C, Section 3(n).

# RESPONSE:

The parkade has been sited and designed to minimize impacts to existing trees wherever possible. Tree #'s 001, 002, 902-913 and 972 will require removal due to the proposed parkade location.

The retention of 969 will be dependent on the design and proposed finished grades of the street level porch, municipal sidewalk and retaining wall that are proposed within the critical root zone. We will review this impact once detailed grading information is provided for review.

Tree Management Plan

•Please update the Tree Management Plan utilizing the most recently revised site plan, in coordination with the civil plans for public realm improvements, services, BC Hydro and 3rd party utilities. If any of the proposed site servicing encroaches into protected root zones, provide recommendations for low-impact installation methods (i.e., hydro-vac) through notes on plans, as well as within the arborist report.

RESPONSE: An updated tree management plan and arborist report has been submitted.

•Indicate mitigation requirements, low-impact construction methodology and updated arborist supervision requirements through arborist notes.

RESPONSE: An updated tree management plan and arborist report has been submitted.

•Designate locations of replacement trees, from Part 1 of Schedule E. Note that planting locations, species selection, and the number of replacement trees that can be accommodated on the lot is subject to approval by the City of Victoria Parks Division.

#### RESPONSE:

There is a Tree Management Plan with the required tables and schedules included in the Landscape package.

#### Site Plan

- •Provide alternative construction and low-impact construction methodologies to reduce impacts to tree #902 911, 913, 001, 002 and 969 (and 972 if possible), as follows:
- o Shift proposed parkade to acceptable location away from critical root zones, in coordination with arborist recommendations for safe retention of all trees along Huntington St. frontage.
- o Ensure no encroachment for new surface parking beyond existing edge of parking lot/curbs.
- o Further minimize encroachment of parkade, building construction and landscape elements by utilizing low-impact construction methods, including vertical excavation and shoring, L-shaped footings, and patios constructed on top of existing grade. Proposed construction measures should be reviewed and signed off by the project arborist and coordinated with the tree management plan and landscape plan.

Note: construction access, encroachment and over-excavation of the building into the protected root zone of tree #969 is not supported.

o confirm existing retaining wall within protected root zones along Douglas St. frontage is to remain in-tact. Arborist to review, provide mitigation comments/arborist supervision notes should the wall require replacement or repair.

# RESPONSE:

The parkade has been sited and designed to minimize impacts to existing trees wherever possible. Tree #'s 001, 002, 902-913 and 972 will require removal due to the proposed parkade location.

The retention of 969 will be dependent on the design and proposed finished grades of the street level porch, municipal sidewalk and retaining wall that are proposed within the critical root zone. We will review this impact once detailed grading information is provided for review.

•Please show all trees, ID #'s, critical root zones and canopy spread for trees to be retained (trunk – scaled circle to represent the trunk where it meets the ground, protected root zone (PRZ) – scaled solid bold circle, and canopy – scaled fine dotted-line circle). Trees proposed for removal shall be identified with a red 'X'.

# RESPONSE:

An updated tree management plan and arborist report has been submitted.

•Clarify proposed landscape elements within protected root zones through improved labelling and notations, including privacy fencing.

#### RESPONSE:

Additional notes have been added.

•Include public realm frontage(s) improvements, in coordination with the Civil plan. Please show SRWs, new boulevard on Toronto St., the new sidewalk alignments and street tree planting along Avalon Road and Toronto St.

#### RESPONSE:

Streetscape improvements have been incorporated into the Landscape design, in coordination with the Civil plans.

•Consider incorporating planting areas for large (Part 1) replacement trees into the surface parking lot area, in coordination with landscape plan.

Note: Refer to Stormwater management comments. Refer to City of Victoria Multi-Unit Residential, Commercial and Industrial Design Guidelines, Section 8.

## RESPONSE:

Trees have been incorporated into the surface parking area as much as possible given the available planting space.

# Landscape plan

•Show all trees, ID #'s, critical root zones and canopy spread for trees to be retained (trunk – scaled circle to represent the trunk where it meets the ground, protected root zone (PRZ) – scaled solid bold circle, and canopy – scaled fine dotted-line circle). Trees proposed for removal shall be identified with a red 'X'.

#### RESPONSE:

Tree symbols have been updated as per City request.

•Show tree protection barriers with dimensions, and arborist supervision notes in coordination with the arborist tree management plan.

#### RESPONSE:

Tree protection fencing and arborist supervision notes have been added to the Tree Management Plan

•Clarify proposed landscape elements within protected root zones through improved labelling and notations, including privacy fencing.

## RESPONSE:

Additional notes have been added.

•Consider incorporating additional, large (Part 1) replacement trees into the surface parking lot area, to screen parking from the street and adjacent properties, improve natural drainage, enhance pedestrian amenity, meet tree minimum, and help mitigate the heat island effect.

Note: Refer to Stormwater management comments. Refer to City of Victoria Multi-Unit Residential, Commercial and Industrial Design Guidelines, Section 8.

#### RESPONSE:

Trees have been incorporated into the surface parking area as much as possible given the available planting space.

•Please indicate how 30% vegetation proposed on private property is composed of native plants, food-bearing plants or provides pollinator habitat as outlined in the Design Guidelines for: Multi-Unit Residential, Commercial, and Industrial (2019).

#### RESPONSE:

Notes have been added to Plant List and Landscape Plan

•Coordinate with civil plan and site plan, showing SRWs on Toronto St., Avalon Pl. and Douglas St., new boulevard and partial inbound sidewalk on Toronto St., street tree planting, existing and proposed service locations, and preliminary third-party utilities (such as Hydro, phone, cable, internet, gas).

Note: Refer to Transportation requirements. For any new street tree plantings, the locations, species selection, and number of trees is subject to approval by the City of Victoria Parks Division.

#### RESPONSE:

Streetscape improvements have been incorporated into the Landscape design, in coordination with the Civil plans.

- •Proposed street tree locations and species selection requires Parks approval. Proposed street tree locations must be indicated and shall respect the minimum offsets from infrastructure outlined in Victoria Subdivision and Development Servicing Bylaw, Schedule C. Trees planted 1.0m or less from curbs or sidewalks are to have root barriers to protect civil infrastructure. Please include the following notes for street tree planting:
- o Street trees must have one dominant central leader or single straight trunk, 6-8 cm diameter caliper measured 15 cm above ground, a well-balanced crown with branching starting at 1.8 m 2.5 m above ground and be planted per the City of Victoria Supplemental Drawing SD P4 (Tree Planting in Boulevard) or SD P5 (Tree Planting in Sidewalk with Tree Guard) and the Canadian Landscape Standard.
- o Required Parks inspections for street tree planting:
- 1.Inspection of soil and planting area prior to planting.
- 2.Inspection of tree stock prior to planting.
- 3.Inspection of installed tree. Trees must be in good health and condition with no visible signs of disease, insect pests, or damage, and comply with the latest version of the Canadian Landscape Standard.

#### RESPONSE:

Street trees have been coordinated with Civil plans. Additional notes have been added.

- •The details for the seed and sod boulevard can be found in Schedule B3-4. (Please ensure that adequate soil volumes for the proposed street trees are installed in grass boulevards). Please contact Tom Sherbo, tsherbo@victoria.ca and copy treepermits@victoria.ca 48 hours prior to the required inspection time to schedule an inspection. Please include the following notes for grass boulevard inspections:
- o Required Parks inspections for seed and sod boulevard:
- 1.Inspection of excavated and scarified subgrade prior to backfill.
- 2.Inspection of installed, rolled and prepared growing media prior to sodding.
- 3.Inspection when the installed turfgrass meets the conditions for total performance as required in the Current Edition of the Canadian Landscape Standard.

# RESPONSE:

Additional notes have been added.

- •Please include the following notes for Soil Testing of Growing Medium:
- o A soil test for the growing media, for each landscape application on City Property must be submitted to the City Parks treepermits@victoria.ca for review at least one week prior to soil placement. Growing media must meet the standards for each specific landscape application as required in the current edition of the Canadian Landscape Standard.

# RESPONSE:

Additional notes have been added.

- •Please include the following notes for Schedule B3-4 and Schedule C:
- o The Victoria Subdivision and Development Servicing Bylaw No. 12-042 and the associated Schedules can be found on the City of Victoria Bylaws webpage.

# RESPONSE:

Additional notes have been added.

•Provide municipal frontage/right of way area take-offs (m2) for tree planting and lawn areas. These numbers are utilized to determine security deposits, maintenance implications, etc.

# Grading Plan

- •A grading plan for the site which provides existing and proposed grades for easy reference and review is required, including:
- o a sufficient number of elevation points so that areas where cuts or fills are required can be identified on future grading plans and the tree management plan;
- o the existing and proposed legal description, property lines, rights-of-way, easements, location of trees, base grades of trees, grades at property lines, principal and accessory building footprints, walkways, patios, retaining walls (top and toe of grade), fences, driveways, sidewalks, curbs, natural features, rock outcrops, existing services; and.
- o all dimensions in metric and include a title block with north arrow, bar scale, date, surveyor's seal and company name, and a legend to identify symbols.

Note: No grade changes permitted within tree protection zones.

## RESPONSE:

A preliminary grading plan has been prepared and submitted.

# Replacement Tree Plan

•Please provide a replacement tree plan, prepared by an arborist or landscape architect. Refer to Tree Protection Bylaw No. 21-035, Schedule E, Section 4, for siting, soil volume, timing of planting, and size of stock requirements.

#### RESPONSE:

The Tree Management plan in the drawing set should fulfill this requirement.

•Please revise the plan to accommodate more replacement trees from Part 1 of Schedule E. On-site replacement trees shall be selected from Part 1 of Schedule E, unless it is clearly demonstrated that it is not possible (due to grade, topography, tree location, soil depth, or other requirements). Select

from the acceptable species tables provided in Schedule E, Section B, C, and D, (Part 1, 2, and 3 Replacement Tree Species Tables).

# RESPONSE:

Garry Oaks have been added to the tree list and tree quantities have been adjusted to include more trees from Part 1 Schedule E.

•Provide a completed soil volume table, ensuring each separate planting area containing a replacement tree shall be included and calculated in accordance with Schedule E. The applicant must demonstrate that appropriate soil volume will be provided for any Replacement Tree in accordance with the recommended targets in Schedule E, Section 3 and 4, or as approved by the Director.

Note: Refer to the soil volume table example in Schedule E, Section A, Part 2(g).

## RESPONSE:

Soil volume table is currently shown on the Tree Management Plan.

## Site Servicing (Civil) Plan

•Please update the civil plan to show public realm improvements, including SRWs, new sidewalk alignments, boulevard and tree planting in coordination with site plan and landscape plan. Refer to Transportation comments.

#### RESPONSE:

A site servicing plan has been prepared and submitted.

•Show the existing and proposed locations of sanitary sewer, storm drain, and water, as well as third party utilities such as gas, BC Hydro, and telecommunications. New hydro service alignment should avoid tree planting

locations as much as possible and be clearly indicated on plans so that requirements can be understood. Show location of proposed PMT if applicable.

#### RESPONSE:

A site servicing plan has been prepared and submitted.

•Include all site and municipal trees to be retained with ID# and show all proposed municipal trees.

#### RESPONSE:

A site servicing plan has been prepared and submitted.

•Identify municipal trees to be removed with an ID# and a red X.

RESPONSE: Tree symbols have been updated as per City request.

- •Please show a separate water service and sleeving under hard surfaces on the site servicing plan for irrigation of the trees and turf in the boulevard, in accordance with the Subdivision and Development Servicing Bylaw. Include the following notes:
- o All irrigation work, including required inspections, shall follow the Supplementary Specifications for Street Trees and Irrigation, Schedule C to the Victoria Subdivision and Development Servicing Bylaw 12-042, and comply with the Irrigation Industry Association of BC standards.
- o Irrigation design shall be submitted for review and approval to City of Victoria Parks no less than 30 days prior to scheduled installation.
- o Contact Parks at 250-361-0600 with at least 48 hours notice to arrange for irrigation inspections.
- o Required Parks inspections for irrigation:
- 1. Irrigation sleeving prior to backfilling.
- 2. Open trench mainline and lateral lines.
- 3.Pressure test.
- 4.Irrigation system, controller, coverage test, backflow preventer assembly test report required, backflow assembly (incl. inspection tag and testing report).

Note: installation of the water service to be at the expense of the applicant.

RESPONSE: Irrigation sleeve has been indicated on the servicing plan. Additional details of the irrigation design will be developed and submitted prior to installation as requested.

For Information prior to Building Permit:

# Tree Permits

- •Various tree permits will be required including a work in the protected root zone permit and a tree removal permit. As part of the work in the protected root zone permit, securities for retained trees will be required at a minimum of \$2,500 per tree up to a maximum total of \$50,000. A tree permit for the removal of trees approved for removal will be required. The permit will include securities of \$2,000 per replacement tree up to a maximum total of \$50,000. Please note the maximum amount of \$50,000 for securities is per tree permit.
- •A permit to plant trees to meet the tree minimum is free and will be required following BP approval. Please submit a completed Tree Permit Application Form to Treepermits@victoria.ca indicating that Tree Minimum is the reason for applying. If planting within an existing PRZ this should be indicated in your application for PRZ tree permit.
- •A pruning permit may be required depending on proposed redesign, arborist recommendations and further Parks review
- •Trees must be pruned to city standard prior to Parks taking ownership of trees within the SRW. Applicant shall contact Parks at parks@victoria.ca for on-site meeting to discuss pruning requirements in advance of the work.
- •Tree permits will be issued after BP approval and trees approved for removal shall remain in place until after BP approval/issuance.
- •A fee of \$1250 will be required for each municipal tree to be planted.

Tree Planting in Boulevard Details

•Street tree planting details should be shown on replacement tree plan or landscape drawings. Parks trees planted 1.0m or less from curbs or sidewalks are to have root barriers to protect civil infrastructure. Refer to Schedule B to the Subdivision and Development Servicing Bylaw No. 12-042 for City of Victoria Tree planting detail SD P4.

#### RESPONSE:

Acknowledged.

# **Permits and Inspections Division Comments**

Conditions to be met prior to the Committee of the Whole:

- ·Items to be addressed at this time.
- 1. Designer to ensure the Siamese connection will not cause a tripping hazard when the Fire Department has hooked up hose(s) when fire fighting.

RESPONSE: The siamese connection will be located east of the Toronto Street Principal Entrance. Hoses will run east to the hydrant so will not cross in front of the doors or path of travel. Refer to drawing DP2.03

2. The floor plans appear to show suites that do not egress directly onto the public corridor but possibly enter onto a hallway that might be part of the public corridor. Please make clear on plans.

#### RESPONSE:

Plans are revised.

3. Designer to ensure the spatial separations and type of construction and cladding comply with 3.2.2. of the BCBC.

#### RESPONSE:

A plan is submitted illustrating spatial separation calculations and requirements.

Items to be addressed at the time of BP application.

- 4. Designer to ensure there is a minimum of 750 mm of unobstructed egress in the rear exit shaft for occupants to pass from the stairs by the door leading into the exit on first floor.
- 5. Designer to provide exit signs in the above noted exit to make clear the egress route to the exterior.

# RESPONSE:

These are noted and will be identified in the BP application.

# **Fire Department Comments**

Contact: Megan Sabell, Telephone: 250.920.3362 or at MSabell@victoria.ca Conditions to be met prior to the Committee of the Whole:

1) Fire department connection must be within 45 meters of a hydrant, on the address side of the building, and arranged so that hose lines do not create a tripping hazard for access/ egress.

#### RESPONSE

Fire department connection for the new building will be adjacent to the principal entrance on the north side of the building and will be within 45m of the existing hydrant located on the north side of Toronto Street.

2) Radio amplification system or Bi-Directional Amplifier (BDA) required to ensure adequate CREST radio coverage for emergency service responders in the underground levels. Provide documentation of either design or commitment to install by qualified electrical engineer at building permit submittal.

RESPONSE: Refer to drawing E1.