



April 2, 2024

Rob Bateman and Planning Staff  
City of Victoria  
1 Centennial Square  
Victoria, BC V8W 1P6

## RE: REVISIONS TO 50 GOVERNMENT ST APPLICATION FOR REZONING AND DEVELOPMENT PERMIT

Our application is respectfully submitted to propose a 16-unit multi-family building at 50 Government St in the James Bay neighbourhood.

The following letter outlines revisions to our proposed design since our last submission in January 2024. We will also include descriptions of our changes related to specific staff comments.

### GENERAL:

The project has maintained its overall form as a four-and-a-half-story residential building. Since the January submission, our project has not modified the unit distribution or layouts but now proposes these units as rental units.

The form of the building is similar to the January 2024 proposal, with a few key changes to the landscape and site layout:

- Priority has been assigned to the City-owned street tree by providing as much green space around it as possible. This includes removing a paved pathway to the south side of the site and new locations for half the visitor bike parking. Additionally, the underground water vault has been moved to under the paved sidewalk approaching the front entry, removing any additional hardscaping that would have been required. Additional hardscaping has also been reduced at the north end of the SRW.
- Additional efforts have been made to find ways for this project to contribute to the city's Urban Forest goals. Two new trees are proposed in the rear yard of the project which will also help shade the building and the exterior deck areas in the afternoon. While three trees were preferred by our team, the proximity of the large neighbouring trees to the south presented problems of shading and limits to available root area on our site.

### RESPONSE TO ZONING AND PLAN CHECK:

Specific adjustments to the proposal have addressed comments found at the bottom of the Zoning Plan Check form, completed by the city and dated January 17th, 2024. These can be found on the drawings and are summarized here:

- Calculated totals for floor areas have been reviewed and revised on the data table and on page RZ-010.
- Calculated totals for Site Coverage have been revised and updated on the data table and described more clearly on page RZ-010.
- The drive aisle behind the two parking spaces has the required distance from the street centre line. A variance from this Schedule C requirement is requested, as suggested by staff, because the two parking stalls share the same access from a 4.5m curb cut.
- Parking areas have been dimensioned on the site plan, RZ-009, and comply with Schedule C requirements.
- Parking calculations have been updated to reflect the current allocation of suites.
- Bicycle parking stalls have been dimensioned on the Floor Plan, RZ-101.
- The slope of the driveway has been noted on the Site Plan, RZ-009



**RESPONSE TO BUILDING CODE CONCERNS (EMAIL CORRESPONDENCE FROM PLANNER):**

We understand that three concerns were raised by the Permits and Inspections Division:

- The exterior stair would normally need to be protected according to part 3.2.3.13 (2) of the Building Code. This sentence addresses the protection of exit facilities, specifically unenclosed exit stairs. Protection of openings that present an exposure hazard (i.e. openings within 5 m above and 10 m below and within 3 m horizontally to the exit stair) will be protected by dedicated sprinkler heads. Compliance is achieved and addressed through an Alternative Solution (AS).
- The corridor between the two halves of the building will be considered an interior corridor even though it is open at both ends. These interior corridor walls will be constructed as fire separations with a minimum 1 h fire-resistance rating. We plan to provide Type X exterior sheathing on the corridor side, noting that the rating must be provided from both sides.
- The loft area above the 4th-floor suites is considered a half story for planning purposes but a separate story according to the building code (not a mezzanine). It will not meet the exit requirements of 3.3.4.4, but instead, we will address egress under an Alternative Solution (AS). Our code review of the project to date is relatively high level; as such, the specific details of a possible AS have not been determined, however, we acknowledge that the Vancouver Building Bylaw permits a single exit from a two-storey dwelling unit where the maximum travel distance is not more than 18 m. Minor plan changes have been included in this proposal that will account for this exit distance.

**RESPONSE TO PARKS COMMENTS:**

Parks' comments touched on a few areas, including civil drawings, bicycle parking and other concerns, but were generally related to the amount of green space we could provide the project, specifically in the SRW.

- Our project will contribute to the Urban Forest goals of the city by providing two trees in the rear setback (west side) of the site. As parks staff have noted, the space is about 400 mm (15 inches) too narrow to strictly meet the requirements of Schedule E. However, we have worked with our landscape team and arborist to find a tree species that would grow to a tall, columnar shape within the soil volumes, shade and sun conditions of that location. By retaining and protecting the existing trees to the south, we have surrendered available root area for additional new trees in that area.
- The renderings and drawings included in our submission package have been revised to correctly illustrate the proposed trees and the neighbouring trees that will remain.
- Hardscape has been reduced in the SRW at the front of the site:
  - Half the short-term bike parking has been reallocated to an area near the northern exit stairs.
  - The pathway on the south side of the building cannot be removed as it is a required fire exit route; however, the paving has been changed to remove the hard surfaces. The path must remain clear and free of tripping hazards but can remain unpaved.
  - The water service vault has been moved to the paved area of the main entry. This will remove any additional loss of planting area due to the vault.
  - The street tree has been allocated much more soil volume and spacing from any hard surfaces. The proposed tree location is centred in front of the bike room window, and offers more space and distance from hard surfaces than the requested dimensions in the Parks comments.
  - Driveway and letdown flares are shown as 1m wide on our Site Plan, RZ-009.
- We have worked with our landscape team and arborist to provide two new bylaw-protected trees. They are being proposed along the west side of the site.
- Updates to the Landscape drawings indicate soil volumes, and our letter from the Arborist will further rationalize our choice of the Columnar English Oak as a suitable tree species.





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- Planting in the SRW has been restricted to grass per Parks requests.
- Revised planting includes native plants such as Salal, Kinnikinick, Nootka Rose and various ferns.
- It has been noted that the species of street tree will be determined by the City.

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

- Traffic Demand Management strategies for this project will meet those requested by the City, including car share memberships, a car share parking location with power to charge an electric vehicle, transit passes for residents, cargo bike parking spaces and power provided to charge e-bikes.
- Conditions to be met prior to the Committee of the Whole meeting are noted, including a sanitary attenuation report.
- Conditions to be met prior to building permit submission are noted.

If you have any questions about the submittal, or our responses to your comments, please email Will King, at [wil@waymarkarchitecture.com](mailto:wil@waymarkarchitecture.com). We will gladly walk through the drawings with you and help ease your review period.

Sincerely,

Will King, Architect AIBC, MRAIC. LEED AP

