

with underground parking and building façades that define the streets and sidewalks. The proposal is consistent with these DPA objectives.

- The properties along Irma Street are within Development Permit Area 7A: Corridors – Gorge Road East. The DPA encourages human-scaled urban design and a sensitive transition in building form and place character to nearby lower density residential neighbourhoods. The proposal contains many human-scaled architectural elements, including ground-oriented dwelling units with individual front entryways along Irma Street, that enhance the streetscape appearance and create an attractive urban village.
- There are some concerns with the proposed building mass and transition, particularly with the south portion of the building adjacent to the lower density residential uses. Staff encouraged the applicant to explore two buildings on the site to address the concerns; however, the applicant has advised that it is not economically viable to develop the site in this manner.
- To create a sense of community on-site, the applicant is proposing a large interior courtyard and roof-top amenity space.
- There is only one driveway into the site and all off-street parking would be located underground. This results in an attractive and pedestrian-friendly building frontage accompanied by hard and soft landscaping.
- The variances to reduce the required number residential and commercial parking spaces are supportable given the proposed car share program and the transit-oriented neighbourhood.
- There are concerns with the impacts this proposed development would have on five bylaw-protected trees (two Garry oak trees, two fir trees in the front yard on Gorge Road East and one on an adjoining property) plus a municipal Douglas fir tree on Irma Street.

As there may be opportunities to refine the design to enhance consistency with design guidelines and tree preservation objectives surrounding some of the trees, the staff recommendation is that the Development Permit with Variances Application be referred back to staff.

BACKGROUND

Description of Proposal

The proposal is for a six-storey, mixed-use building consisting of commercial and residential uses. Specific details include:

Built Form

- low-rise building form consisting of contemporary architectural features including a flat roofline, contemporary-style windows, substantial ground level commercial glazing, and steel and glass canopy system
- L-shaped building footprint with an interior courtyard
- building stepped back at the fifth storey along the south elevation
- exterior materials include brick, corrugated metal, woodgrain metal, cementitious panel, and glass guardrail system
- flexible ground floor commercial space to accommodate one larger tenant or several smaller retail tenants
- ground-oriented units with individual stepped entryways and large outdoor patios
- projecting and recessed balconies for the upper storey units

- main residential entryway fronting Irma Street
- ground level garbage and recycling room for commercial and residential uses
- driveway to underground parkade on Irma Street
- 121 underground parking spaces
- 193 long-term and 18 short-term bicycle parking spaces.

Plaza and On-site Landscaping

- plaza at the Gorge-Irma corner consisting of outdoor seating, street trees, pedestrian lighting, garbage bin, unit pavers and concrete broom-finished surface treatment
- interior courtyard amenities include a barbeque and dining tables under a pergola, a giant chess and checkers board, Patanque Court, garden planters, seating and storage benches, pedestrian lighting, hydrapress slab paving, lawn and soft landscaping
- south-facing rooftop amenity space consisting of a children's sand play area and rubber surfacing, shade pergola with barbeque, sink and two dining tables, seating and storage benches, garden planters and hydrapress slab surface treatment
- substantial soft landscaping along the east and south property lines
- retention of two Garry oak trees
- 26 new trees on-site.

The proposed variances are related to reducing parking and the rear yard setback.

Affordable Housing

Affordable housing impacts are discussed in the concurrent Rezoning application report.

Sustainability

The applicant is targeting Step 3 of the BC Energy Step Code for residential areas and Step 2 for the commercial areas. Some other sustainability features that the applicant proposes to explore include:

- high performance double-glazed windows
- exterior insulation and reductions to thermal bridging (and associated heat loss)
- highly efficient mechanical heating and cooling systems, including a heat recovery system
- low flow fixtures as well as the collection of rainwater for irrigation-purposes.

Active Transportation

The application proposes to install 193 long-term and 18 short-term residential bicycle parking spaces with this development, which supports active transportation.

Public Realm

Proposed public realm improvements are discussed in association with the concurrent Rezoning Application associated with these properties.

Accessibility

The British Columbia Building Code regulates accessibility as it pertains to buildings. The proposed courtyard and rooftop amenity space are designed to be accessible.

Existing Site Development and Development Potential

The site is presently occupied by five single-family dwellings and one duplex. Under the current R1-B Zone, each subject property could be developed as a single-family dwelling with a secondary suite or garden suite.

The following data table compares the proposal with the existing R1-B Zone, Single Family Dwelling District, and the URMD Zone, Urban Residential Multiple Dwelling District. An asterisk is used to identify where the proposal differs from the existing Zone.

| Zoning Criteria | Proposal | URMD Zone | R1-B Zone | OCP |
|--|--|-----------|-----------|---|
| Site area (m ²) – minimum | 4810 | 1840 | 460 | |
| Density (Floor Space Ratio) – maximum | 2.43:1 * | 2:1 | n/a | 2.5:1 (Large Urban Village) / 2:1 (Urban Residential) |
| Total floor area (m ²) – maximum | 11,688.30 * | 9620 | 420 | |
| Height (m) – maximum | 18 | 18.50 | 7.60 | |
| Storeys – maximum | 6 | n/a | 2 | 6 |
| Site coverage (%) – maximum | 52 * | 40 | 40 | |
| Open site space (%) – minimum | 45 * | 50 | n/a | |
| Setbacks (m) – minimum | | | | |
| Front (Irma Street) | 3.16 * (main level) / 1.88 * (upper levels) / 1.38 * (canopy) | 4 | 7.50 | |
| Rear | 2.93 * (main level) / 2.30* (upper levels) / 0* (parkade) | 10 | 18.35 | |

| Zoning Criteria | Proposal | URMD Zone | R1-B Zone | OCP |
|---|--|-----------|-----------|-----|
| Side (south) | 6.07* (main level) / 6.80* (upper level balconies) / 4.92* (canopy) | 6 | 7.30 | |
| Side on a flanking street (Gorge Road East) | 6.95 (main level) / 6.80 (upper level balconies) / 4.92 (canopy) | 4 | 3.50 | |
| Vehicle parking – minimum | | | | |
| Residential | 106 * | | 141 | |
| Commercial | 6 | | 6 | |
| Vehicle parking – minimum | | | | |
| Visitor | 7 * | | 15 | |
| Modo car share parking | 2 | | 2 | |
| Bicycle parking – minimum | | | | |
| Long-term | 193 | | 193 | |
| Short-term | 18 | | 17 | |

Community Consultation

Consistent with the *Community Association Land Use Committee (CALUC) Procedures for Processing Rezoning and Variance Applications*, the applicant has consulted the Burnside Gorge CALUC at a Community Meeting held on August 12, 2019. A letter dated December 10, 2019 is attached to this report.

ANALYSIS

Development Permit Area and Design Guidelines

The Official Community Plan (OCP, 2012) identifies the properties located at 43, 45 and 55 Gorge Road East within Development Permit Area 5: Large Urban Villages – Gorge at Irma. Gorge at Irma Village has been identified as a desired location for transformation from single detached homes into a mixed-use urban village serving the surrounding neighbourhood. This

DPA supports low to mid-rise building forms with underground parking and building façades that define the streets and sidewalks. According to the OCP, the Gorge at Irma Village is an opportunity to define the place character of the neighbourhood.

The OCP identifies the properties at 2827, 2829 and 2831 Irma Street within Development Permit Area 7A: Corridors – Gorge Road East. The DPA encourages transit-oriented streetscaping in the design of new buildings fronting frequent transit corridors. To ensure corridors are compatible with adjacent and nearby lower density residential neighbourhoods, the DPA 7A encourages human-scaled urban design and a sensitive transition in building form and place character.

This proposal would significantly enhance the Gorge Road and Irma Street frontages by introducing human-scale architectural elements, including ground-oriented dwelling units with individual front entryways along Irma Street, as well as prominent glazing to emphasize the commercial storefronts at the street corner and along Gorge Road East. The introduction of a new plaza at the corner of Gorge Road and Irma Street with outdoor furnishings, pedestrian lighting and decorative surface treatments would also enhance the streetscape and improve the pedestrian experience.

The design guidelines state that perceived building mass should be mitigated through the use of architectural elements, visually interesting rooflines, stepping back of upper floors, and detailing that creates rhythm and visual interest. With respect to building transition, the design guidelines state that where new development is directly abutting lands in a different OCP Urban Place Designation (the neighbouring properties to the south are designated Traditional Residential), the design of a new building should provide a transition between areas in ways that respond to established form and character and that anticipate any future development. In order to break up the amount of building mass, staff encouraged the applicant to consider constructing two buildings on the site, which would offer a better transition to the lower density residential uses and provide more breathing room and sunlight penetration into the middle of the site from the south. However, the applicant has indicated that the project would not be economically viable with two buildings of rental housing in perpetuity on the subject site and therefore, has chosen to proceed with the current proposal.

To address these concerns, the applicant has revisited the proposal by stepping back the majority of the articulated fifth storey by approximately 12m from the fourth storey along the south elevation, which faces the two-storey apartment building and single-family dwellings to the south as well as increase the setback from the south property line.

The design guidelines discourage blank walls facing the street. The garbage and recycling room within the building is located at grade fronting Irma Street, which has resulted in a brick wall at the street level. To soften the appearance of this wall, the applicant is proposing to install some public art. The applicant is still working through the design details of the proposed public art; however, the applicant has committed to resolving this issue.

Burnside Gorge Neighbourhood Plan

The *Burnside Gorge Neighbourhood Plan* (2017) encourages new development that is compatible, neighbourly and creates a good fit within the established residential neighbourhood character. The Plan supports mixed-use buildings with village commercial uses on the ground floor of buildings that are built up to the street with parking generally located to the rear or underground. In addition, the Plan envisions new development along Gorge Road East that is

oriented positively towards the street to create a more attractive and pedestrian-friendly streetscape environment. While staff continue to have some concerns with the overall building mass, especially along the south elevation, the proposal achieves the urban design objectives that pertain to well-articulated building facades facing the street with human-scaled architectural features that improve the streetscape appearance.

Tree Preservation Bylaw and Urban Forest Master Plan

The goals of the *Urban Forest Master Plan* include protecting, enhancing, and expanding Victoria’s urban forest and optimizing community benefits from the urban forest in all neighbourhoods. This application was received after October 24, 2019, so *Tree Preservation Bylaw No. 05-106* (consolidated November 22, 2019) applies.

The Neighbourhood Plan notes that an urban village development on the south side of Gorge Road between Irma and Balfour Streets should incorporate street trees.

The Burnside Gorge neighbourhood currently has the second lowest tree canopy cover within the City, at just 13% of the total area based on 2013 data. The average canopy coverage in the City is 26%. This application proposes that some large canopy trees are replaced with small canopy trees, contributing to further canopy reduction in this neighbourhood.

The tree inventory for this proposal includes 46 trees that could be impacted by development activities. Of the 19 bylaw-protected trees on site, 16 are slated for removal; all of the non-bylaw-protected trees are proposed for removal.

Tree Impact Summary

| Tree Type | Total | To be REMOVED | To be PLANTED | Net Change |
|---|--------------|----------------------|----------------------|-------------------|
| On site trees, bylaw-protected | 19 | 16 | 16 | 0 |
| On site trees, non-bylaw-protected | 11 | 11 | 10 | -1 |
| Municipal trees | 6 | 6 | 8 | +2 |
| Neighbouring trees, bylaw-protected | 2 | 0 | 0 | 0 |
| Neighbouring trees, non-bylaw-protected | 8 | 0 | 0 | 0 |
| Total | 46 | 33 | 34 | 1 |

Trees Suitable for Retention

In regard to the significant trees on or adjacent to the subject properties, staff have discussed with the applicant the possibility of making revisions to the proposal in order to accommodate the long-term preservation of six large trees. The application currently proposes to retain three of the large trees, however the proposal without refinements, would require that two trees be significantly pruned (roots and canopy) and the other three be removed. Below is a list of the notable large trees on or adjacent to the site, followed by a map and further information about each tree.

| Tree | Trunk Diameter | Condition | Type | Retained in Current Proposal |
|---------------------------|----------------|-----------|-------------------------------|---|
| Garry oak (#2) | 88 cm | Fair/Good | On site | Yes with impacts – can be further mitigated |
| Garry oak (#34) | 71 cm | Good | On site | Yes with impacts – can be further mitigated |
| Douglas fir (#46) | 60 cm | Good | Neighbouring, bylaw-protected | Yes with impacts |
| Douglas fir (#4) | 83 cm | Good | On site | No |
| Silver fir (#3) | 80 cm | Good | On site | No |
| Douglas fir (Irma St #16) | 110 cm | Good | Municipal | No - can be retained through building redesign (relocation of driveway and garbage/recycling) |



Figure 1. Location of trees

Garry oak #2 is in the northeast corner along Gorge Road East and Garry Oak #34 is located on the east side of the subject property. Both Garry oaks require canopy and root pruning to accommodate the building. To successfully retain these two trees, the design of the underground parkade will need to utilise a vertical excavation face. A review from structural/geotechnical consultants is required to verify the feasibility of the vertical excavation needed to achieve the minimum distance from building excavation to the Garry oaks, as designated by the Project Arborist.

Douglas fir #46 is located on the neighbouring property to the south. To successfully retain this tree, the design of the underground parkade will need to utilise a vertical excavation face. Review from structural/geotechnical consultants is required to verify the feasibility of the vertical excavation needed to achieve the minimum distance from building excavation to the tree, as designated by the Project Arborist.

Douglas fir #4 is located tree on the northeast corner of the subject property along Gorge Road East. This tree is in good condition.

Silver fir #3 is in the northeast corner along Gorge Road East and the canopy and critical root zones of this tree overlaps Douglas fir #4 with Garry oak #2.

Douglas fir (#16) is a 110cm diameter at breast height (DBH) municipal tree located on Irma Street. The west face is pruned to allow hydro wire clearance. This tree is considered a notable tree due to its species and size, one of the largest (0.02%) in the City's inventory. This Douglas fir provides evergreen canopy coverage for a neighbourhood that is lacking in such coverage. In the current proposed plans, the driveway, parkade entrance and underground parkade encroach into the critical root zone to the extent that the tree would require removal.

The applicant has indicated that in order to meet the Burnside Gorge Neighborhood Plan's vision for this site as *Large Urban Village*, while also providing rental units for the neighbourhood, retaining Douglas firs #3 and #4 is not feasible.

Proposed Planting and Replacement Tree Compensation

A total of 34 trees are proposed to be planted in association with the project, consisting of 16 replacement trees, ten small-canopy Japanese maples, and eight new street trees (four on Irma Street and four on Gorge Road).

The new street trees proposed on Irma Street and Gorge Road East will be planted under power lines and will be small to medium canopy trees.

At the required 2:1 replacement ratio for bylaw-protected trees, 32 replacement trees are required. A total of 16 designated replacement trees have been proposed; therefore, \$32,000 cash-in-lieu towards the City's Tree Reserve Fund would be required (\$2,000 x 16 trees not planted).

Development Considerations

This application presents a number of challenges and will require trade-offs in terms of Council priorities. This area is anticipated to develop as a Large Urban Village, with a form of

development that provides a street-fronting building with active commercial uses along Gorge Road East and a corner plaza. Along Irma Street, appropriate transition is provided through ground-oriented housing which provide an opportunity for family housing. Additional density allows for a purpose-built rental building in perpetuity.

There are also objectives that have been set out in the *Urban Forest Master Plan*, that anticipate the retention of trees to support the health of our environment. On this site, previously residential lots, there are a number of significant healthy trees that warrant consideration of preservation.

However, all stated objectives cannot be achieved on this site.

- As noted above, shifting the building further away from the two Garry oak trees would be more respectful of the long-term health of these trees and reduce the amount of canopy and potentially root pruning needed. The increased setbacks would result in reduced building massing in those locations and therefore a reduction in the proposed floor space. As the decreases would not be substantial, there may be an opportunity to relocate this floor area in an alternate way.
- Retaining the Douglas fir tree on Irma Street is possible without impacting the development potential of the site. This would, however, require that the entrance to underground parking mid-block on Irma Street, and the adjacent garbage/recycling room, to be relocated mid-block resulting in significant design changes to the building, especially to the row of ground-oriented dwelling units along the street, and would ultimately negatively impact the on-street experience of the building along Irma Street.
- The location of the existing Douglas fir and Silver fir trees make it challenging to develop the site as a large urban village given the site area required to preserve these trees. The applicant has indicated in a letter dated June 22, 2020 (attached) that their retention would trigger a complete redesign of the project and the site would not be feasible to develop as a large urban village with a substantial mix of commercial and residential uses, including 100% rental housing, as envisioned in the OCP and *Burnside Gorge Neighbourhood Plan*.

In the attempt to balance the various priorities on this site, the staff recommendation has focused on ensuring the retention and health of the two Garry oak trees and the municipal Douglas fir tree on Irma Street, noting that substantial design revisions would be required to facilitate this option. However, staff have included an alternate motion should Council wish to ensure the retention and health of the two Garry oak trees only.

Should Council also wish to retain the Fir trees along Gorge Road East then a major redesign of the building would be required, which would result in a substantial loss of ground floor commercial space and residential rental units and it would be unlikely that the site could be developed to its full potential as a large urban village as envisioned in the OCP and *Burnside Gorge Neighbourhood Plan*. If this is the preferred approach, Council may wish to consider declining the application and instructing staff to amend the OCP to change the land use designation from Large Urban Village to a lower classification which envisions less density and without community serving, ground floor commercial uses.

Regulatory Considerations

Parking Variance

The applicant is requesting a reduction in the required number of residential parking spaces from 141 to 106 and visitor parking spaces from 15 to seven. There would be a parking shortfall of 43 parking spaces as a result of two parking spaces being dedicated to car share vehicles, otherwise it would be a shortfall of 41 parking spaces. To help offset some of the parking shortfall, the applicant is proposing the following Transportation Demand Management (TDM) measures, which are supported by staff and recommended to be secured in a Section 219 Covenant and registered on title:

- two car share vehicles with assigned parking spaces on-site
- 121 car share memberships for the life of the building along with \$100 usage credit for each membership
- six commercial parking spaces would be assigned to residential visitors after business hours and on weekends.

The subject properties are located on a frequent transit route and there is an existing transit stop within 50m of the site.

Setback Variance

Staff have concerns with a rear yard setback of 2.93m for portions of the building along the east property line adjacent to the Gorge Road Hospital site. The concerns are related to the impacts on the existing Garry oak tree as discussed above and on the future redevelopment of the Gorge Road Hospital site.

The adjacent Gorge Road Hospital site has been identified as a Special Planning Area for redevelopment. Allowing a smaller rear yard setback for the proposed building would result in the adjacent site (Gorge Road Hospital) compensating and absorbing the impact of the smaller setback, with respect to protecting the liveability of the dwelling units and ensuring that there is sufficient breathing room between the proposed and future buildings as well as adequate access to sunlight. Increasing the rear yard setback closer to 6m provided that this distance protects the tree canopy of the Garry oak tree would be encouraged by staff.

Although it is recommended that the application be referred back to staff to determine if refinements are feasible, in the event that Council would like to advance the application in its current state, it is recommended that this reduced setback be addressed through a variance process so that it does not become entrenched as a development right in the zone. To that end, an alternate motion is provided that would be appropriate if Council wishes to advance the proposal "as is".

Advisory Design Panel Review

The Advisory Design Panel (ADP) reviewed the Development Permit with Variances Application at their meeting on February 26, 2020 and provided the following recommendation for Council's consideration:

"That Development Permit with Variances Application No. 00720 for 43, 45 and 55 Gorge Road East and 2827, 2829 and 2831 Irma Street be approved with the following considerations:

- *concern about the future success of CRU's with the absence of dedicated parking and layby*
- *minimal variance on the rear yard setback and impact on future development."*

Currently, there is a residential parking only restriction on the east side of Irma Street fronting the subject properties. To help increase parking turnover in support the proposed land use and future businesses within this development these street parking restrictions will be changed to time-limited parking.

There have been no adjustments to the rear yard setback in response to ADP's comments on a minimal setback and impact on future development of the neighbouring properties.

Financial Implications

There are new City assets that will be added if this application is approved, and staff have calculated the annual maintenance costs as shown below. Once the new assets are in place, these costs will be reflected in the City's Financial Plan.

| Increased inventory | Annual Maintenance Cost |
|--|--------------------------------|
| Street trees - 2 net new | \$120 |
| Grass boulevard – approx. 350 m ² | \$2,200 |
| Irrigation system | \$750 |
| Total | \$3,070 |

CONCLUSIONS

The proposed six-story, mixed-use building is consistent with several urban design objectives and guidelines outlined in DPA 5 and 7A and complies with many design guidelines pertaining to a human-scale built form and high quality landscaping on site. Given the concerns outlined in this report related to tree preservation, and a reduced rear yard setback, it is recommended for Council's consideration that the application be referred back to staff for further refinements to better support the retention of the two Garry oak trees and retain the municipal Douglas fir tree on Irma Street, still noting that substantial design revisions would be required to facilitate this option. Staff have included an alternate motion should Council wish to ensure the retention and health of the two Garry oak trees only and avoid a complete redesign of the building. Should Council wish to retain the two Fir trees on Gorge Road East, staff have provided a recommendation to decline the application as a major redesign would be required.

OPTIONS AND ALTERNATE MOTIONS

Option 1 – (Staff Recommendation)

That Council refer the application back to staff for the following refinements by the applicant:

- i. situate the proposed building further away from the two bylaw-protected Garry oak trees located in the front yard on Gorge Road and in the rear yard adjacent to the Gorge

- Road Hospital site to the satisfaction of the Director of Sustainable Planning and Community Development and Director of Parks, Recreation and Facilities.
- ii. retain the municipal Douglas fir tree located on Irma Street to the satisfaction of the Director of Sustainable Planning and Community Development and Director of Parks, Recreation and Facilities.
 - iii. increase the rear yard setback to the satisfaction of the Director of Sustainable Planning and Community Development.

Option 2 - (Refer back to staff - retain two Garry oak trees on-site and explore the retention of the municipal Douglas fir tree on Irma Street)

That Council refer the application back to staff for the applicant to consider the following refinements:

- i. revise the building design so that it is situated further away from the two bylaw-protected Garry oak trees, one located in the front yard on Gorge Road and one in the rear yard adjacent to the Gorge Road Hospital site, to the satisfaction of the Director of Sustainable Planning and Community Development and the Director of Parks, Recreation and Facilities
- ii. explore the retention of the municipal Douglas fir tree on Irma Street to the satisfaction of the Director of Sustainable Planning and Community Development and the Director of Parks, Recreation and Facilities.
- iii. increase the rear yard setback to the satisfaction of the Director of Sustainable Planning and Community Development.

Option 3 - (Advance the application “as is”)

That, subject to the preparation and execution of legal agreements to secure rental housing in perpetuity, Statutory Right-of-Ways, the construction of a new plaza and transportation demand management measures, to the satisfaction of the Director of Community Planning and Sustainable Development and Director of Engineering and Public Work, that Council, after giving notice and allowing an opportunity for public comment at a meeting of Council, and after the Public Hearing for Rezoning Application No. 00720, if it is approved, consider the following motion:

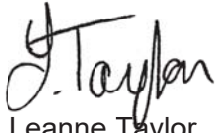
“That Council authorize the issuance of Development Permit with Variances Application No. 00135 for 43, 45 and 55 Gorge Road East and 2827, 2829 and 2831 Irma Street, in accordance with:

1. Plans date stamped May 22, 2020.
2. Development meeting all *Zoning Regulation Bylaw* requirements, except for the following variances:
 - i. reduce the required number of visitor parking spaces from 15 to 7 parking spaces
 - ii. reduce the rear yard setback from 6m to 2.93m.
3. The applicant provide the details of the proposed public art to be installed on the brick facade on the west elevation drawing to the satisfaction of the Director of Community Planning and Sustainable Development.
4. The Development Permit lapsing two years from the date of this resolution.”

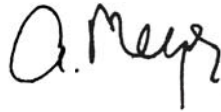
Option 4 - (Decline)

That Council decline Development Permit with Variances Application No. 00135 for the properties located at 43, 45 and 55 Gorge Road East and 2827, 2829 and 2831 Irma Street.

Respectfully submitted,



Leanne Taylor
Senior Planner
Development Services Division



Karen Hoese, Director
Sustainable Planning and Community
Development Department

Report accepted and recommended by the City Manager:



Date: June 26, 2020

List of Attachments

- Attachment A: Subject Map
- Attachment B: Aerial Map
- Attachment C: Plans date stamped May 22, 2020
- Attachment D: Letter from applicant to Mayor and Council dated June 10, 2020 and June 22, 2020
- Attachment E: Community Association Land Use Committee Comments dated December 10, 2019 and May 26, 2020
- Attachment F: Tenant Assistance Plan
- Attachment G: Arborist Report, dated May 20, 2020
- Attachment H: Letter from Modo Car Share dated May 21, 2020
- Attachment I: Advisory Design Panel report, dated February 19, 2020
- Attachment J: Advisory Design Panel minutes from February 26, 2020
- Attachment K: Correspondence (Letters received from residents).