

2025.08.08

Engagement Team
City of Victoria

Via Email: ocp@victoria.ca

RE: PROPOSED ZONING CHANGES AFFECTING ST CHARLES MANOR

Dear Engagement Team,

Our client, Trillium Communities, have retained Continuum Architecture Inc to design and document an addition and modifications to the existing St Charles Manor, at 1020 and 1006 St. Charles Street in Victoria. The project brief includes expansion to the neighbouring property at 950 St Charles, which is owned by the same entity. This site is presently occupied by one house, converted into 6 rental suites.

The full scope of changes proposed to the facility have been included in a Development Permit and Rezoning application, dated November 20, 2024. Please also note that discussions and meetings have been held via teleconference, email and on site with various Planning staff, Heritage staff and others in relation to this project since 2019, before a pause during the COVID-19 pandemic lockdowns.

While the design and program have evolved since the earliest of these conversations, the current application includes a comprehensive rethinking of this entire care facility. It includes a brand new, central, off-street, and fully accessible level drop-off and main entry point. All parking has been relocated from the surface in the front and rear yards to a new secure underground parking structure beneath the new addition. Where the parking areas used to be, we now restore the land to beautiful, welcoming gardens and secure, and private amenity spaces for all the property's residents, including areas that are attuned to the specific requirements of the Memory Care residents. The new addition located on the '950' address has as designed provides 36 new homes for those who need care (especially seniors, but also any others who find themselves with supportive needs). Interior improvements to the existing facility ensure that all resident and support spaces are fully compliant with the current Community Care and Assisted Living Act, including an entirely renovated Memory Care wing, an enlarged kitchen to service the entire site, enhanced staff support areas, and other modernizations and improvements to accessibility and general resident experiences.

Preliminary comments on this application have been received from City of Victoria Planning, Heritage and Engineering staff. We have been incorporating them into an upcoming revised submission for the Development Permit and Rezoning Applications.

Lance Steele, M Arch, Architect AIBC, MRAIC, AIA
Jeremy Beintema, Architectural Technologist AIBC
Wil Wiens, Architectural Technologist AIBC

Continuum Architecture Inc.
519 Pandora Avenue
Victoria, BC, V8W 1N5

www.continuumarchitecture.ca

Only very recently, during our preparation of our responses and re-application documents, have we learned of these proposed zoning and bylaw changes. Through a very enlightening conversation with the Planner assigned to our project, Patrick Carroll, we were introduced to the proposed regulations that will apply to St Charles Manor (1020 and 1006 St Charles St). He also explained that the subject property '950' is NOT at present under consideration for these same changes.

We were surprised at this delineation between our project's property lines, given the current application on file.

We hereby request that consideration for the zoning and land-use as assigned to the 1020 and 1006 St Charles lots also be applied to 950 St. Charles as well.

We believe this is a reasonable request for multiple reasons:

- The '950' property is owned by the same entity, and the new project per our application will be owned and operated by the same current entity.
- An existing application to expand the current zoning of St Charles Manor to '950' is already well known and familiar to the City.
- Having the City apply this zoning to '950' at this time would save both the owner and the City delay and expenses related to an inevitable new rezoning application in a repeat of the current application.
- Adjustment can be made to the design and program of the '950' expansion project to suit the proposed new zoning regulation applied to St Charles Manor.

Additionally, we would like to consider the greater holistic approach to addressing our population's housing needs. Providing sufficient and suitable homes that address the wellness of all residents – senior citizens and otherwise – is a great concern, not only in Victoria and our region, but nation-wide.

The proposed Use Definitions section 2.2 of the Bylaw says:

Assisted Living Facility means premises in which housing is provided:

- a) with services – such as meal services, laundry services, social and recreational opportunities, and a 24 hour emergency response system – and at least one of the prescribed "assisted living services" from the Community Care and Assisted Living Act, and*
- b) to three or more adults who are not related by blood or marriage to the operator of the premises.*

Care Facility means an adult day care facility or residential care facility, in each case licensed under the Community Care and Assisted Living Act.

Within the proposed General Residential District 1 Zone (GRD-1) we find a list of Permitted Uses including such non-residential facilities including: Assembly, Civic, Food and Beverage Service, Retail Trade and Utility.

These uses are defined as:

Assembly means facilities used for a place of worship, cemeteries, convention facilities, cinemas, commercial recreation facilities, social and recreational clubs and facilities, and education and training facilities, and does not include commercial casinos.

Civic Facility means premises used for government operations or services, including but not limited to legislature, municipal hall, law court, hospital, fire hall, library, ambulance or police station.

Food and Beverage Service includes the operation of catering establishments, portable food vendors, cafes and restaurants.

Retail Trade means the retail sale, repair, servicing, or refurbishment of consumer goods other than automobiles or automotive fuels but does not include Retail Liquor Sale or Storefront Cannabis Retailer.

Utility means infrastructure that is used to provide water, sewer, drainage, district heat, gas, electrical, or telecommunications service whether located on, above or below ground and includes pump stations and service vaults and kiosks but does not include sewage treatment plants.

We would posit that both "Assisted Living Facility" and "Care Facility" use as defined in the new proposed Zoning Bylaw, in fact, are a necessary Residential use, and of value in being added to ALL residential zoning areas. As noted previously, our client's facilities provide specialized housing and licensed, supportive care for all ages.

We appreciate your consideration of our request regarding the '950' project site, and would be happy to discuss both our particular project's specifics, our perspective on application of permitted uses, or any other questions you may have.

On behalf of the Partners of Continuum Architecture Inc,

Wil Wiens, Architectural Technologist AIBC, Affiliate RAIC
Partner

From: Roxanne Orpen
Sent: August 17, 2025 8:22 AM
To: Public Hearings
Subject: James Bay - One City One Plan
Attachments: James Bay.docx

Hello!

As a resident of James Bay I want to express my thoughts and feelings about this One City Plan. I, as are many in the community, are requesting more consultation and input into this plan before it is finalized and to have our input taken serious, more seriously then most of the residents currently feel it has been to this point.

Attached please find a document with my thoughts/feelings/wishes about and for our neighborhood.

Thank you taking the time to read it and I have hopes that it will help in understanding how we who live here feel about our community.

Roxanne Orpen/Faulkner
151 St. Andrews Street

James Bay, nestled at the southern tip of Victoria, British Columbia, is more than just a neighbourhood—it's a place that pulses with history, vibrancy, and the daily rhythms of life lived in close harmony with land and sea. Recently, the proposed rezoning under the banner of "One City" has sparked passionate conversations. As residents, we feel compelled to share the reasons why we cherish our home and, in doing so, urge the preservation of the qualities that make James Bay invaluable—not only to us, but to Victoria as a whole.

The essence of James Bay resides in its people. Here, neighbours are more than passing faces—they're friends, co-conspirators in local projects, and helping hands in times of need. Our streets hum with greetings, dog walkers exchanging stories, and gardeners sharing cuttings across fences. Community events, whether the seasonal markets at the Community Centre or impromptu gatherings in the parks, foster connections that run deep.

This spirit of togetherness is not easily manufactured or replaced. It is the result of decades of shared experiences, local traditions, and a genuine sense of belonging. It's part of what makes the prospect of drastic, citywide rezoning so unsettling; we fear losing the intricate social fabric that binds us.

James Bay is one of Victoria's oldest neighbourhoods—its streets are lined with heritage homes, each telling stories of past generations. Walking down Dallas Road or through the residential lanes, one encounters a blend of stately Victorian mansions, modest character houses, and lovingly maintained bungalows. These buildings are more than structures; they are physical embodiments of the neighbourhood's journey through time.

Landmarks like the Emily Carr House tell the tale of a celebrated Canadian artist whose creative spirit was shaped by this very landscape. The Parliament Buildings, standing as our neighbours, connect us to the political heart of British Columbia, reminding us that James Bay is both historically significant and dynamically relevant.

For many residents, the natural beauty of James Bay is its greatest treasure. The neighbourhood is defined by its proximity to the Pacific, with Dallas Road's sweeping vistas, windswept beaches, and the constant spectacle of passing ships. People come from all parts of the city to stroll the seaside walkways, watch storms roll in, or simply sit quietly at Holland Point, letting the ocean air wash over them.

But James Bay's green spaces are more than picturesque—they're living rooms for the community. Fisherman's Wharf, Beacon Hill Park, and the small local gardens provide places to gather, play, and reflect. The sound of children's laughter floats across cricket fields and playgrounds; artists set up their easels to capture the shifting colours of the sky at sunset. These spaces are the lungs of our neighbourhood, essential and irreplaceable.

The lifeblood of James Bay flows through its small businesses and cultural institutions. Cafés tucked on corners, the James Bay Market, and independent shops animate our streets with personality and charm. These establishments are run by neighbours—people who know their customers by name, who remember your favourite order, and who form the backbone of our local economy.

Cultural vibrancy is also evident in the neighbourhood’s diverse population. James Bay welcomes people of all backgrounds, ages, and walks of life. From young families to retirees, newcomers to lifelong residents, there’s a palpable sense of inclusivity. Our festivals, art shows, and music events reflect this richness, creating opportunities for everyone to celebrate the neighbourhood together.

James Bay’s location offers perfect balance: a stone’s throw from downtown Victoria, yet peaceful enough to feel worlds away. Residents enjoy walkable streets, bike-friendly lanes, and easy access to public transit. Everything one needs—grocery stores, health clinics, schools, recreational facilities—is within reach, making life here both convenient and sustainable.

This accessibility fosters independence for seniors, safe freedom for children, and a general sense of well-being for all. In a world where urban sprawl and car dependency are the norm, James Bay stands as a model of thoughtful urban planning.

The push to rezone James Bay as part of a “One City” vision carries the risk of erasing the distinctive character that defines our neighbourhood. Blanket policies may seem efficient, but they rarely account for the unique spirit and needs of individual communities. Increased density, unfamiliar architecture, and shifting priorities threaten to dilute the qualities that residents have nurtured for generations.

We understand the need for progress, for affordable housing, and for making Victoria a more unified city. But we believe that change must be thoughtful, measured, and respectful of the neighbourhoods it affects. James Bay is not opposed to evolution—indeed, our history is one of adaptation and growth—but we ask for a seat at the table, for our voices to be heard, and for our love of this place to be considered in every decision.

What do we hope for James Bay? We dream of a neighbourhood that remains welcoming, beautiful, and resilient. We envision green spaces protected, heritage homes preserved, and local businesses thriving in a market that values community over uniformity. We hope that future development will enhance accessibility, promote sustainability, and foster diversity without sacrificing the intimacy and warmth that set James Bay apart.

As residents, we are ready to participate in shaping the future of Victoria, but we ask that change not come at the expense of what makes our neighbourhood special.

James Bay is more than a point on a map—it is home. It is where our memories are made, our children grow, and our elders reflect on lives well-lived. Every tree, every painted porch, every bustling corner store is a testament to the care and pride of its people.

In this time of uncertainty and potential transformation, let us celebrate James Bay not as a relic to be replaced, but as a living, breathing community worth honouring. Let's share our stories, advocate for what matters, and invite others to discover why we love our neighbourhood—and why it deserves to be cherished for generations to come.



GONZALES NEIGHBOURHOOD ASSOCIATION
www.gonzalesna.ca

August 15, 2025

Mayor and Council
City of Victoria
1 Centennial Square
Victoria, BC V8V 2G7

Dear Mayor and Council,

[Re: Gonzales Neighbourhood Association submission - Official Community Plan Amendments](#)

On behalf of the Gonzales Neighbourhood Association (GNA) we wish to provide input on the proposed amendments to the Official Community Plan. We set out our views under the headings: Heritage Conservation, Affordable and Inclusive Housing, Context-Sensitive Density, Infrastructure, and the Urban Forest and Green Space.

Heritage Conservation

The neighbourhood of Gonzales is home to many architecturally significant residential buildings as well as heritage sites (Gonzales Observatory) and landmarks of other kinds (Abkhazi Garden). Crescent Road and Hollywood Crescent (from Foul Bay Road to St. Charles street) is an essential link of our scenic marine drive and is **a frequent corridor for Victoria's tourism events such as marathons, bike rides and parades**. Some individual properties are protected through the heritage registry, but the overall streetscape and context remain vulnerable due to the absence of any designated Heritage Conservation Areas in the proposed OCP.

Furthermore, **the proposed Heritage Conservation Area found in Queen Anne Heights that was approved in the 2002 Neighbourhood Plan was never enacted** and this has allowed for the continual destruction of stately mansions and mature trees, not to mention likely threatened and endangered species found on these large lots.

Lastly, recognition of the beautiful houses found elsewhere in Gonzales and deserve protection are those found in the Gonzales Walking Tour. People come from around the world to walk this tour: https://victoriaheritagefoundation.ca/wp-content/uploads/2024/04/GonzWTB_web_.Oct20.pdf

To protect cohesive areas of heritage residential architecture and historic commercial areas -such as Montague Court and Gonzales Pharmacy - **it is necessary to increase the heritage protections that are stated in the current OCP**, and recognize the unique character of Gonzales, aligning with existing heritage conservation areas in Victoria such as Old Town and nearby Rockland. Several unique areas/buildings have been removed from previous heritage protection in the proposed OCP.

As of this date there is no protection for heritage in all of Victoria except downtown and in Vic West, which is of grave concern as it **reflects council's lack of priority for what makes Victoria unique. As a provincial capital and tourist destination, it is doubly important to retain heritage buildings and streetscapes, which is what many tourists come here to see.**

Affordable & Inclusive Housing

Gonzales has a strong community of renters, in existing apartment buildings, and suites in houses. Protection for tenants should be put in place, especially when removal of existing affordable suites will be the result of a new development. **New suites, unless subsidized, will not replace the existing affordable ones.**

The housing that is projected in the new version of the OCP is denser, but realistically, more expensive. It's not clear whether any rental or co-op housing is mandated. Inclusive housing would mean all levels of ability, income and family types/sizes would be accommodated. Accessibility should be prioritized in new developments, strengthening it from the new OCP's accessibility guidelines which require structural conversion for full accessibility; after the unit is built.

Context-Sensitive Density

The desirable quality of our Gonzales neighbourhood is a combination of favourable geography within our native Garry Oak ecosystem and years of strong community activity. Larger scale buildings introduced to the streetscape in the middle of blocks should have visual cohesiveness and integration with their context, which is the buildings, rooflines, materials and green spaces nearby. They should not place their neighbours into shade. **A design program should be developed with quantifiable codes, rather than vague guidelines that can be interpreted in a subjective way.** The buildings should also be reviewed for attention to factors such as quality of materials, design and scale and retention of protected trees. Designs referencing historic styles should be relevant (ie. from our regional past- like Indigenous, West Coast Modern or Arts & Crafts, not Mediterranean or Cape Cod) and well-executed, rather than pastiche elements grafted onto a generic box.

Infrastructure

An immediate and crucial concern is the necessity of upgrading infrastructure to accommodate more households and vehicles. There will be a huge need for all systems (sewer, water mains, power) to be upgraded. ... the costs of which are borne by taxpayers. The maintenance of parks, capacities of schools and transit services will need to be increased. We currently need upgrades to existing traffic control especially near Gonzales Beach. If a commercial hub is planned for that area,

stoplights, parking regulations and enforcement will be a necessity. **This cost should be anticipated by the City of Victoria and addressed in the OCP**, so that it will be a cost borne by the developers who profit from building new developments, rather than taxpayers who are expected to be heavily taxed for many years going forward. Developer Cost Charges (DCCs) are not currently guaranteed to fully cover these costs.

Urban Forest and Green Space

There is not adequate environmental protection in the proposed OCP. Gonzales' green spaces and Garry Oak forests will be lost because of infill development. **The removal of Garry Oak trees should be a last resort.** We need a stronger tree preservation plan—and the City should demonstrate their willingness to steward this important species. Our proposed migration corridor located on the Gonzales Community map released in July 2025 will be compromised when large areas of trees are removed. Established large trees are not replaceable, and linear parks proposed in the OCP are only capable of addressing human needs—they do not replace vital ecosystems.

The parks of Gonzales will be vulnerable to over-use, as has happened in other cities like Toronto. In response to a growing population and climate change, existing parks, green spaces and street trees should be highly valued, retained and increased in number.

Thank you for your consideration of our concerns.
Gonzales Neighbourhood Association Board
www.gonzalesna.ca

From: Legislative Services email
Subject: FW: Support for OCP and Zoning Modernization

I would like to express my support for the proposed new OCP and the zoning modernization.

Victoria desperately needs more housing, and a wider range of housing choice. I think this plan will provide that.

I live in James Bay, and I received a NIMBY pamphlet, with a lot of fear-mongering and misleading information, through my mail slot. I want council to know that the NIMBY's don't speak for me. I want to see more housing, as do many of my friends and neighbors. It will help affordability and make our neighborhoods more vibrant. Higher densities will also better be able to support transit, and make it easier for people to get to places they need to go without needing a car. All these things will also help to reduce our GHG footprint.

Thanks.

Steven Murray
James Bay

To: Mayor Marianne Alto and Victoria City Councillors
Date: August 24, 2025

Submitted by: Marilyn Callahan, James Bay resident.

I moved to James Bay when I was 6 weeks old, living with my family on Kingston Street 82 years ago. While I have lived in Victoria in other areas since then, I moved back to James Bay in 1996 and have lived here continuously. I know my community.

In the last 29 years, I have supported many of the developments designed to make James Bay more liveable and affordable. There are many examples. Liveability includes the remarkable transformation of the flat field adjacent to Fisherman's Wharf on Erie St into a well-used, versatile park for recreation, as only one. Another is the demolition of two world war cottages on Dock St and Niagara, replaced by a handsome multifamily development of 12 units. I happen to live in a skinny infill house where one lot was divided into two. There are plenty more.

I am not opposed to development, in fact done well it enables neighbourhoods to keep pace with changing needs.

However, there are several reasons why the proposal to greatly increase the density in James Bay is fraught with problems.

The geography of James Bay: Bounded as it is by beaches, the major city-wide park and harbours, James Bay is effectively a peninsula with two narrow immediate major exit routes: Dallas Road and Bellevue-Douglas. Frequent city-wide events associated with the Parliament Buildings, celebrations and sports events already jam up these exits. Further James Bay is vulnerable to natural disasters associated with earthquakes as the recent tsunami warning reminded us.

The existing density of James Bay: In the last 30 years, I have observed major projects in James Bay that have greatly increased its density. These include Shoal Point, numerous high rises and multi-family developments along Dallas, and smaller in fill projects to name a few. Given their high-end quality, it is doubtful that they have increased the affordability of the community. One major exception to this is the project not yet complete at Niagara and Menzies, putting density first, hopefully resulting in affordable units, but sacrificing the trees and even boulevards that contribute greatly to the community ambiance. James Bay has taken more than its share of development given its geographical limitations.

The value of James Bay to the economy as it now exists. Daily I hear the clop-clop of horse driven carriages swinging tourists down San Jose with its 19th century houses, and hear the remarkable stories of its history, told by their drivers. Dallas Road, a Victoria gem, funnels a multitude of cruise ship tourists down nearby streets enjoying the ambiance of a people-sized community with lush gardens, boulevards, and trees, lots of trees. We cannot lose this in our

haste to build up. Conde Nast rates us #1 as the best small city in the world to visit. Tourism is a major industry for Victoria and James Bay is the gateway to our city for many tourists.

There are other parts of Victoria that could benefit from increased development: The developments along Douglas, including the old Bay store, and the high-rise communities in the Cook/Pandora area are great examples of this council moving forward to meet housing goals. Further along Douglas, up to and past Hillside, provide fertile areas for future development. These are just a few examples.

Development in James Bay does not need to demolish and go up. There are areas of James Bay now occupied by surface parking lots; some publicly owned, some, private. Attention to their development is beginning. As a priority, these wasteful spaces should be considered for thoughtful, community friendly developments that add to, rather than diminish, James Bay's contributions to the Victoria community.

I urge you to consider these 5 factors in developing more nuanced neighbourhood plans to reach goals of liveability and affordability.

Marilyn Callahan
314 Niagara St, Victoria

From: RD Music
Sent: August 25, 2025 2:31 PM
To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>
Subject: OCP

Good day Mayor Alto and Councillors, i am writing to you as a fellow human being who values cooperation and collaboration rather than confrontation. i want to make an analogy that will be pertinent to my point, and that is to imagine your home that you have worked on, tended and kept up, was torn apart and made unrecognizable by someone you thought knew how much you cared for your home and not only that was supposed to be working to see that it wasn't destroyed.

James Bay is that home and what the OCP does is tear apart a vibrant, cohesive and very diverse neighbourhood, with the densest population of any in the city. This is the same neighbourhood with heritage homes, character homes and varieties of design that huge numbers of cruise ship passengers pay to be taken through yearly because it reflects the best of what Victoria has to offer.

The OCP plan is an absolutely out-of-touch, unrespectful assault on a wonderful, colourful neighbourhood, a real one where people interact and enjoy the scenery and vitality. Turning this into a downtown, Vancouver, Toronto and the like is not an asset but an insult to this remarkable city.

It's not even as if there was one small area designated for (by James Bay standards) these oversized, out-of-scale developments but it's most of it! This would surely tax the infrastructure with the massive impact of a tripling (at least) of the current population, and of course with no parking probably in the buildings being approved, the scramble for what little available parking there is will make life more stressful for those driving and living here.

This drives to the final point of why the city feels compelled to massively increase the population when one of the draws for living in this city has been it's scale and livability. Densifying one of the quaintist neighbourhoods in the way being proposed is exactly contrary to why we live here in the first place. So i ask you, along with most if not all of my fellow neighbours i'm sure, to put aside whatever agendas may be at work here and walk a mile/kilometre in our shoes and imagine how you would feel living here and watching it become a crowded, characterless, housing warehouse?

As public servants you were given the opportunity and privilege of working for the citizens of Victoria, this responsibility included responding to and acting on what the people (who make this city 'real') need and suggest for improvement, not dictating to those very people just how they are going to live their lives. Yes, the public hearing is essential but actually listening, not just hearing the suggestions, concerns and yes, complaints is what true dialogue is about. Thanks for your time, rd wraggett

Thank you, sincerely, (wes) rd wraggett

-----Original Message-----

From: Patricia

Sent: August 26, 2025 8:03 AM

To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>;

Subject: James Bay neighbourhood

I am writing to express my concern about the massive changes to the official community plan for James Bay.

I have lived in James Bay for close to three decades and have witnessed a tremendous amount of change in my neighbourhood, a lot of it not for the better. Your latest proposals are nothing short of shocking.

We are already crowded here, already denser than much of Victoria, and your proposals to densify further do not make sense. One of the things that make James Bay a great place to live is the preservation of heritage homes, many of which were demolished in the 1970s/1980s under mayor Peter Pollen's watch, replaced by cheaply built multistruktures and leaving an unfortunate legacy. Some have had to be replaced already as you know. Mr. Pollen is not well regarded for his lack of foresight.

The massive apartment building currently being built at Menzies and Niagara is going to put so much more pressure on our already horribly congested streets that I cannot imagine how we are all going to manage, shoulder to shoulder, cars and more cars choking the neighbourhood. This is progress? I am aware that people need to live somewhere, but it's hard to understand how structures like this one, increasing density so intensely as it obviously will, is in the best interests of the greater population. And as for the children who will live in these apartments: where are they supposed to play? James Bay Community School isn't going to be able to handle the crush and neither is South Park.

I've seen so many trees coming down along our James Bay streets in order to facilitate builders who likely do not live in James Bay and have little interest in preserving a kinder atmosphere when there is profit to be made. The regular signage posted on the trees to inform the public of the intended removal is a sham. They are noted to be unhealthy but they almost always do not present that way at all. And public protest never does any good. Do you think about the environmental impact of all this tree removal? Is that forward thinking? Maintaining an ample canopy is critical in face of climate change. I don't believe you are looking at the serious consequences of your actions.

One of the worst, the worst, plans on the roster are the proposed changes along Dallas Road. Are you serious? You are talking about our waterfront! One of the jewels in the crown of this historic city. Is nothing sacred? Can you understand what a blow that will be to the look and feel of our beloved Victoria. And if you are considering all-over affordability of housing, I can't imagine how anyone except the wealthy and wealthier will be able to afford living along Dallas Road and the waterfront. Is that who you are courting? Seems so.

And, by the way, thinking about courting the wealthy: the gas station a Michigan and Menzies is a pretty good example of the city losing control to businesspeople who don't live here and obviously don't give a damn about anything but money and control. You want to make a positive impact? Fix that one!

And If you are courting the tourist trade, and the big revenue that cruise ships regularly bring to Victoria, you are shooting yourselves in the foot. There is nothing appealing about being greeted by impersonal 6-storey buldings, compared to our well-established homes along the water.

Change is inevitable, but it needs to be sensitive and considerate, for the good of everyone, renter and owner, visitor and resident, all of us. I love my neighbourhood, diverse and supportive as it is. Don't destroy James Bay. Please take into consideration the far-reaching effects on everyone to your current proposals. Don't ruin what makes James Bay one of the most unique and beloved parts of Victoria. I cannot believe that there aren't better solutions to accommodate growth in our city.

Patricia Parkins
35 Pilot Street
V8V2A5

From: Sandra Kriese

Sent: August 26, 2025 2:53 PM

To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>

Subject: Please reassess your OCP plans for the greater Victoria area 🏠

hello Mayor and Council of Victoria, BC.

My name is Sandra Kriese and this email is about a few things.....

1. OCP for James Bay and downtown Victoria,
2. Allowing so many tall condo buildings in all areas.
3. and... below.... understanding that the condo market's heyday has passed!!!

Here is an example of what is on the horizon.... in Toronto, in Vancouver... across Canada

The condo market is no longer viable and is destroying the landscape....

creating "concrete jungles"

Please read this Maclean's article on this topic:

https://macleans.ca/longforms/canada-condo-market-crash/?utm_medium=email&utm_source=ten_tabs&utm_campaign=FIREFOX-EDITORIAL-TENTABS-2025_08_26&position=1&category=fascinating_stories&scheduled_corpus_item_id=596697f1-3ee4-40d3-a4b6-9133421b6e13&url=https%3A%2F%2Fmacleans.ca%2Flongforms%2Fcanada-condo-market-crash%2F

I live in James Bay... in Victoria.

I was deeply disturbed to see a development proposal to build a SIX storey building at the corner of Michigan Ave. and Government St.!!!! This is NOT a busy street, where we do have taller apartment buildings. This is in the Village of James Bay!!

The proposed building will LOOM above the surrounding homes. As usual, the building will be built as close to the sidewalk as possible... no real greenery (maybe a few of those weird low maintenance bushes.. all the same.. a massive, boring landscape of “green”).....

NO CHARM, NO CHARACTER!!!

According to the (I hope still) proposed OCP for this area, FOUR and SIX storey condo/apartment buildings will now be allowed deep into the core of James Bay!!!

This is a VILLAGE!!!!.... all summer we have 2 or 3 cruise ships per day with hundreds of people enjoying the James Bay ambience in horse drawn carriages, peddle carts, walking tours, etc. This OCP proposal will absolutely ruin the feeling of what should be a Heritage designation... the James Bay Village. Once it is gone... it is gone.. and we are nothing more than another concrete jungle.

And on that note.... your allowing an excessive number of super tall condo buildings in the downtown core is also a travesty. As in the article above.. these teeny tiny condos are NOT affordable housing and are not even desirable by most!! The downtown core is grey, ugly, boring,... now has wind tunnels and no sun.

An example is the HUGE Telus building!... that building is almost DIRECTLY at the sidewalk.... a giant building of shiny glass that does nothing for our town let alone the birds.

You are WAY BEHIND what progressive cities around the world are doing!!!!.... LESS CONCRETE!! Quality green spaces... not just some strange low bushes with a concrete bench or two.

You are all missing the mark here.... Once you build these ugly monstrosity condos... either in the inner core village of James Bay or in downtown Victoria..... or, my GAWD..... Langford!!! they will destroy the nature of this area.

I simply cannot believe your short sighted approach to this....

you seem to pass ANY request to build, build and build.

Each time I notice another sign of a proposed building, I go online and the “public input” has already passed!!! It’s like all these projects are basically rubber stamped into existence.

Please do not do this,

We elect YOU to steward important decisions... to think 7 generations ahead, even!

Do NOT pass the OCP to build 4 and 6 storey buildings off the main streets of James Bay.

(Dallas rd. Douglas Rd. Southgate Rd..... Government St. is NOT a busy street!)

Do NOT allow any more tall buildings in the downtown core.... the current 4 or 5 that are in process are already going to be a blight for the city.

sincerely,

Sandra Kriese

James Bay

August 29, 2025

Dear Mayor and Council,

Congratulations on reaching the milestone of voting on a renewed Official Community Plan for the City of Victoria. We are pleased to see the visitor economy represented in the new Plan, especially under Section 9.1.4, Support and Showcase Victoria as a Destination City.

In 2023, Greater Victoria welcomed 4.9 million visitors, contributing \$2 billion to the region's GDP. Our reputation as a premier destination is affirmed by being named the Best Small City in the World by Condé Nast and achieving the highest sustainability ranking in North America from the Global Destination Sustainability Index in 2024.

However, a third-party Greater Victoria Hotel Sector Analysis by Floor 13 Consulting has identified a growing shortage of visitor accommodations as a risk to our destination. While it is encouraging to see visitor accommodation referenced across many districts and planning areas in the new draft OCP, clear language and targets are currently missing.

The Greater Victoria Hotel Sector Analysis shows that Greater Victoria will require 800–1,200 additional hotel rooms in the next five years, and up to 2,000 over the next decade, growth that would help recover lost hotel inventory. Over the past decade, the region has lost 2,000 to 3,000 hotel rooms, declining from a high of 6,470 rooms in 2009 to 4,695 in 2023—a 27% drop. Most of these losses have been in economy-branded hotels, narrowing the range of choices for visitors.

With visitor demand increasing across all segments, the need for hotel rooms at every price point has become urgent. The current shortfall risks making visits to Victoria unaffordable for families, sports teams, and other groups, which could negatively impact the many local businesses that rely on steady, year-round visitation.

Approximately 75% of the region's hotel rooms are located within Victoria. To maintain this share, support economic growth, and continue capitalizing on the benefits of tourism, the City of Victoria should plan for 1,500 new hotel rooms over the next ten years.

Therefore, we respectfully request that the City of Victoria include more detailed and prescriptive language regarding hotel development needs and targets in the renewed Official Community Plan. Clear and ambitious direction will signal to developers and investors that the City of Victoria and the business community are united in supporting a thriving, accessible visitor economy, with a full spectrum of accommodation options.

Potential language for inclusion in Section 9.1.4:

Ensure an adequate supply of full-service visitor accommodations across all price points and visitor segments by supporting the development of 1,500 new hotel rooms by 2035.

Thank you for your continued partnership and consideration.

Sincerely,

Paul Nursey
CEO, Destination Greater
Victoria

Jeff Bray
CEO, Downtown Victoria
Business Association

John Wilson
CEO, Greater Victoria
Chamber of Commerce

From: Robert Malcolmson
Sent: August 29, 2025 9:32 AM
To: Public Hearings
Cc: Patricia Malcolmson
Subject: Proposed closure of Douglas Street northbound between Belleville and Humboldt

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Council Members:

I live at 777 Belleville Street (unit 709) and have lots of experience concerning the intersection with Douglas, in car and on foot and from observations from my balcony. If the proposed closure of northbound Douglas (to private vehicles) between Belleville and Humboldt goes ahead, I foresee major traffic problems. Northbound vehicles on Douglas will either have to turn right onto Belleville, adding to the traffic on Blanshard; or turn left on Belleville, often waiting for a gap in the southbound traffic on Douglas, with a consequent backing up of traffic northbound on Douglas south of Belleville. Even if an advanced green light were to be installed for left-turning traffic, additional congestion on Government going north is a virtual certainty. None of these new problems would surely enhance the appeal of downtown Victoria.

Your sincerely,

Robert Malcolmson

709-777 Belleville Street
Victoria, V8W 0G1

From: Sheila Hanna
Sent: August 29, 2025 12:56 PM
To: Official Community Plan Update <ocp@victoria.ca>
Cc: Victoria Mayor and Council <mayorandcouncil@victoria.ca>
Subject: OCP

To Whom it May Concern,

I will be unable to attend the Public Hearing on Thursday, September 11, but would like my input as outlined in this email, to be considered.

I am a 26 year resident of James Bay who loves the beauty, heritage, diversity and sense of community in this neighbourhood. However, I feel that the proposed OCP is threatening the unique nature of our neighbourhood with the rezoning proposals.

James Bay is already very dense, but has managed to strike a balance with various building styles, housing needs, affordability, green spaces including tree cover, tourists, schools, etc., as well as roads to

accommodate people, cars and bikes. This balance will topple if the proposed zoning changes are followed through on.

Residents will be displaced from older affordable lower-rise buildings to build taller new ones.

I realize that 4 - 6 storey buildings are not high-rises, but the huge amount of land blocked out for these on the OCP proposed map for the James Bay neighbourhood will drastically change its character. Furthermore, I doubt if these newly built units will be "affordable" to the average citizen.

Parking is already a problem, and despite the wish/dream that people will use public transit or bikes, the reality is that for many, that is not an option. New buildings need to have enough parking spaces as part of their approval process.

James Bay is already denser than any other neighbourhood in Victoria, so it is unfair to add more to our tiny community.

People love to come to James Bay for its heritage character. Being close to downtown and the tourists make this an easy horse carriage ride or walk. When new, taller buildings replace older homes, that heritage flavour is lost.

Ingress and egress from James Bay is already limited and would become even worse with increased densification.

I will end here. Please listen to the residents, such as myself, who know their neighbourhood. The housing problem that we have in our country, province and city will not be solved by trying to squeeze in more unaffordable units into a tiny little enclave like James Bay.

Thank you.

Sheila Hanna
143 Medana St.
Victoria, BC
V8V 2h6

From: Tess Hawkins

Sent: Saturday, August 30, 2025 9:53 AM

To: Citywide Planning email inquiries <CitywidePlanning@victoria.ca>

Subject: James Bay Neighbourhood Plan—Protection of Capacity, Parks, and Heritage

To whom it may concern,

I am writing regarding future reviews or amendments to the James Bay Neighbourhood Plan. Please consider the explicit intention within the Plan to maintain "areas of greatest stability," limit new development to carefully managed infill, and strictly protect heritage and park space.

The current population and infrastructure capacities for utilities, parks, transportation, and roads were identified as near their limits, with "significant costs" anticipated for upgrading if densities increase. These facts should discourage any development proposals which require upzoning, expansion, or greater commercial use.

Victoria's international reputation is inseparably linked to the preservation of scenic, peaceful, and beautiful neighbourhoods like James Bay. I urge you to uphold these values and resist any zoning or land use recommendations that would threaten them.

Regards,
Tess Hawkins

Tessa C. Hawkins
(she/her/hers)
Master of Art History, Design & Visual Culture
Library Technician

From: Tess Hawkins
Sent: August 31, 2025 11:31 AM
To: Public Hearings
Subject: Statement to the James Bay Community Project

To whom it may concern,

The recent advisory opinion from the International Court of Justice clearly establishes that governments around the world—including those at the local level like the City of Victoria—are **legally obligated to protect their citizens from the impacts of climate change**, as part of their **duties under international and human rights law**. This means that all levels of government must take real and effective action to limit greenhouse gas emissions and to help communities adapt to changes like extreme weather, rising sea levels, and other climate-related risks.

In practical terms, this historic ruling means the City of Victoria **must ensure its policies and plans, including the James Bay Official Community Plan (OCP), are aligned with these legal obligations**. The Local Government Act already requires the OCP to address sustainability and the reduction of greenhouse gas emissions, but the ICJ opinion confirms that these requirements are not just policy preferences—they are binding legal commitments.

For the health and well-being of James Bay residents, and for the long-term safety of our community, it is now clear the **City has a duty to strengthen the James Bay OCP to ensure it genuinely protects our environment** and prepares for the effects of climate change. This means making sure the plan includes stronger protections for green space, heritage buildings, existing trees, affordable housing, and effective measures for climate resilience.

By responding to this **international legal ruling** and updating the OCP, Victoria will not only fulfill its obligations under Canadian and international law but will also help secure a safer, healthier, and more sustainable future for everyone in James Bay and beyond.

Regards,
Tess Hawkins

From: Peter Stahl
Sent: September 1, 2025 12:53 PM
To: Public Hearings
Subject: Official Community Plan

Re:Official Community Plan

I am a resident of James Bay, where I own a single family dwelling along with my wife. I intend to be present at the public hearings on the Official Community Plan; however, in case I do not have the opportunity to provide input there, I will here. Although I understand the need for residential densification in the Greater Victoria area, I consider the current OCP to be poorly conceived. Priority Growth and Residential Infill are arbitrarily designated, particularly in James Bay which is already densely occupied. For example, my property is designated Priority Growth, whereas my immediately adjacent neighbour's property is Residential Infill. Why? The same applies for my neighbour's relatively new duplex directly across the street which is designated Priority Growth while the adjacent relatively new duplex is designated Residential Infill. Why? The same, holds, throughout the neighbourhood. I strongly suspect that whoever drew these designations, did so in an office based on an existing map or overhead image. I doubt very much that they did so after any on-site inspection. They certainly don't live here, or have any real idea of what they are doing, at least in James Bay. Not surprisingly, there are no new or increased Parks/Green Space allocations included, despite the 400% to 600% increase in units. This strikes me as somewhat hypocritical, as our city council tells us how much they value bike lanes, trees, and green space, etc. How will this flush of population leave/access this crowded space? It is already very difficult to exit/enter our peninsula to/from anywhere. Where will these future residents park their automobile(s)? The council is easing concessions for required parking spaces in new developments. On-street parking? It's already difficult. Do the planners see a pedestrianized James Bay? Affluent new residents will certainly bring their automobile(s) with them. I understand that higher organizational levels pass implementation down to lower levels in the chain, until they end up on an employee's desk charged with devising a plan to satisfy those higher up the chain. This plan is a sophomoric effort, painted with a broad brush with neither understanding nor vision. I probably won't be around if this ever comes to fruition, but James Bay will become a monotonous collection of condominium boxes developed privately for maximum profit. Will it solve a housing crisis? No, these new units will be quite unaffordable for most. It will, however, destroy James Bay's value for the cruise ship passengers and tourists who ply through our neighborhood from April to October. They sure don't go to Vic West.

Peter Stahl
327 Niagara Street
James Bay

From: Frances and Steve Dove
Sent: August 15, 2025 12:27 PM
To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>
Subject: Proposed Zoning for Richmond Ave suggestions

Re: The C1: General Zoning Approach affected area Phase One Richmond Ave between Oak Bay and Fairfield.

Dear Mayor and Council,

My request would be that instead of six story apartments along this stretch, you would "first" consider townhouse complexes (and perhaps you are).

I am in support in general of densification. However, this stretch of Richmond Ave is not serviced by transit, but is stated as a "Transit Priority Network". It could better accommodate smaller densification than tall apartment buildings. We have many garden suites and these are needed greatly.

Adding townhomes would help greatly with providing the much needed style of homes that many of us seniors are looking to downsize to, in our own neighborhood. Decent setbacks and "walk throughs" would be desirable.

Regards,

Frances Dove
861 Richmond Ave, Victoria, BC V8S 3Z2

Frances & Steve Dove

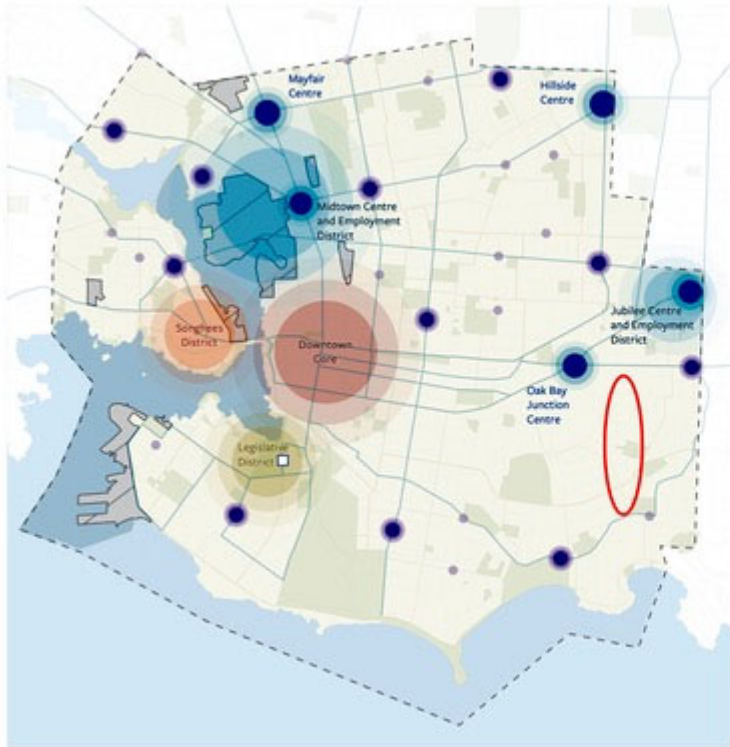
From: Ross Crockford
Sent: September 2, 2025 8:42 AM
To: Public Hearings; Victoria Mayor and Council
Subject: Remove 400- to 900-blocks of Richmond Avenue from OCP Priority Growth zone

Dear Mayor Alto and City of Victoria Councillors,

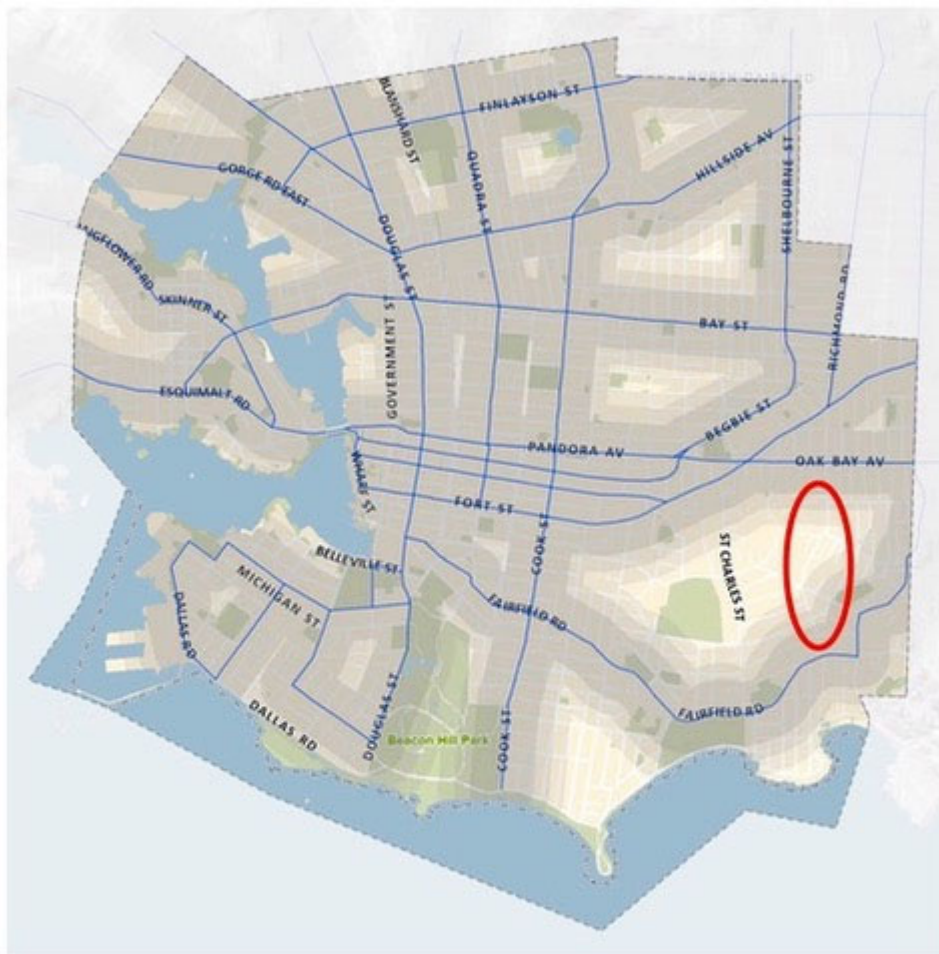
We are residents of the 400- to 900-blocks of Richmond Avenue, between Fairfield Road and Brighton Avenue (one block south of Oak Bay Avenue).

We were shocked to find our homes rezoned as a “Priority Growth” area in the draft Official Community Plan (OCP) presented to Council this past spring. Apparently this rezoning occurred because **our section of Richmond is identified in the OCP as part of a “Transit Priority Network” — even though there is no transit service on Richmond south of Oak Bay Avenue.** Other nearby streets in this network, such as Fairfield, Fort, and Foul Bay Road, have had bus service for decades. Our section of Richmond has none.

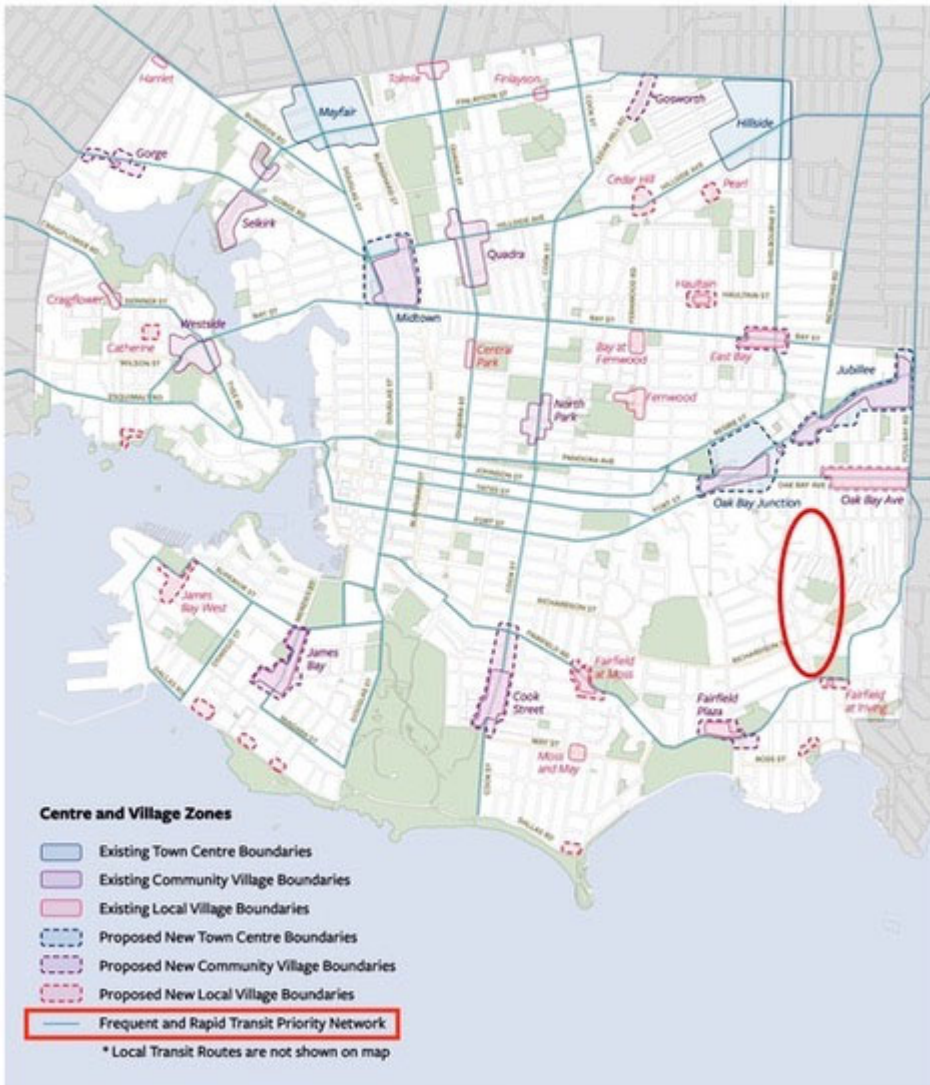
When the City conducted open houses on the OCP in the summer of 2024, its materials did not identify our blocks of Richmond as part of the Transit Priority Network guiding the OCP’s design. Here are maps from three [boards displayed at the OCP open houses](#), with our part of Richmond circled in red:



- General Urban Fabric**
 Primarily residential along with some commercial and community serving uses in a diversity of building forms from **ground oriented up to six storeys*** to support a range of incomes, needs and lifestyles.
 - Town Centres**
 Mainly residential and commercial (office, retail, accommodation), with some institutional and light industrial uses. A mix of mid-rise and tall building forms with active frontages and public open spaces.
 - Downtown Core**
 Includes employment, residential, commercial, institutional, retail, tourism, community and cultural uses. Tall buildings taper to the harbour and surrounding areas, preserving heritage assets and views.
 - Community Villages**
 Primarily residential and commercial with retail uses. Some community, art or cultural spaces, or office uses. Low-rise on main streets will often remain. New mid-rise forms should contribute open spaces.
 - Employment Districts**
 Mainly industrial, commercial and cultural uses supporting employment needs and economic growth with some transit-oriented residential. A mix of low- to mid-rise and tall buildings.
 - Local Villages**
 Primarily residential and commercial with retail uses. Some community, art or cultural space. Low- to mid-rise development should contribute to public spaces and the village experience.
 - Songhees District**
 A mix of commercial, retail, residential, limited light industrial and waterfront uses. A mix of low- to mid-rise and tall buildings designed to complement and preserve views and access to the harbour.
 - Urban Industrial Reserve**
 Marine industrial and light industrial uses including manufacturing, along with accessory retail and office uses. Primarily low-rise industrial buildings, mid-rise industrial buildings can include offices.
 - Legislative District**
 Hosts institutional, commercial, retail, office, accommodation, water and air transport, tourism and residential uses. A mix of low- to mid-rise and tall buildings tapering to the water.
 - Working Harbour/Marine**
 Marine industrial, water and air transport, shipping, port, navigation, marinas, public shoreline and recreation uses. Built form includes ports, docks, terminals, navigational and other structures.
- Transit Priority Network
□ Transit Oriented Area (Provincially prescribed)



Proposed Transit Priority Network



(Even some maps [currently posted](#) on the City’s “Have Your Say” engagement website do not identify our section of Richmond as part of the Transit Priority Network.)

So we were astonished to find our bus-empty blocks added to this network, and thus rezoned for Priority Growth in the City’s recent OCP maps. On August 5 we wrote to the City’s OCP engagement team seeking an explanation, but they have not provided one.

We submit that imposing this Priority Growth designation upon our homes, without explanation or warning, violates the principles of procedural fairness. [As the provincial Ombudsperson has stated](#), a public body must provide reasonable notice and clear information about the criteria for its decisions. That hasn’t happened here.

Therefore, we ask Council to remove our homes from the maps and terms of the draft OCP identifying them in a Priority Growth zone.

A few weeks ago, we discovered on our own that BC Transit developed a [“Regional Corridor Strategy”](#) last summer that might run buses along our part of Richmond, starting some time

between 2026 and 2029. BC Transit then cited this strategy in its latest [“10-Year Vision”](#) statement, published last November.

Was this new and untested strategy the rationale for a last-minute addition to the draft OCP, rezoning our homes for Priority Growth?

If so, we would like to remind you that **BC Transit’s plans constantly change. If and when BC Transit actually implements service on our street, and if it actually gets used and [financially sustained by the province](#), then Council can amend the OCP accordingly at that time. Otherwise, we could end up with six-storey apartments along our street, and no transit to justify or service them.**

Please remove our homes from the maps and terms of the OCP labelling them as Priority Growth, at least until BC Transit actually runs and maintains service along our section of Richmond Avenue. Thank you for your attention to this matter.

Respectfully,

Ross Crockford and Jennifer Wise, 942 Richmond

Kathryn Hilton, 428 Richmond

Liam and Alexis Underwood, 660 Richmond

Connie and Doug Waddell, 714 Richmond

D’Arcy Green and Adrienne Holierhoek, 750 Richmond

Lois Fisher, 762 Richmond

Chris and Judy Butterworth, 850 Richmond

Lorraine Douglas, 859 Richmond

William Pike and Jennifer Tedlie, 860 Richmond

Sue Wynne-Hughes, 926 Richmond

Brent Bitz, 2-928 Richmond

Jennifer Crazz and Chris Thomson, 3-928 Richmond

Sue Lukewich and Bruce Hagedorn, 944B Richmond

From:
To: [Public Hearings](#)
Subject: Amendments to an OCP Bylaw in James Bay
Date: September 3, 2025 2:22:35 PM

To Mayor, Councillors, and Members of Community:

We are the residents of **42 South Turner St. in James Bay, Thomas Hunt, Antonio Tsui and Sau Tsui.**

We are **100%** against the proposed rezoning that would allow six-storey buildings in our neighbourhood, and we believe the City must first address **infrastructure accountability**.

We had a sewage backup recently at our home. We called a plumber, and the cause was confirmed to be tree roots in the **City's portion** of the sewer line—not ours. We paid **the full amount** for this emergency on a public holiday on August 4th. Public Works came out, cleared the blockage that same day and the following day on August 05, the Public Works confirmed with a camera inspection that the problem was indeed on City property. They even placed that section on their maintenance schedule.

Despite this, the City only reimbursed me **half** of the cost. We contacted Public Works twice by phone and followed up with an email, but after more than a week, I still have no response.

This is frustrating because as residents, we pay **100% of our property taxes and sewer utility fees**—not partial. Yet when the City's infrastructure fails, the City only takes partial responsibility.

That raises a larger concern: if the City is unwilling to fully maintain and take responsibility for existing infrastructure today, how can residents have confidence it will handle **greater demand tomorrow with rezoning and six-storey buildings in James Bay?** More density means more pressure on already aging sewer and stormwater systems. Without proper maintenance and accountability, problems like this will only grow—and they risk becoming **public health issues**.

Rezoning without first upgrading and maintaining infrastructure is putting the cart before the horse. Before moving forward, the City needs to show residents that infrastructure will be properly managed, maintained, and funded.

I urge Council to ensure accountability and infrastructure improvements come first—before adding density that our systems may not be ready to handle.

Thank you for your time!

Antonio Tsui
Thomas Hunt
Sau Tsui

From: Brian Knee

Sent: September 3, 2025 9:01 AM

To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>

Subject: James Bay OCP and Public Meeting September 11, 2025

I live in the James Bay neighbourhood. I am vehemently opposed to the James Bay OCP rezoning vis-a-vis density Bill 44 and Bill 16 Province of British Columbia.

The provincial government's refusal to allow public input before this legislation was passed causes me to wonder if the September 11, 2025 is a true opportunity for residents to voice concern and opposition; or, is it a pretense allowing each of you to then rubber stamp the OCP as it impacts James Bay.

I have attached an image of the cover This Old House, Volume Two James Bay. Will the political legacy of this mayor and councillors be Volume Three depicting the loss of more heritage neighbourhoods?

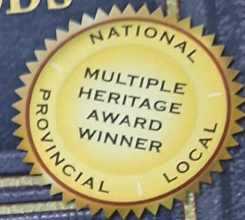
I strongly urge all of you to not to move forward with the densifying of my neighbourhood as propose in the OCP.

Brian Knee

REVISED & UPDATED 2018

This Old House

VICTORIA'S HERITAGE NEIGHBOURHOODS



VOLUME TWO JAMES BAY

BY THE VICTORIA HERITAGE FOUNDATION
FOR THE CITY OF VICTORIA

-----Original Message-----

From: Virginia Erick

Sent: September 3, 2025 6:55 AM

To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>

Subject: Mature Tree Protection- OCP

Old growth tree canopy is imperative for climate adaptation in our neighbourhoods.
Please, make sure that our building codes leave room for mature trees.
Setbacks and boulevards are important.

Virginia Errick
615 Foul Bay Rd.

Sent from my iPad

From: Virginia Erick
Sent: September 3, 2025 8:03 PM
To: Public Hearings; Victoria Mayor and Council
Subject: Housing affordability

Please, be sure to address housing affordability and rental security in the new OCP.
We don't want to live in a city of rich folks, desperately poor folks and long distance commuting workers.
Better transit is also an issue for workers, seniors and students who have to live outside of the city and get around.

Virginia Errick
615 Foul Bay Rd.

Sent from my iPad



To the City of Victoria,

Surfrider South Vancouver Island's mission is to protect and enjoy the ocean, beaches, and waves for all people. For 18 years, we have worked in the Greater Victoria region to reduce plastic pollution and address the sources of water pollution.

Through our grassroots network, it has come to our attention that the current practice of outdoor dry cutting of PVC pipes, common in construction and infrastructure works, releases microplastics and nanoplastics into the environment. As per recent findings, one instance of PVC pipe cutting can disperse thousands of microplastics and billions of nanoplastics via dust and shards, which infiltrate soil, storm drains, and ultimately our marine ecosystems.¹

PVC is widely recognized as one of the most toxic forms of plastic, containing up to 60% additives such as phthalates, vinyl chloride monomers, and heavy metals. Many of these substances are known carcinogens and endocrine disruptors, earning PVC the reputation as one of the worst plastic resins.

The environmental consequences are profound: once PVC fragments enter the ocean via stormwater runoff, they can block sunlight and leach toxic additives, impairing phytoplankton, organisms that generate over half our planet's oxygen and underpin marine food webs. There are also serious public health risks: construction dust and overall PVC exposure have been linked to respiratory and cardiovascular diseases, gut microbiome disruption, neurotoxicity and reproductive harm, as well as pathogen transport.² These plastic particles pose risks to workers, pedestrians, including children and pets, who are vulnerable to inhaling or ingesting PVC particles. These pollutants also migrate into soil and food chains, and can even aerosolize above the sea to return via atmospheric deposition.

In response to the growing concern of PVC pollution, other municipalities have begun to act. For example, Atlantic City, New Jersey, requires construction companies to contain plastic dust and shavings produced from materials like PVC, vinyl, and plastic lumber. This measure has been both practical to implement and effective in safeguarding environmental and public health.

We understand the City of Victoria is currently drafting a bylaw aiming to limit plastic pollution from cutting or drilling PVC through the new Works and Services Bylaw. We welcome this initiative and strongly urge the City to adopt robust measures in the new Works and Services Bylaw to mitigate PVC dust pollution. These measures will also advance the rainwater

¹ <https://pubmed.ncbi.nlm.nih.gov/35033619/>

² <https://particleandfibretoxicology.biomedcentral.com/articles/10.1186/s12989-020-00358-y?>



management requirements for the proposed Works and Services Bylaw. Ideally, the sample bylaw language below this letter can be adopted.

By embedding these measures into the new bylaw, the City of Victoria can lead the region in addressing an overlooked yet serious source of plastic pollution, protecting clean water, marine ecosystems, public health, and residents' rights to a clean and safe environment. You can see and utilize more resources for addressing PVC dust pollution here:

<https://sites.google.com/surfrider.org/njplastic/construction-dust-home?authuser=0>

Beyond containing the plastic shavings from cutting PVC pipes, we're continuing to advocate amongst hundreds of civil society organizations for a Global Plastics Treaty that caps plastic production and bans problematic plastics and chemicals. Experts widely agree: PVC is one of the most toxic plastics to produce, use, and dispose of. Beyond addressing the issues associated with PVC construction, we need to move towards phasing out PVC piping altogether, as this plastic leaches chemicals and microplastics into the water we consume.

We stand ready to support the City's efforts through collaboration, outreach, and sharing best practices based on the Surfrider network's coastal victories, locally and internationally.

We look forward to working with you to ensure our shared values are realized through effective policy and responsible construction practices.

Sincerely,

Chair, Surfrider South Vancouver Island

Regional Manager, Surfrider Foundation Canada



**SAMPLE BYLAW: A BYLAW AMENDING THE CITY OF VICTORIA WORKS AND SERVICES
BYLAW TO PROMOTE CLEAN AND SAFE WORKSITES WITHIN THE CITY OF VICTORIA**

WHEREAS, the City of Victoria recognizes the importance of maintaining clean and safe worksites to protect the environment, occupational safety, and public health; and

WHEREAS, it is imperative that contractors take measures to minimize the release of dust, trash, debris, plastic, and other contaminants from worksites, thereby reducing pollution and preventing harm to the environment and the community; and

WHEREAS, plastics and composite materials do not decompose, and over time would break down to smaller and smaller particles: microplastics. Microplastic pollution disrupts ecosystems and can cause endocrine, digestive, and respiratory issues in animals, including humans, and

WHEREAS, the City of Victoria seeks to regulate construction practices to ensure compliance with environmentally responsible and safe procedures;

NOW, THEREFORE, BE IT ORDAINED by the City Council of Victoria as follows:

City's Subdivision and Development Servicing Bylaw is being renewed to improve development processes and outcomes. The existing bylaw will be replaced with the new "Works and Services Bylaw", which should encompass the following measures:

Section I: Add

ARTICLE I

CONTROL OF CONSTRUCTION DUST AND CONTAMINANTS

1: Definitions



For the purposes of this ordinance, the following definitions apply:

- a) "Contractor" refers to any individual or entity engaged in the construction, renovation, or maintenance of commercial or residential properties within the City of Victoria.
- b) "Worksites" shall include all outdoor and indoor worksites within the jurisdiction of the City of Victoria where construction, renovation, or related activities are taking place.

1.14: Dust, Trash, Debris and Plastic Control

Contractors operating within the City of Victoria shall do all of the following to control dust, trash, debris and plastic contaminants at their worksites:

14.1 When cutting, drilling, or sanding dust-producing materials, including but not limited to plastic, silica, fiberglass, pavers, or wood treated with chemical contaminants, contractors shall use a vacuum attachment on all saws when practical to minimize the release of dust and micro plastic particles.

14.2 Contractors shall cut, drill, and sand in enclosed spaces to keep dust levels to a minimum and facilitate ease of cleanup and prevent the release of debris. These enclosed spaces may include tents to enclose the worksites or hoods made specifically for saws.

14.3 Contractors shall cut, drill, and sand pavers and tiles with wet saws and in enclosed spaces to keep dust levels to a minimum and facilitate ease of cleanup and prevent the release of debris. These confined spaces should include tents to enclose the worksites.

14.4 Contractors shall not engage in cutting, drilling, or sanding activities without placing a tarp under power tools to catch debris and contaminants.

14.5 Contractors shall tarp their work areas and clean-up all trash and generated from work of the day [e.g. dust particles, microplastics and saw dust] a minimum of once a day to prevent the dispersion of dust, trash, debris, and plastic contaminants.



14. Contractors shall clean up all contaminants before leaving their worksites, ensuring that no waste is left behind nor can be blown into areas beyond the worksite and/or property.

1.15: Prohibition on Storm Drain Disposal

Contractors are strictly prohibited from blowing or disposing of debris, dust, or plastic contaminants into storm drains. All contractors must dispose of waste materials properly in accordance with existing municipal waste disposal regulations.

Contractors whose job site drains to a public stormwater inlet after stormwater leaves the property, prior to cutting, drilling, sanding or any activity regulated by this section, shall install a filter at that stormwater inlet Polypropylene Geotextile which conforms to ASTM Test D4491, D4751 and D4355.

1.16: Compliance and Enforcement

16.1 Notice of this bylaw shall be given with each new permit issued for construction, renovation, and related activities.

16.1 The City of Victoria may conduct inspections of worksites to ensure compliance with this bylaw. Any person who violates, fails, or refuses to comply with this chapter or any part or section thereof shall, upon conviction in the Provincial Court of British Columbia under the bylaw ticketing system, be punished for each offence. Fines and punishments shall be defined by the City of Victoria [e.g. a warning for a first offence, up to \$1,000 for a second offence, and up to \$5,000 for a third or subsequent offence, with each day being considered a separate offence]. Every such violation or refusal shall be deemed a separate violation, and each day that the same shall continue shall be deemed a separate violation.

16.2 Contractors are responsible for informing their employees and subcontractors of the requirements and obligations outlined in this ordinance.



Section 2. Effective Date. This bylaw shall take effect [Insert Effective Date] and shall apply to all contractors operating within the City of Victoria from that date onward.

Section 3. All bylaws or parts of ordinances inconsistent with any terms of this Ordinance are hereby repealed to the extent of such inconsistency only.

Section 4. This bylaw shall take effect upon its final passage and publication as required by law.

From:
To: [Public Hearings](#)
Subject: Fwd: James Bay OCP Plans
Date: September 5, 2025 11:47:26 AM

Hello,

I am writing to voice my grave concerns over proposed changes to the James Bay's Official Community Plan.

With the upzoning proposed to all single family and duplex properties allowing four to six stories amongst other changes this will drastically change the neighbourly feel of James Bay with character homes being torn down and new tall apartment builds going up in all areas of the community. Many of these old homes have multiple units, suites that rent at affordable rates. This will also mean demolishing the beautiful character homes that characterize James Bay as well as many of the trees and urban canopy within the community. Please remember that James Bay is the oldest neighbourhood on the West Coast of North America North of San Francisco. Our tourism industry uses James Bay as a focus for tourism.

I urge City Council to not allow for this upzoning throughout James Bay. Instead of allowing it to result in the demolition and complete change of our neighbourhood to instead encourage growth of multi family, affordable units by allowing for more suites within existing character homes and secondary small homes on properties. We do not want to see James Bay be ruined by turning it from a neighborhood to a downtown style setting. This zoning also unfairly targets James Bay, a community which has taken on more than it's fair share of high density. We are 40% denser than other Victoria communities!

Please respect my neighbourhood of James Bay, a community that is like no other and one that us James Bayers love to call home!

Lara Hurrell
James Bay resident