

May 13, 2025

Cover Letter
(accompanying re-submission on May 14, 2025)

Sustainable Planning and Community Development
1 Centennial Square
Victoria, BC V8W 1P6

Re: 235 Russell Street, Victoria – Rezoning and Development Permit Application

Dear Mr. Bateman,

Included in this package are the documents (updated ARCH) that made up our re-submission on March 13th of this year. Although a multitude of revisions, based on staff comments received on Nov. 29, 2024, were made for that submission of March 13th, a new Application Review Summary was not provided. Rather, some new comments from specific departments were provided. As the submission of March 13th addressed the Application Review Summary, this letter will address the new comments.

Planning. Planning's only new request to provide a material legend on the elevations has been satisfied.

Parks. To be clear, we are unable to meet the Urban Forest Master Plan goals and Tree Protection Bylaw No. 21-035. While we support such initiatives, the subject property and proposed development cannot meet such targets. The subject property is an empty, paved lot. There are no trees, and as far as we know, there have not been any trees for decades. That is, there are no trees to protect or replace. Although our project may be unable to meet the goals of the Urban Forest Master Plan, we have incorporated extensive landscape into a very restricted site. Landscape features incorporated into the project include,

1. A planter on every deck. That is, each home has a private outdoor space and each space has a planter.
2. The large concrete decks have large planters able to receive three trees.
3. Green roof

While these measures may not meet the goals of the Master Plan, they most certainly will enhance the immediate area and the quality of life for the tenants and those living in and visiting the neighbourhood. We are very pleased with the work of the landscape architect and believe they have been very creative in maximizing visible green features. Where there is currently nothing green, dozens of planters and a green roof will be created.

Transportation. We are supportive of Transportation's push for alternative modes of transportation. We are able to accommodate the majority of the recommendations. We are appreciative of the specific comments received from Transportation. Specific responses in italics below,

- The applicant to provide clarity on the response to car share vehicle recommendation and proposed location. Staff continue to recommend the car share vehicle is located within the parkade.

Alternatively, a curbside location consideration requires the applicant to design and install an EV charging station for an 'interim' location while securing via legal agreement an on-site 'home' location. The proposed frontage of this site is not suitable for curbside EV charging, staff can provide recommendations for chosen location.

We are open to staff's suggestion of an alternate location. We would request it be as close to the subject property as possible.

- The applicant to provide clarity on the proposed on-site parking uses. TDM recommendations assume stalls provided to the residential component.

We are happy to allocate the on-site parking to residential use.

- Staff recommend providing the required zoning minimums for short term bike parking, accessible and van accessible parking. As part of the TDM recommended program long term bicycle parking minimum is exceeded by 10%.

Staff recommendations for short- and long-term bike parking have been adopted.

- Staff recommend providing short term bicycle parking that meets schedule C and aligns with intent of providing bicycle parking for guests of the building (barrier free access, 24/7 use, etc).

Staff recommendation that short-term bike parking meets schedule C and aligns with intent of providing bicycle parking for guests of the building (barrier free access, 24/7 use, etc) has been adopted.

- The applicant has declined the integration of the proposed road dedication along the frontage, staff will recommend a 0.64m road dedication to achieve Mobility and Urban Forestry objectives as a condition of rezoning.

Please see previously submitted letters.

- The applicant has declined the inclusion of the extension of curb, gutter and sidewalk to Esquimalt Road, staff will recommend these additional frontage improvements as a condition of rezoning

We have not declined. As per the letter submitted as part of the March 13th submission, we are happy to discuss further.

- The expected parking variance is significant, a robust Transportation Demand Management (TDM) program is required to encourage alternative modes of travel for future residents and employees. The applicant is not in alignment with staff recommendations to off-set the parking variance.

To confirm, the applicant is in alignment with a robust TDM program. Contingent on space/availability we very much support alternative modes of travel.

- Staff will recommend to council as a condition rezoning TDM measures including;
- Exceeding long term bicycle parking spaces (min 10% beyond zoning requirement) within a secure bicycle storage room

This recommendation has been adopted (i.e., long-term parking is provided in an amount 10% above required).

- Providing min 10% oversized spaces
We have been able to provide 5% oversized spaces.
- Min 50% with access to electrical outlets
Happy to accommodate.
- A bicycle maintenance station with tools and space, including water and drain
Maintenance station has been provided.
- End of trip facilities (shower, changerooms, storage lockers) for employees
Already incorporated into the building.
- Financial contribution to BC Transit ecoPASS program of \$21,000 (contributing to 10% of residential units equalling \$1000/ecopass, for a min term of 5 years (\$15,000) & contributing to the commercial stall variance 75% of parking rate equalling \$1000/ecopass for a min term of 5 years (\$6000).
Happy to accommodate.
- Contribution of \$55,000 to the purchase and operation of a car share vehicle with car share memberships and \$100 credits to each residential unit.
Happy to accommodate.

In summary, while we are unable to meet the Urban Forest Master Plan goals and Tree Protection Bylaw No. 21-035, we have incorporated considerable green features (including three trees) into the project. Given there are no trees to protect or replace on a site that is 100% paved, the green features provided are an enhancement to the city and neighbourhood. We are extremely supportive of the alternative modes of travel suggested by Transportation and are able to accommodate the vast majority of the suggestions. We are of the opinion we have worked very hard to win staff support and hope to receive it. As we initiated this pivot to include a residential component over 14 months ago, we feel it is time to go in front of council. We strongly believe this iteration incorporating a residential rental portion, including a below-market component, is a better fit for the neighbourhood and desperately needed. With or without staff support, please present our project to City Council.

Sincerely,

Daniel Robbins

Dan Robbins

Fraser McColl

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