

June 26, 2024  
City of Victoria  
No.1 Centennial Square  
Victoria BC  
V8W 1P6

**Attn.: Rezoning and Development Permit**  
**Application: 1885 Government Street**

**Re: 1885 Government Street – Revisions**

The revisions included within this drawing package have been undertaken since the proposal was presented to the Advisory Design Panel Meeting, and responds to the Panel's formal Motion to Council, as well as Staff provided TRG Comments and Zoning Plan Check. Itemized changes have been bubbled on drawing sets for reference.

**RESPONSE TO DEVELOPMENT SERVICES DIVISION COMMENTS:**

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

1. *COMMENT*

This application will be advanced to an Advisory Design Panel. Please await the ADP comments prior to resubmitting plan changes to reduce the amount of submissions.

*RESPONSE*

This application was presented to the Advisory Design Panel on May 22<sup>nd</sup>.

2. *COMMENT*

Please provide the clearance dimension for the underside of canopy at its lowest point on Store (Government) Street. If lower than 2.5m – please remove this section of canopy or explore an alternative architectural solution that will achieve the minimum below canopy clearance.

*RESPONSE*

At the canopy's lowest point along Government Street, the canopy has a clear height of 3.1m as indicated on the project elevation in this location. This being the case, no revision has been made to the canopy extents.

3. *COMMENT*

Please note, it has been determined that this application would not meet the threshold to be considered an OCP amendment. On balance the application advances and is consistent



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with the majority of policy aspirations and will be advanced as a rezoning and development permit with variances.

**RESPONSE**

Acknowledged.

4. *COMMENT*

Consider a more fitting cladding approach for Chinatown – and or Chinatown colour etc.

**RESPONSE**

We have incorporated a number of revisions to our cladding concept in response to this comment. We are proposing an alternate brick finish in a lighter, brighter colour family, directly tying to a number of existing buildings with a similar brick finish located in Chinatown's historic fabric. This brick is still varied, subtle, and muted in tone, but more directly ties to its contexts, moving away from any colour variations that could be construed as too dark for this location. We have also introduced a metal inset panel in a softened, muted gold/bronze finish. This newly introduced metal panel serves to emphasize the brighter bronze finish of the perforated balconies, highlighting the distinctive architectural expression of the building in its key location at the entrance to Chinatown along Government Street.

5. *COMMENT*

Rooftop amenity space or access to the Spencer Block amenity space is strongly encouraged.

**RESPONSE**

Nicola Wealth will own and retain both assets upon completion. Access to the Spencer block amenity space will be explored.

6. *COMMENT*

West facing windows may benefit from solar control, provided through an architectural response.

**RESPONSE**

The existing perforated metal guards on the west-facing windows reduce solar heat gain by filtering and diffusing sunlight, enhancing indoor comfort and energy efficiency. This passive design solution integrates seamlessly with the building's design, offering both functional and aesthetic benefits. Given the effective solar shading provided by the current guard design, no further solar control elements will be incorporated at this elevation.

7. *COMMENT*

Consider projecting the balconies or additional balcony space on the south façade where the building is behind the retained heritage building.

**RESPONSE**

Creating a design response for the new structure that is simple and understated in relation to this historic structure has been a central tenet of our design approach for the courtyard space. Projecting or adding additional balconies to the façade in this location would produce a busier architectural expression which we feel will distract from the

Sam Kee building. Additionally, this elevation is north facing, meaning that balconies in these locations are unlikely to be heavily utilized and would produce additional shading within the north facing units themselves.

**RESPONSE TO HERITAGE COMMENTS:**

8. *COMMENT*

Bicycle parking and planters are blocking and overwhelming the front and side facades of the heritage building. The heritage building should be given as much space that is feasible to be as prominent as possible on the street. Consider minimizing or relocating bike parking and large planters to avoid blocking the heritage building.

*RESPONSE*

We have reworked some key elements of our Chatham Street frontage in response to this comment. Our previous submission was over-providing short term bicycle parking. We have reduced the short-term bicycle parking stall count to standard Schedule C requirements, and consolidated these stalls to one location north of the proposed planter in the centre of the Chatham facing outdoor area adjacent to the Sam Kee building and the primary residential entrance. This has allowed for a new patio space at the Chatham Street frontage directly in front of the Sam Kee building. We have removed the full height planter from the property line at the northeast corner of the site, opting for lower lying vegetation located in an in-ground bed instead. Where the adjacent Spencer Block development projects beyond the face of the Sam Kee building, a planter softens the sidewall condition of this adjacent structure. The overall height of all planters have been reduced to minimize their mass and dominance at street level, and the size of the proposed tree in the central planter has been reduced to further minimize its impact on sightlines to the heritage structure. These adjustments have all been undertaken in an effort to celebrate and highlight the Sam Kee building and to provide an animated and enlivened frontage in this location.

9. *COMMENT*

Consider stepping back the façade or the ground level of the new development along Chatham to improve the views to the heritage building.

*RESPONSE*

We have chosen to prioritize the organization of our massing on site to provide a maximum N/S and E/W buffer directly surrounding the Sam Kee building, which we believe is the most effective means of celebrating the historic structure. In order to achieve targeted densities on the site, a stepped back façade for the new development would likely require impeding into this buffer area. On balance, we feel that locating density as proposed provides a better visual connection to the Sam Kee building in three dimensions.

10. *COMMENT*

Building materials for the addition should be durable and of high quality.

*RESPONSE*

The proposed cladding finishes for the new building are simple and understated, comprising of metal and brick. These materials are widely understood to be high quality, long lasting, and durable.

11. *COMMENT*

Consider recessing entrances to the commercial units, to better respond to Chinatown's and Old Town design guidelines for storefronts.

**RESPONSE**

We have recessed entrances to commercial units along Government Street to better respond to Chinatown's and Old Town design guidelines for storefronts.

12. *COMMENT*

Consider how the story or history of the heritage building might be communicated.

**RESPONSE**

As the design of the proposal advances to include interiors scope, we will explore the opportunity to incorporate historic photographs into both the Sam Kee building itself as well as the primary residential entrance and lobby.

13. *COMMENT*

Heritage Designation Application should be submitted at your earliest convenience in order to be considered with the rezoning and development permit application. These are required prior to getting schedule for the Heritage Advisory Panel. As part of this application please provide:

- A Statement of Significance,
- Seismic Assessment for the heritage building
- Conservation Plan

**RESPONSE**

A Heritage Designation Application was submitted on April 22<sup>nd</sup>, 2024.

Conditions To Be Met Prior to Approval:

14. *COMMENT*

A housing agreement securing all units as rental will be required.

**RESPONSE**

Acknowledged. Staff provided a housing agreement for Applicant to review. Housing Agreement terms and conditions are generally acceptable. Tenure of rental to be 60 years.

15. *COMMENT*

An agreement to secure frontage improvements will be required.

**RESPONSE**

Acknowledged. Staff to provide draft frontage improvement agreement for Applicant to review.

16. *COMMENT*

Confirmation of an access easement over/ through the Spencer block property will be required to secure access to the underground parking as proposed.

**RESPONSE**

Acknowledged. Staff to provide draft access easement for Applicant to review.

17. **COMMENT**

An encroachment agreement will be required for decorative features that encroach on the City ROW.

**RESPONSE**

Acknowledged. Staff to provide draft encroachment agreement for Applicant to review.

**RESPONSE TO ENGINEERING AND PUBLIC WORKS DEPARTMENT:**

Letters of Engagement (Client-Engineer agreements):

18. **COMMENT**

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**

Acknowledged. Please see enclosed submission folder with Letters of Engagement.

**RESPONSE TO LAND DEVELOPMENT REVIEW**

19. **COMMENT:**

The proposal is to create rental residential above commercial space. It is not clear if the commercial will be lease space or purchase. Should the owner wish to consider an Air Space subdivision, which could separate the commercial space from the residential, or a Strata for the commercial use space, please contact the City.

**RESPONSE**

The commercial space will be leased. 1885 Government will be owned and operated by Nicola Wealth Real Estate or a nominee.

20. **COMMENT:**

Please advise if lot consolidation is being considered with 610 Herald Street.

**RESPONSE**

Lot consolidation is not being considered.

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

21. *COMMENT*

Please provide the access agreement for parking as shown "from the adjacent building" to the south. As per the Highway Access Bylaw, the agreement is to be registered in a form satisfactory to the City Solicitor, and is to contain a covenant in favour of the City for use. It is recommended that the Developer work with the Planner and City solicitor.

**RESPONSE**

Acknowledged. Planning to provide sample of access agreement.

22. *COMMENT*

Encroachment - The plan identifies an overhang projection along the Chatham Street frontage. This overhang is to be considered concurrently with the Development Permit for the lands. The owner will be required to enter into an encroachment agreement with the City for the overhang projection, with the overhang designed and constructed in a manner that enables it to be removable.

**RESPONSE**

Acknowledged. Planning to provide sample of encroachment agreement.

23. *COMMENT*

Encroachment - For the Government Street facade, the plans are not consistent. A050 shows no encroachment while the south elevation on A053 shows encroachment the Government facade. Please note that features such as gutters and drainage systems are to be located within the lands, or encroachment consideration applied. Please refine the drawings for consistency. Any encroachment should be considered concurrently with the identified encroachment to Chatham Street. An agreement would be required.

**RESPONSE**

There is no encroachment at the Government Street façade, a plan adjustment has been made. No encroachment agreement will be required.

24. *COMMENT*

It is noted on the parkade plan that there will be an onsite electrical substation. Please provide a preliminary BC Hydro servicing plan to the development.

**RESPONSE**

Please refer to the enclosed email correspondence between BC Hydro and the design team.

25. *COMMENT*

Please note that urban design related comments under Development Services review may influence frontage requirements.

**RESPONSE**

Acknowledged.

It is recommended that, as a condition of rezoning, and secured in a legal agreement which is registered prior to bylaw approval:

26. *COMMENT*

Access agreement

**RESPONSE**

Acknowledged. Planning to provide sample agreement.

27. *COMMENT*

Commitment to install soil cells on both frontages.

**RESPONSE**

Refer to Landscape plans for soil cell extents on both frontages.

28. *COMMENT*

Encroachment agreement for decorative awnings in right of way.

**RESPONSE**

Acknowledged. Planning to provide sample agreement.

29. *COMMENT*

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

**RESPONSE**

Acknowledged.

30. *COMMENT*

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

**RESPONSE**

HEL's calculated sealed sanitary design flow memo dated March 4/24 was submitted to the CoV by Nathan with the project's rezoning application. City engineering staff provided the following update on June 18/24: "I have received word the results are with our Manager of Underground for final approval, but the tech is recommending no sewage attenuation for the project. Will hopefully have the final response soon."

**RESPONSE TO TRANSPORTATION REVIEW:**

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

31. *COMMENT*

The proposed parking variance (for both vehicle and bicycle based on the zoning plan check) for the development is significant, no information detailing the proposed TDM measures was included in the submission; Thank you for proposing oversized bicycle parking, and a bicycle maintenance area. Further enhanced bicycle parking facilities are recommended, including 50% with access to an electric outlet and a wash facility included in the maintenance area. In addition, staff will recommend Car Share memberships and usage credits to all residential units and an ECO Transit pass for each CRU, with minimum 5 year term. This is consistent with similar developments and magnitudes of parking variances.

**RESPONSE**

The Applicant is proposing to share parking stalls with the Spencer Block Development to accommodate all 1885 building units over 45 m<sup>2</sup> to meet the vehicular parking bylaw. We will allocate 5 shared stalls at Spencer Block. The Applicant will offer one (1) Modo vehicle which will result in 70 memberships which will remain tied to the unit in perpetuity. Each Modo membership has a \$500 value. In addition, it is our expectation that Modo will provide \$100 driving credit for each membership. Due to the site not having surface parking, an off-site location is preferred as it would better serve the surrounding neighbourhood. At this time, we do not believe an ECO Transit Pass for the commercial units is the best option. Bunt has experienced the ECO Transit Pass is difficult to administer.

32. *COMMENT*

The applicant is to describe how garbage, recycling, and organics are collected from the site. Placing bins on the right of way for any period of time is not permitted.

**RESPONSE**

Picker service is specific to the larger plastic or metal bins (normally 2, 3 or 4 Yards) and is reserved for waste compounds in which the pull is determined to be too long, a safety risk for the driver, or too difficult - like the lower level of an underground parkade.

In those cases, a smaller vehicle (like a Ford F550 or similar) fitted with forks on the back will enter the property collect the bin and bring it to an on-site staging area so that the larger front-load truck can service it in a more convenient way.

33. *COMMENT*

Frontage design including revised curb alignments, bicycle lanes on both frontages, propose tree canopy, and public realm components will require updating, a concept can be provided for clarity.

**RESPONSE**

Acknowledged. A preliminary frontage design was received from City Staff and has been coordinated and generally incorporated into the drawing sets. Additional clarity may be required at BP submission.

34. *COMMENT*

In addition to dimensions for the long-term bicycle parking in all proposed areas, illustrate 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. A plan revision is required.

*RESPONSE*

Plans have been adjusted to include bicycle rack placements.

**RESPONSE TO UNDERGROUND UTILITIES REVIEW:**

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

35. *COMMENT*

Please provide proposed SS/SD sizes.

*RESPONSE*

M3 Mechanical has provided the following preliminary service sizes current as of June 5/24:

- Sanitary service – 200mm dia. @ 1%
- Storm service – 200mm dia. @ 0.5-1.0%
- Domestic water service – 75mm dia.
- Fire water service – 150mm dia.

36. *COMMENT*

Please shift water vault out of the soil cells.

*RESPONSE*

HEL's Site Servicing Concept Plan (Issue: 'RZ DP REV1' dated June 27/24) reflects the City's road frontage concept and was confirmed as correct via correspondence with City Transportation Engineering staff on June 10/24. The Water meter vault has been relocated outside of the soil cells on the Chatham St. frontage. Further shallow utility conflicts will be addressed as part of the project's detailed designs, with Tel and gas routed around the water vault as required.

37. *COMMENT*

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*

Same topic and response as #30 above; HEL's calculated sealed sanitary design flow memo dated March 4/24 was submitted to the CoV by Nathan with the project's rezoning application. City engineering staff provided the following update on June 18/24: "I have received word the results are with our Manager of Underground for final approval, but the tech is recommending no sewage attenuation for the project. Will hopefully have the final response soon."

**RESPONSE TO STORMWATER MANAGEMENT REVIEW:**

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

38. *COMMENT*

As per DCAP Design Guidelines, please incorporate stormwater management into site design.

**RESPONSE**

Given an impervious site area of ~1,350m<sup>2</sup>, the project would need to store ~43.2m<sup>3</sup> of stormwater to meet the CoV target ( $\cong$  32mm in 24 hrs, stored for re-use or infiltrated to ground). (Note: LADR's pervious paving design measures will serve to reduce this volume). Project design decisions have yet to be finalized with regard to pursuing City of Victoria Rainwater Rewards and possible stormwater utility rate reductions.

39. **COMMENT**

Please include a green roof to mitigate urban heat island effect, increase biodiversity, reduce summer cooling demand, and provide stormwater attenuation.

**RESPONSE**

Green roofs on wood frame buildings substantially increase the risk of water egress and damage, which can compromise the entire roof structure and will significantly raise insurance premiums. Instead, we will explore passive cooling strategies in design development, including the incorporation of a light color finish for the roof, minimizing heat gain and urban heat island effect.

40. **COMMENT**

Incorporate stormwater management into site and boulevard soil cells to reduce potable water demand, provide stormwater quality improvements, and reduce demand on city storm infrastructure. Direct runoff from courtyard to the soil cells provided for the Katsura tree.

**RESPONSE**

Stormwater runoff from courtyard is now directed towards the Katsura tree via permeable pavers and detained in soil cells below the hardscaped surface.

41. **COMMENT**

Incorporate stormwater distribution into boulevard soil cells from road catch basins and provide subdrain connection back to City storm main.

**RESPONSE**

Soil cells in the boulevard have the capacity to detain some stormwater runoff from the adjacent sidewalk, but the sidewalk has not been graded to direct flow specifically to boulevard tree grates. Grading of off-site frontage is cost prohibitive and does not align with design guidelines therefore there is no change to off-site grading approach.

42. **COMMENT**

The City's rainwater management target is 32mm/24 hours. See the City's Rainwater Management Standards. Rainwater Rewards incentives are available. see [www.victoria.ca/stormwater](http://www.victoria.ca/stormwater).

**RESPONSE**

Same topic and response as Item #38.

**RESPONSE TO PARKS DEVISION REVIEW:**

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

43. *COMMENT*

Tree Inventory

Please revise to include only one rating per condition, as opposed to hybrid ratings such as good/fair.

**RESPONSE**

Please refer to revised Tallmack Arborist Report within the submission folder.

44. *COMMENT*

Please revise to reflect the status of tree M2 which was removed to facilitate the construction at 610 Herald.

**RESPONSE**

Please refer to revised Tallmack Arborist Report within the submission folder.

45. *COMMENT*

Arborist Report

Please revise to remove the municipal tree counts from the Tree Preservation Summary Table. The table is intended for private tree removal and replacement, with the "off-site" section referring to any private trees on neighbouring trees which are proposed for removal.

**RESPONSE**

Please refer to revised Tallmack Arborist Report within the submission folder.

46. *COMMENT*

Please note that despite the impacts from the proposed underground parking, at Building Permit phase for demolition, tree M1 shall be retained and protected throughout the demolition unless impeding demolition. If approved for removal, the full appraised value for the tree shall be paid in full to the City of Victoria. The tree shall be posted for 10 days prior to being approved for removal by the Applicant.

**RESPONSE**

Tree M1 is proposed to be retained during demolition (with its health monitored by the project arborist) and then removed during construction of the new building.

47. *COMMENT*

Awnings

Please consider reducing the encroachment of the proposed awnings on Chatham Street to provide a minimum of 2 m clearance from center of tree to the edge of awning. Given the overhead infrastructure, only small trees are being considered as municipal plantings and additional space is required to train them above any awnings present.

**RESPONSE**

The awning depth has been reduced to achieve 2m clearance from the centre of the tree to the edge of the awning.

48. **COMMENT**

Please clarify the proposed depth of the soil cell in the private central courtyard.

**RESPONSE**

The proposed soil cell depth in the courtyard (for the proposed Katsura tree) is 1.0M. Given the soil cell multiplier in the CoV bylaw, this provides the equivalent of 0.92M soil depth.

49. **COMMENT**

Consider spacing the soil cell and tree further from the proposed balcony to allow for increased setback without an increase in pruning maintenance for security.

**RESPONSE**

Pruning is not expected to be a significant issue given the proposed balcony setbacks.

50. **COMMENT**

Please ensure the tree grates on both frontages are dimensioned at 1200 mm x 1200 mm on all relevant plans

**RESPONSE**

Tree grates are shown as 1.2M x 1.2M on the landscape & civil drawings.

51. **COMMENT**

Please label the soil cells on the civil plan for ease of reference and review.

**RESPONSE**

Acknowledged. See revised CIVIL drawings from updated landscape underlays.

52. **COMMENT**

Please indicate irrigation and drainage for the proposed soil cells.

**RESPONSE**

Irrigation designs are by others (I believe LADR had indicated by the contractor's irrigation sub-contractor on our last call); HEL will coordinate with LADR; storm drainage will be addressed by HEL.

53. *COMMENT*

Please confirm the Telus servicing proposed for the development. The proposed trees on government conflict with the existing Telus conduit.

*RESPONSE*

Detailed Telus designs are not available as at June 21/24. However, we understand from LADR that the soil cells typically specified (detailed designs yet to commence) are Citygreen Stratavault (<https://citygreen.com/product-category/soil-vault-systems/>) which can be installed around existing utilities or have new utilities run through them before they're backfilled.

54. *COMMENT*

Please provide an off-site electrical plan or concept plan to propose the ideal desired route.

*RESPONSE*

Refer to email with BC Hydro within Submission Folder.

55. *COMMENT*

Chatham St. Frontage

Please revise the tree and street light alignment on the Chatham St. frontage to ensure the trees are spaced with further offset from existing infrastructure. Currently the most eastern proposed tree is in direct conflict with the existing BC Hydro pole. Parks will accept tighter spacing of the proposed trees as necessary, but four trees are still desired. Please consider a frontage design which provides one cohesive soil cell on each frontage with narrowing around the required street lighting bases.

*RESPONSE*

Chatham St. frontage has been revised to ensure that trees have an increased offset from infrastructure. The pattern has been adjusted so all trees are more tightly spaced. One soil cell trench is proposed across the entire frontage so that all trees share the same volume of soil.

56. *COMMENT*

Soil Cells

Please note that the proposed soil cells will require securement through a covenant prior to bylaw readings.

*RESPONSE*

Acknowledged.

**RESPONSE TO PERMITS AND INSPECTIONS DIVISION REVIEW:**

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

57. *COMMENT*

The 2024 BCBC will be applicable.

*RESPONSE*

Acknowledged. We understand that applicable 2024 BCBC implications do not include updated adaptability requirements for units or seismic requirements.

58. *COMMENT*

Architect to ensure with the structural engineer that the building will not sway over the property line in the case of a seismic event.

*RESPONSE*

Acknowledged. The architect has confirmed with City Staff (Calvin Gray) that it is acceptable to respond to this comment at Building Permit submission.

59. *COMMENT*

Cladding to be noncombustible as per 3.1.4.8. of the BCBC.

*RESPONSE*

Acknowledged. Cladding material is noncombustible.

60. *COMMENT*

Sheet A 053 shows that protection of exits is required on glazing over the exit stairs. See 3.2.3.13. of the BCBC.

*RESPONSE*

Where openings are located within two vertical meters of an exit sprinkler protection will be provided.

**RESPONSE TO FIRE DEPARTMENT REVIEW:**

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

61. *COMMENT*

Fire department connection must be installed on the address side of the building, within 45 meters of a hydrant and in a location acceptable to the fire department and where it will not impede exit access/ egress.

*RESPONSE*

Fire department connection has been proposed on the Chatham Street side of the building, located within 45 meters of a hydrant so as not to impede exit access/egress.

62. *COMMENT*

Plan to install a BDA (bi-directional amplifier). During the design process you should plan on providing space for a signal booster to cover the below grade portions of the building. Typically, this involves 1.5m x 1.5m

wall space in an equipment room, a 53mm conduit to the roof from the equipment room and conduits to each of the below grade levels for the installation of antennas. Provide documentation of either design or commitment to install by qualified electrical engineer at building permit submittal. Best to engage one of the approved contractors that provide this equipment in our area. They should be able to provide any information that you require. <https://www.radioworks.ca/> <http://www.cartelsys.com/>

**RESPONSE**

Acknowledged.

**RESPONSE TO ZONING PLAN CHECK:**

63. *COMMENT*

Elevator shafts are not exempt from floor area. Ensure they are included in the total floor area and FSR.

**RESPONSE**

Plan diagrams, floor areas, and FSR calculations have been adjusted to include this area.

64. *COMMENT*

Provide the vehicle parking calculation. The values shown on the project information table differ from the calculated values on this plan check.

**RESPONSE**

The vehicle parking calculation has been included on Sheet A 051 of the drawing set.

65. *COMMENT*

Provide the bicycle parking calculation, including the CRU's. The values shown on the project information table differ from the calculated values on this plan check.

**RESPONSE**

The bicycle parking calculation has been included on Sheet A 051 of the drawing set.

66. *COMMENT*

Note the slope % throughout the parkade.

**RESPONSE**

Refer to the parkade plan for slope % where relevant.

67. *COMMENT*

Exterior steps located at the south side cross over the property line. Provide more details in a section.

**RESPONSE**

The steps will not extend beyond the property line. A detailed section of this condition will be provided at Building Permit.

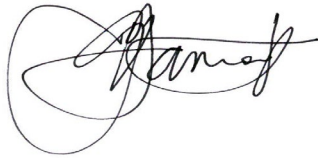
**GENERAL REVISIONS:**

68. The site grading and CRU access has been revised at Level 1 to accommodate the interconnection point of the parkade access between the 1885 Government site and the Spencer Block development. This has had a small impact on average grade and therefore has reduced the building height to 19.51m.
69. The garbage and recycling areas have been progressed and sizing of these rooms has been adjusted and reduced allowing for the introduction of two additional parking stalls to the parkade, bringing the total count to 13 stalls.

We trust that this resubmission provides the City with information needed to proceed with a comprehensive review of the Project revisions, and we look forward to future feedback on our revised design. If any further information is required, please do not hesitate to reach out to our office.

Sincerely,

CASCADIA ARCHITECTS INC.

A handwritten signature in black ink, appearing to read 'G. Damant', enclosed within a large, loopy circular scribble.

Gregory Damant, Architect AIBC, RAIC, LEED AP  
Principal