

March 2023

City of Victoria  
1 Centennial Square  
Victoria, BC V8W 1P6

Attention: Mayor and Council

RE: 50 Government St Application for OCP amendment, Rezoning, and Development Permit

We acknowledge that our proposed development is located on the homelands of the Songhees and Esquimalt People. Our application is respectfully submitted to propose a purpose built affordable rental building at 50 Government St in the James Bay neighborhood. Our proposal for a 24 unit residential building is an opportunity to simultaneously address the housing crisis and the climate crisis. Our proposal provides what citizens, Victoria's Mayor and Victoria City Council is searching for (instead of what the property is currently zoned for, a 4 story condominium). The proposed building will include two fully accessible units.



50 Government is currently a 4 unit multi-family residential building, in poor repair and not attractive. This 1910, non-heritage building was not designed to address Victoria's needs in 2023. Current R3-2 zoning allows for Multifamily Residential up to 6 stories, which is what we propose. Our proposal is asking for a rezoning and OCP amendment because we are integrating a higher floor space ratio, higher

site coverage, lower parking space count (to accommodate e-bike charging/parking / Modo car share spots), and smaller setbacks. Additionally, our proposal is aiming to further James Bay's decolonization effort, with a street-facing building height art piece, created by a local First Nations artist.

The Official Community Plan places designation for 50 Government as “Urban Residential,” which would allow for most of what we are proposing to do. Instead we would propose re-classifying this land with the “Housing Opportunity” designation, which is consistent with the project that we are putting forward.

The following sections of this letter outline how our proposal will provide public benefit consistent with OCP Policy 6.1.6.A, and address how we are responding to Victoria's design guidelines.

#### AFFORDABILITY:

The units we are proposing are all purpose built affordable rentals. Our project team is already in conversation with BC Housing and will be using their definition of affordable housing. We anticipate working with them on financing and other support to achieve these affordability goals.

The housing crisis is a multi-faceted and difficult problem to solve. All members of the community are working together to solve this problem. A solution can only be achieved through the combination of many projects and policies. Our proposal aims to contribute as much as possible to solve this problem.

According to the National Bank of Canada Housing Affordability Monitor, Canadian housing affordability continues to deteriorate for a 6th consecutive quarter in Q2, 2022, which is the worst quarterly and annual deterioration in 41 years. Of the 10 markets studied, Victoria experienced the worst deterioration

[\[https://www.nbc.ca/content/dam/bnc/en/rates-and-analysis/economic-analysis/housing-affordability.pdf\]](https://www.nbc.ca/content/dam/bnc/en/rates-and-analysis/economic-analysis/housing-affordability.pdf).

We are experiencing a 30-year high in migration to our province. Statistics released by the Ministry of Jobs, Economic Development and Innovation B.C. Jobs Ministry shows that more than 100,000 people moved to the province in 2021, the highest annual total since 1961. When we look specifically at Vancouver Island we see that between 2014 and 2021, more than 89,000 people moved here.

This has caused a spiraling increase in rental demand, but supply has not increased at the same rate. The housing supply only increased by 28,000 units in the same period; a fraction of which is affordable rental housing.

#### COMMITMENT TO CLIMATE ACTION & SUSTAINABILITY:

The City has declared a Climate Emergency, and we are committed to meaningfully address the climate crisis. Due to the long-lasting nature and high cost of buildings and their components, decisions made in the short term will lock in emissions for decades. What we build today will almost certainly exist in 2050 when net-zero (or better) will be required. Therefore, we are committed to build today in a way that is compatible with the 2050 targets. Building to net-zero standards today is not only the right thing for the climate but also the right thing financially. Failing to do so will require a costly retrofit before the 2050 net zero deadline, which is long before buildings would require major work otherwise.

We are thrilled and supportive that in August of 2022 the council decided to require new buildings to be zero carbon by 2025, five years before the provincial requirement. It is our position that switching from fossil energy to electricity is necessary. Our proposal aims to go beyond what is required from an environmental standpoint. Solar panels on a roof does not make a building green; it only makes the energy it uses green. Reducing energy demand through efficiency must be the first step, then the smaller energy demand can more easily be met through electrification.

Buildings have an enormous role in the broader transition away from the carbon economy because buildings may be the only sector where demand can be reduced by 80% to 90%, where these changes can be cost effective, and where nothing is sacrificed. In fact, quite the opposite; efficient buildings are healthier, more comfortable, lower maintenance, and lower cost over their lifetime, even if they take a modest up-front investment. Renewable energy capacity can then be more available for those sectors where such deep cuts to demand are more challenging.

In many ways, climate change mitigation and adaptation are two sides of the same coin. Efficient buildings are comfortable even in extreme weather events, and will maintain that comfortable indoor environment far longer in a power outage. Airtight buildings are more efficient, and airtightness is a key to maintaining good air quality when forest fire smoke is in the air. Heat recovery ventilation is key to achieving efficiency, and those systems include filters that can clean out smoke particulates and reduce the transmission of pathogens. These synergies can be achieved by taking a whole building systems approach.

To meet our climate change mitigation and adaptation goals, we are committing to the highest tier of step code, will target the Passive House standard, and have conduit ready for future solar panels, being truly net-zero ready. We will also have generous bicycle infrastructure, including e-bike charging, and all parking stalls will be able to accommodate electric vehicle charging. We also aim to replace two resident parking stalls with Modo stalls, encouraging the use of car sharing in the community and building.

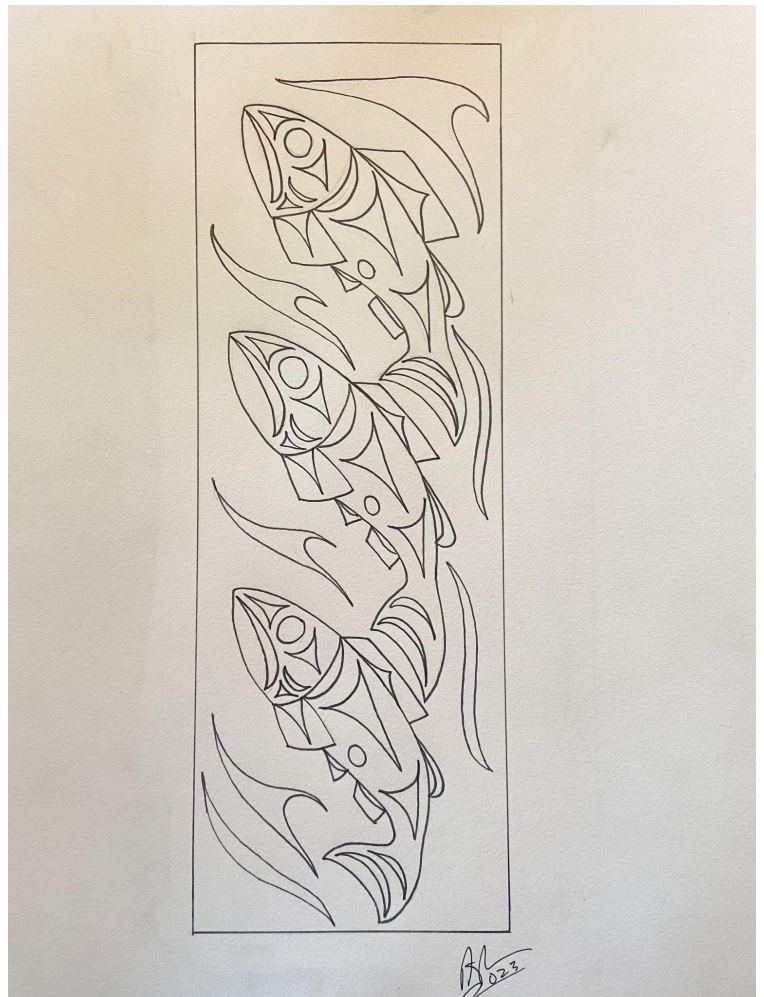
This project will replace an existing 4 unit building that is in poor condition; however, as much material as is practical will be reused and recycled. It is likely that our proposed building, which may house up to 6 times more people, will run on less electricity than what is there now.

#### PLACEMAKING AND PUBLIC ART:

The most significant design feature visible from the street will be a very large piece of public art. Given our project's unique position at the end of Battery Street (a Heritage Preservation Area), the East facade is a unique opportunity for a prominent piece of public art. The project will work with First Nations artist Bear Horne.

The three prominent salmon would span the front of the building vertically with the final palette being at the artist's direction.

This offering to the public realm is meant to promote decolonization and promote the importance of integrating First Nations culture into future developments in Victoria.





POLICY CONTEXT:

As noted above, this proposal is not in keeping with all aspects of the Official Community Plan. We believe that in the context of the housing crisis and the climate emergency that the council will find reason to support this project.

The most significant way that our proposal deviates from the OCP is the Floor Space Ratio. The OCP land use designation of urban residential envisions relatively high FSR in strategic locations for the advancement of plan objectives (page 39). We are proposing an FSR of 2.34:1.

Strategic locations are defined as within 200 m of the urban core, a town center, a large urban village, or abutting an arterial or secondary arterial road. This section of Government St is not arterial, and we are 430 m from James Bay Village. We are arguing that in the context of the dual climate and housing crises, that any location where affordable units are proposed in a building aligned with the Paris Accord climate targets should be considered strategic.

Alternately, the OCP urban place designation that best fits what we are proposing is "Housing Opportunity."

Within this land use designation, the OCP's guidance is that building forms should be responsive to the existing and envisioned context of the surrounding areas. Even though there are many buildings nearby which are larger than what we are

proposing, the immediately adjacent lots are single family and are expected to remain so for the foreseeable future.

The design aims to celebrate this contrast by offering something to the community; most importantly the prominent piece of public art described above. We believe that our proposed building will become a recognizable landmark.



BUILDING TYPE DIAGRAM: James Bay's residential buildings consists of a mix of single family, townhouse, mid-rise, and high-rise.

- Yellow square: Apartment style 3 to 6 stories
- Red square: Multi-family over 6 stories

OCP Policy	Our Proposal
<p>Vision and Strategic directions identified in the OCP for the James Bay Neighbourhood:</p> <ul style="list-style-type: none"> <li>● 21.15.1 A densely populated mixed-use neighborhood with a Large Urban Village.</li> <li>● 21.15.6 Home to a large portion of the city’s rental housing stock.</li> <li>● 21.16.1 Maintain a variety of housing types and tenures for a range of age groups and incomes.</li> <li>● 21.16.3 Maintain an interesting diversity of land uses, housing types and character areas.</li> </ul>	<ul style="list-style-type: none"> <li>● <i>Adding density close to James Bay Village</i></li> <li>● <i>Adding to the rental stock</i></li> <li>● <i>Adding to the variety of housing types</i></li> <li>● <i>Adding to the diversity of housing types in the neighborhood</i></li> </ul>
<p>Values and goals identified in the OCP:</p> <ul style="list-style-type: none"> <li>● 3.2 One Planet Living: Become a city that lives and works within its fair share of the planet’s resources.</li> <li>● 3.6 Individual Well-Being: Help ensure that all residents have secure access to basic needs, such as food, housing and services, as well as the skills and abilities required to flourish.</li> </ul>	<ul style="list-style-type: none"> <li>● <i>We propose to reflect this value by designing a building aligned with Paris Agreement goals.</i></li> <li>● <i>We propose to reflect this value by providing more affordable housing options to those who have a difficult time finding adequate housing in the City. Some of the housing units will also be accessible for people with mobility issues.</i></li> </ul>

<ul style="list-style-type: none"><li>● Goals by topic area (identified in Figure 4)<ul style="list-style-type: none"><li>● Land Management and Development:<ul style="list-style-type: none"><li>A. Victoria has compact development patterns that use land efficiently</li></ul></li><li>● Placemaking<ul style="list-style-type: none"><li>B. Victoria's cultural and natural heritage resources are protected and celebrated.</li></ul></li><li>● Climate Change and Energy<ul style="list-style-type: none"><li>A. Victoria and Victorians are more resilient to climate change and energy scarcity and costs.</li><li>B. New and existing buildings are energy efficient and produce few greenhouse gas emissions.</li><li>C. Transportation options reduce fossil fuel dependence, help conserve energy and produce low greenhouse gas emissions and other air contaminants.</li></ul></li><li>● Housing and Homelessness<ul style="list-style-type: none"><li>A. All residents have access to appropriate, secure, affordable housing.</li><li>B. A wide range of housing types, tenures and prices gives residents choices.</li></ul></li><li>● Arts and Culture<ul style="list-style-type: none"><li>A. Victoria is a place where artists are able to thrive and where people from all walks of life enjoy formal and informal opportunities to create and enjoy the arts, culture, and entertainment activities.</li><li>B. Victoria's cultural and natural resources are protected and celebrated.</li></ul></li></ul></li></ul>	<ul style="list-style-type: none"><li>● <i>This proposal will use the land more efficiently</i></li><li>● <i>Including a prominent piece of public art by a local First Nations artist celebrates Victoria's culture</i></li><li>● <i>The building is designed to remain comfortable in extreme weather events, provide good indoor air quality through smoke events, and remain comfortable even in the case of prolonged power outages, and do so with very little energy.</i></li><li>● <i>The building will be emissions free and net-zero ready.</i></li><li>● <i>The building will provide generous bicycle infrastructure, EV charging, and car sharing</i></li><li>● <i>This proposal is for 24 new (20 net new) purpose built affordable rental units.</i></li><li>● <i>A prominent piece of artwork is included on the front of this proposed building celebrates a local First Nations artist and will be experienced by any residents and visitors of Victoria.</i></li></ul>
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<ul style="list-style-type: none"><li>• Emergency Management<ul style="list-style-type: none"><li>A. Victoria is prepared to deal with known hazards and emerging threats, to limit the adverse impacts of events, and effectively manage emergencies.</li></ul></li></ul>	<ul style="list-style-type: none"><li>• <i>As a building designed in alignment with Paris Accord goals, residents will be able to shelter in place in the case of extreme weather events.</i></li></ul>
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