



625 Fisgard Street, PO Box 1000
 Victoria BC V8W 2S6
 Tel: (250) 360-3065

File: 5220-20
 Gorge Waterway Initiative

April 2, 2025

Miko Betanzo
 Senior Planner
 City of Victoria
 Via email: mbetanzo@victoria.ca

Dear Miko Betanzo:

RE: GORGE WATERWAY INITIATIVE COORDINATED RESPONSE TO THE CAPITAL CULTURAL DISTRICT REZONING APPLICATION

On behalf of the Gorge Waterway initiative (GWI), thank you for the opportunity to provide comments on the rezoning application for the Capital Cultural District. The rezoning application and associated documents from the City of Victoria Development Tracker were forwarded to the GWI steering committee. This letter reflects the comments of the committee members based on reviewing the changes to the rezoning application (as noted in pink text and outlined figures) submitted to the City of Victoria on November 21, 2024, and evaluated it as it pertains to the protection, restoration and enhancement of the Gorge Waterway and its watersheds¹:

GWI Comments:

The GWI is highly supportive of the following features included in the proposed development including:

- Design and development of a stormwater management plan to mimic natural hydrological processes. The GWI encourages the implementation of a variety of design approaches including green roofs, rain gardens, stormwater treatment and retention areas and permeable paving to capture rainwater and support improvements to water quality and the marine environment.
- Measures intended to support a healthy and resilient urban forest canopy. The proposed project area has some of the lowest canopy cover and highest cover of impervious surfaces in the City of Victoria and along the shoreline of Victoria Harbour, the Gorge Waterway and Portage Inlet. Reducing impervious surfaces and creating growing conditions needed for large trees and native species is important for supporting habitat and biodiversity, climate resilience and cooling.

¹ The GWI also submitted a coordinated response on April 16, 2024, on the previous version of the rezoning application.

- Inclusion of native plants in the overall planting strategy to support biodiversity and resilience to climate change.

Our recommendations and comments for consideration are as follows:

Shoreline Restoration Opportunities:

- The location of the project presents a unique opportunity in an urban environment to contribute to improvements to the shoreline and marine environment. If thoughtfully implemented, shoreline enhancements and stormwater management have the potential to support:
 - Out-migrating juvenile salmon and cutthroat trout from the Colquitz and Craigflower Rivers
 - Pacific Herring, which were formally abundant in this area and are now present in low numbers
 - Olympia oysters, a species of “Special of Concern” listed under Canada’s Species at Risk Act with a healthy population in the Gorge Waterway²
 - Resting and foraging habitat for marine birds within the Victoria Harbour Migratory Bird Sanctuary

- The GWI is highly supportive of shoreline restoration opportunities. The rezoning application includes reference to a small “potential shoreline improvement area” (p.31) however there is little detail except for reference to a wet swale.

- The submission also includes the following on P.31:

“any future design enhancements to the shoreline will consider flood and habitat protection measure eg. replanting native riparian vegetation, managing invasive vegetation and introducing large woody material in combination with a variety of granular material”.

Although the GWI is supportive of this statement in principle, it is unclear how this will be implemented as the illustration shown on p.38 includes an overwater piled structure with what appears to be a sheet pile wall. This conceptual design is not in alignment with the statement above and the GWI highly recommends limiting the construction of overwater structures and vertical walls.

- Should overwater structures be included in the project, the GWI agrees that salmon habitat needs should be considered including utilizing light permeable materials as indicated in the rezoning application. However, the illustrations show a vertical wall which would not allow for salmon passage. If over water structures and vertical surfaces are included in the design, marine concrete products specifically designed to support habitat complexity for marine species (potentially including Olympia oysters) should be considered where possible. Piles should not be made of creosote treated wood³.
- It is understood that an alternative alignment for the pathway is under consideration that would set back the pathway from the rip rap. This approach would be preferable to the piled structure. We highly recommend exploring hybrid nature-based solutions and habitat enhancements in consultation with a coastal engineer and biologist with experience in the implementation of Green Shores and/or hybrid coastal Nature Based

² Olympia oysters have been observed in the vicinity of the proposed project area.

³ Use of creosote may pose risks to fish including juvenile salmon and herring.

Solutions. It is understood that considerations will be required based on the level of contamination in the sediments.

- We strongly recommend the incorporation of Green Shores principles along the shoreline to restore physical processes, enhance habitats, reduce pollutants and reduce cumulative impacts along the shoreline where possible.
- The shoreline design should consider sea level rise projections by ensuring that the design is resilient and adaptive to projected sea level rise. Furthermore, the siting of permanent structures should consider sea level rise projections.
- Opportunities for education and public interaction with the marine environment including signage and viewing areas should be included along the pathway.

Stormwater Management and Green Infrastructure:


- The following language is included under “Landscape and Open Space” under “Greenspace” on P. 25.
“green roof planting and usable rooftops will be considered for all buildings”
Stronger language and commitments for green roofs should be included in the application.
- The GWI recognizes the plan to incorporate blue and green infrastructure though the site. We are encouraged by the use of permeable paving in the new public plaza and would like to see the use of permeable paving throughout the public walkways where possible.
- Urban Site Certification with Salmon Safe BC, an eco-certification program managed by the Fraser Basin Council should be considered. The program recognizes land management practices that better protect Pacific salmon habitat and enhance water quality on urban lands. The TELUS Ocean Building in Victoria was recently certified as Salmon-Safe.

Urban Forest:

- The following language is included under “Landscape and Open Space” under “Greenspace” on P. 25.
“at the Harbour Concourse level there is potential for use of soil cells to promote a thriving and healthy urban forest canopy.”
Stronger language and commitments for including soil cells that will accommodate the growing conditions required for large trees where possible should be included in the application.

Thank you again for the opportunity to provide comments on this project. Please contact me at 250-360-3065 with any questions or comments.

Sincerely,


Jennifer Tyler
Harbours and Watersheds Coordinator
Chair, Gorge Waterway Initiative