

**Richard Elliott**

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**From:** Victoria Mayor and Council  
**Sent:** August 18, 2020 11:18 AM  
**To:** Victoria Mayor and Council  
**Subject:** Re: Telus Ocean

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**From:** Diane Chimich [REDACTED]  
**Sent:** August 14, 2020 7:28 AM  
**To:** Lisa Helps (Mayor) <LHelps@victoria.ca>; Councillors <Councillors@victoria.ca>  
**Subject:** Telus Ocean

To Mayor Helps and Councillors

I am writing to express my concerns regarding the newly proposed Telus Ocean development that is proposed for the corner of Humboldt and Douglas.

This development is in one of the most historic sections of Victoria. Both the Empress Hotel and the Crystal Gardens are historical buildings and as such add to the culture and appearance of this area. They are viewed as important buildings to protect and ensure that nothing diminishes them.

The proposed development by Telus could be an addition to this area but the proposed plan is not going to provide this. It is massive in height and density. The plan utilizes every inch of the property and has minimal setbacks from the street. The proposed height far exceeds the height restrictions and will result in a building that dwarfs everything else in the area. This proposal can not be allowed as it. The rezoning that they are requesting in order to far exceed the approved building height in this area should not be approved.

The overall appearance of the building is excessively modern with huge spans of glass and they have even suggested that they will have a massive jumbotron projecting pictures on the building. This is totally unacceptable in an area that has multiple residents and large numbers of hotels. That is not in keeping with the area at all and will create an eyesore for the city and the Humboldt Valley.

If this building is allowed to proceed as it is presently being proposed, it will overpower the entire area and especially the Crystal Garden and the Empress Hotel.

This building should not be approved as presented and the developers must devise a building that will add to the area. Do not approve any design for this building that exceeds the approved height restrictions and appropriate setbacks from the street. Enforce the requirements that were put in place to protect this area. Nothing should ever detract from the historical nature of this area.

Sincerely  
Diane Chimich  
788 Humboldt St.

## Richard Elliott

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**From:** Victoria Mayor and Council  
**Sent:** August 19, 2020 2:33 PM  
**To:** Victoria Mayor and Council  
**Subject:** Fw: Telus Building

Has been shared with Mayor Helps, but needs to be redacted and saved in the folder for 749 - 767 Douglas Street.

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**From:** Dale Lovell [REDACTED]  
**Sent:** August 19, 2020 2:29 PM  
**To:** Lucas De Amaral <LDeAmaral@victoria.ca>  
**Subject:** Re: Telus Building

Thank you for that information Lucas.  
Dale Lovell

On Tue, Aug 18, 2020 at 11:04 AM Lucas De Amaral <[LDeAmaral@victoria.ca](mailto:LDeAmaral@victoria.ca)> wrote:  
Dear Dale,

Thank you for the email, it has been shared with Mayor Helps

The next steps for the project are as follows:

- TELUS and its local community development partner, Aryze Development, plan to initiate a community engagement and consultation program related to the TELUS Ocean Project at the end of June 2020. See here for more info: <https://telusocan.com/outreach>
- TELUS plans to submit a land use application to the City's planning process within the next few months after conducting initial public engagement.

When an application is received, you can follow it's progress via the City's Development Tracker: <https://www.victoria.ca/EN/main/residents/planning-development/development-tracker.html>

Thank you for sharing your thoughts with Mayor Helps and the City of Victoria.

Sincerely,

Lucas de Amaral  
Correspondence Coordinator

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**From:** Dale Lovell [REDACTED]  
**Sent:** August 13, 2020 8:06 PM  
**To:** Lisa Helps (Mayor) <[LHelps@victoria.ca](mailto:LHelps@victoria.ca)>  
**Subject:** Telus Building

Dear Mayor Helps:

I am writing to ask you to reject the proposed design of the Telus building on Douglas Street. My biggest concern is the effect it will have on the local bird population. The Smithsonian migratory bird center estimates that glass-covered and illuminated buildings kill anywhere from a 100 million to a billion birds a year. Birds see the moon or the sun reflected in the glass and feel they have a clear flight path before slamming into a solid wall that either kills them outright or leaves them fatally injured on the pavement below. Mirrored glass is especially dangerous.

Please consider the negative impact this building design may have on bird species already in serious decline. If council decides this project must be approved, at the very least require Telus to follow “best practises” for reducing bird collisions. Toronto has been a leader in requiring developers to follow bird-friendly design guidelines. I am including a link to a document on the city web site.

<https://www.toronto.ca/wp-content/uploads/2017/08/8d1c-Bird-Friendly-Best-Practices-Glass.pdf>

Thank you for your attention.

Dale Lovell

## Richard Elliott

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**From:** DMcNally [REDACTED]  
**Sent:** August 20, 2020 10:11 AM  
**To:** Victoria Mayor and Council  
**Subject:** Telus Building, glass, bird deaths

Mayor Helps and Council:

The proposal for the new Telus building is lovely.  
But that aesthetic appeal is negated by the numbers of birds  
who will be killed by flying into it.

The Fatal Light Awareness Program and the City of Toronto  
have worked together to come up with solutions.

Please read, and demand the needed changes to this building.

<https://www.toronto.ca/wp-content/uploads/2017/08/8d1c-Bird-Friendly-Best-Practices-Glass.pdf>

Diane McNally  
353 A Linden Avenue  
Victoria  
[REDACTED]

## Richard Elliott

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**From:** Lia Fraser [REDACTED]  
**Sent:** August 20, 2020 8:16 AM  
**To:** Victoria Mayor and Council  
**Subject:** Telus Tower

After reading a letter in the *Times Colonist* today about the proposed Telus Ocean building with a glass wall and how it will kill unsuspecting birds, I am requesting that you ask Telus to go back to the drawing board and eliminate the glass wall. It would be an act of compassion towards to the birds, who cannot speak for themselves.

Lia Fraser

## Richard Elliott

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**From:** kelly barbin [REDACTED]  
**Sent:** August 21, 2020 8:14 AM  
**To:** Victoria Mayor and Council  
**Subject:** Design for proposed Telus Ocean building

Hello Mayor and Council

I am writing today regarding the design of the Telus Ocean building, in hopes you are aware, and considering bird friendly design on all new buildings.

This Telus Ocean building appears to be deadly for birds with a very large amount of reflecting glass Please consider the evidence of large bird deaths with glass buildings and be leaders in innovative bird friendly design Thank you all for your hard work and dedication to our city, you are appreciated!

Warmly

Kelly Barbin and family  
District of Highlands BC

Sent from my iPhone



# BIRD-FRIENDLY Best Practices **Glass**



# BIRD-FRIENDLY DEVELOPMENT GUIDELINES

## Best Practices

### Glass

The City of Toronto would like to thank the following for their assistance in developing the Bird-Friendly Best Practices • Glass:

John Robert Carley, Architect Incorporated  
Fatal Light Awareness Program (FLAP Canada)  
Daniel Klem Jr., Professor,  
Department of Biology Muhlenberg College, Allentown, Pennsylvania  
Alison Lapp  
Bailey Bradshaw  
Hannah del Rosario  
Joseph Hong  
Photographs and artwork used with permission.

Illustrations and photographs provided by:  
Gabriel Guillen; John Robert Carley, Architect Incorporated;  
Fatal Light Awareness Program (FLAP Canada); Barry Kent MacKay;  
Alison Lapp; Hannah del Rosario; Daniel Woolfson; Tim Hoeflich;  
Karen Jiang; Alan Filipuzzi, Carol L. Edwards  
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Bird Layout by FLAP Canada

[www.toronto.ca/planning](http://www.toronto.ca/planning)

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**The goal of this document is to inspire, suggest, and direct designers towards treatments of glass to render it as Bird-Friendly as possible. . .to mitigate and prevent deaths of birds.**

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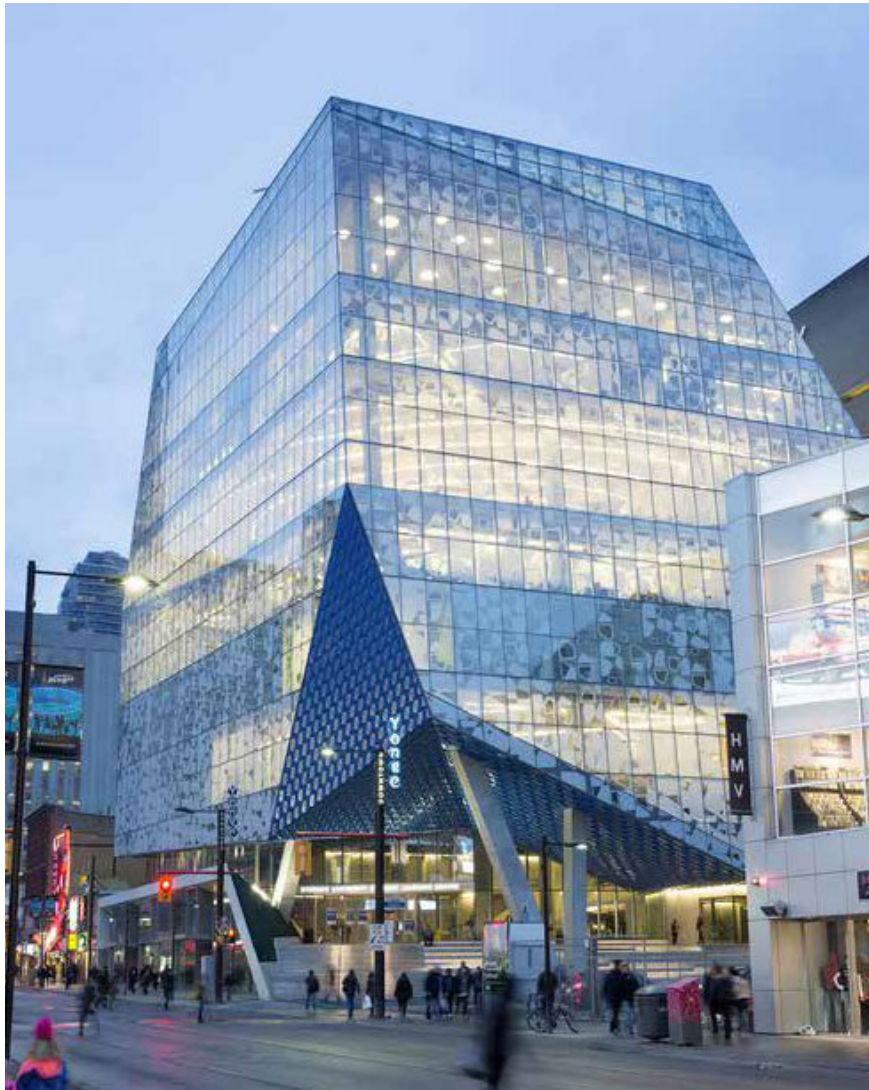
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*We have the opportunity to construct well-designed buildings that are also bird-friendly...*



### **Ryerson Student Learning Centre**

The glass exterior of the Ryerson University Student Centre incorporates strong visual markers, making it bird-friendly.

Design by: Zeidler Partnership Architects and Snøhetta

Photo: Lorne Bridgman

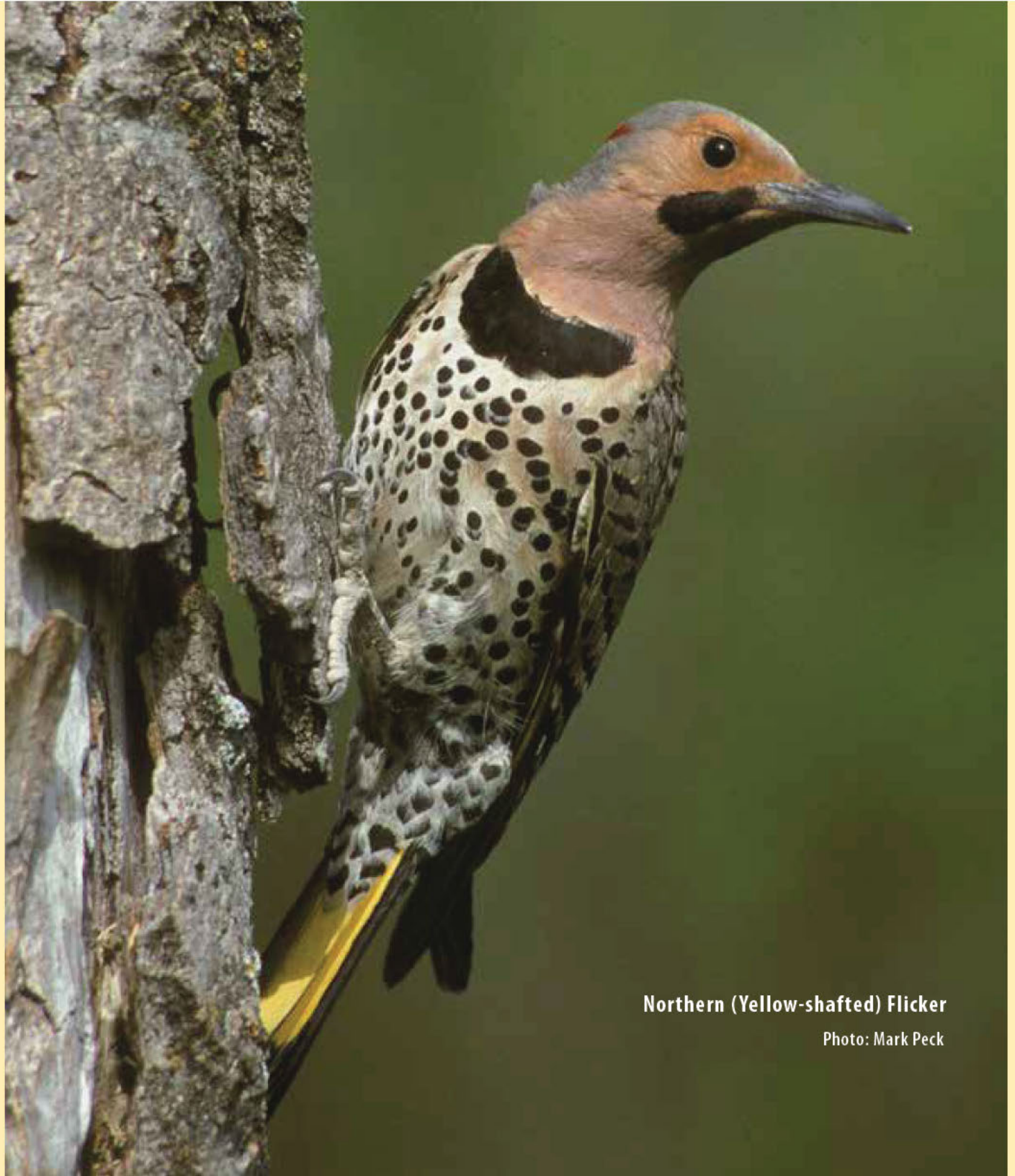


### **Picasso Condominium**

The exterior envelope of the Picasso Condominium Building is only 43 percent glazing as compared to the typical condominium in Toronto which may include upwards of 70 percent glass. The building's facade was designed to achieve higher levels of energy performance by reducing the area of exterior glazing, with the co-benefit of a significantly more bird-friendly design.

Design by: Teeple Architects Inc.

Rendering by: Teeple Architects Inc.



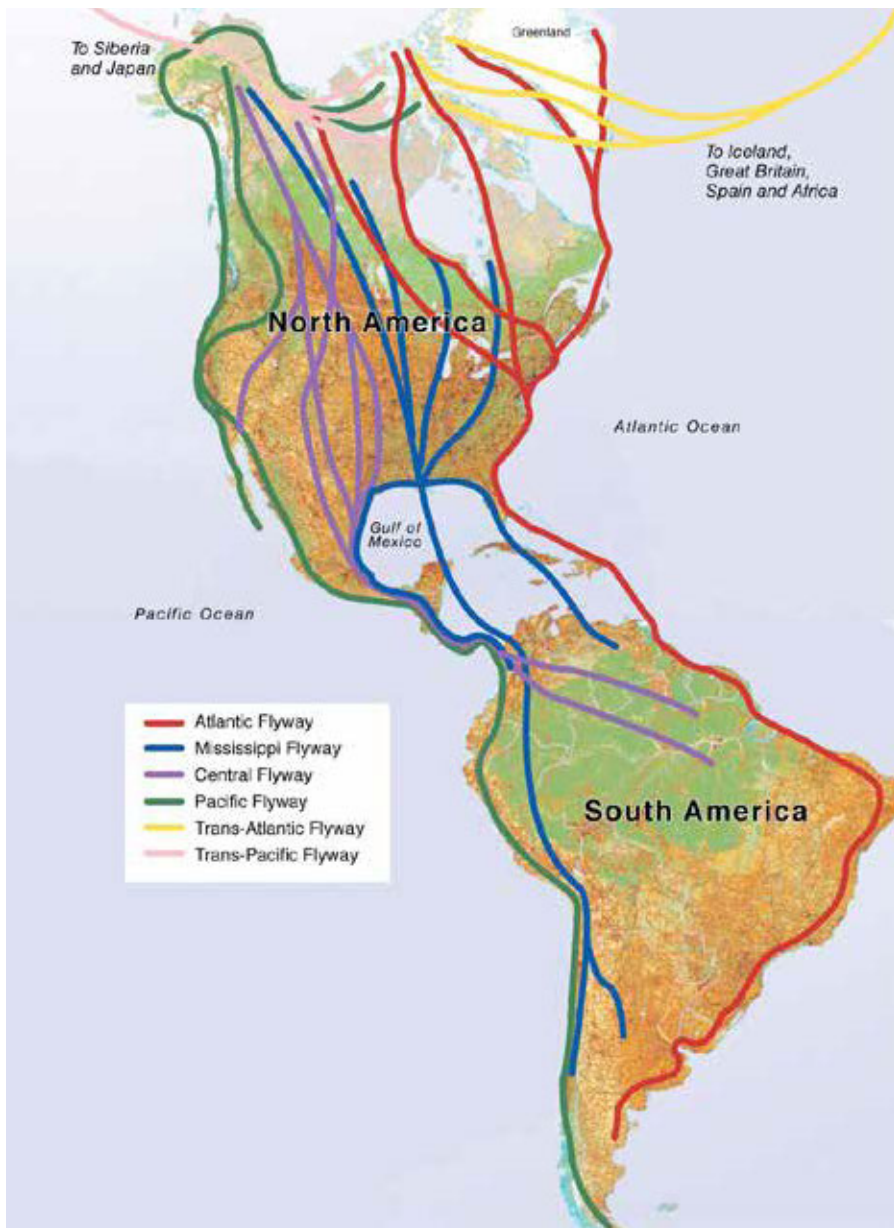
Northern (Yellow-shafted) Flicker

Photo: Mark Peck



Northern Flicker • from Common Birds of Toronto • Flap.org

Drawing by Barry Kent MacKay



North American Migratory Flyways.

Image: City of Toronto

## What Is The Problem? Dead Birds

Recent estimates suggest that about 25 million birds die each year from window collisions in Canada. A disproportionately high number of these fatalities occur in Toronto due to its location adjacent to Lake Ontario; at the confluence of the Atlantic and Mississippi Migratory Flyways, and to the fact that it contains one-third of all tall buildings in Canada. Bird mortality is disproportionately higher at mid-rise and high-rise buildings, which are concentrated in urban areas such as Toronto.

Despite the extreme scale of the problem, there are solutions available today that can reduce bird mortality without sacrificing architectural standards.



A dead Common Yellowthroat.

Photo: FLAP Canada

## Leadership in Bird-Friendly Design

### Council Action - 2005

As a result of citizen scientists and the Fatal Light Awareness Program (FLAP Canada) drawing attention to this issue, in April 2005, Toronto City Council adopted Motion J(17) regarding the “Prevention of Needless Deaths of Thousands of Migratory Birds in the City of Toronto”. This led to the development of the “Bird-Friendly Development Guidelines” (the Guidelines), which was released in 2007.

### Bird-Friendly Development Guidelines - 2007

Toronto’s 2007 Bird-Friendly Development Guidelines was the first Council-adopted document of its kind in North America. The award winning Guidelines provided several strategies and options for making new and existing buildings less of a threat to migratory birds, with a focus on the two key issues that are of critical importance – making glass less dangerous to birds and mitigating light pollution. These strategies could be voluntarily incorporated into the design of new buildings and into retrofit projects of existing buildings by developers and owners respectively.

### Toronto Green Standard - 2010

In 2010, the Toronto Green Standard (TGS) came into effect for new development in Toronto. The TGS established performance measures for green development based on local environmental drivers. Performance measures for reducing bird collisions were incorporated into the TGS, thereby defining a green building in Toronto as one that must also be bird-friendly. The bird-friendly standards contained in the TGS have been refined from the 2007 Guidelines to include those that can be implemented through the planning approval process in the Province of Ontario. Toronto demonstrated leadership and innovation by being the first municipality in North America to require new development to incorporate bird-friendly standards.

In 2014, the TGS was revised after substantial consultation with the public, architects, planners, designers and the development industry. The consultation process identified the standards for bird-friendly design as the most challenging for the development industry to implement. As a result, the standards were revised. Some were altered, some were amplified, and some were discarded all in the best interest of mitigation and, ultimately, prevention of bird fatalities from striking buildings.



Toronto is the first municipality to require bird-friendly standards.



Images: City of Toronto

## Why A Best Practices Manual?

Since the publication of the Bird-Friendly Development Guidelines in 2007, great advances have been made in the understanding of bird collisions and bird mortality from collisions with buildings. This is a topic of ongoing research by the scientific community working in this area, and resulting policy development by municipalities in Canada and the United States. The Best Practices for Bird-Friendly Glass has been developed as a supporting document to the TGS 2014 and elaborates upon the original bird-friendly strategies.

'Best Practices' answers many of the most common questions on bird-friendly design and provides local examples of strategies used to reduce the number of birds that die each year in Toronto.

This document is intended to assist with the understanding of the issues and the implementation of the Toronto Green Standard.



Dark-eyed Junco killed by colliding with window in downtown Toronto.

Photo: Simon Luisi, FLAP Canada



## Ontario Legal Context

In 2011, a prominent development company was prosecuted under Ontario's Environmental Protection Act (EPA) and the federal Species at Risk Act (SARA) for bird window strikes at one of its sites in Toronto.

In February 2013, Justice Melvyn Green of the Ontario Court of Justice found, beyond a reasonable doubt, that the company was responsible for hundreds of bird deaths at its site. Judge Green ultimately acquitted the company on the basis that it had exercised due diligence in attempting to address the problem by taking measures to install visual markers on the most lethal facades of its buildings. However, the case makes it clear that owners or managers of buildings whose design results in death or injury to birds could be found guilty of an offence if they fail to take all reasonable preventative measures.

The judge's ruling found that the reflected light discharged from the building was a "contaminant" under the EPA. Owners and managers of buildings whose windows reflect light as a contaminant are violating s.14 of the EPA, as well as s. 32 of the SARA where death or injury occurs to a species at risk. In summary, it is now an offence under Ontario's EPA and the federal SARA for a building to emit reflected light that kills or injures birds.

The issue of bird deaths and injuries caused by collisions with building glass due to reflected light is now in the judicial realm. Therefore, it is important and prudent for architects, engineers, developers and owners to adhere to current best practices to prevent these collisions and to demonstrate that all reasonable preventive measures have been taken.

Black-capped Chickadees killed at a two-storey building one morning in 2010.


Photo: FLAP Canada





**American Robin**

Photo: Mark Peck



## The Cause: Light and Glass

Photo: NASA



The clear glass corner of this building in downtown Toronto poses a lethal threat to birds.

Photo: Hanna del Rosario

## Light

Migratory birds are unable to adapt to the urban environment. It has been observed that many have evolved to travel at night when they are safer from predators; and the cooler temperatures enable them to expend less energy. To find their way during these flyovers, birds use natural cues including the moon and stars to navigate. Light emanating from urban areas obscures these natural cues, which disorients and confuses the migrating birds. Light attracts them into the unfamiliar urban environment where they subsequently get trapped, hence the term “fatal light attraction”. Once trapped, birds will attempt to take shelter in whatever habitat they can find.

## Glass

The urban environment contains a number of hazards to birds, many of which are common and hard to avoid. Unlike humans, birds cannot perceive images reflected in glass as reflections and will fly into windows that appear to be trees or sky. Clear glass also poses a danger as birds have no natural ability to perceive clear glass as a solid object. Birds will strike clear glass while attempting to reach habitat and sky seen through corridors, windows positioned opposite each other in a room, ground floor lobbies, glass balconies or glass corners. The impact of striking a reflective or clear window in full flight often results in death.

Experiments suggest that bird collisions with windows are indiscriminate. They can occur anywhere, at any time, day or night, year-round, across urban and rural landscapes, affecting migratory, resident, young, old, large, small, male and female birds.

## Why is the Problem getting Worse?

### Growth of Cities

The upward and outward growth of urban areas around the world has both degraded the quality of existing natural habitat and increased the number of hazards found in cities. As human activity encroaches on shorelines, wetlands, ravines and meadows, stopover locations for migrating birds are becoming smaller and more fragmented. Urban intensification also brings larger and taller buildings that increase the number of obstacles for migrating birds.

### Expanded Use of Glass in Architecture

The amount of glass in a building is the strongest predictor of how dangerous it is to birds. As changes in production and construction techniques facilitated the greater use of glass, cities have become more dangerous for birds to navigate through.

The development of the curtain wall system and the invention of the float glass technique led directly to the expanded use of glass in modern architecture.

Today it is now common to see buildings with the appearance of complete glass exteriors. The increase of curtain wall and window wall glazing, as well as picture windows on private homes, has in turn increased the incidence of bird collisions. Today, the vast majority of Toronto's new mid to high rise buildings contain more than 60 percent glass. Historic masonry structures, with their "punched" windows, used less glass area per facade, and the glass itself, by necessity of manufacture and transportation, was divided into panes by muntins. Further, operating windows frequently had exterior insect screens, rendering them completely bird-friendly.

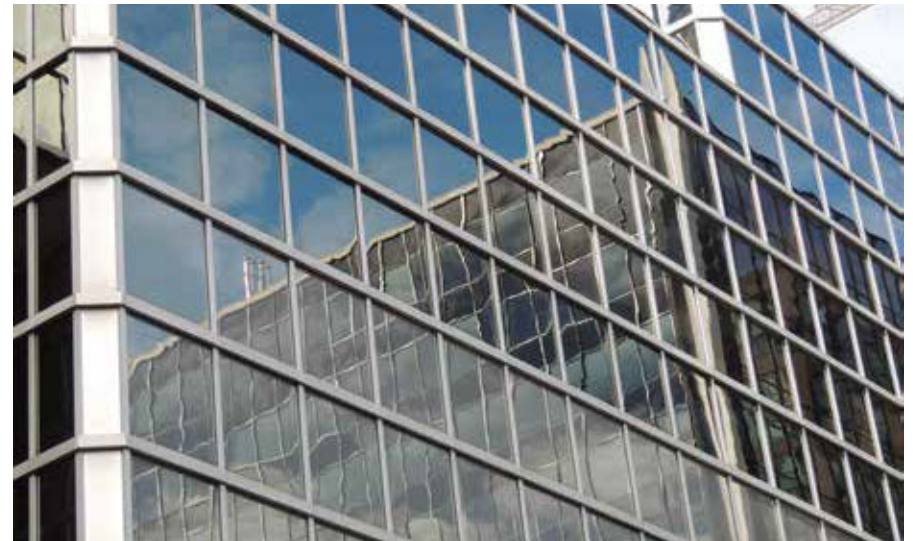


Photo: FLAP Canada



Old City Hall

Image: City of Toronto



Cedar Waxwing  
Photo: Mark Peck



# The Problem: Glass

Photo: Daniel Woolfson

## Properties of Glass

Glass can appear very differently depending on a number of factors, including how it is fabricated, the angle at which it is viewed, and the difference between exterior and interior light levels. Combinations of these factors can cause glass to look like a mirror or dark passageway, or to be completely invisible. Humans do not actually “see” most glass, but are cued by context such as mullions, roofs or doors. Birds, however, do not perceive right angles and other architectural signals as indicators of obstacles or artificial environments.



Photo: Hannah del Rosario

## Reflection

Viewed from outside, transparent glass on buildings is often highly reflective. Almost every type of architectural glass, under the right conditions, reflects the sky, clouds, or nearby habitat and appears familiar and is attractive to birds. When birds try to fly to the reflected habitat, they hit the glass. Reflected vegetation is the most dangerous, but birds also attempt to fly past reflected buildings or through reflected passageways.



Photo: Gabriel Guillen



Photo: Gabriel Guillen

## Transparency

Birds strike transparent windows as they attempt to access potential perches, plants, food or water sources, and other lures seen through the glass. Glass “skywalks” connecting buildings, glass walls around planted atria, windows that form glass corners and exterior glass guardrails or walkway dividers are dangerous because birds perceive an unobstructed route to the other side.



Photo: John Carley

## Black Hole or Passage Effect

Birds often fly through small gaps, such as spaces between leaves or branches, nest cavities, or other small openings. In some light, glass can appear black, creating the appearance of a cavity or “passage” through which birds try to fly.



Photo: Gabriel Guillen



## Building Features that Influence Bird Collisions

Untreated glass is responsible for virtually all bird collisions with buildings. The relative threat posed by a particular building depends significantly on the amount of exterior glass, as well as the type of glass used, and the presence of glass “design traps”. In a study based on data from Manhattan, New York, Dr. Daniel Klem found that a 10 percent increase in the area of reflective and transparent glass on a building facade correlated with a 19 percent increase in the number of fatal collisions in the spring and a 32 percent increase in fall.

### Type of Glass

The type of glass used in a building is a significant component of its danger to birds. Mirrored glass is often used to make a building “blend” into an area by reflecting its surroundings. Unfortunately, this makes those buildings especially deadly to birds. Mirrored glass is reflective at all times of day, and birds mistake reflections of sky, trees, and other habitat features for reality. Many of Toronto’s most hazardous buildings include mirrored glass. Non-mirrored glass can be highly reflective at one time, and at others, appear transparent or dark, depending on time of day, weather, angle of view, and other variables. Low-reflection glass may be less hazardous in some situations, but does not actively deter birds and can create a “passage effect,” appearing as a dark void that can be flown through.



Photo: Hannah del Rosario

### Building Size

As building size increases, so typically does the amount of glass, making larger buildings more of a threat. It is generally accepted that the lower stories of buildings are the most dangerous because they are at the same level as trees and other landscape features that attract birds. However, monitoring programs accessing setbacks and roofs of tall buildings are finding that birds also collide with higher levels especially during inclement weather at night.



Photo: Gabriel Guillen



Photo: John Carley

### Reflected Vegetation

Glass that reflects shrubs and trees causes more collisions than glass that reflects pavement or grass. Vegetation around a building will bring more birds into its vicinity as reflections of vegetation correlate with more collisions. Studies with bird feeders (Klem et al., 1991) have shown that collisions will be fatal when birds fly towards glass from more than a few feet away.

## Design Traps

Windowed courtyards and open-topped atria can be death traps for birds, especially if they are heavily planted. Birds fly down into such places, and then try to leave by flying directly towards the reflections. Glass sky walks and outdoor guardrails, and building corners where glass walls or windows are perpendicular are dangerous because birds can see through them to sky or habitat on the other side.



Photos: City of Toronto



## Green Roofs And Walls

Green roofs provide many environmental benefits, including habitat elements that are attractive to birds. Recent work shows that well designed green roofs can become functional ecosystems, providing food and nesting for birds. However, green roof features are often located close to glass, for views onto greenspace. This poses a great threat to birds. It is particularly important that glass near rooftop gardens, green roofs and other features such as green walls be treated to be bird-friendly.



Photo: FLAP Canada



Photo: Gabriel Guillen

## Lighting

Interior and exterior building and landscape lighting can make a significant difference to collision rates in any one location. This phenomenon is dealt with in detail in the “Best Practices for Effective Lighting” document.



**Black-capped Chickadee**

Photo: Mark Peck



## The Solution: Bird-Friendly Building Design

Photo: Lorne Bridgeman, Ryerson Student Learning Centre  
Design by: Zeidler Partnership Architects and Snohetta

## Building Envelope

The overall extent of glass on the building facade is a primary focus of bird-friendly design and retrofit methodologies. The risk of bird collisions increases as the ratio of glass to solid wall increases. As well as contributing to bird collisions, extensive glazed surfaces also contribute to glare and reflection, and create unwanted heat gain. A building designed with a total window surface area of 25-40 percent relative to the entire facade (low window to wall ratio) can reduce fatal bird collisions. When coupled with passive solar strategies such as daylighting, the design can also provide high-quality light, and help reduce energy use for heating and cooling.



**SQ Condominium Building in Alexandra Park**  
Rendering of a new residential building designed by Teeple Architects. The exterior of Alexandra Park Block 11 is only 3 percent glazing, significantly reducing the bird collision hazard posed by this building.

Rendering: Teeple Architects



### **HOT Condos**

Rendering of a new low-rise residential development designed by Quadrangle Architects.

Rendering: Quadrangle Architects

## Design to Eliminate Fly-Through Conditions

The elimination of potential fly-through conditions in a building will help to reduce the potential collision hazards a building presents to birds. Glass bridges and walkways, outdoor railings, free-standing glass architectural elements and building corners where glass walls or windows are perpendicular are dangerous because birds can see through them to sky or habitat on the other side.

## Awnings and Overhangs

The design of recessed windows, balconies and awnings can add both visual cues for birds to avoid, as well as reduce the amount of visible glass and the corresponding collision threat. However, awnings and overhangs, and other building-integrated structures do not completely reduce reflections and as such are considered far less effective than visual markers applied directly to glass.



Photo: City of Toronto



Photo: Hannah del Rosario



Photo: John Carley

## Exterior Screens, Grilles, Shutters and Sunshades

Many buildings that are considered good examples of bird-friendly design have achieved this by virtue of incorporating unique architectural elements that provide clear visual cues for birds to avoid without impacting views from the interior of the building. Decorative facades that wrap entire structures can reduce the amount of visible glass and thus the threat to birds. Netting, screens, grilles, shutters and exterior shades are commonly used elements that can make glass safer for birds. They can be retrofitted on an existing building or integrated into the design of a new building, and can significantly reduce bird mortality.

## Creating Visual Markers:

### Frit, Film and Acid-Etched Patterns

Once the amount of visible glass and high threat features have been minimized, the remaining glass must be made bird-friendly. Natural features in the wild do not reflect images in the way glass does, rather they project 'visual markers' to birds, indicating to them that they are solid objects to be avoided. There are two means of mitigating the danger glass poses to birds. The first and most effective approach is to create visual markers. The second and less effective strategy is to mute reflections in glass.

Glass can have an image or pattern screened, printed, or applied to the glass surface. Ceramic frit and acid-etched patterns are commonly used to achieve other design objectives including a reduction in the transmission of light and heat, privacy screening or branding. By using patterns of various sizes and densities, manufacturers can create any kind of image, translucent or opaque. The image in the glass then projects enough visual markers to be perceived by birds.

Studies have shown that visual markers spaced at a maximum of 10 cm apart are effective at deterring bird collisions with glass. The size of the visual marker, and spacing between them have been found, by testing and observation, to be the most effective at diminishing the risk of bird collisions. The denser the pattern, the more effective it becomes in appearing as a solid object to birds. The markers must also be high contrast. If contrast is subtle to the human eye, it will also be subtle to birds.

Only non-reflective glass should be used in combination with ceramic frit patterns. The visual markers are most visible on Face 1 (exterior surface) of the glass, as they are not obscured by reflections. Face 2 or Face 3 applications are of assistance, but are of secondary and diminished value. With these parameters, a wide variety of aesthetic solutions are possible, enhancing the design of the building.

DIY window film for homeowners will provide visual markers to glass.

Photo: FLAP Canada







Photo: John Carley



Photo: FLAP Canada



Photo: MMC Architects



Photo: MMC Architects



Photo: FLAP Canada



Photo: FLAP Canada

## Tips for Designing Visual Markers

*Select a pattern.*

*Any design will be effective if it meets the following criteria:*

- Ensure the pattern density is 10 cm by 10 cm or less;
- Visual markers must be at least 5 mm in diameter
- Visual markers are applied to low reflectance glass
- Visual markers should be high contrast
- Face 1 (exterior surface) is the most effective surface to deter bird collisions

Acid-etching patterns will provide similar visual markers to that of fritted glass. Acid-etched patterns on the first (exterior) surface of the glass provide both visual cues and break up any reflections on the glass surface.

Exterior bird-friendly films applied directly to the glass are a less permanent but similarly effective solution. The lifespan of exterior film will be a fraction of the operating life of a building and is not recommended for new construction. This type of film is most commonly used in retrofit situations.



**Pan Am Aquatic Centre**  
This imaginative frit pattern is both a branding strategy and a deterrent for bird collisions.



Photos: Karen Jiang



## Opaque and Translucent Glass

Opaque, etched, stained, and frosted glass, as well as glass block are excellent options to reduce or eliminate collisions and are commonly used in new construction. Frosted glass is created by acid etching or sandblasting the exterior surface of transparent glass. This process both reduces the reflectivity of the exterior surface and makes the glass translucent, appearing to birds as something to avoid. An entire surface can be frosted, or frosted patterns can be applied. Patterns should be applied at a 10 cm by 10 cm spacing. For retrofits, glass can be frosted by sandblasting on site. Stained glass is typically seen in relatively small areas but can be extremely attractive and is not conducive to collisions. Glass block is extremely versatile, can be used as a design detail or primary construction material, and is also unlikely to cause collisions.

Photo: FLAP Canada

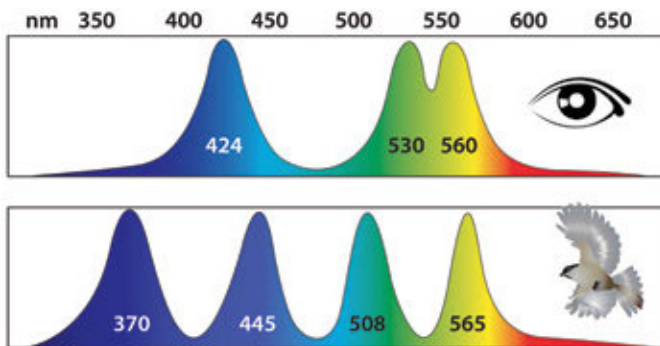


Illustration: American Bird Conservancy

## UV Glass (or similar products)

Birds have evolved to perceive the ultraviolet (UV) spectrum of light. Thus, any glass product that is able to reflect and/or absorb UV light would appear solid to a bird but clear to the human eye. Several products with this ability are already available. In order to be accepted as bird-friendly, a product that makes this claim would need to provide demonstrable, third party testing results that clearly indicate a significant reduction in bird collisions comparable to acid-etched and/or fritted glass treated to the performance measures set out in the 2014 Toronto Green Standard version 2.0.

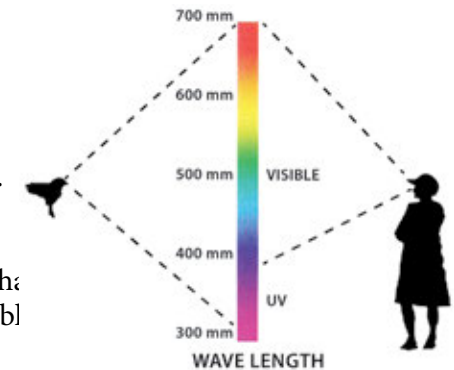


Illustration: New York City Audubon



## Low Reflectance Glass

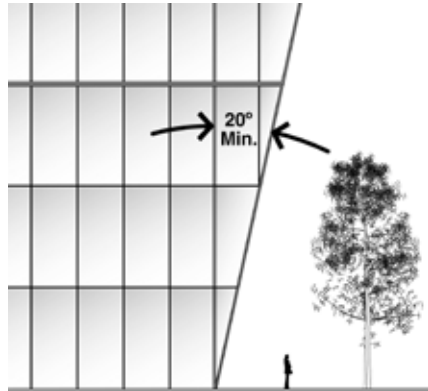
As discussed in the preceding sections, mirrored glass is the most reflective of all building materials and should be avoided in all situations. Lower reflectance glass (less than 15 percent reflectance) may reduce collisions in some situations, but does not actively deter birds and can create a “see-through” effect. Low-reflectance glass on its own is not considered a treatment and must be coupled with visual markers to be considered bird-friendly.

Photo: FLAP Canada

## Ineffective Strategies

### Angled glass

In the 2007 Bird-Friendly Design Guidelines, it was suggested that angling glass panes downward at 20 to 40 degrees is an effective means of deterring bird strikes at ground level. Due to the architectural challenges involved in utilizing this strategy and the lack of scientific evidence supporting the effectiveness, angled glass is no longer accepted as a suitable strategy.



Angled Glass is no longer accepted

Illustration: City of Toronto



Unacceptable to use Tinted Glass

Photo: FLAP Canada

### Blinds

Interior blinds installed behind windows have been used as a means of deterring bird collisions on the assumption they provide sufficient visual markers to make a window appear as a solid object. However, while it is possible to require the installation of blinds by a developer through the Site Plan process, there is no mechanism to ensure or require that blinds be utilized by the tenant during the migratory seasons and/or that the building owner or manager will require this of their tenants. Due to this fact, blinds are not accepted as a suitable strategy.



Blinds not always utilized by tenants

Photo: FLAP Canada

### Tinted Glass

There is no definitive evidence that tinted glass has a positive effect in reducing bird collisions. Tinted glass is not an acceptable option or strategy for meeting the Toronto Green Standard “Bird Collision Deterrence” requirements.

## Interior Screens

In the 2007 Bird-Friendly Design Guidelines, it was suggested that installing permanent internal screens may provide enough visual markers through non-reflective glass for birds to perceive the windows as solid objects. It was stated that they must be installed as close to the glass as possible to maximize the visual markers projected through the window. Due to the variability in the possible distance from the window and the lack of scientific evidence supporting the effectiveness of this strategy, interior screens are no longer accepted as a suitable strategy.



Interior Screens are not a suitable strategy

Photo: Gabriel Guillen

## Bird Decals

It has been a popular belief that large opaque silhouettes of birds of prey will deter other birds from frequenting an area. This is not the case. Bird silhouettes have, unfortunately, been proven to be ineffective at reducing collisions applied in this manner. Commonly used bird of prey silhouettes have been tested experimentally and found to be largely ineffective. Birds will avoid hitting the decal if it is applied on the exterior surface of the window, but may still hit glass beside the decal if it reflects vegetation or sky. To be effective, decals would have to be applied on a window in a pattern of 5 to 10 cm apart.



One or two Bird Decals are ineffective

Photo: FLAP Canada



Red Knot  
Photo: Mark Peck



## Applying Bird-Friendly Design to New Development in Toronto

Bird Safe Glass  
Acid Etched Pattern Surface  
Photo: AviProtek E

# Toronto Green Standard

*Making a Sustainable City Happen*



For

## New Low-Rise Residential Development

(5 dwelling units or more)

**Version 2.0**

January 2014



## Toronto Green Standard

### Standards for New Development

The Toronto Green Standard (TGS) has been a requirement for all new development through the planning process since 2010. The bird-friendly performance measures set out in the TGS are required as a matter of exterior sustainable design (s. 114 City of Toronto Act, 2006). This includes applications for rezoning, plan of subdivision and site plan control.

The requirements for Bird Collision Deterrence in the Toronto Green Standard are applied to the following building types:

- Residential development 4 storeys and higher
- All non-residential development
- Low-rise residential development (under Part 9 of the Ontario Building Code) that is abutting a ravine or natural area and contains more than 5 units

Image: City of Toronto



## Areas Requiring Glass Treatment

All glass poses a collision risk to birds and must be treated when within the required areas. Building designs that reduce the total exterior glazing also reduce the total area that must be treated.

The Toronto Green Standard requirements focus on reducing the hazards within areas that pose a higher risk of collision, such as:

- 0-12 m above grade: exterior glass, fly-through conditions and balcony railings
- 4 m above rooftop vegetation: exterior glass, fly-through conditions and balcony railings
- At all heights: parallel glass such as bridges and walkways

## ECOLOGY



### For New Mid to High-Rise Residential and All Industrial, Commercial and Institutional (ICI) Development

Development Feature	Required Tier 1	Voluntary Tier 2	Specifications, Definitions and Resources	Potential Strategies
<b>Bird Collision Deterrence</b> Design buildings to reduce bird collisions and mortality	<p><b>EC 4.1 Bird friendly glazing</b></p> <p>Use a combination of the following strategies to treat a minimum of 85% of all exterior glazing within the first 12 m of the building above grade (including balcony railings, clear glass corners, parallel glass and glazing surrounding interior courtyards and other glass surfaces):<sup>1,2</sup></p> <ul style="list-style-type: none"> <li>• Low reflectance, opaque materials<sup>3</sup></li> <li>• Visual markers applied to glass with a maximum spacing of 100 mm x 100 mm<sup>4</sup></li> <li>• Building-integrated structures to mute reflections on glass surfaces.<sup>5</sup></li> </ul> <p><b>Balcony railings:</b> Treat all glass balcony railings within the first 12 m of the building above grade with visual markers provided with a spacing of no greater than 100 mm x 100 mm.<sup>4,6</sup></p> <p><b>Fly-through conditions:</b> Glass corners: Within the first 12m of the building, treat all glazing located at building corners with visual markers at a spacing of no greater than 100 mm x 100 mm.<sup>7</sup></p> <p><b>Parallel glass:</b> Treat parallel glass at all heights with visual markers at a spacing of no greater than 100 mm x 100 mm.<sup>7</sup></p> <p><b>City-owned buildings and all Agencies, Boards, Commissions and Corporations:</b></p> <p>For new buildings or major renovations, treat all exterior glazing within the first 16 m of the building above grade as per the requirements of EC 4.1 above; visual markers applied to glass must have a maximum spacing of 50 mm x 50 mm<sup>8</sup>.</p>	<p><b>EC 4.4 (Optional) Enhanced bird friendly glazing</b></p> <p>Use a combination of the following strategies to treat a minimum of 95% of all exterior glazing within the first 12 m of the building above grade (including all balcony railings, clear glass corners, parallel glass and glazing surrounding interior courtyards and other glass surfaces):<sup>1,2</sup></p> <ul style="list-style-type: none"> <li>• Low reflectance, opaque materials<sup>3</sup></li> <li>• Visual markers applied to glass with a maximum spacing of 100 mm x 100 mm<sup>4</sup></li> <li>• Building-integrated structures to mute reflections on glass surfaces.<sup>5</sup></li> </ul> <p><b>EC 4.5 (Optional) Opaque building materials</b></p> <p>Provide at least 50% of the exterior surface of the building as non-reflective opaque materials to significantly reduce bird collisions with buildings.</p>	<ol style="list-style-type: none"> <li>1. Bird friendly design aims to reduce bird collisions and mortalities caused by reflective glazing by: making glazed areas visually distinct to birds and by reducing images of trees or sky reflected in glass through shading/muting reflections. The most critical zone for bird collisions is 12 m minimum above grade (mature tree height).</li> <li>2. If the site is adjacent to a natural area feature, glass must be treated to the first 12 m of the building or to the height of the top of the surrounding tree canopy at maturity, whichever is greater.</li> <li>3. Low reflectance, opaque materials may include spandrel glass with one of the following: (i) Solid back-painted frit or silicone backing opaque coatings OR; (ii) Reflective or low-e coatings that have an outside reflectance of 15% or less. Spandrel glass with reflective or low-e coatings that have an outside reflectance of greater than 15% should be used in combination with other strategies.</li> <li>4. Visual markers consist of opaque contrasting points or patterns etched into or applied onto the exterior or interior surfaces of glass and must have a minimum diameter of 5 mm and a maximum spacing of 100 mm x 100 mm. Patterns applied closer to the first (exterior) surface, in combination with low reflectance glass, are most visible and effective.</li> <li>5. Building integrated structures include: opaque awnings, sunshades, exterior screens, shutters, grilles and overhangs or balconies that provide shading below a projection (assume 1:1 ratio of treatment below a projection) to mute reflections. Shade cast by the building or adjacent buildings cannot be included as a bird collision deterrence strategy.</li> <li>6. Glass behind treated balcony railings is considered to be treated.</li> <li>7. Fly-through conditions are created when clear glass corners meet or provide any clear line of sight to birds. Glass corners must be treated for 2.5 m extending on each side away from the corner. Parallel glass is glass installed at any height that is parallel at a distance of 5 m or less such as a clear glass corridor or bridge.</li> <li>8. This requirement applies to City-owned non residential facilities.</li> </ol>	<p>Visual markers: Etched glass Fritted glass Films Decals Mullions</p> <p>Exterior screens, shutters, grilles and louvers to shield glass surfaces</p> <p>Shadows from opaque overhangs, awnings, exterior sunshades</p>

14 Apply this Standard to: New Residential Apartments 4 storeys and higher and ALL Industrial, Commercial and Institutional (ICI) Development

March 2015

Refer to the full Toronto Green Standard Document for the complete set of bird-friendly requirements.

Image: City of Toronto

## Scarborough Civic Centre Branch

Our 100th Library Branch



Photo: Alan Filipuzzi

### Municipal Buildings

For new projects or major renovations, all buildings owned by the City and its Agencies, Boards, Commissions and Corporations are required to provide a higher level of protection for birds by treating exterior glazing within the first 16 m of the building and providing a denser pattern of visual markers on glass at a spacing of 50 mm x 50 mm.

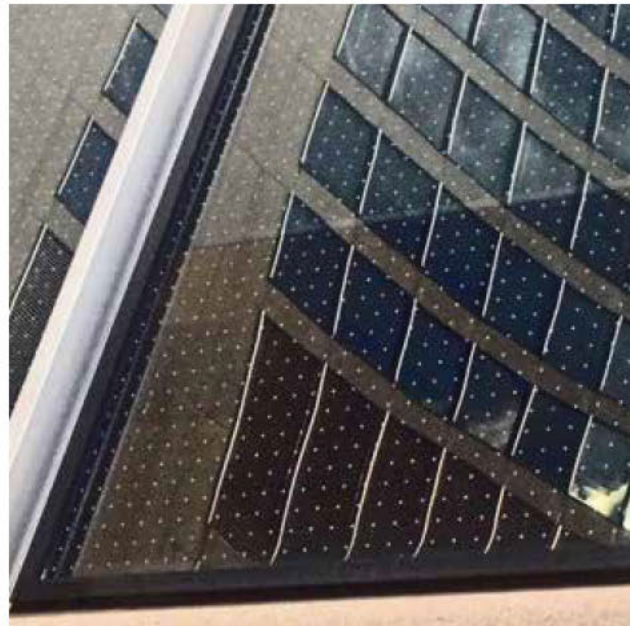
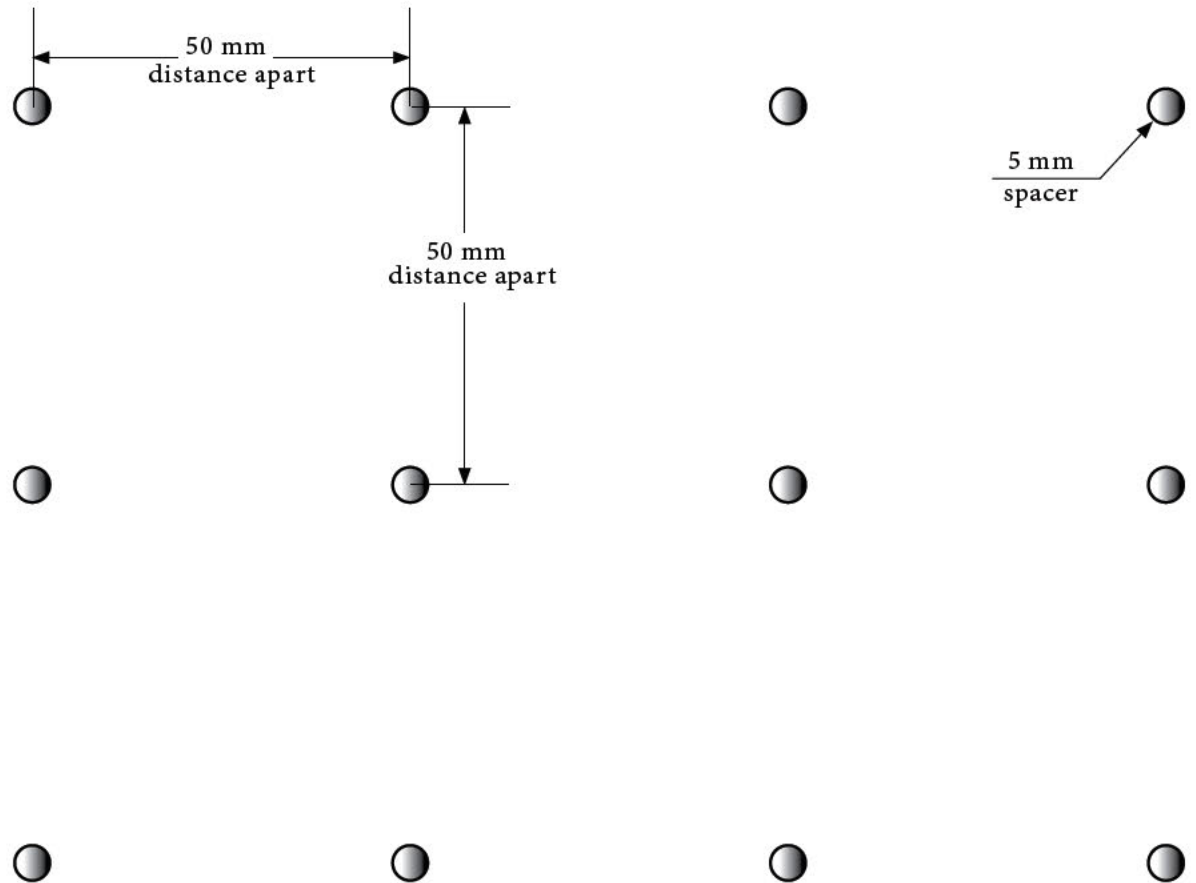


Photo: Monika Hoxha

Illustration: Monika Hoxha

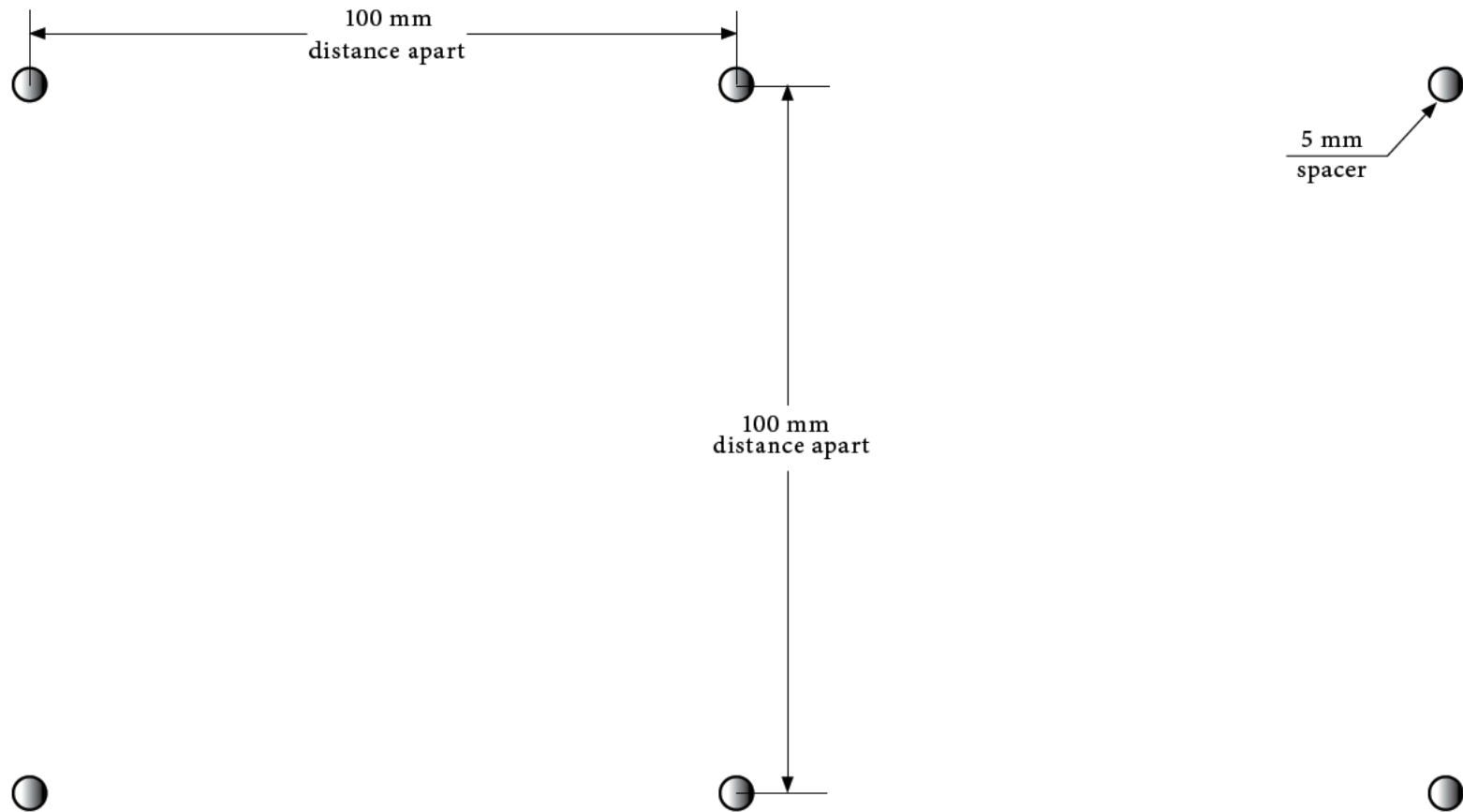
## Compliance Strategies (TGS Tier 1)

### Visual markers applied to glass with a maximum spacing of 100 mm x 100 mm

Visual markers consist of opaque contrasting points or patterns etched into or applied onto the exterior or interior surfaces of glass. Patterns applied closer to the first (exterior) surface, in combination with low reflectance glass, are most visible and effective. Areas that pose a high risk for bird collisions must be treated using visual markers including glass balcony railings, fly-through conditions, parallel glass and areas adjacent to rooftop vegetation.

Visual markers must be designed to meet the following criteria:

- minimum diameter of 5 mm
- maximum spacing of 100 mm x 100 mm



## Compliance Strategies (TGS Tier 1)

### EC 4.1 Bird friendly glazing

Use a combination of the following strategies to treat a minimum of 85 percent of all exterior glazing within the first 12 m of the building above grade (including balcony railings, clear glass corners and glazing surrounding interior courtyards and other glass).

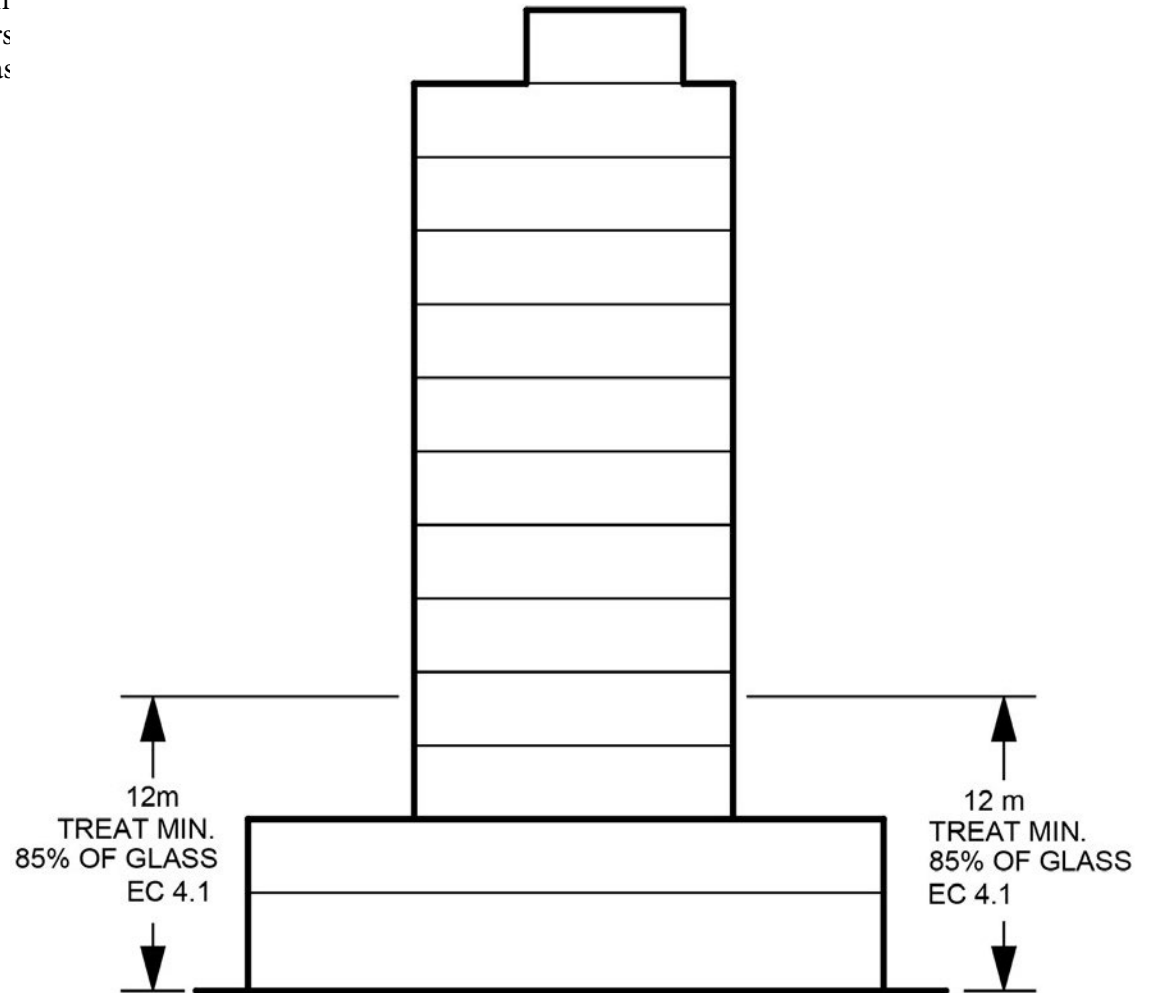
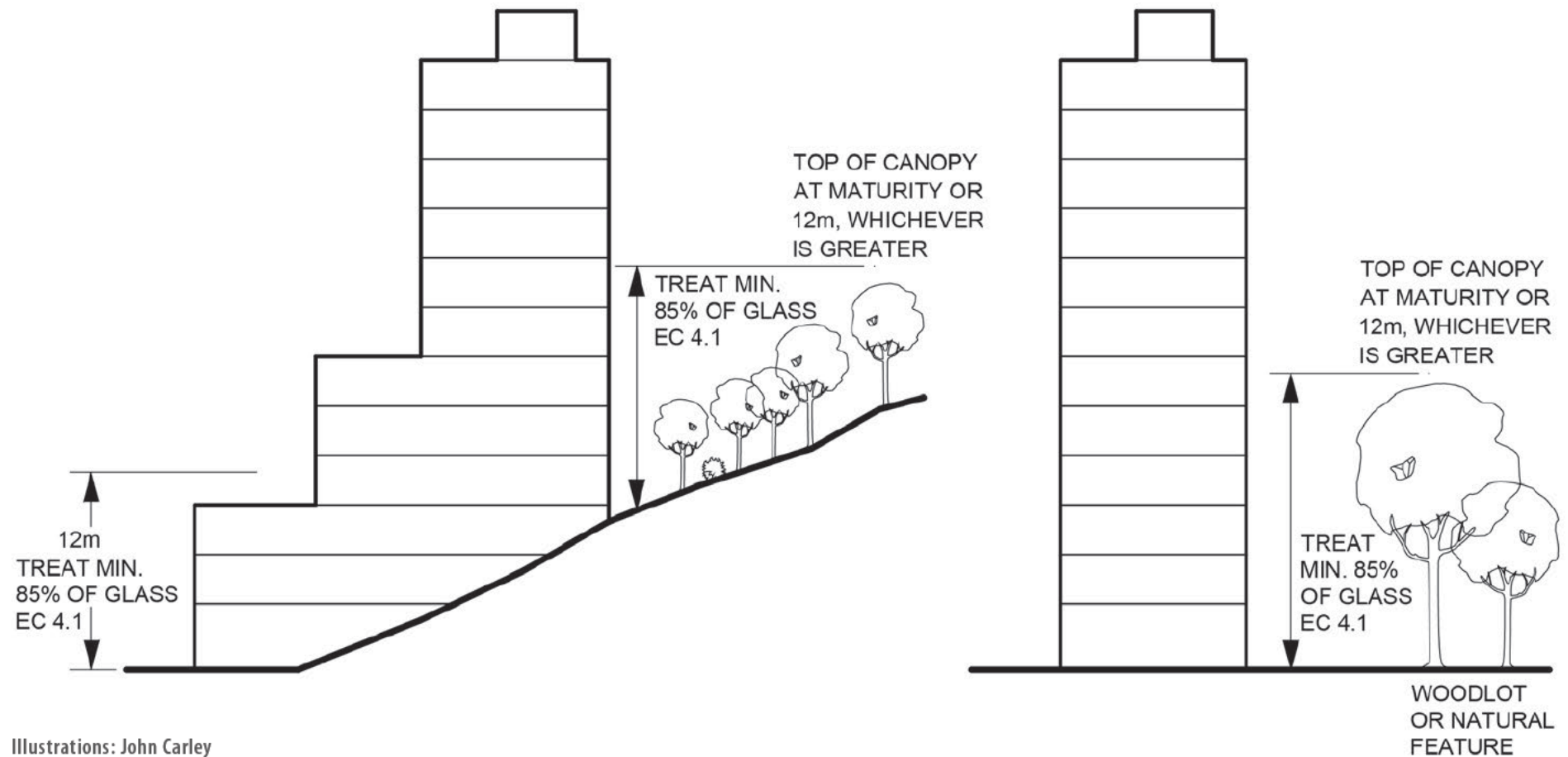


Illustration: John Carley

## Compliance Strategies (TGS Tier 1)

### Buildings Adjacent to Natural Features

Because natural features such as ravines attract greater concentrations of birds, developments that are adjacent to a natural area feature must have glass treated to the first 12 m of the building or to the height of the top of the surrounding tree canopy at maturity, whichever is greater.



Illustrations: John Carley

## Compliance Strategies (TGS Tier 1)

### Balcony railings

Treat all glass balcony railings within the first 12 m of the building above grade with visual markers provided with a spacing of no greater than 100 mm x 100 mm.

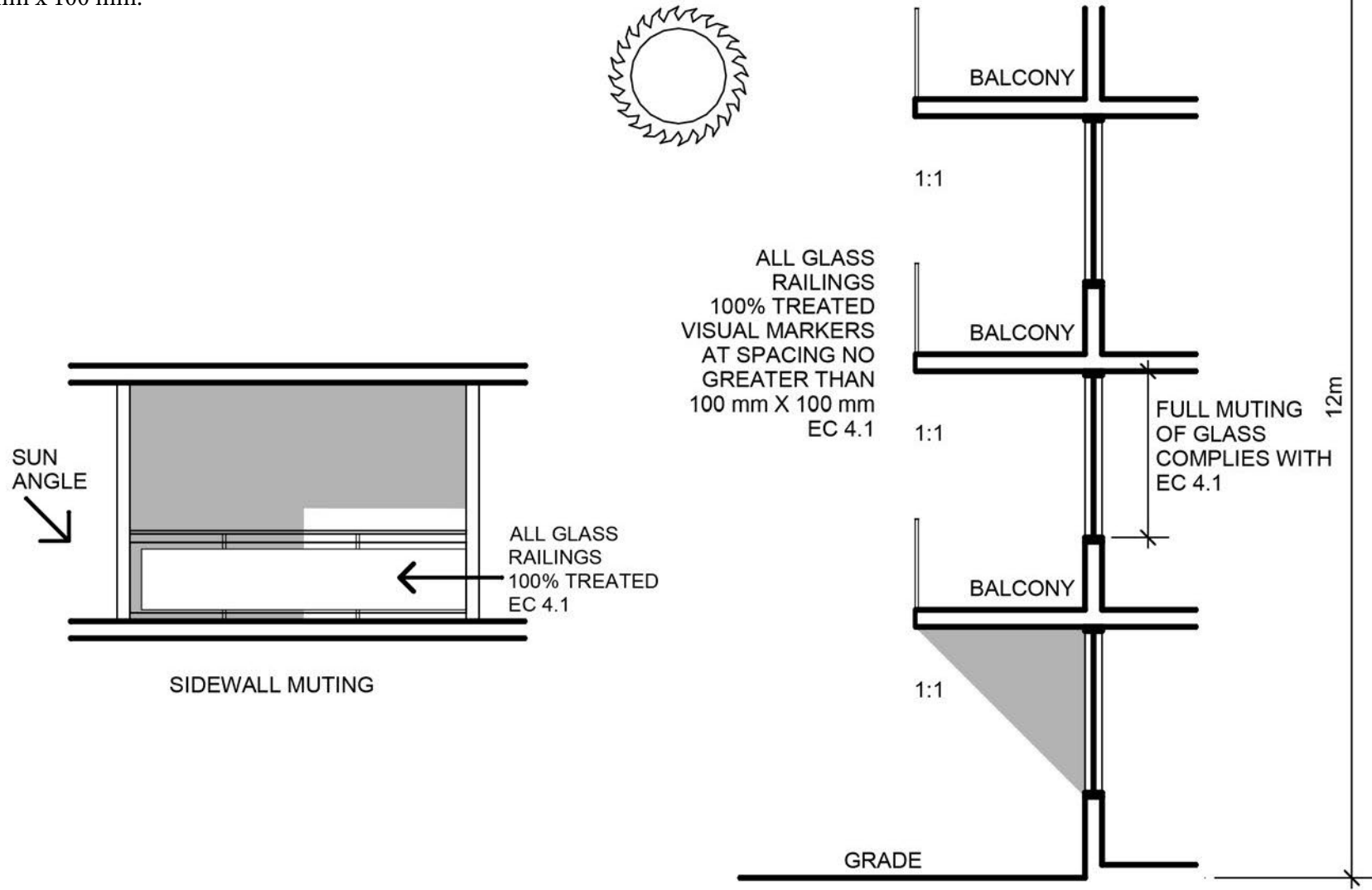


Illustration: John Carley

## Compliance Strategies (TGS Tier 1)

### Fly-through conditions

Glass corners: Within the first 12m of the building, treat all glazing located at building corners with visual markers at a spacing of no greater than 100 mm x 100 mm.

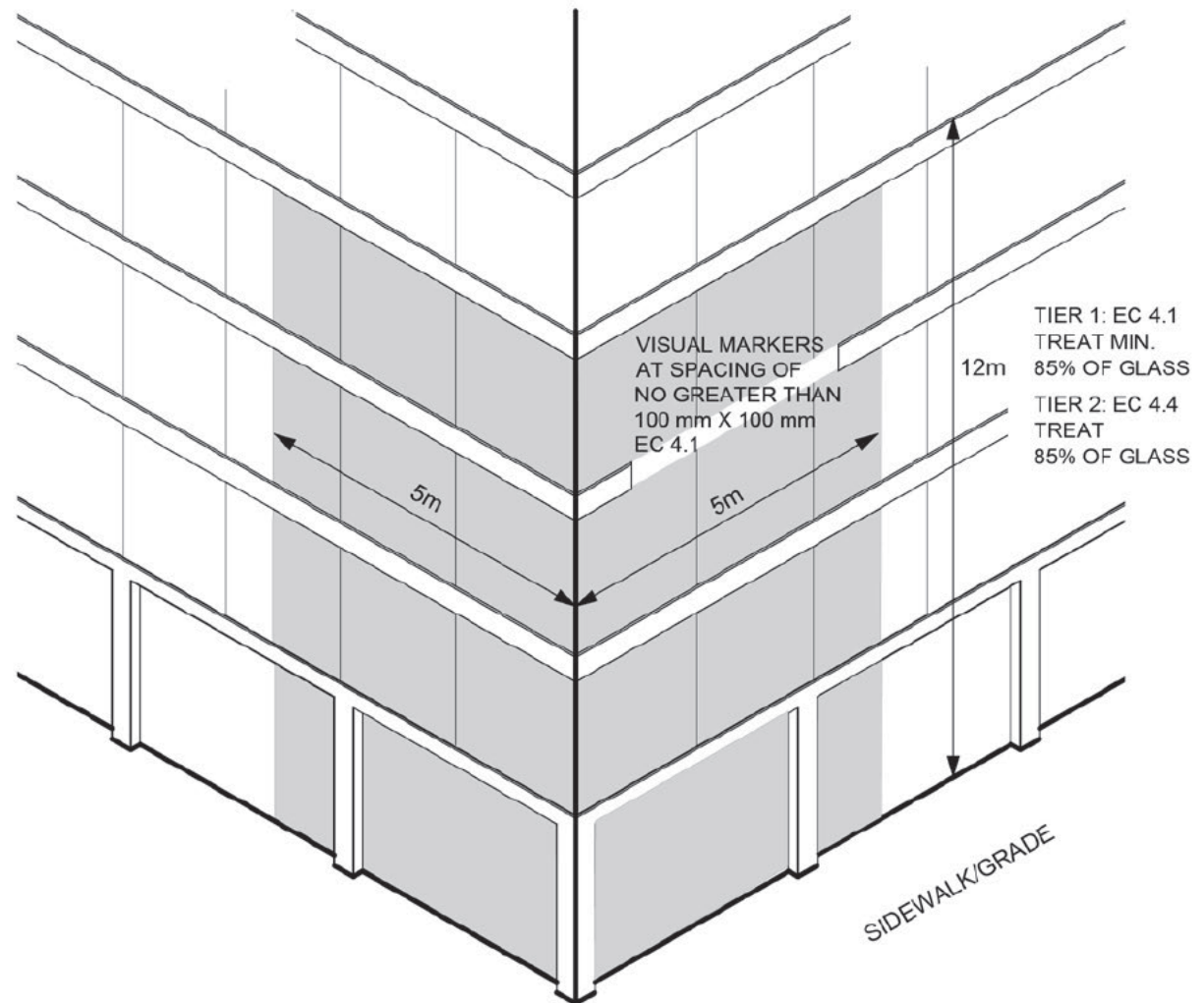


Illustration: John Carley

GLAZED CORNERS:  
TREAT ALL GLASS AT CORNERS

## Compliance Strategies (TGS Tier 1)

### Parallel glass

Treat parallel glass at all heights with visual markers at a spacing of no greater than 100 mm x 100 mm.

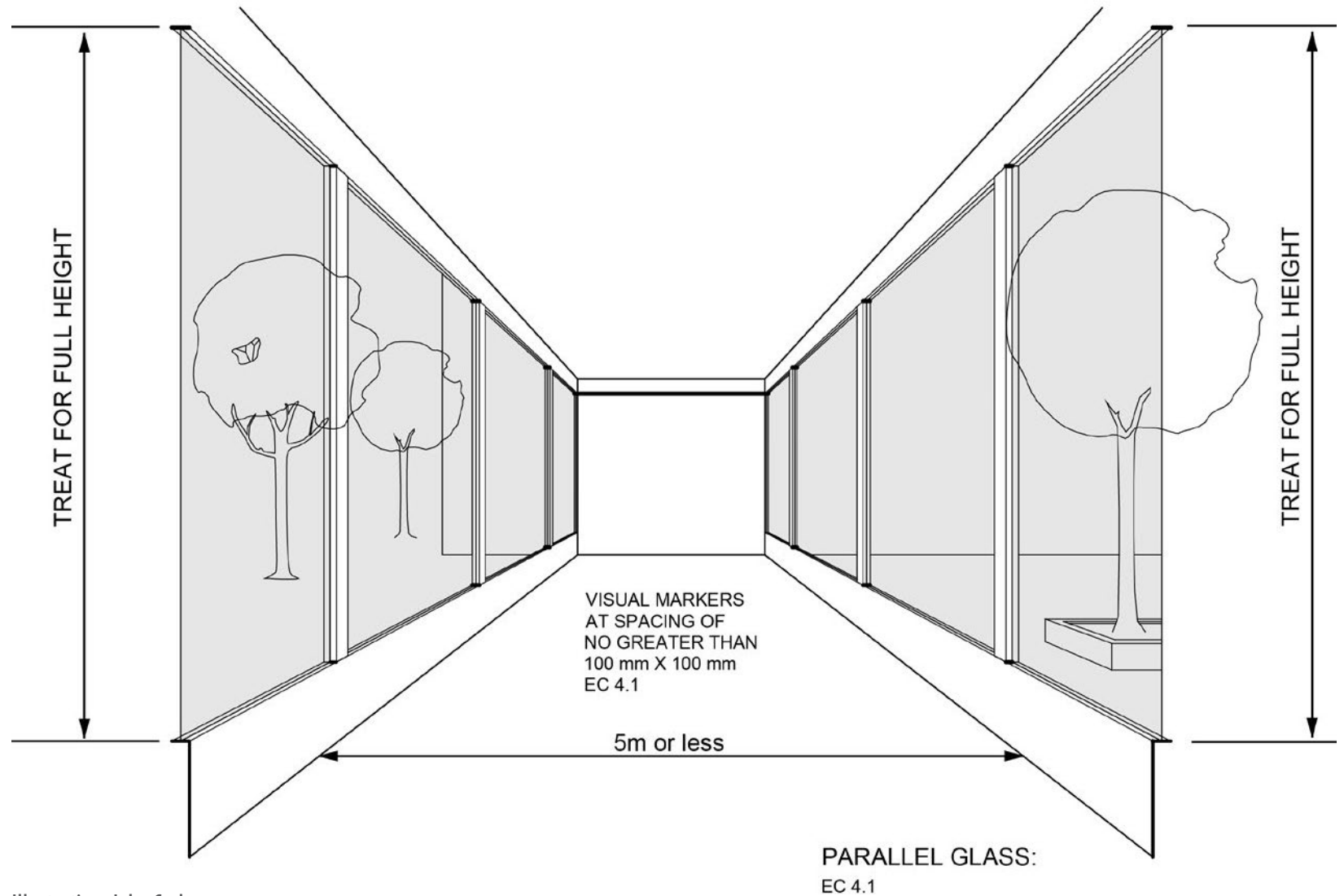


Illustration: John Carley



# Compliance Strategies (TGS Tier 1)

## EC 4.2 Rooftop vegetation

Treat the first 4 m of glazing above the feature and a buffer width of at least 2.5 m on either side of the feature using strategies from EC 4.1

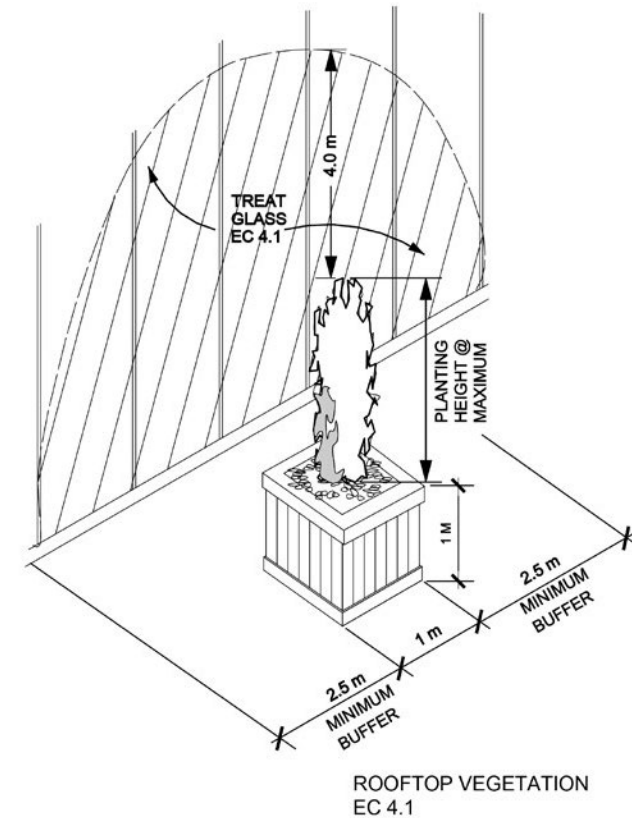
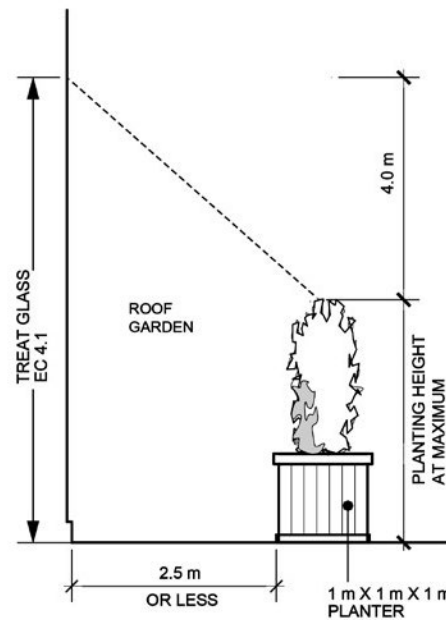
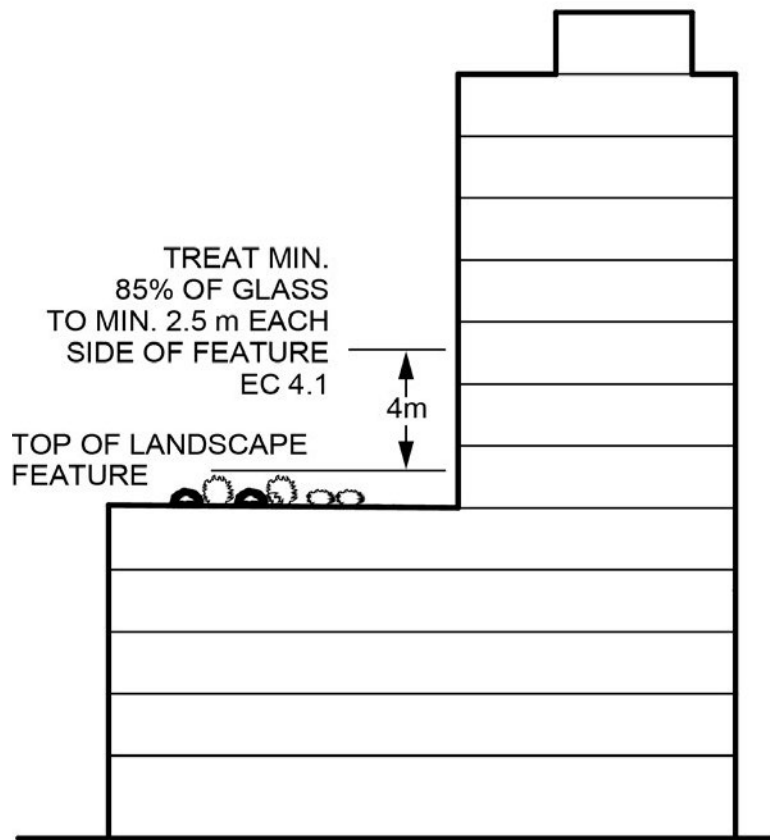


Illustration: John Carley

## Compliance Strategies (TGS Tier 1)

### Low reflectance, opaque materials

Low reflectance, opaque materials may include spandrel glass with one of the following:

- (i) Solid back-painted frit or silicone backing opaque coatings or;
- (ii) Reflective or low-e coatings that have an outside reflectance of 15% or less.

Spandrel glass with a reflective or low-e coating that has an outside reflectance of greater than 15% should be used in combination with other strategies such as visual markers.

Photo: FLAP Canada



## Compliance Strategies (TGS Tier 1)

### Building-integrated structures to mute reflections on glass surfaces

Building-integrated structures obscure glass from view, mute reflections during certain times of the day and provide visual cues for birds to avoid an area. These structures include: opaque awnings, sunshades, exterior screens, shutters, grilles and overhangs or balconies that provide shading below a projection. A 1:1 ratio of treatment below a projection can be assumed to mute reflections. Shade cast by the building or adjacent buildings does not obscure glass or provide any visual cues and cannot be included as a bird collision deterrence strategy.

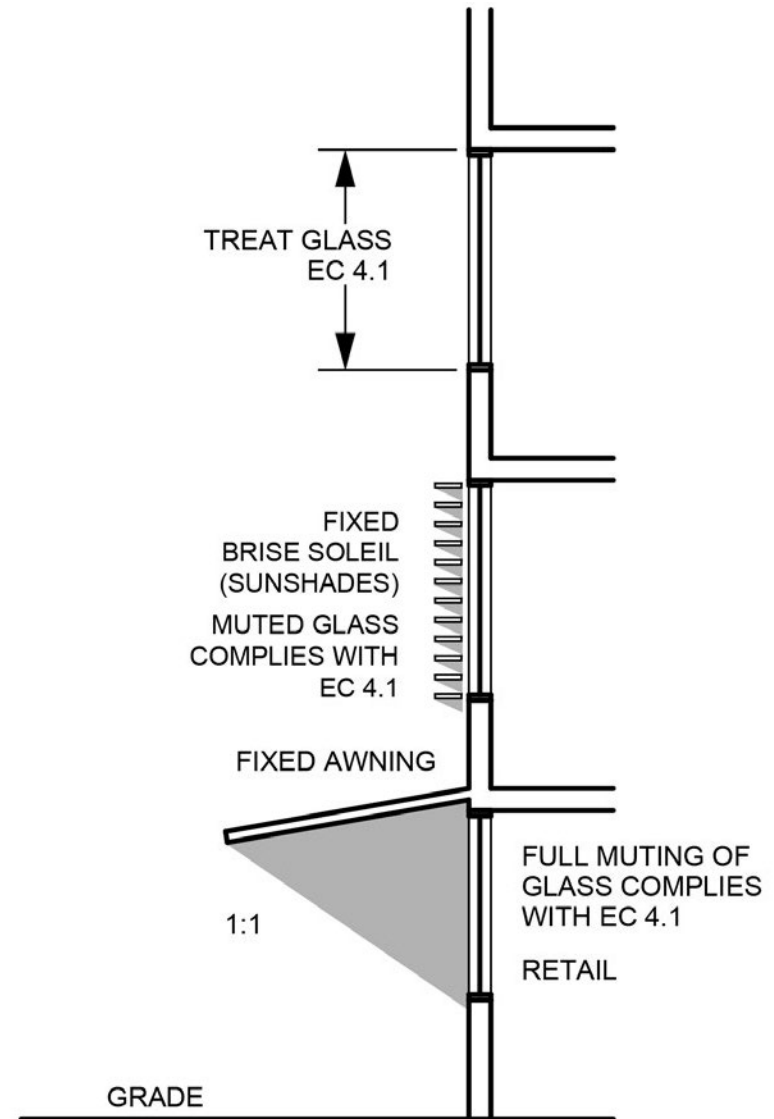


Illustration: John Carley



Photo: Linda Woods,  
Canadian Peregrine Foundation

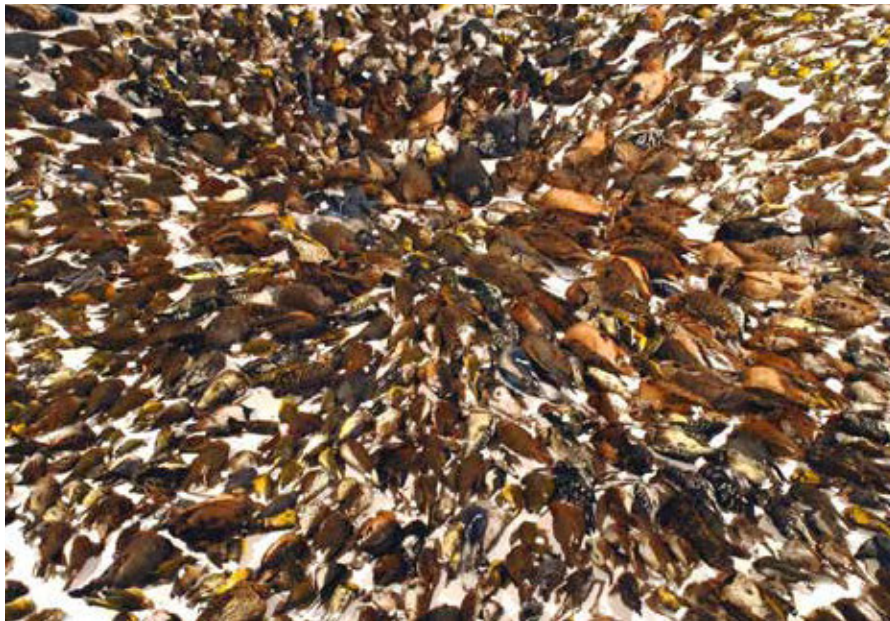
An aerial photograph of a city with several multi-story buildings. A semi-transparent dark blue rectangular box is overlaid on the right side of the image, containing the word "Appendix" in white text. The background shows a dense urban environment with various building heights and colors, including a prominent white building with many windows in the center.

# Appendix

## Magnitude of Collision Deaths

An alarming number of birds are killed every year due to window collisions: an estimated 25 million birds per year in Canada alone (Machtans, Wedeles and Bayne, 2013). Canadian data is still very limited in terms of recording bird mortality from building collisions. The first Canada-wide estimate was produced by Machtans et al. using data from houses, low-rise buildings, and tall buildings.

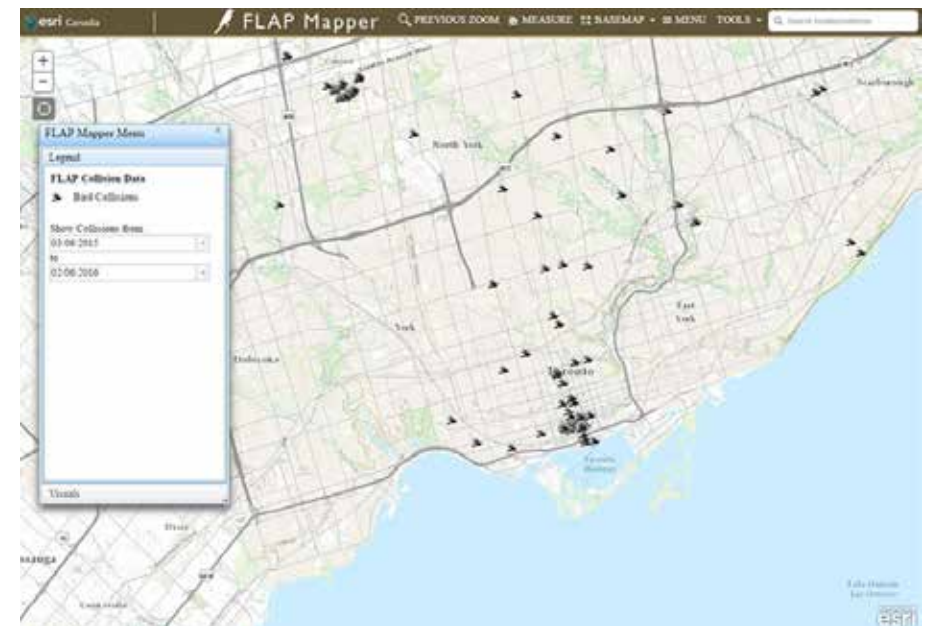
A benchmark study by Dr. D. Klem Jr. (1990) estimated that each building in the United States kills one to ten birds every year. He used 1986 United States Census data to then estimate a yearly range of 97.6-975.6 million birds killed. This number has inevitably risen given the continuing increase in new construction across North America.



Sample of collision victims

Photo: FLAP Canada

FLAP (Fatal Light Awareness Program) Canada, a bird conservation initiative working to safeguard migratory birds in the built environment through education, policy development, research, rescue and rehabilitation, has been documenting and collecting bird collision data in Toronto and area since 1993. The City of Toronto is a significant area of focus for bird-window collisions due to its location at the convergence of two migratory flyways and its abundance of low, mid and high-rise buildings abutting Lake Ontario (Cusa, Jackson and Mesure, 2015). This combination of factors results in a disproportionate number of birds being killed at buildings. Data collected by FLAP, however, is only based on a limited number of buildings where frequent collisions occur. FLAP encourages citizen participation in data collection through its on-line Mapper tool, found at FLAP website. This allows citizens to input information about bird collisions that they witness. The tool helps create more conclusive information about bird collisions in Canada and across the globe.



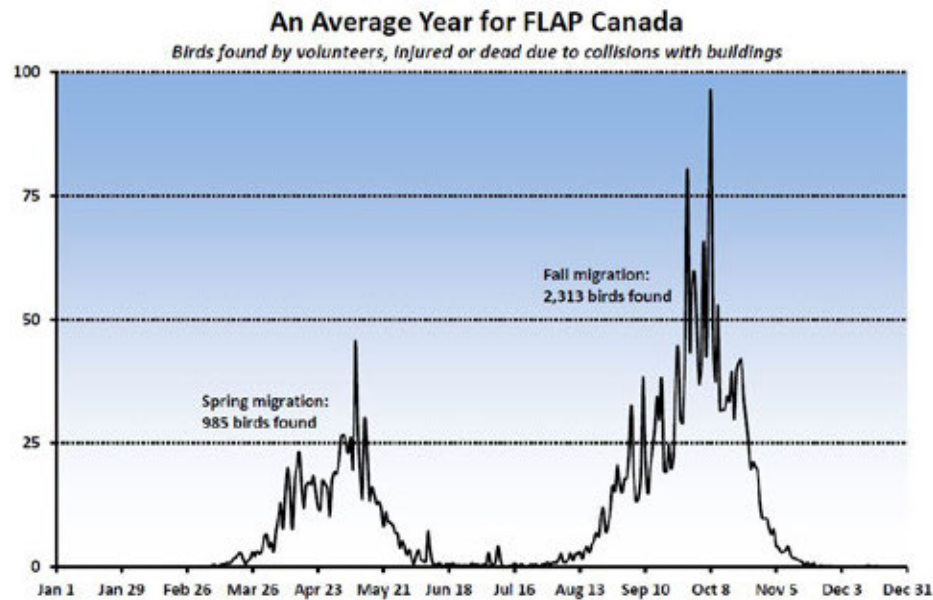
Bird Mapper (Global Bird Impact Recording Database Mapper) also known as FLAP Mapper

Image: FLAP Canada

## Patterns of Mortality

Due to the huge impact of buildings on avian mortality it is very difficult to track the full extent of bird deaths and accurately interpret this data.

Wedeles and Pickard (2015) undertook a study to examine factors which may impact data collection on bird mortality rates. The study examined three issues: the scavenging of birds before they can be collected, the efficiency of searchers, and building architecture which may intercept falling birds before they reach ground level. The study was conducted in downtown Toronto during the spring and fall migration seasons of 2014. Separate experiments were conducted to study scavenging rate and searcher efficiency. Using previously collected birds distributed among the survey site, it was found that searchers (FLAP volunteers) found only 33% of all specimens. It was also found, in a separate survey area, that 55% and 53% of birds were scavenged within 8 hours in the spring and fall, respectively. Finally, it was estimated that 50% of birds were intercepted by buildings so that only half of birds killed by collisions would be found by searchers at ground level. Wedeles and Pickard (2015) used these factors to estimate that for every 100 birds collected, 752 birds are killed. This has huge implications for calculations of bird mortality rates.



Birds for the study were provided by the Royal Ontario Museum's Ornithology Department. The department maintains a collection of birds found by FLAP Canada volunteers each year, which is catalogued and used for research as well as bird identification training and public awareness campaigns (FLAP, 2016).

Cusa, Jackson, and Mesure (2015) have used data collected in Toronto to further understand species-specific patterns of mortality. In one such study, conducted during the migratory seasons of 2009 and 2010 (April - May, August - October), FLAP volunteers collected data on bird-window collisions at three distinct commercial building sites. The study found that increased glass cover on buildings and increased natural habitat surrounding buildings had an impact on increased bird collisions. They also found that certain migratory species appeared to adapt better to urbanized areas than others. Different species were found to have higher collision rates at the most urbanized downtown site and at the two less-developed areas. The finding that predictable bird family clusters are more likely to collide with buildings at certain geographical regions suggests that future research should consider specific species.

In the study, bird species with the overall greatest number of collisions were the Golden-crowned Kinglet and the White-throated Sparrow. FLAP has published a list of the numbers of all bird species collected (dead or alive) from 1993 to 2014. The Golden-crowned Kinglet and White-throated Sparrow also top this list, along with the Ovenbird, Ruby-throated Hummingbird, Ruby-crowned kinglet, Dark-eyed Junco, and Brown Creeper. To date, twenty four of the species collected by FLAP are on the Ontario or federal Species at Risk lists (pers. com. Susan Kranjc, February 8, 2015).

Seasonal mortality  
patterns of FLAP collisions

Image: FLAP Canada

## Birds and Night Time Light Pollution

Artificial light has long posed a threat to migratory birds, and this threat has increased with rapid urbanization in North America. Migratory birds use a variety of cues for orientation including the sun, Earth's magnetic field, patterns of stars and the moon, and topography. Evidence suggests that visual cues are at least as important, if not more important than cues from Earth's magnetic field, and weather affecting visibility has been found to significantly impact the orientation of migratory birds (Evans Ogden, 1996). The impact of artificial light on nocturnally migrating birds has historically been noted through the impact of lighthouse beams, and is now seen much more substantially in urban areas.



In 1997, FLAP and the World Wildlife Fund Canada initiated the Bird Friendly Building (BFB) Program to address light pollution from buildings and reduce bird mortality. Building managers and tenants of buildings in Toronto's downtown core were educated on bird friendly practices, and buildings which committed to applying these practices were given the Bird Friendly designation. Sixteen buildings ranging from eight to 72 storeys were then monitored between 1997 and 2001 to explore the impacts of light emissions on bird mortality.

Evans Ogden (2002) determined that light emissions do have a significant impact on bird mortality. Also, building height was found to be a less significant factor. Weather was also considered, and found to have a significant impact. Cloud cover and rain in particular were important factors in predicting bird mortality.

Overall, Evans Ogden (2002) found that the BFB program did have a statistically significant impact on bird mortality at the buildings studied. Surveys conducted with building managers determined that tenant awareness programs were the most employed technique in enforcing light emission reduction. Computer-controlled lighting systems were also employed in many of the buildings.

Finally, similar to Cusa, Jackson and Mesure (2015), Evans Ogden (2002) suggested the need for closer examination of bird species-specific trends. The data collected suggested that certain species are at higher risk of building collision, and this should be incorporated into future studies and programs.

Birds attracted to nighttime light emissions at Yonge-Dundas Square.

Photo: FLAP Canada

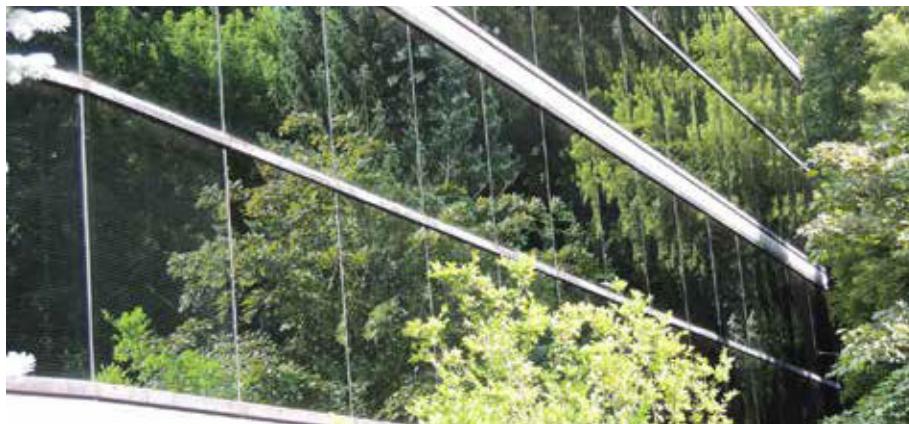
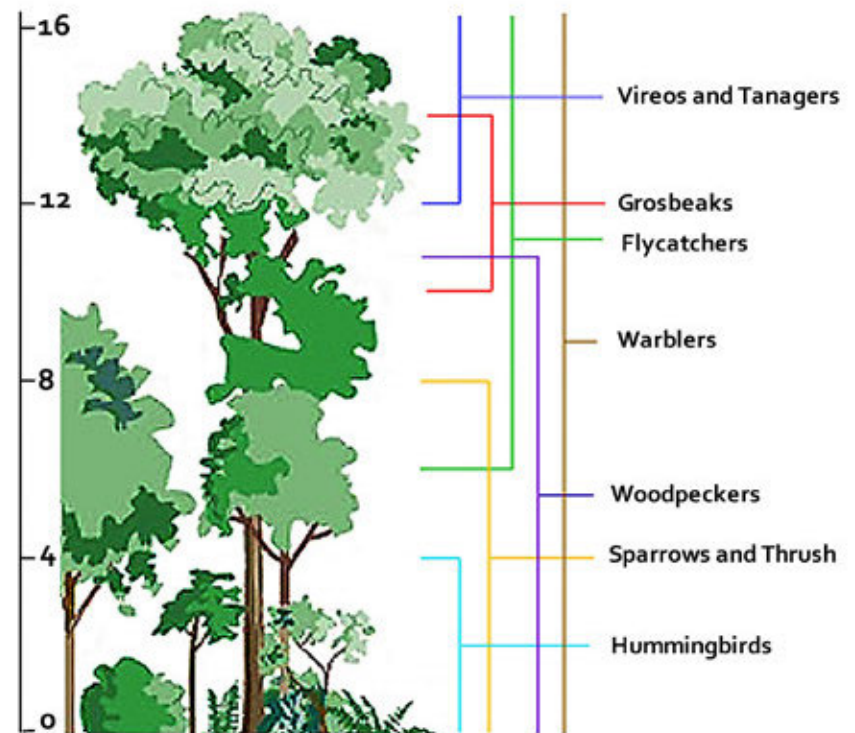


## Landscaping and Vegetation

Urban greenery and reflective windows can be a dangerous combination for birds. Cusa, Jackson and Mesure (2015) examined landscape within a 500m radius of study buildings and studied this in a wider geographical context. It was predicted that increased glass surface on a building, greater tree canopy cover, and open habitats in the landscape would all be positively correlated with window collisions. While canopy was not strongly correlated, open habitat and reflective glass surface were found to be significant contributors to collisions.

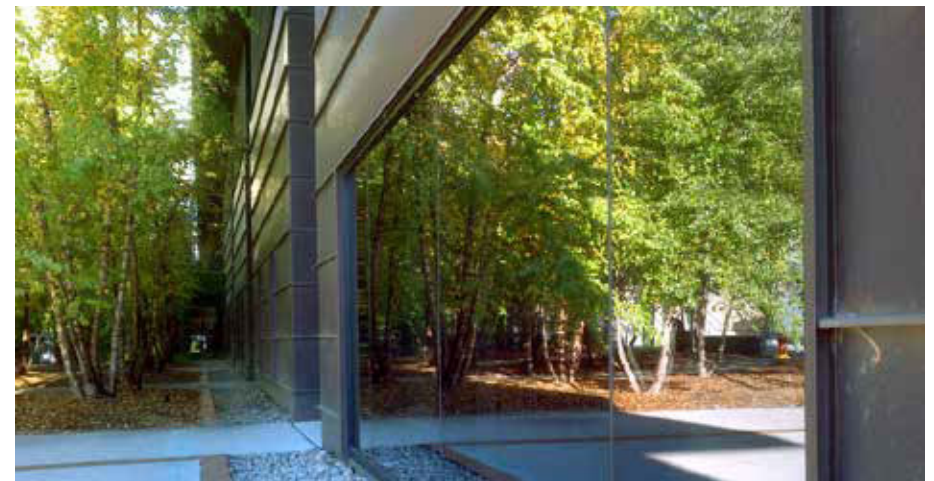
Overall, there was a notable increase in the effect of reflective glass when surrounded by vegetation. It was found that the bird species most likely to collide with windows in vegetated areas are those which are often found in forested habitats and are foliage gleaners (Cusa, Jackson and Mesure, 2015). This would suggest that birds are drawn to areas with higher vegetation, and supports the hypothesis that bird collisions rise with increased numbers of birds present in the area.

“Migrant traps” are areas with particularly high numbers of fatalities, characterized by certain conditions. Trees over five metres, high ground cover and large areas of glass create particularly deadly conditions. Klem et al. (2009) studied the vegetation directly adjacent to buildings in Manhattan, and found that a ten percent increase in tree height, and ten percent increase in the height of vegetation corresponded to a 30% and 13% increase in collisions in the fall migratory season.



Vegetation and reflective windows create a hazardous environment for birds.

Image and Photos: FLAP Canada



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Photo: Tim Hoeflich via flickr

Bird-friendly

Mitigation

Compliance

Best practices



Toronto Green Standard



PLANNING A GREAT CITY  
**TOGETHER**



@CityPlanTO

[www.toronto.ca/planning](http://www.toronto.ca/planning)

Dear Mayor Helps and City of Victoria Councillors

I am writing to share my concerns about the design of the proposed Telus Ocean building. The facades of reflective glass will pose a major threat to birds because of the high risk of collisions. Collisions with glass kill an estimated one billion birds per year in North America, and are one of the biggest causes of death of birds in Canada. Collisions are thought to be a major reason why North America has lost one third of all its birds in the last 50 years, and why many species are severely declining.

Reflective glass is one of the most dangerous design features to birds, because they see vegetation or sky reflected in the glass, and try to fly towards it, only to collide. Buildings featuring reflective glass that are monitored for bird strikes have been recorded killing more than 10,000 birds per year, showing that a single building can have a significant effect on bird numbers in the surrounding area. The proximity of this building to large areas of green space like Beacon Hill Park means there are many birds in the area who will be at risk of colliding with this building.

Many cities, such as [Toronto](#) and [New York City](#), require new buildings to be designed following guidelines that make buildings safe for birds. I hope that the city of Victoria will consider adopting guidelines similar to the Toronto Green Standard to help protect our wildlife. The architects of the Telus Ocean building must be familiar with these guidelines, as the Diamond Schmitt main offices are in Toronto and New York City, but have chosen not to follow them for this design. There are many ways buildings can be made bird-friendly: patterned or frosted glass prevents collisions while also being aesthetically pleasing (more information can be found in the attached best-practices guide for glass put out by the City of Toronto). Reducing the amount of glass in a design helps protect birds, while also making buildings more energy efficient, and still allows for plenty of natural light. When incorporated in the design process, making buildings bird-friendly can be cost-neutral.

Given the major emphasis on sustainability in Victoria, I hope bird-friendly glass is being considered for use in this project. The City of Victoria could ensure that future developments are bird-friendly by adopting bird-friendly design guidelines as so many other cities have done. The bird-friendly building movement is gaining momentum, as the federal government and organizations like UBC and UVic work to prevent collisions at their buildings. Legal precedent has been set in Ontario finding property owners responsible for the birds who collide with their buildings, most of which are protected under federal law. Birds are increasingly being recognized for the roles they play in our ecosystems, such as insect control, and the positive effect their presence has on people's mental health. I hope Victoria will require this project to make changes to protect birds, and raise the standards for sustainable development to include wildlife safety and protecting biodiversity.

Regards,

Willow English

Safe Wings

I find it hard to believe that the City of Victoria is planning to allow Telus to erect a building such as described in the Times Colonist of August 7th, 2020.

This building, as described, will not only be a monstrosity and incongruous in the heart of downtown Victoria but will also serve as a death trap for millions of native birds.

When I lived in Toronto, some years ago, I read about a group of volunteers who went downtown every morning to pick up the carcasses of dead birds lying at the foot of the glass-walled highrises; the birds are attracted to the reflected light at dusk and sunrise and crash into the wall, killing themselves. Do we want this in Victoria?

This is not New York nor Hong Kong; this is Victoria, a small city on a peninsula at the tip of an island; an idyllic spot on the beautiful west coast of Canada; we should be fighting to preserve this unique environment, not erecting showy skyscrapers; that is not what the tourists come to see.

WAKE UP, PLEASE, VICTORIA!

Val Boswell, Victoria, B.C.

I am stunned at the proposed Telus Building. Not only is the design unsuitable to Victoria ( I concede a matter of taste) but most importantly it is a death trap in the making for birds. I would have thought by now that everyone ,especially architects, would be aware of the fact that mirrored exteriors are an environmental hazard. Please put a stop to this potential disaster.

Thank you.

Sincerely

Eileen Thomson

316-4000 Douglas St.,

Victoria, B.C.,

V8X 5K5

Good Afternoon,

After the number of excellent designs that were turned down at the Northern Junk site - citing lack of maintaining the heritage - some of which we thought were beautiful and keeping in mind the heritage aspects. We then see a proposed building across the street from Fairmont Empress and the Crystal Gardens which is eleven stories and solid glass, as far from a heritage building that could be designed.

Do not destroy the heart of Victoria.

Dale & Lisa Klimek



**From:** Steven Tuck [REDACTED]  
**Sent:** August 19, 2020 3:57 PM  
**To:** Miko Betanzo <[mbetano@victoria.ca](mailto:mbetano@victoria.ca)>  
**Subject:** 749/767 Douglas (Telus Ocean)

They need to redesign that building in accordance with existing regulations. I oppose granting any variance or rezoning.

Steven H. Tuck  
1403-788 Humboldt Street  
Victoria, BC V8W 4A2

Sent from [Mail](#) for Windows 10

**From:** [Sarah Truelson](#)  
**To:** [permits@victoria.ca](mailto:permits@victoria.ca); [Development Services email inquiries](#)  
**Subject:** Telus Ocean Development Feedback re: height restriction  
**Date:** August 20, 2020 5:41:58 PM

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This letter is to request that the City of Victoria and Telus/Aryze adhere to the current building height restriction of 45 metres for the new Telus Ocean development. The proposed 11 storey height is misleading, as the heights of individual floors are substantially higher than those in surrounding buildings. For an 11 storey building, 45 metres is entirely sufficient; as a comparison, the 19 storey Hilton Double Tree Hotel is approximately 58 metres in height.

A new building in a neighbourhood ideally complements the surrounding structures. Rather than adding value to the neighbourhood, the request to build Telus Ocean to 53 or 54 metres devalues the neighbourhood by obstructing views from several commercial and residential properties (Marriott, Double Tree, Aria, Astoria, The Falls).

Telus Ocean would have unobstructed views of the Empress Hotel and Victoria Legislature at a height of 45 metres, and upper floors would have Inner Harbour views (overlooking the Empress, which is approximately 35 metres in height). The height restriction would still allow an 11 storey design, and therefore have minimal impact on commercial space/income potential for the Telus building.

In comparison to commercial tenants in the Telus Ocean building, the loss of view would be more personally impactful to homeowners who have invested in the neighbourhood, and financially impactful to hotel owners who rely on views to charge premiums for certain suites.

I appreciate your consideration of this matter.

Sincerely,

Dr. Sarah Truelson  
Homeowner in Humbolt Valley

Dear Mayor Helps and Council,

We are residents of The Belvedere, a condominium located at the corner of Humboldt and Blanshard Streets, and we have concerns about the Telus Ocean proposal.

If diligent and discerning readers have sufficient patience to wade through the proposal's hyperbolic rhetoric, they are most likely left with only a handful of salient points. These include:

- The City of Victoria clearly needs and wants development of the under-utilized site at the south-east corner of Humboldt and Douglas Streets.
- There are far worse possibilities for the site than the Telus Ocean proposal. A casino is merely one example.
- Based on the sketchy details available, the proposed building may or may not be an "architectural icon," but it would likely make a handsome addition to the neighbourhood nonetheless.
- Telus Ocean appears to be a socially, economically and environmentally worthy multi-million dollar proposal which is critically flawed by an inadequate two-bit vehicle access "plan."
- According to a Telus Ocean representative at a recent Humboldt Valley Committee meeting, "most" traffic headed to Telus Ocean would approach from the north and would turn onto Fairfield, turn again onto Penwill (aka Penwell) St. and proceed south to cross Humboldt into the development's underground parking facility. This is wishful thinking. Blanshard Street commuters would surely simplify things by turning onto Humboldt, heading west a block and turning left into the parking entrance. Why bother with turns onto Fairfield? Why use Penwill which, size-wise, is more lane than street and includes a stop sign? And what about traffic coming from the south or east? And, finally, what routes will vehicles take when departing Telus Ocean?
- Developers minimize the traffic coming and going to Telus Ocean, while at the same time touting the fact that the parking facility will be open all day, seven days a week for commuters working in the building as well as clients/customers and the general public.
- Developers ignore the fact that the building's loading docks sit adjacent to the parking entrance thereby creating a busy and uneasy mix of commuters and delivery trucks servicing various building tenants, including, but not limited to, Telus.
- If Humboldt Street indeed becomes the preferred route to and from Telus Ocean for cars and trucks, they will join significant existing traffic flows to and from the neighbourhood's three large condominium buildings, assorted small businesses, including, ominously, a day care centre, along with the Marriott and Doubletree Hotels. Garbage and recycling removals generate significant additional traffic pressure as large and small bins are retrieved six days a week from one or more Humboldt buildings and deposited along the street for eventual dumping into enormous garbage trucks.
- Critically, Humboldt Street has just been converted into a major bike way. Bicyclists now enjoy most of the roadway with separate lanes going west and east. Vehicles, meanwhile, share a single lane. When oncoming vehicles meet, one is expected to give way to the other by pulling to the right into a bike lane and doing so without running over any cyclists. This recent and radical change may or may not be a wise one, but exists, nonetheless, unless and until unexpected consequences demand a re-think. Into this experimental traffic configuration, it seems the City is about to inject, intended or not, a sizeable new cohort of large and small vehicles generated by Telus Ocean. Bad idea: conflicting purposes.

Assuming that Telus Ocean is approved (a likely result), City Council needs first to demand that Telus Ocean developers apply the same creativity invested in the development's architecture into their design for a realistic vehicle access plan which would prevent Humboldt from descending into a chaotic traffic hell, both inconvenient and dangerous for bikes, cars, taxis and trucks.

A simple solution would be to provide vehicle access off Douglas Street. If there is a bylaw preventing such a solution, the principals need to think out of the box or, in Telus Ocean jargon, provide a “whole systems approach” to solve a building/community problem under a “single deep green umbrella.”

Finally, Telus Ocean’s promotional material states that its developers are committed to being “good neighbours,” fully transparent in providing and sharing information. Perhaps more rhetoric? We emailed Telus Ocean on Aug. 10 asking for a copy of its traffic study. Except for an auto-response confirming receipt of our request, we have not heard a peep from Telus Ocean in the three weeks since.

Sincerely,  
Ken and Leona Mennell  
306 — 788 Humboldt St.,  
Victoria, B.C. V8W 4A2

**From:** [Ken Mennell](#)  
**To:** [Victoria Mayor and Council](#)  
**Cc:** [hello@telusocan.com](mailto:hello@telusocan.com); [REDACTED]; [Community Planning email inquiries](#)  
**Subject:** Telus Ocean Proposal  
**Date:** September 2, 2020 12:43:36 PM

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Dear Mayor Helps and Council,

We are residents of The Belvedere, a condominium located at the corner of Humboldt and Blanshard Streets, and we have concerns about the Telus Ocean proposal.

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Sincerely,  
Ken and Leona Mennell  
306 — 788 Humboldt St.,  
Victoria, B.C. V8W 4A2

Can you please review the issues of height, density and compromise to the already present buildings and people represented in the Humboldt Valley.

This is just too big and affects so much of what already is established with success.

Sincerely

Charlotte and Robert Cronin  
Owners and residents of the Aria, South Tower

To Mayor and Council,

Telus Ocean has a good design that will complement well this specific location of downtown by finally getting rid of this double rental car parking lot that doesn't fit at all this part of downtown.

The proposed plaza at the south end of the building (next to Crystal Garden) will look much better than the current unfinished empty space giving it a real community feeling.

The building will have a positive impact in Victoria downtown landscape and hopefully it will become a landmark for generations to come. Not to mention the fact that Telus is bringing more new jobs for Victoria community.

I would also like to congratulate City of Victoria for their decision to finally use this piece of land and to complete the landscape of new buildings in Humboldt Valley with a well thought development.

Please give this project a high priority in order to see this landmark completed as soon as possible.

Sincerely,  
Dan



I have several concerns. I believe The Empress, our jewel, will be overpowered by the height of the new Telus building. The Empress should shine on our skyline, and not be in competition with the height and signage of Telus Ocean. Also, Humboldt must be closed to traffic, in front of the Marriott Hotel to car traffic. All Ocean traffic should use Penwell Bikes only on Humboldt. When one considers morning and evening rush hours, with car traffic and bikes going both ways on a single lane for cars, an accident is inevitable. There are three apartment buildings between Blanchard and Douglas as well as the Marriott... what a mess at rush hour! Bikes only, please, going both ways at rush hour, giving the hotel and three apartments a fighting chance to come and go at rush hour. Bear in mind that one-way lane traffic still has to deal with bikes in both directions! Seriously, this is madness to consider anything less! Thank you, Melanie Robb

Hi all,

As a resident of Victoria, I wish to voice my concern for the size of the proposed TELUS Ocean building.

It's a beautiful corner which deserves a beautiful building, and the current design is certainly striking.

Nevertheless, it is simply too big.

It exceeds current guidelines for this area/corner, and I figure that it can do its job by fitting into those guidelines, eg without having to add additional size to an already generous allotment.

I hope council will consider allowing TELUS to build within current guidelines only.

Warm Regards,

Ron Proulx

31 Oswego St., Victoria, BC V8V 2A7

To the City of Victoria Mayor and Council,

We are residents of the Humboldt Valley, living in the Belvedere since 2012. Over the past eight years we have come to understand the neighbourhood including: its residential nature; how it acts as a border between downtown Victoria and the other residential neighbourhoods of both James Bay and Cook St Village; and, how it contributes important residential population density for a vibrant downtown.

We believe that these important residentially-related characteristics of the Humboldt Valley neighbourhood must be considered with respect to the Telus Ocean Development proposal.

Specifically the **size of the building is too big:**

1. **It will overwhelm the human scale of developments that have currently been achieved.** For example, the building proportions and heights that increase as one moves east on Humboldt Street and away from the Inner Harbour are currently proportionate to both the Fairmont Empress Hotel and the Provincial Legislature - the most significant buildings in the area. The proposed Telus Building will detract from both of these iconic buildings and will undermine the critical balance that has been achieved by City Planners and elected officials up until this time.

2. **Will negatively impact the quality of life:** In being built on Douglas and Humboldt streets, the exact border between downtown businesses and a significant urban residential neighbourhood, the Telus Ocean Development proposal needs to address issues and demonstrate how they will **eliminate unnecessary nighttime lighting** such as a lit-up sign, television advertising screens, and overall building lights as well the **minimize the extent to which the building shadow will darken Humboldt Street during the day and evening.**

In order to address these concerns we urge TELUS Ocean to:

- Reduce the height to the 45m allowed in the current zoning, decreasing the proposed density in the process. That would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.
- Give more priority to the public south plaza by cutting back the second "prow" that extends over that plaza. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, that would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls.
- Consider any other actions that can be implemented that demonstrate consideration of the residential nature of the neighbourhood into which they hope to implement the Development.

Thank-you for the opportunity to provide input into this development process. Please contact me if you have any questions or require clarification,

Sarah and Peter Cunningham

Unit #806, Belvedere



Dear Mayor and Council,

I have read Andy Watchtel's response to Telus Ocean proposal and I fully support its content. As proposed, the Telus Ocean is too large and would have a negative impact on its surroundings. I am in favour of proceeding with a scaled back proposal as per Andy Wachtel's conclusions as shown below:

"TELUS Ocean is too big. It overwhelms the site, the nearby historic buildings, and the neighbourhood. But TELUS Ocean can achieve many of its goals to become a downtown landmark even at a smaller scale. To this end, we urge TELUS Ocean to:

- Reduce the height to the 45m allowed in the current zoning, decreasing the proposed density in the process. That would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.
- Give more priority to the public south plaza by cutting back the second "prow" that extends over that plaza. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, that would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls."

Regards,

Tom Kovacs

Dear Mayor and Council

I am writing to ask that you do not approve of the present plan for the Telus Ocean Development. One of the major responsibilities of the mayor and council is to protect Victoria and ensure that it remains the outstanding city with historic features that make us unique.

The proposal by Telus for the Telus Ocean building on the corner of Douglas and Humboldt will negatively impact the downtown historic area that it is located in. This area has the landmark Empress Hotel and the historic Crystal Gardens, two of Victoria's remarkable historic buildings. This area has been zoned to protect those buildings as well as the entire area in which this land is located. While a development on this land is inevitable, it is the responsibility of the mayor and the council to ensure that this development is within the current zoning as this was established to protect the integrity of the area.

The TELUS Ocean is too big. It overwhelms the site, the nearby historic buildings, and the neighbourhood. TELUS Ocean can achieve many of its goals to become a downtown landmark even at a smaller scale.

I urge TELUS Ocean to:

- Reduce the height to the 43m allowed in the current zoning, decreasing the proposed density in the process. That would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.
- Give more priority to the public south plaza by cutting back the second "prow" that extends over that plaza. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, that would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls.

The mayor and council need to follow the plan that was established for this area and require Telus to stay within the limits that are in place for a reason. Do not allow this over development to negatively impact an area of the city that is irreplaceable.

Sincerely  
Diane Chimich  
788 Humboldt St.

Hi There,

I have recently reviewed some information with regards to the Telus Ocean building and although I can appreciate the intent of the building I am concerned about its size and setback. I currently own a unit at the Aria and my unit directly faces this development. I am requesting the heights and setbacks be further reviewed since this will greatly reduce if not completely eliminate, the amount of light that enters my unit.

Regards,

Dwight

Dear Mayor and Council,

I should like to add my support to the eminently reasonable report written by Andy Wachtel on behalf of the Humboldt Valley Committee. The report is particularly compelling because it recognizes the potential contribution of the building to the downtown, despite calling attention to the distortions in the proposal and the negative impact of its attempt to go beyond zoning regulations.

I can do no better than quote the final words of the report:

**TELUS Ocean is too big. It overwhelms the site, the nearby historic buildings, and the neighbourhood. But TELUS Ocean can achieve many of its goals to become a downtown landmark even at a smaller scale. To this end, we urge TELUS Ocean to:**

- **Reduce the height to the 45m allowed in the current zoning, decreasing the proposed density in the process. That would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.**
- **Give more priority to the public south plaza by cutting back the second “prow” that extends over that plaza. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, that would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls.**

I urge Council to require Telus to amend its proposal accordingly.

Yours truly,

Edward Berry





Humboldt Valley Committee

## INFORMATION BULLETIN

### The Elephant in the Room:

### Questions about the TELUS Ocean Development Application

Researched and written by Andy Wachtel

**Summary:** This review finds that the TELUS Ocean proposal, in its ambition to build a landmark office tower at the south end of the downtown, misconstrues or distorts existing rules and guidance on building height, density, setbacks and overall massing. If neighbours built or purchased property in the expectation that the Official Community Plan and its more elaborated Downtown Core Area Plan offered them some assurance that they could foresee the potential impact of further building, this proposal comes as a bad surprise. The proposal needs to be reworked to better respect the context in this historic district.

#### Introduction

The TELUS Ocean Application Brief is more descriptive and less technically detailed than most development applications – in part, because it is also being used as a public engagement tool. That means that it, quite naturally, puts the project in the best light and does not include all the information a reader might need to corroborate claims and statements. This analysis aims to highlight aspects of the proposal that require scrutiny from stakeholders, especially residents in the Humboldt Valley who will be directly affected by the building. The application asks for a significantly larger building than might be expected on this site. We will test the rationale offered for that bonus size to see if it is supported by official plans and guidelines.

#### Context

TELUS Ocean is an ambitious project to build a signature regional headquarters building.

*TELUS Ocean is envisioned as an iconic architectural landmark—a centre of activity, creativity and innovation in the heart of Victoria’s Downtown and Inner Harbour.*  
(TOAB, p17)

As a building going into the last remaining unbuilt lot in its vicinity, TELUS Ocean faces the central challenge of fitting in. It is in the interplay of these two goals – creating a landmark while being properly sensitive to context – that key development challenges arise.

The Downtown Core Area Plan (DCAP), the official Victoria development guide for the Downtown, takes this up under Vision:

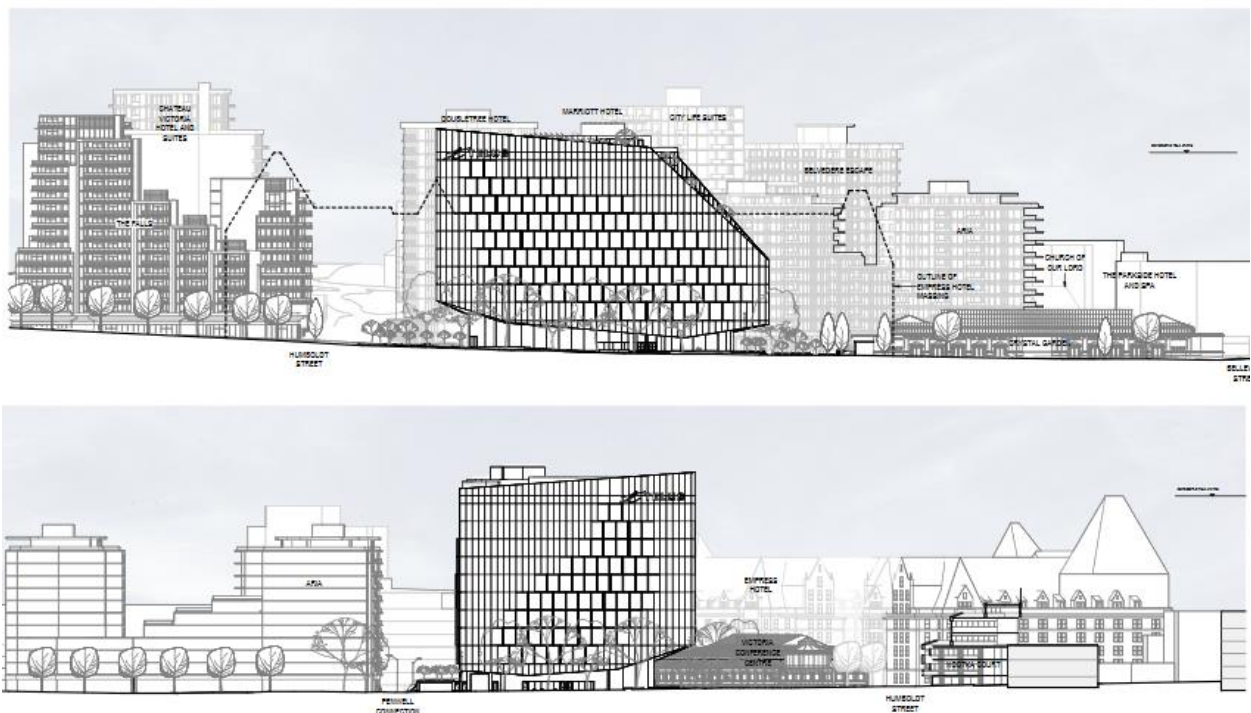
4.3. Supporting context-sensitive developments that complement the existing Downtown Core Area through siting, orientation, massing, height, setbacks, materials and landscaping. (DCAP, p.11)

TELUS Ocean makes this promise in its design principles:

*TELUS Ocean will be defined by a celebrated, innovative and contemporary building design that complements the surrounding community and nearby landmarks like the Empress Hotel and Crystal Garden. (TOAB, p20)*

We need to judge that in terms of the proposal presented. And, if a picture is worth the proverbial 1000 words, here is what is being proposed:

Fig. 1



Picture along Douglas of **11 storey TELUS Ocean (53+M)** next to **18 storey Falls condominium**.

Picture along Humboldt of **11 storey TELUS Ocean (53+M)** next to **12 storey ARIA condo (37M)**.

(from TOAP, pA304)

### How does TELUS Ocean justify this scale as appropriate in the context?

The TELUS Ocean application refers to the DCAP to provide a policy context and confidently interprets that policy to support its plan. In three paragraphs, TELUS Ocean moves from a current zoning of up to 43m in height with a Floor Space Ratio (FSR) or density of 3.0:1 to a

rationale for a much larger building through rezoning. Let us examine how TELUS Ocean does this.

### **TELUS Ocean claim about number of storeys permitted**

TELUS Ocean suggests that they have license to build up to 15 storeys and are showing contextual restraint by only proposing 11. (TOAB, p106)

*The TELUS Ocean site is located within the Core Inner Harbour / Legislative Urban Place Designation, which anticipates buildings up to 15 storeys, with densities up to 4:1 considered in strategic locations. Commercial and office uses are encouraged in this district, and local planning has strategically targeted increased height and density along Douglas and Yates Streets, in addition to the general strengthening of the Core Business area by increasing office capacity. (TOAB, p27)*

**Response:** The TELUS Ocean site is currently zoned (CA-4) for buildings of up to 43m in height and permits commercial, office, and residential uses. Map 32 in the DCAP (which the TELUS Ocean application reproduces on page 29) has an interpretive table next to it which the TELUS Ocean application leaves out. This table shows that buildings of 45m can have up to 15 storeys, if they are residential – and up to 11 storeys, if they are commercial. That is, residential storeys are considered to average 3.0m; while commercial stories average 4.1m. The TELUS Ocean plan has an average office floor height of 4.25m and, with a higher first floor and top amenity floors, an average storey height of 4.8m overall. This is what pushes the proposed height of their 11 storey building to over 53m, about the height of an 18 storey residential tower.

### **TELUS Ocean claim about permitted density**

The existing CA-4 zoning has a maximum density of 3.0:1. The OCP allows for increased density up to 4.0:1 in strategic locations. (TOAB, p27, referencing OCP, p42). TELUS Ocean doesn't belabour this point, however, because they want much higher densities than that, arguing that the current zoning "does not contemplate the advanced building design features proposed by the TELUS Ocean development vision". (TOAB, p106)

**Response:** TELUS Ocean could make an argument for this being a strategic location and seek a variance to build up to 4.0:1 but that isn't the goal. Why the particular "advanced building design features" merit increased density is not made clear.

### **TELUS Ocean claim about greater height and higher density**

*The TELUS Ocean is just adjacent to the area where densities of 6.0:1 are permitted. The TELUS Ocean should be allowed to "support the area" with a similar density of 5.6:1. (TOAB, p27 & 106)*

**Response:** The DCAP indeed allows for increased height and density along the Douglas / Blanshard Street corridor, but both height and density ramp up north of Humboldt and east of

Douglas, and no transitional zone is implied. The TELUS Ocean may argue they are close enough to this area to take on its zoning but there is nothing in the OCP or DCAP that supports this, and as we shall see below, some clear counter-indications.

### **TELUS Ocean claim about the goal of enhancing the downtown skyline**

*A major goal within the DCAP is to enhance the skyline within the Inner Harbour District, expressing an “Urban Amphitheatre Concept” by building taller buildings, particularly along Douglas Street. TELUS Ocean is uniquely placed to “complement the Empress Hotel, emphasizing its rich detail without diminishing its visual appearance.” (TOAB, p29)*

**Response:** As noted above, the Urban Amphitheatre Concept maps show building height ramping up north of the TELUS Ocean site but less along Douglas than closer to Blanshard. In fact, two conceptual illustrations in DCAP on these points show that no tall buildings were anticipated immediately behind the Empress Hotel (the skyline was already marked by tall buildings on the north side of Humboldt and beyond) and the TELUS Ocean site specifically was portrayed with a much shorter building. (DCAP, p63 and 88). In the picture below, reproduced from DCAP, note the dark building just to the right of the Empress; this is the TELUS Ocean site.

Fig. 2



**Conceptual illustrations of how building heights and designs should relate to the local context.**

(DCAP, p88)

## TELUS Ocean claim about enhancing views of the Empress roofline

*TELUS Ocean will provide an improved backdrop for the Empress, a rising roofline that mirrors the rising scale of the hotel. The light coloured glass walls will show off the Empress roofline and the building's southern cut "reduces the building's bulk as seen from the harbour." (TOAB, p96)*

That concept is illustrated with a line drawing and a photograph taken from Laurel Point with TELUS Ocean inserted. (TOAB, p97)

**Response:** The view from Laurel Point is a vantage point from which the impact of a new building on the skyline is meant to be tested. (DCAP, 6.187, p94 and Appendix 2) The photo shows a large but fairly bland, light colored façade behind the Empress.

However, one telling detail contradicts this modest desire to "bolster the visual impact of the Empress". It is not unusual for an office building to have prominent signage. The TELUS Ocean, a signature building, is shown with signature signage – right over the Empress. If, as might be expected, this will be lit-up after dark, that places a TELUS sign in as prominent a location as any corporation might desire.

Fig. 3



(TOAB, p97)

## **Aspects of a “Landmark” Building**

### ***Accessing the View***

TELUS Ocean consistently interprets DCAP as encouraging or at least giving sanction to a much larger building on its site than the zoning provides. If none of these assertions actually supports moving TELUS Ocean in the direction of a higher, denser building, the ambition to build a landmark building clearly does. One mark of that is the remarkable view accessed.

*“Acting as a marker of the southern edge of Victoria’s Downtown, TELUS Ocean will boast high-calibre views of both the city and the harbour.” (TOAB, p49)*

Most telling is the beautiful panorama pictured (see TOAB, pages 50-51). While not captioned, it appears to show the view from the south end of the roof deck, with the rooftop of the ARIA almost 18 meters below at the bottom left and the roofs of the Empress in the mid distance on the right. Without doubt, an iconic view.

While it is true that no property owner owns the view, it is clear that building higher than and in front of another property is the surest way of capturing it. In a development application, the City always needs to weigh how much advantage can be taken by the new property and what concessions it should make to preserve its neighbours’ view corridors. This proposal disproportionately privileges office tower over hotel and residential views.

### ***Monumental Design***

The TELUS Ocean is described as a “flatiron” design, in reference to the prow that takes the corner at Douglas and Humboldt (see the rendering at TOAB, p41). In fact, we see it is a triangle with two equal sides in cross-section, with the long side along Douglas Street and a second point at the south plaza.

This is not a “typical” building design as described in DCAP. The most significant difference is that TELUS Ocean rises to its full height with no setbacks (except for the tiered terraces that start at the 5<sup>th</sup> floor at the south end, i.e., at the 8<sup>th</sup> floor residential level). These vertical walls define the prow shape that is the building’s identifying feature (as shown in a quick sketch on TOAB, p3). Zoning would require the building wall, after a vertical rise of 10m, be set back by 1 meter for every 5 meters additional rise. Relaxation of setback rules permits the monumental verticality that TELUS Ocean seeks to achieve.

TELUS Ocean, as noted, diverges from a flatiron design in having 2 acute points, on the south as well as the north end. That means that while its sheer vertical facades are very prominent, the side facing Douglas Street is roughly 40% longer than that up Humboldt - a massive wall indeed. Again, a sense of how that dominates the block along Douglas Street can be seen in Figure 1 above as viewed from the Empress. It is this face that the architects tried to relieve by making the cut alluded to in describing the shortened roofline as viewed from across the harbour. For

anyone facing the building, in the ARIA, the Hilton Doubletree, the Falls, or the Empress, the impression, as shown in the many renderings, is massive and pervasive, even from the higher floors.

### ***Orientation and Placement on the Lot***

The lot, shown in various renderings, is a kite shape, with the narrow end at Humboldt and Douglas (TOAB, p20). The building, as described in Big Moves – 2 Reorganize Building Mass to Prow (TOAB, p38), was oriented to emphasize its frontages along Douglas and Humboldt and especially its dramatic leading edge at the north corner. TELUS Ocean describes this as “taking advantage of its flatiron terminus on one of Victoria’s most prominent intersections.” (TOAB, p46) This has the additional advantage of “doing well by doing good”. It allows the architects to set the building back from the ARIA, and open up a wide throughway in the “Penwell Extension” for public realm improvements, while orienting the building most effectively along Douglas with the prow at the corner for greatest placemaking impact. (For example, see the rendering on TOAB, pages 42-43.)

### ***Public Realm***

TELUS Ocean has committed to an ambitious landscaping plan that includes redevelopment of the north plaza at the prow (where Humboldt Street has been closed off), along Humboldt Street (which TELUS hints may be further redeveloped), up the Penwell Street Extension (including the area above the parking ramp), and all of the existing South Plaza.

The proposal makes some unwarranted claims. For example, TELUS Ocean says of the north plaza at the prow that “a new public plaza is created by closing the northern portion of Humboldt Street to vehicular traffic to allow bicycles and pedestrians only.” (TOAB, p55) Certainly, at least the nucleus of this plaza already exists by virtue of the City’s bicycle path initiative.

Even so, this is a strength in the development application. It depends on entering into what amounts to a private – public partnership with the City; TELUS Ocean is able to “borrow” a lot of public space to enlarge its grounds around the building. In particular, the “forecourt” in front of the main entrance and the plaza beyond the planned restaurant at the south point are expansive and enhance the importance of the building (TOAB, p54-61). If this is to be a true shared amenity, it will be crucial that TELUS Ocean make it very comfortable for the public to enter and share the space.

### ***South Plaza***

As noted above, the south plaza is recognized by the City as a Minor Public Open Space (DCAP, Map 28, p75), a rare commodity in the Downtown. The OCP makes a point of “identifying strategies to... develop key public amenities, including urban plazas”. (OCP, 6.10.5, p48) This plaza is connected by crosswalk with the Conference Centre and is an important informal marshalling ground for events at the Conference Centre and the Crystal Garden. In that regard,

the shape of TELUS Ocean presents a problem. While the extent to which the corner is undercut at ground level helps, the building's corner overhang looms above the plaza well beyond the crosswalk from the Conference Centre. TELUS Ocean touts this as providing "weather protection at...the mid-block pedestrian crossing" (TOAB, p95) but it reads as defining private space.

If this were a conventional building, there would be a requirement next to the plaza to cut back and terrace the edge. (DCAP, 6.187, p94). TELUS Ocean indeed goes in this direction by cutting back at its level 5 and tiering up from there. However, because this starts as a point, this does not open up the plaza except perhaps as viewed from a large distance. (See rendering, TOAB, p60).

Again, if this were a conventional building, current zoning would require a side yard setback of 4.5m. Instead, the southern point of TELUS Ocean extends right to the property line. The following overhead rendering (Fig. 4) shows how this overhang defines the plaza (at the lower right).

Fig. 4



(TOAB, p48)



## Conclusion

TELUS Ocean, like any proposed development, has the right to build on its site in conformity with existing zoning and guidelines. Its neighbours should have anticipated that and framed their expectations accordingly. TELUS Ocean also has the right to apply to go beyond current zoning and ask the City for variances. At that point, however, it is then up to the City to weigh competing rights, those of TELUS Ocean to build its vision of a landmark versus its neighbours' desire to retain some of the advantages they have enjoyed. TELUS Ocean sought to show that it has properly taken account of its neighbours and has made appropriate design decisions to limit harms.

However, for many of the people in the neighbourhood most directly confronted with this proposed building, that balance has not been achieved. The mitigations proposed do not resolve the problems adequately. The arguments TELUS Ocean has made to justify its scale are self-serving. Neighbours, who have depended on the City's official plans, would be completely justified in believing that no such massive building could be put on this site.

**TELUS Ocean is too big. It overwhelms the site, the nearby historic buildings, and the neighbourhood. But TELUS Ocean can achieve many of its goals to become a downtown landmark even at a smaller scale. To this end, we urge TELUS Ocean to:**

- **Reduce the height to the 43m allowed in the current zoning, decreasing the proposed density in the process. That would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.**
- **Give more priority to the public south plaza by cutting back the second "prow" that extends over that plaza. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, that would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls.**

## REFERENCES

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Dear members of Council,

**Re: Telus Ocean development**

As a long time resident of the ARIA in Humboldt Valley, I'm concerned about the proposed Telus Ocean development next door. As someone who both lives and works in the downtown core, I fully support tasteful & sensitive development that promotes the livability of our wonderful city. My concern is that the Telus proposal is much too big and would overwhelm surrounding residential buildings as well as historic landmarks such as the Empress. Although there has been much fanfare behind the proposal, it seems that the developers are attempting to flaunt the existing guidelines for respectful development in Victoria. The last thing we need is our neighbourhood turning into another Yaletown. That sort of height and density would be completely inappropriate and I strongly oppose the current size of the proposal. I respectfully urge Council to require Telus Ocean to scale back the size of the proposed development.

Sincerely,  
Ian Stockdill  
606N – 737 Humboldt St.

Mayor and Council,

My wife and I live in the area and strongly object to the proposed building. It is too big and too high, exceeding height restrictions. There is no reason the building couldn't be scaled back to meet the needs of Telus within the current building regulations.

Higher profits for Telus are not more important than retaining the livability and attraction of this central part of Victoria.

Regards,

Jean and Roger Nield  
906-737 Humboldt St.  
Victoria

Good morning to all of you,

I would like to put on record that although I certainly feel the Telus Ocean building is a spectacular looking building, it is simply too tall for the neighbourhood.

The Downtown Core Area Plan (which I would assume to carry some clout) does not appear to encourage development of this size and the fact that the Telus logo would be highly visible above the Empress when looking from Laurel Point is very contentious.

Is there some mechanism to prevent highly illuminated signs from being on all night?

Telus Ocean seem to be using the public pedestrian and bike plaza area (where Humboldt Street has been closed from Douglas) to their own advantage. and claiming they will enhance this further ... it is not THEIRS to enhance! It is City property - or so I thought!

I do realise Telus have made a lot of concessions to their closest neighbour (the Aria, where I live) but the soaring height and sheer mass do appear very much out of context with the whole area and the Downtown Core Area Plan, as well as the Official Community Plan.

I wish you well in your discussions but hope there will be no change to the zoning of this property.

Thank you for reading this.

Sincerely,

Miranda Jones  
South 1006 - 737 Humboldt Street  
Victoria, BC  
V8W 1B1

Dear Mayor Helps,

The proposed TELUS Ocean Building overwhelms the site, the nearby historic buildings, and the neighborhood. However, TELUS Ocean could achieve many of its goals to become a downtown landmark even at a smaller scale.

Sincerely,

Martin

The building dimensions are much too large for the size of the lot. It could fulfill their needs with a smaller dimension

HVC neighbor

Pat Glover

708 Burdett

Hello Mayor and Council

We're writing to express our concerns about the proposed design for the Telus Ocean building on the Apex lot at Humboldt and Douglas.

We're very excited to have a project of this quality coming to this end of Douglas Street, but we do have concerns about some aspects of the design.

1.00

The vision of the Downtown Core Area Plan is to support developments that complement the existing surroundings, in various ways. We currently have a great mix of hotels, residential towers, unique urban outdoor spaces, and of course the Empress and Crystal Garden. Now we have the chance to further enhance this area by adding something **complementary** to the existing surroundings.

2.00

Our opinion is that the proposed design overwhelms everything around it, and doesn't enhance or complement the important historical buildings nearby. We totally understand that the developer and architect are trying to fit as much square footage and height into this awkwardly shaped lot as possible, while still trying to design something beautiful. There's no question that this is a very tall order. However, we must not treat the needs and agenda of the developer as being more important than the existing hotels, residents and historical architecture nearby.

Telus should be encouraged to stay within the guidelines of the DCAP, specifically with respect to height (45 metres/11 stories for commercial buildings) and certainly with respect to setbacks. If you grant variances on these items, we'll end up with a massive building which will overpower everything around it. The sheer mass, size and shape of their proposed building, although beautifully clad, isn't very subtle. We strongly believe that Telus can design something more graceful within the guidelines of the DCAP, and still achieve their goal of adding a financially viable landmark building to this area. We hope you will challenge them to do so.

Thank you for reading this letter.

Brent and Jennifer Baynton  
S1201 - 737 Humboldt St



Hello,

I am emailing you as a resident of Astoria located at 751 Fairfield Rd. I have recently been made aware of the Telus Ocean development, and am extremely concerned for a couple of reasons. I have expressed my concern in detail below and hope that you will consider ensuring the development of Telus Ocean is scaled back overall.

TELUS Ocean, like any proposed development, has the right to build on its site in conformity with existing zoning and guidelines. Its neighbours should have anticipated that and framed their expectations accordingly. TELUS Ocean also has the right to apply to go beyond current zoning and ask the City for variances. At that point, however, it is then up to the City to weigh competing rights, those of TELUS Ocean to build its vision of a landmark versus its neighbours' desire to retain some of the advantages they have enjoyed. TELUS Ocean sought to show that it has properly taken account of its neighbours and has made appropriate design decisions to limit harms. However, for many of the people in the neighbourhood most directly confronted with this proposed building, that balance has not been achieved. The mitigations proposed do not resolve the problems adequately. The arguments TELUS Ocean has made to justify its scale are self-serving. Neighbours, who have depended on the City's official plans, would be completely justified in believing that no such massive building could be put on this site.

TELUS Ocean is too big. It overwhelms the site, the nearby historic buildings, and the neighbourhood. But TELUS Ocean can achieve many of its goals to become a downtown landmark even at a smaller scale. To this end, we urge TELUS Ocean to:

- Reduce the height to the 43m allowed in the current zoning, decreasing the proposed density in the process. That would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.
- Give more priority to the public south plaza by cutting back the second "prow" that extends over that plaza. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, that would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls.

**It does not support context-sensitive developments that complement the existing Downtown Core Area skyline.**

The view from Laurel Point is a vantage point from which the impact of a new building on the skyline is meant to be tested. (DCAP, 6.187, p94 and Appendix 2) The photo shows a large but fairly bland, light colored façade behind the Empress. However, one telling detail contradicts this modest desire to "bolster the visual impact of the Empress". It is not unusual for an office building to have prominent signage. The TELUS Ocean, a signature building, is shown with signature signage – right over the Empress. If, as might be expected, this will be

lit-up after dark, that places a TELUS sign in as prominent a location as any corporation might desire.

**It does not support context-sensitive developments that complement the existing Downtown Core Area through density**

The existing CA-4 zoning has a maximum density of 3.0:1. The OCP allows for increased density

up to 4.0:1 in strategic locations. However, TELUS Ocean should be allowed to “support the area” with a similar density of 5.6:1. This is unreasonable and they make no claims to why this should be supported through their 'advanced building design features'.

**It does not support context-sensitive developments that complement the existing Downtown**

**Core Area through siting, orientation, and height.**

The TELUS Ocean site is currently zoned (CA-4) for buildings of up to 43m in height and permits commercial, office, and residential uses. Map 32 in the DCAP (which the TELUS Ocean application reproduces on page 29) has an interpretive table next to it which the TELUS

Ocean application leaves out. This table shows that buildings of 45m can have up to 15 storeys,

if they are residential – and up to 11 storeys, if they are commercial. That is, residential storeys

are considered to average 3.0m; while commercial stories average 4.1m. The TELUS Ocean plan

has an average office floor height of 4.25m and, with a higher first floor and top amenity floors,

an average storey height of 4.8m overall. This is what pushes the proposed height of their 11

storey building to over 53m, about the height of an 18 storey residential tower

I reside at the ARIA (737 Humboldt St.) and attended the community meeting in August. The Telus Ocean proposal is a beautiful design, however I do feel it is very ambitious given the size of the lot, and the amount of traffic it will bring.

It is very concerning that an estimated 250 vehicles will be trying to navigate Humboldt Street with B.C. transit buses, vehicles from the 2 hotels (The Hilton and The Marriott), tour buses, now 2 bicycle lanes and let us not forget the regular traffic from residents of The Aria, The Belvedere and The Astoria.

It is surprising to me that the proposed sheer mass of this project and additional traffic flow or lack of it are even a consideration.

This project will effect ALOT of taxpaying citizens who chose to live and thrive in this very short city block.

I am sure that The Telus Ocean can be more creative with their plans going forward and that Victoria council and mayor be more sensitive.

Thoughtfully,

K. Kodama

Hello,

As a resident of the Humboldt valley community it disheartens me to see that Telus intends to bring in a structure far taller, and directly on the edge of what are some of the most spectacular views the city has to offer.

As long time renters in the neighbourhood, we will be forced to move, not only due to the noise created by the proposed development, but also the change in our view.

The owner of our suite has voiced similar concerns, saying that the property's value will be so significantly reduced it will have to be sold at a loss.

Before the proposal, my wife and I were seriously considering buying the strata lot from our landlord, but upon finding out about the massive disruption Telus intends to force the neighborhood into, im here to tell you that the project cannot go ahead as initially described.

Beyond the simple day to day of living beside a noisy hole in the ground, there's also the traffic disruptions, the occlusion of our already limited view, and of course the imminent downfall of property values on the north face of the Aria.

I feel the architects plans, while appropriately ambitious for the disused site, are overly ambitious for the neighbourhoods needs.

Members of our community love living here because we have the views of the hotel, the mountains in the west and south, and easy access to our lovely downtown core.

The Telus Ocean project is oversized for the lot, too tall for the surrounding buildings, and generally a garish addition to the skyline.

If the project were to be scaled back to a more appropriate height (per floor, and total), and if the plaza were to be extended to further lessen the buildings footprint, we could make all parties a bit happier.

While there's no stopping progress, there is a possibility to change the plans before ground is broken.

Please take into consideration our communities requests, and make actionable the changes our community has requested.

As a community we don't want a literal shadow cast over the growth we have achieved. The decision is in your hands, and I hope you will take our requests into consideration.

Angus Donald Jeffries Durrie

737 Humboldt  
N703  
V8W1B1

Mayor and Council

The City of Victoria is the centre of greater Victoria and, although we live in Saanich, we spend (or spent before the virus) a lot of time "downtown". We know the harbour area well and also have friends who live nearby. In that regard, the report of the Humboldt Valley Committee concerning the size of the proposed TELUS Ocean development seems very cogent and reasonable to us. It would be reassuring to see the Mayor and Council respect the area zoning.

George and Barbara Boer

Good morning,

There is only one thing to say about the proposed building IT IS TOO BIG!

While I'm sure that in another location this building would be fabulous...in this case however... it absolutely DESTROYS and OVERWHELMS our historically established and developed area.

As a local resident, It is my hope that you will reconsider the development of this project.

Yours sincerely,

Christine Corbett

S905-737 Humboldt St.  
Victoria, BC  
V8W 1B1

September 19, 2020

Dear Mayor and Council:

I am writing as a concerned citizen and property owner in the Aria condo building beside the proposed Telus Ocean building. I am dismayed at the overpowering size of the Telus Ocean building in its current design. It shall overwhelm the site, nearby historic buildings and neighbourhood.

I am asking that Telus Ocean be brought into balance with its surroundings including a height reduction to 45 meters as is allowed in the current zoning. I am also requesting a limit on the light the building will emit from within and from the exterior signage.

My husband and I were attracted to life in downtown Victoria through the promises made in the Official Community Plan. I'm counting on you to take care of our residential needs in the Humboldt Valley.

Yours sincerely,  
Deborah Rodger



Hello,

My name is Thomas Park, resident of Humboldt Valley.

I am extremely concerned about the size of Telus Ocean Building. Not only the view it blocks but privacy is another bigger issue. Another issue is the building does not suit Victoria. Seems like the city planners are unsympathetic to the culture and heritage of Victoria. Green space should be available on the ground floor, not on top of the building accessible for a few.

I hope the plan can be reconsidered.

Regards,

Thomas

I've sat through a presentation on this proposed corporate behemoth and came away with two specific conclusions.

The size, especially the height, is so far over the top in terms of being out of place in the proposed location. A structure as tall as proposed is not appropriate for the Humboldt valley.

And the second point is I find TELUS a bit disingenuous in touting it as an 11 story structure, both in presentations and in their publications. Their 11 stories equate to a 17 story residential structure. They need to be a bit more transparent on this. A building thus size simply is out of place for this location.

And unrelated to my previous comments, I wonder if Telus has considered the long term effect of so many employees working at home in the future after the effects of the Pandemic have passed. Do we need this much additional office space in a city that will have a glut of space moving forward.

Lastly with all the additional traffic that will naturally ensue, the intersection of Penwell and Fairfield, which is already a dangerous one, will only get worse. Even now it's an accident waiting to happen coming up Penwell and turning onto Fairfield(primarily due to the city having closed off the Humboldt access to Douglas to accommodate bike lanes!

I only hope that council considers these reservations.

Thank you

Bob Bardagy  
737 Humboldt St, Victoria

To the Mayor & Council,

I wish to strongly propose that the height & size of the new development of the Telus Ocean be addressed.

I realize that the aim of any development is to maximize the size with an view to profitability. Hopefully this can be achieved without sacrificing what Victoria prides itself on - "The City of Gardens" "Heritage" come to mind & while we have added a more modern flavour to the downtown I am hoping that the proposed building can enhance the area but not overwhelm it. The proposed height is definitely overwhelming & the thought of travelling south on Douglas to witness a behemoth of a building does not say "welcome to Victoria"

Keeping the height of the development the same as the Empress would seem to me to be acceptable as opposed to seeing it from the harbour approach which, along with the Legislative Building, are our most iconic views.

Respectfully submitted,

Rhya Lornie  
737 Humboldt Street,

Dear Mayor and Council,

I am writing to you to express my concern and present dissatisfaction of the plans for the Telus Ocean complex at the corner of Douglas and Humboldt in Downtown Victoria. The size, scope, and the footprint of the current plan is overwhelming and requires planning revisions. The building will capture the essence and destroy the beautiful Victoria skyline's two iconic buildings: The Legislature and The Empress Hotel. The effect on the Empress Hotel will be soul destroying for the downtown core.

I am particularly dismayed at the zoning and bylaw abeyances being proposed and historically supported by the mayor and city council. Telus has misled the public by stating the height of the buildings in "floors", providing the illusion that the height will be within a traditional dimension, yet each floor is approximately equal to 1.5 floors. The building requires a height reduction to 45 metres, as is allowed in its current zoning. It really makes me wonder why the mayor and city Council have any zoning bylaws at all given their record and history of abeyances to any contractor and project developer that requests them. Everyone recognizes the "game" that is being played by developers, i.e., ask for a ridiculous amount, get less, but still get more than the zoning regulates. As a citizen, it is tiresome to observe this chronic gamesmanship and its deleterious effects on our beautiful city.

I enjoy living downtown very much, yet recent practices of the mayor and council and plans for its future are diminishing the experience considerably. I really question myself whether I could recommend other to live here given the other attractive options in the metro Victoria region.

Regards,

William Rodger, PhD  
South 905 - 737 Humboldt Street  
Victoria, BC  
V8W 1B1

The proposed TelusOcean building overwhelms a downtown corner, it is too big.

...Telus assumes permission for commercial height and density beyond that anticipated by us, at the presentation, 11 vague storeys can be 53 meters.

...the building doesn't complement the surroundings, the Southern prow interferes with a busy Douglas St crosswalk and diminishes use of the popular southern plaza. If less dense there would not be need to "borrow" public space.

...who wants to see a Telus sign glowing above the Empress at night from across the harbour?

...with several floors earmarked for rental, where will excess cars park? not everyone bikes or buses.

...concerns for birds being killed against the glass walls.

...concerns for areas being in constant shadow, a hotel all but hidden and the Ocean's lights on all night.

Does Telus know its neighbours, 4 condo buildings, 1 hotel and a soon to be occupied large building for the over 55's.?

Given the unhappy state of our downtown, look at the proposal carefully, consider your residential and business taxpayers, scale the size of this building back.

Catherine Campbell  
The Aria, 737 Humboldt St

To the City of Victoria,

Today I like to send my strong opposition to the planned building of the new TELUS building on the corner of Humboldt Street and Douglas Street in downtown Victoria.

With this letter I also like to forward several names of concerned citizens that disagree with the proposed building height.

Keith Orton

Kyle Orton

Constance Fischer

Cielieca Fischer

Cyprus Fischer

Peter Scholz

Art Cram

Robbie Christie

Gary Christy

Marianne Sorensen

Glen Sorensen

Loretta Fischer

If necessary, I will collect their signatures.

*Loretta Fischer*

1602-788 Humboldt Street  
Victoria, BC  
Canada V8W 4A2

This is our south view from the 9th floor of the Falls building on Burdett avenue at Douglas. Sadly, it seems that within a year or two, we will lose this view. Instead, we will be looking at the new Telus building in all its glass and polished steel glory. Our neighbours the Sherwoods have articulated much better than we how inappropriate this building is, an office tower smack dab in the middle of a highly populated residential area. Council has promoted the idea of living in the downtown core, and we took the bait and bought here 6 years ago. It hasn't been that easy. Bike lanes and little or no synchronization of traffic signals have made navigating through the core difficult and time consuming. Vagrants camped on the sidewalks outside of our building, our front "yard", have made us feel uneasy, as have the thefts and vandalism in our parking garage. Still, we can come up and enjoy our view. We paid quite a high price for our place, and pay high property taxes, and strata fees, yet the view helps us forget these expenses, set them aside, after all, we enjoy a "million dollar view". For now. We wonder who, in the future when we decide or need to sell, will pay for a view of the Telus building? What will this monstrosity do to our property values?

While council dithers over the future development of the "Northern Junk Buildings" because of its potential negative effect on the neighborhood there, it has allowed Telus to slap a huge glass and steel structure, in golf terms, a "chip shot" from hundreds of entrenched residents in our area.

Please reconsider the plan. We deserve better.

Stephen and Margarita Kishkan

905 708 Burdett ave

Victoria.





To the Mayor and City Council  
Victoria, BC

## **Telus Ocean Development**

Telus has designed a high-rise glass building for downtown Victoria, which they state will “**anchor**” the south end of Douglas Street. Will the anchor enhance the street profile or drag down this residential/tourist area of the city?

### **1. Does the new Telus Building belong in the centre of a residential/tourist area?**

At present the site of the proposed building is a small triangular lot on Douglas Street directly across from the Empress Hotel. It is surrounded by many layers of residential buildings that include condominiums and hotels (Figure 1 at end of letter). All these buildings are used as temporary or permanent places for people to sleep, eat and live. The Victoria City Council has approved each of these buildings, thus creating a high density of residents. There are very few businesses in the area except for some restaurants and other small outlets. Tourist sites are abundant. Each person who bought a condo was attracted by the area, which appeared to be a liveable and safe residential zone in which walking and biking were emphasized.

**Conclusion:** The Telus proposal is a commercial business building (unlike hotels) that does not match any of the residential and tourist structures in the neighbourhood. It is enormous: too high (equivalent to 18 residential storeys) and too wide. It matches buildings along Douglas Street to the North where other high-rise commercial buildings are located, e.g. the Sussex and CIBC Buildings. The noise, and especially the lights shining into residential living rooms and bedrooms at night, are unacceptable.

### **2. Is the massive North wall of the Telus building fair to the residents of The Falls and others?**

The proposed Telus Building is designed to fit on a small lot in which the building would come very close to the Aria condominium. To compensate, the architects have designed terraces to move the bulk of the new building away from the Aria at upper levels. Alas, this has resulted in a massive wall on the other side of the Telus building across the street from The Falls condominium. Approximately 66 condos in The Falls will lose Southern views not only of the Olympic mountains, Victoria landscape and Parliament, but of their main source of light from the South and Southwest sky. Telus responded that the residents of The Falls must have known it was coming. We did not!

**Conclusion:** The North wall of the proposed Telus Building is inhumane for its immediate neighbours, the Falls Condominium and the Hilton Doubletree Hotel. Humans do not thrive when light during the day is removed and artificial light shines in their eyes during the night. Some of the residents already know about this problem; night lights from Nootka Court come on when cleaning crews arrive and often the lights remain on all night. As to the loss of views, the Victoria City Council rejected the original design for The Falls Building in which two towers of 18 floors each were proposed. City Council decided that the South Tower of The Falls

would obscure the view of the Inner Harbour for Vista 18 in the Chateau Victoria Hotel. The Falls had to remove the top five floors of the South Tower. This seemed to be a fair balance. The last building to be erected does not have a right to arbitrarily obscure its neighbour's views.

### 3. Is the Northern protrusion (prow) of the Telus Building justified?

The architects of the new Telus Building have designed a very sharp point at the Northern corner of the building and included a winter garden behind the glass point. The aesthetic view is not without merit, but the damage to residents in the Falls is profound. As shown in Fig. 2 (at end of letter), the protrusion of the prow above the lobby level extends the building width to almost the edge of the property line. This part of the building will have a great impact in addition to the height, in blocking light to the southern balconies and windows in The Falls; views of the Parliament and light from the southwest are the only source of light and delight for many owners with only a view to the South.

**Conclusion:** The sharp protrusion at the North point of the building on Douglas Street is very inefficient in creating inner space. The winter garden proposed to fit in this space at each level would have little appeal from the inside or out. If this pointed design is set back from Douglas Street by 6 feet or more, the light from the Southwest would be greatly improved. It is a small concession for a huge benefit to the neighbours.

### 4. Does the Telus building need to house unrelated offices in a residential area of the city?

Telus has proposed to house 250 of its employees in a modern glass building on Douglas Street. This is a strange request as this area is devoid of high-rise business buildings. If Telus moved even two blocks to the North, they would be in a business office building area. However, they not only propose to house their own employees, but an additional 250 employees that are unrelated and simply want to rent office space. No details are given. Nothing in their presentation booklet suggests how the employees in the new building will do "creative and innovative" work. The building is too expensive to house research projects or start-up companies. The government has just moved a large number of employees out of four stories of office space in Nootka Court and into the new James Bay complex behind Parliament. More office space does not appear to be in demand.

**Conclusion:** The Telus building is inappropriate for this part of the city. At the least, it should be restricted to Telus employees. This would halve the number of people and offices, which would allow the height to be reduced to half, the North protrusion to be set back and the terraces to begin lower. Common sense and fairness are necessary.

**Final summary:** The proposed Telus Building is inappropriate for the triangular lot. The lot is too small and is completely surrounded by residential and tourist buildings. All the advantages of the site for Telus in regard to context, transit and views are available either by moving to the high-rise commercial district just two or three blocks North or by eliminating the rental space. Finally, a resident of The Falls wisely observed about the Telus development that "This is

in part a vanity project and the main objective is to have their marquee prominently visible over the Victoria core and even loom over the Empress.” Telus is a welcome and valuable addition to Victoria in a context that is less troublesome. A different site would allow the full design without detracting from the Empress.

Thank you for considering this letter.

Sincerely yours,

Nancy and Terry Sherwood  
1005-708 Burdett Avenue  
The Falls

Figure 1.

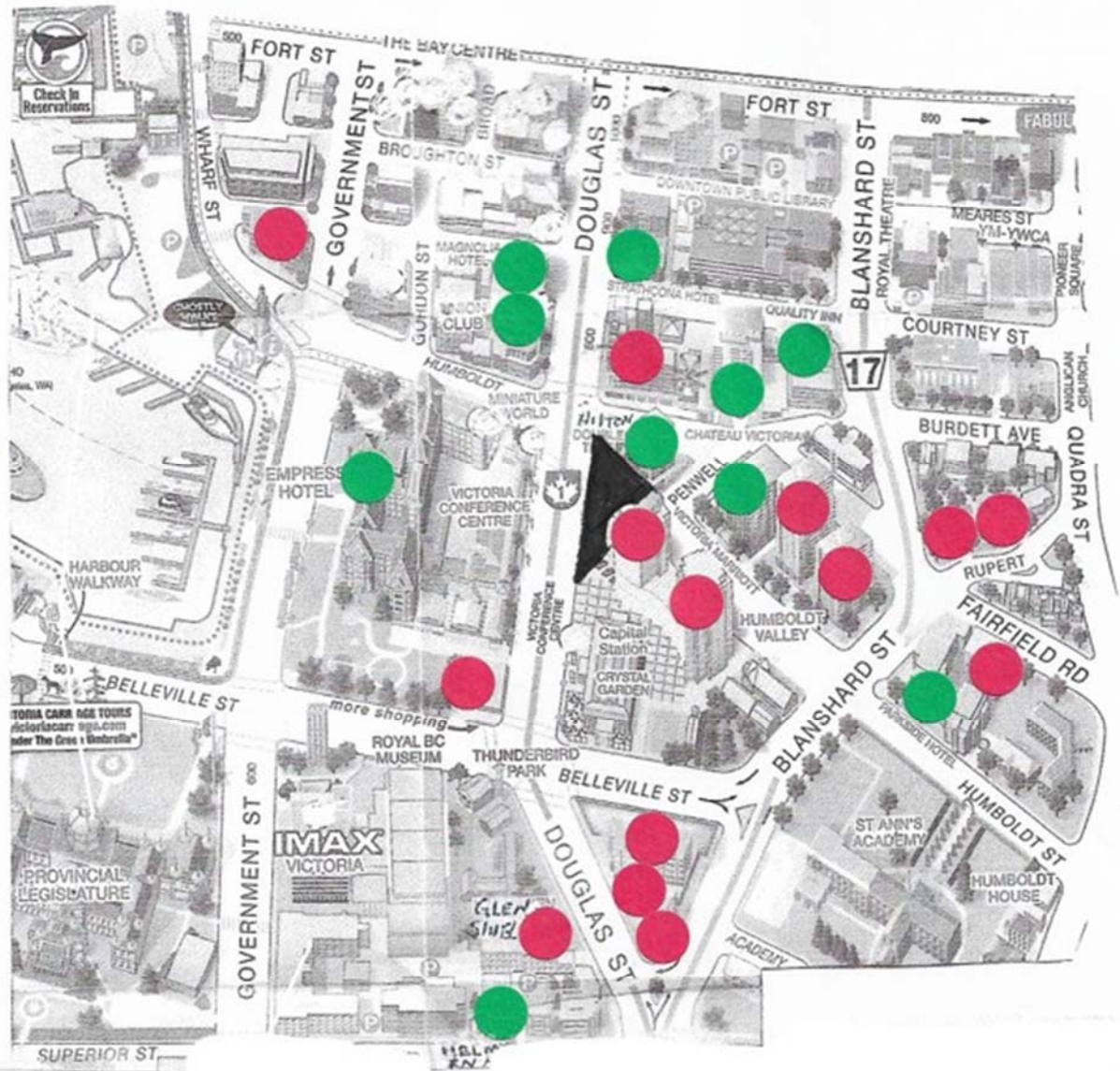


Fig. 1



Telus proposed building on triangular lot



Hotels in the vicinity of proposed Telus building (names on map)



Condos in the vicinity of proposed Telus building

Aria	177 units
Astoria	164
Belvedere	77
Cherry Bank	51
City Place	53
Customs House	57
Empress Condo (in planning)	72
Falls	155
Glenshiel (rental)	68
Landmark	32
Q Apartments (rental)	124
Savoy	62
Tapestry	173

Figure 2. The Falls Condominium is represented with the North Tower on left and the South Tower on the right. The foot print of the proposed Telus Building is shown in black. The North wall of the Telus building is problematical for two reasons. The extended sharp point on Douglas Street and the height equivalent to 18 residential stories combine to block all Southern and Southwestern views for the residents of the South Tower and some in the North Tower. At night artificial light from the Telus Building will shine into the South-facing windows of The Falls.



Dear Mayor and Council,

Our view of the Telus Ocean location is from the Astoria at 751 Fairfield Rd. We presently have a view through the lowered portion of the Aria, over the Empress to the Parliament buildings. We are concerned about the mass of the Telus Ocean building and its effects not just on sightlines, but on the "neighborhood" feel of this site with its access to the Empress and Victoria Conference center. We are concerned about the effect of "reflections" on largely residential buildings, which has been sited as a concern of other such facades elsewhere in the world. While we understand our personal "view" might be impacted by a building on this site, we understood that any new building would be no higher than the Aria, given how the site slopes from north to south.

We were recently advised of an analysis of the building project through the Humboldt Valley Community and concur with the recommendations of that analysis as follows:

TELUS Ocean is too big. It overwhelms the site, the nearby historic buildings, and the neighbourhood. But TELUS Ocean can achieve many of its goals to become a downtown landmark even at a smaller scale. To this end, we urge TELUS Ocean to:

- Reduce the height to the 43m allowed in the current zoning, decreasing the proposed density in the process. That would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.
- Give more priority to the public south plaza by cutting back the second "prow" that extends over that plaza. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, that would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls.

Thank you for consideration of our concerns.

Yours truly,

N.Avery

I support the Humboldt Valley Committee's call for downsizing the planned Telus building. It should not overshadow other buildings in the area including the Empress Hotel.

Take care

*Peter*



Dear Councillors,

I am writing to express my disappointment that the Victoria City Council has deemed that ignoring zoning bylaws is an acceptable procedure in approving a major city project. The Telus Ocean development is too large and overpowering for the designated site, and will overwhelm existing structures. I urge you to restrict the building height to that dictated by the present bylaw, as measured in metres rather than stories.

Sincerely  
Stewart Ballantyne  
788 Humboldt St.

Outlined below are some concerns about/objections to various aspects of the Telus Ocean project proposed for the Apex lot at the corner of Douglas and Humboldt Streets.

- As proposed, the Telus Ocean building will loom over the plaza to the south by the Crystal Garden. To avoid stifling this rare public open space, we would like to see:
  - A. the Telus Ocean building cut back and the edge terraced as of the second floor (per the DCAP, 6.187, p94); and
  - B. application of the set back requirement of 4.5 meters.
    - (Note: It was hard to get a sense of the “pinching” effect to the south from the literature Telus provided us. In some Telus photos the pinching effect appears to cease at a level higher than the roofline of the Aria, a neighboring residential building with twelve floors. In other Telus photos the pinching appears to continue down to about the second or third floor of the Telus Ocean building. We understand from other sources that the terracing doesn’t start until the eighth floor of the Telus Ocean building. If this is so, the Telus Ocean building, which is marketed as a landmark project, will not impress, but oppress.)
- We’re concerned that the Telus Ocean building will reflect light and heat around the neighbourhood, to include into our unit in the adjacent residential building, through the use of metal and “high-reflectance glass” as well as the mirroring effect on the façade of the Telus Ocean building.
- We’re concerned that light will be beamed into our unit from the Telus Ocean building acting as an “alluring lantern at night,” per the Telus marketing literature.
- We’re concerned about our privacy being violated by individuals having a view into our unit from the Telus Ocean building, its terraces/tiers, and its restaurants.

We’ve forwarded these and other concerns/objections to Telus.

Thank you for your time and consideration.

Sincerely,  
A.M. Lohner  
N501-737 Humboldt St.  
Victoria, BC V8W 1B1

I am writing about the proposed Telus building at the corner of Douglas and Humboldt Streets. While I do appreciate the idea of having a lovely showcase building in our city, I wish to share some concerns I have.

Looking towards the Empress from the Songhees area I was struck again by my concern about the huge bulk of this proposed building. I think it is way over-scale for this location. I could see from the other side of the harbour that not only will the building dwarf and spoil the Empress from the rear side, but the front view of the Empress will clearly also be ruined by a huge building looming above it. I assume there will also be a large commercial (and probably lit) sign showing above the Empress. I had thought that city plans were to limit height of buildings close to the harbour, increasing as the eye went further back, to preserve the look of the harbour area itself. Having a building of this size right behind the Empress is just way too much.

Also not to be forgotten is the fact that the Crystal Garden is another beautiful historic building which I believe has great tourism value. This importance and attraction would be diminished by this huge neighbor. I urge you to consider the importance of preserving the beauty of our inner harbour area and the value it has in our important tourism industry.

Not only will the view from the Falls condominium and the Doubletree Inn be severely impacted, but the sheer size of this giant will overbear that corner and affect neighbouring buildings to an alarming degree. Property values and hotel revenues will be seriously diminished. I live in one of the towers near it, but not immediately adjacent to it, nor in a location such that a change to my own view is a concern.

I also urge you to consider that an already choked Humboldt Street will need redesigning to accommodate the increase in traffic. Much of the increased traffic will further stress Humboldt and we can't expect that all additional traffic will use Penwell Street, especially with the very difficult stopping area at the top of the hill. We also need to consider how difficult that stop would be when the streets get icy.

Thank you for considering my concerns about the development of this corner.

M.F. Kearns  
737 Humboldt Street

Maureen

Mayor Helps and Victoria City Councillors,

I hope this finds you well.

The Telus representative fielding questions from Humboldt Valley residents on 5 August was pleasant enough. He politely listened to our points of concern, confusion, and frustration. He shrugged his shoulders and summarily dismissed our objection to having our southern view, and daylight, taken away by their proposed extra tall office tower. He also understood that many of the suites on lower floors would entirely lose their view of the sky! He noted that since we are across the street from their building, they owe us no consideration. He was equally polite in noting our concern about the effects of bright lights from their offices and their logo. Again, sorry and good luck. It seems they do appreciate rules and guidelines; when expedient. He had that extra-confident way about him as he described the "proposed" project, and all the "sacrifices" they had made; stopping just short of saying "you are welcome". It almost seemed like he was ticking a PR checklist item on an already approved project. How could it be? Sure, confusion and disappointment remains surrounding the sudden end of the bidding process and no public vetting of the options. But they could not have been given the nod somehow; and they should not assume it. Afterall, you have not approved the project.

My wife and I live in a south facing suite on the 11th floor of the south tower of The Falls. We joyfully selected this neighbourhood and this suite for the many benefits that combined into a wonderful (and high priced) choice. We retired here and hoped to quietly enjoy life in this wonderful downtown in peace. We generally liked the status quo but also understood that things could evolve for the greater good of our community even if it has some undesired impact on our interests. That is not the case here.

We watch with great concern the full court press to get you (and city staff) to bow to pressure to reinterpret, amend or otherwise torture the governing rules and guidelines into submission so Telus can raise their corporate flag of ownership to impose over our city's historic and elegant downtown. More than an office building, this arrogant vanity project is intended to be a towering commercial billboard erected over us. Please do not let us and our beloved city's downtown drown in the Telus Ocean.

Telus representatives complain that they have made many design compromises and sacrificed so much in terms of cost, benefits and utility because of the site's shape and size. Then why force it? Why force this bull-in-a-china-shop into a bird cage? Why not build on any number of sites available in downtown, along Douglas and in close proximity to other office buildings?

Lets not pretend to not know that those design "compromises" are there so that they can gain the additional height for prominent placement of their corporate logo (and permanent

advertisement) over everything else in our downtown. That is a *feature*, not a concession. The objective is to hijack, and tower over, the iconic Empress. The poor Empress might become the "T'Empress"! The rest of us are merely collateral damage. As would be our trust in our representatives.

Again, they can build a few short blocks away, at a lower cost, with higher utility for them and greater positive community impact. But they want you to approve this corporate vanity project at this ("challenging") location so that they can permanently impose their brand logo on the elegantly inviting views of our downtown skyline. Their stated objective has always been to have their oversized and incongruent tower and lights prominently visible from sky and the harbour. Will this overbearing billboard be your legacy? We hope not.

You can do the right thing by disapproving this project. Or you can pretend that you have no choice but to go along and have us and our neighbourhood drown in the Telus Ocean.

If you choose to approve this project, you would cause substantial negative impact on our property values, daily use and enjoyment of our homes and neighbourhood, and overall quality of life we sought by choosing to live and spend here. We are your constituents. We are watching. We will not forget.

Please do not approve the Telus Ocean project at this location.

Respectfully submitted,

Pirooze Khebreh  
1105-708 Burdett Ave

To whom it may concern,

As a resident of the Astoria I share the same concerns as the Humboldt Valley Committee. While the my view will not be affected, I am particularly concerned about the noise coming from late night parties on the proposed rooftop amenity space...if the space is rented out what guarantees will we have that it is governed by the same noise controls that were imposed on the Strathcona Hotel outdoor volleyball courts or Bart's pub as this is a primarily residential area.

Another concern relates to traffic. Do we have any indication what will happen when the sun reflects off the glass facade as motorist approach the stop lights at Douglas and Burdett? Will the glare pose safety issues in terms of drivers seeing the street lights?

What will happen to traffic patterns during the construction Phase and as a result of traffic entering and leaving the underground parkade onto Humboldt? Firstly bus stops will be moved during construction. Living on Fairfield/Burdett I already feel like I am living in a bus depot with the noise and pollution from the growing number of buses that park outside our front door and would hope that the few parking stalls remain in place.

Of greater concern is the unsafe intersection at Burdett/Fairfield and Penwell. A no parking zone was established at the blind corner, however it needs repainting and the transit drivers need to be reminded that buses cannot park there. With increased traffic coming from the TelusOcean building I fear that intersection will become the scene of fatal or near fatal crashes as more traffic avoid the choke point on Bellville Street at Douglas and come down Fairfield. Then there is the issue of buses turning onto Penwell trying to avoid parked cars as vehicles come up the hill. If nothing else a traffic safety study is needed.

Regards  
Anne Kyle-Bartlett  
Astoria

Her Worship Mayor Lisa Helps  
and Council  
City of Victoria  
Email: [mayor@Victoria.ca](mailto:mayor@Victoria.ca)  
[councillors@Victoria.ca](mailto:councillors@Victoria.ca)

Dear Mayor Helps and Council:

We were pleased to hear that Telus is interested in developing the site next to the Aria where we live. However, in reviewing their plans, we have concerns about the size of the building, which is overwhelming for the site.

As agreed with our neighbours and the Humboldt Valley Committee, it's imperative to reduce the height to the 45m allowed in the current zoning and decreasing the proposed density in the process. This would also protect the Empress from being overshadowed and prevent their corporate logo from piggybacking on its roofline. It would also give more priority to the public south plaza by cutting back the second "prow" that extends over it. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden and in the process, would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls.

Although I am looking forward to the eventual development of the lot next door, I don't wish to live in the shadow of a behemoth whose height and signage placement implies ownership of the iconic Empress Hotel. As per Telus' plans every photograph of the Empress from the inner harbour will advertise Telus. Please ensure that the height is reduced as described above. Thank you for your kind assistance. I look forward to your response.

Sincerely,  
Chantelle Fortin  
and Shaun Millar  
N904-737 Humboldt St

cc: Humboldt Valley Committee

September 24, 2020

Dear Mayor Helps and City Councillors,

As a long-time resident in the Humboldt Valley, I am writing to express my personal concerns about the proposed TELUS Ocean development in downtown Victoria under consideration by city council.

I found the Application Brief 1.0 from TELUS and Aryze to be a beautiful and superficially informative document that revealed a number of misleading statements upon careful reading. Essentially, while the proposed building is architecturally remarkable, it's size does not fit its location.

While I appreciate TELUS' architectural efforts to accommodate the buildings nearby, my conclusion is that it will look like a very large foot being shoehorned into a small shoe as it overwhelms the buildings nearby. This was not my expectation, or the city's, based on Victoria's current Official Community Plan or Downtown Core Area Plan.

As a resident of the ARIA condominium, I appreciate the Ocean's setback from the ARIA but on every other side the building goes to, or very near, the property line and the crowding will be more visually intrusive if the City grants TELUS' request for a height extension from 45 to 53 metres. If there is one iconic view of Victoria, I think it is of our harbour with the Empress Hotel. Imagining that view at night with the Ocean looming over the Empress with its bright TELUS sign dominating the view is very distressing and diminishes city's our brand. Please don't let that happen!

Finally, although TELUS has conducted a Transportation Impact Study, as a resident of Humboldt St, I am doubtful of their conclusions. The access streets of Humboldt and Penwell are not wide and already service 2 major hotels and 3 large condominiums. The condominium residents and the Ocean occupants will be travelling in opposite directions in rush hours and Humboldt St (the wider of the two streets) now has only 1 vehicle lane to handle both directions!

I urge you to restrict the Ocean's height to that currently zoned and to seriously consider the traffic implications it presents. Thank you for taking these views into consideration.

Yours truly,

Peter Bonyun  
737 Humboldt St, Unit S707



Greetings ~

My comments are about the proposed Telus building at Humboldt and Douglas streets.

As a letter writer recently commented in the Times Colonist, this building will definitely affect our bird populations: they will be flying into those glass walls.

How can Council seriously contemplate approving the use of so much glass, when in this day and age of environmental awareness it is an affront to people who care about the avian world? Anyone who appreciates our bird life knows that putting some visuals on windows, closing the blinds or simply turning off all lights at night, are recommendations for homeowners and businesses. Is the building's proponent willing to commit to such measures?

Victoria Council goes on about environmental concerns, including 'Climate Leadership and Environmental Stewardship' in the 2020 - 2022 Strategic Objectives. I think this includes paying attention to the wildlife in our city. We have a thriving birdwatching community here.

Have you given any thought to how the reflection from these walls of glass will affect vehicle drivers and cyclists? How does this all-glass design mesh with Green Building standards and 'sustainable design'?

Clearly your enthusiasm for this building proposal is affected by anticipating both land sale income, tech companies and related employment opportunities, and potential extra space for VCC use.

I guess you are still thinking of an expansion for the VCC as an economic driver? Given COVID, conference and meeting business experts say it is unlikely that such gatherings will occur the same way in the future. They will be a hybrid of online and face-to-face interactions. Environmental considerations will lessen air travel and virus considerations will deter people gathering in large groups, not to mention the organizational cost factors of anti-COVID measures. So attendance at conference and meetings will diminish in favour of staying put and using online technology.

Further, long ago there was talk of building a pedestrian overpass when the Crystal Garden was put into use for VCC events. Has this idea been revisited in light of this proposal? and is it a factor in your approving this proposal? The cost probably won't justify the effort.

So, my concern is the use of so much glass in this building proposal. I don't think it fits; it is an overheight edifice that will noticeably 'stick out' without enhancing or complimenting its neighbours.

And be a threat to birds.

As for the Aryze proponent comments "Victoria has a heritage-first approach to development" - that's disingenuous. My impression is that this Council pays only lip-service to heritage and preservation. Your decision re the Northern Junk buildings will say a lot in this regard. But that's another matter.

Regards,  
Pat McGuire  
Victoria

Dear Mayor and City Councillors

I am writing to share my concerns about the size of the Telus project slated to begin soon.

While I do not have an issue with this building being built, it's the enormity of height that concerns me greatly

I was told it was going to be 12 stories. The actual height would be over 17 stories. Only understanding now there is a difference between residential and commercial floor heights. I haven't built either so when I heard 12 stories I believed Telus was taking our community into consideration in their plans. This height will destroy views and shadow the Falls building, Double tree and the Marriot.

These buildings and businesses have contributed to Victoria's tax base for some time now. The value of their properties will be greatly impacted.

Please do not endorse this plan as it has been presented.

I ask that you hear our communities wish to keep this Telus building to the height of 12 (residential) floors. The Telus building should be an **add on** to our community. With the proposed height it is **taking away** from our community,

Many thanks  
Yours respectfully  
Brenda Dean  
751 Fairfield Road  
Victoria

Dear Mayor and City Councillors

I am writing to share my concerns about the size of the Telus project slated to begin soon.

While I do not have an issue with this building being built, it's the enormity of height that concerns me greatly

I was told it was going to be 12 stories. The actual height would be over 17 stories. Only understanding now there is a difference between residential and commercial floor heights. I haven't built either so when I heard 12 stories I believed Telus was taking our community into consideration in their plans. This height will destroy views and shadow the Falls building, Double tree and the Marriot.

These buildings and businesses have contributed to Victoria's tax base for some time now. The value of their properties will be greatly impacted.

Please do not endorse this plan as it has been presented.

I ask that you hear our communities wish to keep this Telus building to the height of 12 (residential) floors. The Telus building should be an **add on** to our community. With the proposed height it is **taking away** from our community, Thankyou

V. Dean 751 Fairfield Victoria

Victoria City Council

September 27 2020

Re: TELUS Ocean Proposal

Dear Victoria Council Members:

I am writing to express my serious concerns about the TELUS Ocean proposal, and am urging the City to enforce existing zoning laws and guidelines. This, I believe, would require that the size of the allowable TELUS Ocean building be decreased to the 43 meters allowed in current zoning laws. I don't think it is appropriate for this neighbourhood or fair to its residents that such a large building be put on the small site in which the proposed TELUS Ocean development is proposed.

I accept that TELUS Ocean has a right to build on its site. However, I think that residential owners of nearby properties also have the right and a reasonable expectation that building developments will not vary from existing zoning laws and guidelines.

The decision to purchase my home in the Astoria (1704-751 Fairfield Road) last autumn (2019) was influenced by the expectation that the City's official plans would be maintained and preserved. This is the biggest purchase of my life and I was hoping it would be the final home I own. Before deciding to purchase here, I spent considerable time thinking about, waiting and choosing this particular location because I love the character of the Humboldt Valley neighborhood. I paid a premium to enjoy the view my property affords. However, both the character of the neighbourhood and my view of the inner harbour will be fundamentally impaired if the proposed TELUS Ocean development proceeds without significant modifications to its height. To put the matter bluntly, my husband and I would not have purchased this particular property had there been a reasonably foreseeable possibility that such a massive building would be erected on the tiny site for which it is proposed, particularly when so doing is contrary to existing zoning and guidelines.

As an owner, I realize I don't own my view, or have a right to prevent developments for which I disapprove. However, it is only reasonable and fair that at the time of purchasing my condo in 2019, it would be safe to assume that zoning requirements would be enforced and that a plain interpretation of them would be applied for subsequent review of proposed developments. Thus, I did not expect the possibility of a building of the size TELUS is proposing be constructed on the lot in question. I assumed, reasonably, that any future development would be no higher than equivalent to a 15 story residential tower. However, the proposal for TELUS Ocean exceeds

substantially the height that would be reasonably assumed or equated with a 15 story residential tower.

I also assumed that the ‘visage’ or atmosphere of the Humboldt Valley would not be radically transformed from a residential area to a commercial area. While I accept the role and place of commercial businesses in this neighbourhood, I did not expect there would be large commercial

signage and blazing lights that interfere with our sleep and tranquility. However, If TELUS Ocean is permitted to proceed as proposed, contrary to existing zoning laws and guidelines, this will not only make it difficult to sleep at night and significantly impair my view, but it will also fundamentally detract from the residential quality of our neighbourhood.

At public hearings, TELUS Ocean officials were also promoting the possibility of a large screen that would feature public information and other bulletins. This is not in keeping with the residential qualities of our neighborhood and I urge the City to block this idea, if TELUS desires to proceed with it.

In closing, I don’t object in principle to the TELUS Ocean building but urge the City to require that it conform with current zoning and guidelines and be confined to the 43 metres allowed in current zoning. This not only protects our view but would also protect a landmark Victorian entity – the Empress, from being overshadowed by a corporate logo.

Yours sincerely,

Janet Hiebert

1704-751 Fairfield Road

Victoria

Victoria City Council

September 27 2020

Re: TELUS Ocean Proposal

Dear Victoria Council Members:

I am writing to oppose the TELUS Ocean application, as currently proposed. Specifically, I am writing to urge City Council to enforce existing zoning laws and guidelines and require that the TELUS Ocean building be no higher than the 43 meters allowed in current zoning laws.

I purchased my condo in the Astoria (1704-751 Fairfield Road) in 2019. At the time, I believed that my view would not be harmed because existing zoning laws and guidelines did not permit buildings as high as the proposed TELUS Ocean development. I realize that one's view is not an absolute right. But having said that, it is reasonable to assume that when you purchase a property, existing guidelines and zoning requirements will not be suddenly abandoned. So I urge Council Members to only approve this application if it is consistent with these. That would require that TELUS Ocean be limited to 43 meters in height. I wouldn't have purchased this condo a year ago if the TELUS Ocean building existed as the size proposed in the application.

A change to reduce the size and height of the development will be beneficial to the Humboldt Valley, which is predominantly a residential area. Although commercial properties are beneficial, they should not fundamentally impair the character of our community. In addition to the height problem, the proposed footprint of the building is too large for the site in which it is proposed.

When you review this application, please consider the fact that for most residential owners their homes are the biggest investment they will ever make, and therefore they have a right

and reasonable expectation that building developments will not vary from existing zoning laws and guidelines if in so doing they detract from existing views and the community feel of a residential neighbourhood.

In short, I urge you to ensure that the TELUS Ocean development complies with existing rules, and therefore should not be allowed to be any higher than 43 meters. Also, please do not allow TELUS Ocean to include a large screen publicizing information and bulletins, as mentioned as a possibility in public hearings. This will lead to light pollution and interfere residents' abilities to sleep.

Yours sincerely,

Wayne Hiebert

1704-751 Fairfield Road

Victoria



# Regarding: Telus Ocean development proposal

To: Victoria City Council

Dear City of Victoria Council Members

I have read the extensive report compiled by the Humboldt Valley Committee and wholeheartedly concur with their observations and recommendations.

I agree that the Telus proposed building is much too big for that small plot of land. To erect a building of that magnitude one would need a property 2-3 times that size. Telus is attempting to accommodate the property and make it appear smaller by referring to it as "triangular" etc. However in the final analysis it is a humongous building on a very small plot of land.

An analogy would be of a person who wears a size 12 shoe trying to wear a size 8 shoe. It could be done but should not be done because permanent foot problems will occur. The same holds true for trying to put an oversized building on a small piece of land. It can be done but shouldn't because permanent problems will follow ie:  
...traffic congestion (Humboldt being a very small, one way street is not designed to accommodate the influx of car/foot traffic that a building of that magnitude would bring.  
...the area is already overwhelmed and overpopulated. Victorians and tourists alike would be better served if that small piece of land could be used to reduce stress and create a sense of balance and harmony not increase it.  
The existing rules and guidelines by the city have been created to serve all at many levels. I trust these will not be broken to serve a few.

Sincerely, and with respect  
A. Frayne

Hello Mayor Helps and Victoria City Councillors,

My husband and I live in south tower of the Falls. When we bought our home we knew that something would eventually be built at the Apex site and that, given the zoning, we might lose some of our view to the south and be looking at, or slightly up towards, the roof line of the new structure.

The proposed Telus Ocean building is beyond anything we could have imagined in height, width, and potential for lighting our home at all hours of the day and night. It would occupy our full southern view; we see neither over it, nor around it. We would need to crane our necks to even see the sky. We are on a high floor and are fortunate to also have a view to the West. Other units in our building would be impacted even more severely. It would be our constant companion, greeting us in the morning and being the last thing we would see at night.

Telus has obviously designed a building whose M.O. is to be visible from the Inner Harbour, with the Telus Logo dominating the Empress and the skyline. To meet those ends, they have proposed a hulking structure that would be out of place and substantially change the nature of Humboldt Valley.

I urge you to not approve the proposed Telus Ocean building as designed. If they want a billboard, they should put it somewhere else. Otherwise, they should be a good neighbour and build something congruent with the surrounding area.

Best regards,  
Andrea Rolston  
1105-708 Burdett Ave.

Dear Mayor and Council,

I'm writing to you as a concerned resident of 737 Humboldt Street, Unit N309, Victoria V8W 1B1.

My concern is regarding the potential increased height (to over 53m) as described in the Application Brief of the 11 storey TELUS Ocean building, the proposed site of which is located within the Core Inner Harbour / Legislative Urban Place Designation, the south end of the downtown at Douglas and Humboldt Streets.

The TELUS Ocean site is currently zoned (CA-4) for buildings of up to 45m in height and permits commercial, office, and residential uses. Map 32 in the Downtown Core Area Plan, the official Victoria development guide for the Downtown (DCAP), has an interpretive table next to it. This table shows that buildings of 45m can have up to 15 storeys, if they are residential – and up to 11 storeys, if they are commercial. Residential storeys are considered to average 3.0m; while commercial stories average 4.1m.

The TELUS Ocean plan has an average office floor height of 4.25m and, with a higher first floor and top amenity floors, an average storey height of 4.8m overall. **This pushes the proposed height of their 11 storey building to over 53m** (about the height of an 18 storey residential tower).

As a resident living next to this proposed building, I would urge TELUS Ocean to:

- **Reduce the height to the 45m allowed** in the current zoning, decreasing the proposed density in the process. This would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.
- Give more priority to the public south plaza by **cutting back the second “prow”** that extends over that plaza. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, it would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls.

Thank you for your prompt attention to this matter.

Sincerely,  
Gary Roberts  
N309-737 Humboldt Street  
Victoria, B.C., V8W 1B1

## Letter to the City Council of Victoria

Telus Ocean is pitching to build a monstrous building up to 53 meters asking permission to deviate from the current height permissions of 45 meters. The proposed building is an insult to the heritage integrity of our downtown.

The tower would overwhelm the Humboldt Valley Neighborhood with its expensive condo buildings, the convention center and the Empress Hotel taking away the charm of our neighborhood. Extending the North side of the building all the way to the absolute corner of Douglas and Humboldt as the building gains in height takes away not only the views of The Falls completely but also blocks the sunlight and the sky.

The proposed Telus Ocean building would irrevocably change the heritage landscape. The current character of our city attracts many tourists and draws residents to live in the downtown core.

I trust you will scrutinize all letters and information presented regarding this development proposal.

**This evidence should be enough for City Council to send the project back for additional rework to only allow 45 meters and design for a reasonable set back from the North Corner of the building.**

Developments require public engagement. The Humboldt Valley community was not involved in any planning process. The presentation by Telus in August informed us that we benefited from the views from our condos but knew sooner or later there would be a building. Yes, that is correct, however, we could not envision the monstrosity proposed that would not only eliminate any view but also block our sunshine and skies and face us and the city with a large glass wall and the Telus billboard.

The city blocked off the Humboldt street for bicycle lanes resulting in increased traffic for Burdett Avenue in addition to the already heavy bus traffic going up and down our street creating pollution and noise. Now we will also be faced with a massive glass wall from the Telus Ocean building.

It is time the city of Victoria gives some consideration for the residents of the Burdett Avenue.

Many residents of our community support redevelopment, however many residents also feel the current proposal represents overdevelopment of the site. For these reasons, please return the proposal to the developer to ensure meaningful community engagement and exploration of new building forms for densification and traffic management. After community engagement, an independent review by the Victoria planning commission is necessary to create a well-informed urban design that ensures livability and integration with our community.

This decision has too many negative ramifications for our community and should not be rushed. More time is required for further community consultation and information gathering before a final decision for redevelopment is made

Community residents have been inadequately informed of the proposed building. All parties including the developers, elected officials, and the public should ensure that this addition to the city contains the best design for our neighborhood.

Accordingly, I urge you to table the Telus Ocean zoning proposal until a master plan for this critical site has been completed with meaningful input from community members.

Sincerely

Irmela and David Clack

1002-708 Burdett Avenue

Dear Mayor and Council,

I am very disappointed that you are considering allowing Telus to build a monstrosity of a building so close to me. I live at #1401 – 751 Fairfield rd., basically across the street from where this building is to be built. I walk in this area several times a day to access downtown and the inner harbour.

1. The building is too high and overwhelms the site. A corporate logo should not be allowed to piggy back over the Empress. We have a beautiful landmark with the Empress and it should not be overshadowed. The building must be shorter.
2. Leave more room for pedestrian walking and reduce overall building size.
3. I am concerned about the amount of traffic on Humbolt street. We already have 3 condos, a church and the Marriot Hotel in one block. There is already too much traffic.
4. A glass reflective building is dangerous to birds. We should not be endangering wildlife. Does Telus promise to turn off all lights at night?

Thank you for your attention to this matter.

Sincerely,

Jennifer Walton  
#1401 – 751 Fairfield Rd.

Dear Mayor Helps and Council,

As a long time resident of the Humboldt Valley area, I would like to share with you know my feelings about the proposed TELUS Ocean building on the property at the corner of Humboldt and Douglas Streets. First of all, let me say that so far, the changes made in the Humboldt Valley are all welcome and have been well managed to complement each other nicely.

First of all, the overall size of the building is just simply far too big. If TELUS needs to be applying for a variance in height restrictions, it is obvious that they also know it is far too big. Having a building of that size and "footprint" towering over everything else in the neighbourhood should not be allowed. I am at a loss to understand why the building being taller than the world-renowned Empress Hotel and therefore showing off the TELUS logo seems to be acceptable to this plan.

Seeing the large number of empty offices that were downtown before the Covid-19 pandemic struck and knowing that so many are likely to remain empty for quite some time to come, building more office space for rental seems rather unproductive, even for TELUS employees. I have a nephew who is a TELUS worker who for several years has done almost all of his work from home and now does so all the time. Also, dropping a hint that there might be a Medical Clinic included in the plan certainly doesn't take into consideration the costs to said clinic when one sees nearby medical offices losing tenants due to high rents.

Another major concern is their claim that all the traffic would come down Penwell Street rather than along Humboldt. This is not currently the case and has not been the case since the closure of Humboldt St to through traffic. The increased traffic, and noise, especially from service vehicles to service such a huge building would not only be a safety issue but a quality-of-life for all concerned issue. The City of Victoria has just spent quite a bit of time, effort and money on redesigning Humboldt Street ensuring more bicycle paths and the new seating/paly area that is well used that the extreme expense of changing all of that new plaza just to accommodate the new building doesn't seem to make much sense to me.

The outer shell of this huge building, I believe, will be extremely bright due to reflection. In the summer, the reflection from the roof of the Crystal Garden is significant and the TELUS building will be a huge magnification of that. I believe that green, treed areas including Thunderbird Park would be in danger from far too much sunlight reflecting onto it in summer especially. It is also likely to be a very serious danger to bird life. The TELUS proposal claim that the night lights would be low **for plants** seems a rather a ridiculous way of saying that yes, lights will be on 24/7. Even the Parliament Building turns off the lights overnight...

Thanks you for your consideration of this letter,

Best regards,  
Marni Horner

Your Worship and Councillors:

I am writing as a person who lives close to the proposed Telus building to give my concerns about this project. I live in the Aria (737 Humboldt), and my unit faces Blanshard and Humboldt. I will not be affected directly by the building and its ongoing construction, but am very concerned about the impact on construction movements on my immediate area.

In particular, I am concerned about two things:

1. Vehicle movements during the 2 or 3 years of construction, and
2. Location of the construction worksite.

1. Vehicle Movements:

- **The main access should be on Douglas if at all possible.** I think this is feasible as the worksite for the nearby Tapestry has tied up a full lane of Belleville for several years, and traffic still manages to get by.
- **The access should not be on Penwell.** This is a short, very steep street which has blind corners at both ends. Any trucks coming down Penwell (toward Humboldt) will have to cross two bicycle lanes when going across Humboldt, and unless there are new traffic lights (and also alert behaviour by bicyclists), truck-bicycle collisions are inevitable probably with tragic results. Trucks going up Penwell will have the same problem crossing Humboldt. They will also cause an enormous amount of noise when going uphill to Burdett/Fairfield which will disturb almost all local residents, and certainly will impact on the two hotels bordering Penwell (the Marriott and the Double Tree). Trucks going uphill would then have to turn, with either direction having very poor sightlines (in part as this part of Fairfield is a bus stopover area). Cars also tend to speed along the Fairfield-Burdett part of this road.
- **Truck access should not be on Humboldt either.** Adding heavy vehicles to the Penwell-Blanshard block leading up to Blanshard would be very dangerous – there are several parking garage entries, two prominent bike lanes, a daycare, and a service lane along this piece of road. Whichever way a truck would then turn at Blanshard would cause problems, too: a steep downhill and curve to Belleville in one direction, and a very steep hill with a lot of merging traffic heading toward Fort in the other. As well, Humboldt has only recently been rebuilt twice (!) in one year, and truck traffic would probably ruin the road. The truck noise would affect a large number of strata residents and hotel guests.

2. Worksite Location:

- **This should also be on, or adjacent to Douglas Street.** The Belleville-Humboldt block of Douglas is straight and wide with good sightlines, and so could accommodate an area being blocked off as a worksite – if Belleville could handle the Tapestry's worksite, Douglas should be able to handle one for Telus.
- **The other possible location (on the closed-off part of Humboldt near Douglas) would not work:** it would be too short to accommodate a mix of offices and pull-up places for vehicles, and would not have room for vehicles to turn around. Many local residents would be impacted by the noise of vehicles coming or going to such a location, too.

I will not comment on other aspects of the building, except that I am concerned that it is too high, and the 'Telus' logo will dominate the view from the harbour.

I hope you will seriously consider these concerns.



Sincerely,

Paul Harker

I agree with the following and have added three additional points:

- Reduce the height to the 45m allowed in the current zoning, decreasing the proposed density in the process. That would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.
- Give more priority to the public south plaza by cutting back the second “prow” that extends over that plaza. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, that would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls. Build only to the lot line on the south side as the “prow” encroaches on the Aria Condominium building & the personal enjoyment of tenants living on the north side of the building.
- Delete the vertical south east facing graphic as this will take over any view enjoyment that the Aria tenants have currently.
- Make mandatory, in the Telus tenants lease that all office lights on the south side of the building, facing the Aria’s north side, are to be shut off from 6pm. through 6am. 7/24.
- To assist in eliminating traffic gridlock;

As the traffic pattern has been altered on Humboldt Street; so should a strict enforceable traffic patterns be put in place for all traffic entering and existing the Telus Ocean Parking Garage

Regards

Sally Talbot,  
737 Humboldt Street,  
Victoria, BC., V4W1B1



Humboldt Valley Committee

## INFORMATION BULLETIN

# The Elephant in the Room: Questions about the TELUS Ocean Development Application

Researched and written by Andy Wachtel

**Summary:** This review finds that the TELUS Ocean proposal, in its ambition to build a landmark office tower at the south end of the downtown, misconstrues or distorts existing rules and guidance on building height, density, setbacks and overall massing. If neighbours built or purchased property in the expectation that the Official Community Plan and its more elaborated Downtown Core Area Plan offered them some assurance that they could foresee the potential impact of further building, this proposal comes as a bad surprise. The proposal needs to be reworked to better respect the context in this historic district.

### Introduction

The TELUS Ocean Application Brief is more descriptive and less technically detailed than most development applications – in part, because it is also being used as a public engagement tool. That means that it, quite naturally, puts the project in the best light and does not include all the information a reader might need to corroborate claims and statements. This analysis aims to highlight aspects of the proposal that require scrutiny from stakeholders, especially residents in the Humboldt Valley who will be directly affected by the building. The application asks for a significantly larger building than might be expected on this site. We will test the rationale offered for that bonus size to see if it is supported by official plans and guidelines.

### Context

TELUS Ocean is an ambitious project to build a signature regional headquarters building.

*TELUS Ocean is envisioned as an iconic architectural landmark—a centre of activity, creativity and innovation in the heart of Victoria’s Downtown and Inner Harbour.*  
(TOAB, p17)

As a building going into the last remaining unbuilt lot in its vicinity, TELUS Ocean faces the central challenge of fitting in. It is in the interplay of these two goals – creating a landmark while being properly sensitive to context – that key development challenges arise.



The Downtown Core Area Plan (DCAP), the official Victoria development guide for the Downtown, takes this up under Vision:

4.3. Supporting context-sensitive developments that complement the existing Downtown Core Area through siting, orientation, massing, height, setbacks, materials and landscaping. (DCAP, p.11)

TELUS Ocean makes this promise in its design principles:

*TELUS Ocean will be defined by a celebrated, innovative and contemporary building design that complements the surrounding community and nearby landmarks like the Empress Hotel and Crystal Garden. (TOAB, p20)*

We need to judge that in terms of the proposal presented. And, if a picture is worth the proverbial 1000 words, here is what is being proposed:

Fig. 1



Picture along Douglas of **11 storey TELUS Ocean (53+M)** next to **18 storey Falls condominium**.

Picture along Humboldt of **11 storey TELUS Ocean (53+M)** next to **12 storey ARIA condo (37M)**.

(from TOAP, pA304)

### How does TELUS Ocean justify this scale as appropriate in the context?

The TELUS Ocean application refers to the DCAP to provide a policy context and confidently interprets that policy to support its plan. In three paragraphs, TELUS Ocean moves from a current zoning of up to 45m in height with a Floor Space Ratio (FSR) or density of 3.0:1 to a rationale for a much larger building through rezoning. Let us examine how TELUS Ocean does this.

### **TELUS Ocean claim about number of storeys permitted**

TELUS Ocean suggests that they have license to build up to 15 storeys and are showing contextual restraint by only proposing 11. (TOAB, p106)

*The TELUS Ocean site is located within the Core Inner Harbour / Legislative Urban Place Designation, which anticipates buildings up to 15 storeys, with densities up to 4:1 considered in strategic locations. Commercial and office uses are encouraged in this district, and local planning has strategically targeted increased height and density along Douglas and Yates Streets, in addition to the general strengthening of the Core Business area by increasing office capacity. (TOAB, p27)*

**Response:** The TELUS Ocean site is currently zoned (CA-4) for buildings of up to 45m in height and permits commercial, office, and residential uses. Map 32 in the DCAP (which the TELUS Ocean application reproduces on page 29) has an interpretive table next to it which the TELUS Ocean application leaves out. This table shows that buildings of 45m can have up to 15 storeys, if they are residential – and up to 11 storeys, if they are commercial. That is, residential storeys are considered to average 3.0m; while commercial stories average 4.1m. The TELUS Ocean plan has an average office floor height of 4.25m and, with a higher first floor and top amenity floors, an average storey height of 4.8m overall. This is what pushes the proposed height of their 11 storey building to over 53m, about the height of an 18 storey residential tower.

### **TELUS Ocean claim about permitted density**

The existing CA-4 zoning has a maximum density of 3.0:1. The OCP allows for increased density up to 4.0:1 in strategic locations. (TOAB, p27, referencing OCP, p42). TELUS Ocean doesn't belabour this point, however, because they want much higher densities than that, arguing that the current zoning "does not contemplate the advanced building design features proposed by the TELUS Ocean development vision". (TOAB, p106)

**Response:** TELUS Ocean could make an argument for this being a strategic location and seek a variance to build up to 4.0:1 but that isn't the goal. Why the particular "advanced building design features" merit increased density is not made clear.

### **TELUS Ocean claim about greater height and higher density**

*The TELUS Ocean is just adjacent to the area where densities of 6.0:1 are permitted. The TELUS Ocean should be allowed to "support the area" with a similar density of 5.6:1. (TOAB, p27 & 106)*

**Response:** The DCAP indeed allows for increased height and density along the Douglas / Blanshard Street corridor, but both height and density ramp up north of Humboldt and east of Douglas, and no transitional zone is implied. The TELUS Ocean may argue they are close enough to this area to take on its zoning but there is nothing in the OCP or DCAP that supports this, and as we shall see below, some clear counter-indications.

## TELUS Ocean claim about the goal of enhancing the downtown skyline

*A major goal within the DCAP is to enhance the skyline within the Inner Harbour District, expressing an “Urban Amphitheatre Concept” by building taller buildings, particularly along Douglas Street. TELUS Ocean is uniquely placed to “complement the Empress Hotel, emphasizing its rich detail without diminishing its visual appearance.” (TOAB, p29)*

**Response:** As noted above, the Urban Amphitheatre Concept maps show building height ramping up north of the TELUS Ocean site but less along Douglas than closer to Blanshard. In fact, two conceptual illustrations in DCAP on these points show that no tall buildings were anticipated immediately behind the Empress Hotel (the skyline was already marked by tall buildings on the north side of Humboldt and beyond) and the TELUS Ocean site specifically was portrayed with a much shorter building. (DCAP, p63 and 88). In the picture below, reproduced from DCAP, note the dark building just to the right of the Empress; this is the TELUS Ocean site.

Fig. 2



**Conceptual illustrations of how building heights and designs should relate to the local context.**

(DCAP, p88)

## TELUS Ocean claim about enhancing views of the Empress roofline

*TELUS Ocean will provide an improved backdrop for the Empress, a rising roofline that mirrors the rising scale of the hotel. The light coloured glass walls will show off the Empress roofline and the building’s southern cut “reduces the building’s bulk as seen from the harbour.” (TOAB, p96)*

That concept is illustrated with a line drawing and a photograph taken from Laurel Point with TELUS Ocean inserted. (TOAB, p97)

**Response:** The view from Laurel Point is a vantage point from which the impact of a new building on the skyline is meant to be tested. (DCAP, 6.187, p94 and Appendix 2) The photo shows a large but fairly bland, light colored façade behind the Empress.

However, one telling detail contradicts this modest desire to “bolster the visual impact of the Empress”. It is not unusual for an office building to have prominent signage. The TELUS Ocean, a signature building, is shown with signature signage – right over the Empress. If, as might be expected, this will be lit-up after dark, that places a TELUS sign in as prominent a location as any corporation might desire.

Fig. 3



(TOAB, p97)



## **Aspects of a “Landmark” Building**

### ***Accessing the View***

TELUS Ocean consistently interprets DCAP as encouraging or at least giving sanction to a much larger building on its site than the zoning provides. If none of these assertions actually supports moving TELUS Ocean in the direction of a higher, denser building, the ambition to build a landmark building clearly does. One mark of that is the remarkable view accessed.

*“Acting as a marker of the southern edge of Victoria’s Downtown, TELUS Ocean will boast high-calibre views of both the city and the harbour.” (TOAB, p49)*

Most telling is the beautiful panorama pictured (see TOAB, pages 50-51). While not captioned, it appears to show the view from the south end of the roof deck, with the rooftop of the ARIA almost 20 meters below at the bottom left and the roofs of the Empress in the mid distance on the right. Without doubt, an iconic view.

While it is true that no property owner owns the view, it is clear that building higher than and in front of another property is the surest way of capturing it. In a development application, the City always needs to weigh how much advantage can be taken by the new property and what concessions it should make to preserve its neighbours’ view corridors. This proposal disproportionately privileges office tower over hotel and residential views.

### ***Monumental Design***

The TELUS Ocean is described as a “flatiron” design, in reference to the prow that takes the corner at Douglas and Humboldt (see the rendering at TOAB, p41). In fact, we see it is a triangle with two equal sides in cross-section, with the long side along Douglas Street and a second point at the south plaza.

This is not a “typical” building design as described in DCAP. The most significant difference is that TELUS Ocean rises to its full height with no setbacks (except for the tiered terraces that start at the 5<sup>th</sup> floor at the south end, i.e., at the 8<sup>th</sup> floor residential level). These vertical walls define the prow shape that is the building’s identifying feature (as shown in a quick sketch on TOAB, p3). Zoning would require the building wall, after a vertical rise of 30m, be set back by 1 meter for every 5 meters additional rise. Relaxation of setback rules permits the monumental verticality that TELUS Ocean seeks to achieve.

TELUS Ocean, as noted, diverges from a flatiron design in having 2 acute points, on the south as well as the north end. That means that while its sheer vertical facades are very prominent, the side facing Douglas Street is roughly 40% longer than that up Humboldt - a massive wall indeed. Again, a sense of how that dominates the block along Douglas Street can be seen in Figure 1 above as viewed from the Empress. It is this face that the architects tried to relieve by making the cut alluded to in describing the shortened roofline as viewed from across the harbour. For





anyone facing the building, in the ARIA, the Hilton Doubletree, the Falls, or the Empress, the impression, as shown in the many renderings, is massive and pervasive, even from the higher floors.

### ***Orientation and Placement on the Lot***

The lot, shown in various renderings, is a kite shape, with the narrow end at Humboldt and Douglas (TOAB, p20). The building, as described in Big Moves – 2 Reorganize Building Mass to Prow (TOAB, p38), was oriented to emphasize its frontages along Douglas and Humboldt and especially its dramatic leading edge at the north corner. TELUS Ocean describes this as “taking advantage of its flatiron terminus on one of Victoria’s most prominent intersections.” (TOAB, p46) This has the additional advantage of “doing well by doing good”. It allows the architects to set the building back from the ARIA, and open up a wide throughway in the “Penwell Extension” for public realm improvements, while orienting the building most effectively along Douglas with the prow at the corner for greatest placemaking impact. (For example, see the rendering on TOAB, pages 42-43.)

### ***Public Realm***

TELUS Ocean has committed to an ambitious landscaping plan that includes redevelopment of the north plaza at the prow (where Humboldt Street has been closed off), along Humboldt Street (which TELUS hints may be further redeveloped), up the Penwell Street Extension (including the area above the parking ramp), and all of the existing South Plaza.

The proposal makes some unwarranted claims. For example, TELUS Ocean says of the north plaza at the prow that “a new public plaza is created by closing the northern portion of Humboldt Street to vehicular traffic to allow bicycles and pedestrians only.” (TOAB, p55) Certainly, at least the nucleus of this plaza already exists by virtue of the City’s bicycle path initiative.

Even so, this is a strength in the development application. It depends on entering into what amounts to a private – public partnership with the City; TELUS Ocean is able to “borrow” a lot of public space to enlarge its grounds around the building. In particular, the “forecourt” in front of the main entrance and the plaza beyond the planned restaurant at the south point are expansive and enhance the importance of the building (TOAB, p54-61). If this is to be a true shared amenity, it will be crucial that TELUS Ocean make it very comfortable for the public to enter and share the space.

### ***South Plaza***

As noted above, the south plaza is recognized by the City as a Minor Public Open Space (DCAP, Map 28, p75), a rare commodity in the Downtown. The OCP makes a point of “identifying strategies to... develop key public amenities, including urban plazas”. (OCP, 6.10.5, p48) This plaza is connected by crosswalk with the Conference Centre and is an important informal marshalling ground for events at the Conference Centre and the Crystal Garden. In that regard,

the shape of TELUS Ocean presents a problem. While the extent to which the corner is undercut at ground level helps, the building's corner overhang looms above the plaza well beyond the crosswalk from the Conference Centre. TELUS Ocean touts this as providing "weather protection at...the mid-block pedestrian crossing" (TOAB, p95) but it reads as defining private space.

If this were a conventional building, there would be a requirement next to the plaza to cut back and terrace the edge. (DCAP, 6.187, p94). TELUS Ocean indeed goes in this direction by cutting back at its level 5 and tiering up from there. However, because this starts as a point, this does not open up the plaza except perhaps as viewed from a distance. (See rendering, TOAB, p60).

Again, if this were a conventional building, current zoning would require a side yard setback of 4.5m. Instead, the southern point of TELUS Ocean extends right to the property line. The following overhead rendering (Fig. 4) shows how this overhang defines the plaza (at the lower right).

Fig. 4



(TOAB, p48)

## Conclusion

TELUS Ocean, like any proposed development, has the right to build on its site in conformity with existing zoning and guidelines. Its neighbours should have anticipated that and framed their expectations accordingly. TELUS Ocean also has the right to apply to go beyond current zoning and ask the City for variances. At that point, however, it is then up to the City to weigh competing rights, those of TELUS Ocean to build its vision of a landmark versus its neighbours' desire to retain some of the advantages they have enjoyed. TELUS Ocean sought to show that it has properly taken account of its neighbours and has made appropriate design decisions to limit harms.

However, for many of the people in the neighbourhood most directly confronted with this proposed building, that balance has not been achieved. The mitigations proposed do not resolve the problems adequately. The arguments TELUS Ocean has made to justify its scale are self-serving. Neighbours, who have depended on the City's official plans, would be completely justified in believing that no such massive building could be put on this site.

**TELUS Ocean is too big. It overwhelms the site, the nearby historic buildings, and the neighbourhood. But TELUS Ocean can achieve many of its goals to become a downtown landmark even at a smaller scale. To this end, we urge TELUS Ocean to:**

- **Reduce the height to the 45m allowed in the current zoning, decreasing the proposed density in the process. That would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.**
- **Give more priority to the public south plaza by cutting back the second "prow" that extends over that plaza. This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, that would make the building better mirror the kite shape of its lot and reduce slightly the massive expanse of the walls.**

## REFERENCES

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I am in agreement with the recommendations in the Humboldt Valley Committee Bulletin. The signature buildings downtown Victoria are the Empress and the Legislature buildings. That is what makes Victoria unique for both residents and tourists. Having the Telus building overpower the Empress with their TELUS sign above the Empress is wrong, caters to commercialism and, I feel, does nothing to "bolster the visual impact of the Empress".

I have no problem with Telus building on the Apex site and welcome a new unique building there, however, the current building plans are too overpowering for the inner harbour landscape and need to be scaled down.

Thank You  
Kathryn Otton  
737 Humboldt Street

To the Mayor and Council

Having reviewed the plans for the proposed building, I feel that the building is too high and needs to be reduced to 43 meters as opposed to 53.

The artist's rendering I have seen appears to me to spoil the lines of the historic Empress, a Victoria icon. And the reflective glare reminds me of a Trump tower.

It looks too 'glitzy' to me to add any charm to the downtown landscape.

It dwarfs the Empress and the huge "Telus" logo looks downright tacky.

This building would befit Vancouver where commerce has overtaken much of the old charm there once was.

Let's not cheapen the beauty of Victoria's and waterfront area with this monstrosity!

Surely there can be a more attractive solution to this.

Yours very truly,

Mary Dales

608-751 Fairfield Rd, Victoria

Hello Mayor and councillors,

We are writing to express our concerns with the proposed Telus Ocean office building development at the corner of Humboldt and Douglas streets.

In short we feel that the proposed development is too big for this location near our beautiful inner harbour.

We moved to 788 Humboldt in 2016 and chose this location because it is on the edge of downtown and near the inner harbour. We love the residential feel while being so close to many historic landmarks. The proposed Telus Ocean development simply does not appear to be a well integrated addition to this part of the city. As is proposed we feel this building is too tall and architecturally divergent from the other buildings in the area. Would you have allowed Telus Ocean to develop on the site of the Customs House development? Of course not and as we can see how much effort is being put into retaining the look and feel of the new structure with no negative impact to Victoria's world famous inner harbour. We sincerely hope that you will use the same type of consideration to value the potential negative impact that the massive Telus Ocean project as currently proposed will have on the look and feel of our beautiful inner harbour.

Please instruct Telus to downsize this project to better integrate into our community.

Respectfully,

Paul and Rolande Vaillancourt  
1501-788 Humboldt Street, Victoria, BC

Mayor and Council  
City of Victoria, British Columbia  
1 Centennial Square  
Victoria, BC  
V8W 1P6

Dear Mayor Helps and City Council members,

I have been following the announcement on the proposed development of the property at 767 Douglas Street and I thank you for receiving my thoughts on the proposal. I regret to say that I am opposed to the project on several different grounds. I moved into The Falls building assuming the car rental businesses presently occupying the site would, at some point be developed into something more substantial, so I am not opposed to all development of the property. I do not believe that the proposal by Telus is a benefit to the taxpayers of Victoria, but rather is a blight to this residential, hotel and tourist driven section of the city that we will regret for years to come.

## **Scale and Style**

The proposed tower on this site dwarfs all other buildings in the area and is 11 metres taller than allowed under the current zoning bylaws. I would think that the rationale behind the current height restrictions was put there to keep the Douglas corridor at a height that would not be out of step with other buildings and would not be visible from the harbour above the lines of historical buildings such as the Empress Hotel. The light up logo on the “prow” of this building would impose itself just above the roofline of the Empress Hotel. The ultra modern design does not fit in with what has been built on neighbouring properties from the Crystal Gardens to the more recent condo towers that transformed this part of Victoria into a residential zone. Another city council tried to modernize the historic downtown by a proposal to replace our globe style street lights with an ultra modern “candelabra” design back around 1960 and this too was met with derision and ultimately defeated after the outcry. Victoria is a unique capital city steeped in history and the area around the Legislature should be kept in scale with those historic buildings that are the foundation of the city. I believe that this proposal would be a better fit elsewhere such as the former Plaza Hotel site at Government and Johnson where the buildings are taller and more suited to an office tower. Do we want our harbour area to become awash in corporate logos as is the case in Vancouver?

## **Danger to Birds**

The style of building proposed would be a particular danger to birds in our city. Whether migrating or nested in our beautiful parks, birds would be drawn to this “lantern” at night and to the trees on the

structure during the day. The reflective glass walls of the building would not be as visible to birds as the more solid buildings already built. The sheer size of this wall of glass would make it difficult for the birds to avoid whether flying from Beacon Hill Park or to the harbour area.

## **Light Pollution**

The proposed tower is described as a welcoming lantern, but welcoming to whom? I live in an area with enough ambient street lighting to keep the neighbourhood reasonably well light at night. The proposal would add more light and the size of this structure would create walls of light even when vacated after hours. I look forward to the quieter evenings as the city gears down without a fifty four metre street light glaring in my windows.

## **Consultation With Residents and Business**

The proposal seems to have been worked on for quite some time before being unveiled as a fait accompli by the council. We could have been consulted on the type of building that would be acceptable to those of us already living or working in the neighbourhood. This approach might have saved time and energy by knowing ahead of time what would or would not be an acceptable use of this lot. Surely this proposal was on the table before the last municipal election, but I cannot find any mention of it in your campaign literature.

## **Selling Price**

On the face of the proposal the selling price seems reasonable enough, but what costs lie beneath the surface? I understand that we, the taxpayers, will be paying for half of the remediation of the site. This is an open ended cost as nobody knows what the final price will be. Usually the buyer is responsible for these costs and other development charges in and around the site. What will the applicant be paying in development fees and taxes over the next decade?

Once again, I thank you for receiving my thoughts on the matter and I look forward to public hearings where we may voice our opinions and receive more feedback from both council and the developer.



Robert Newton  
405 - 708 Burdett Avenue  
Victoria, BC  
V8W 0A8

Dear Mayor and Council

TELUS Ocean is too big. In its ambition to build a landmark office tower, it misconstrues or distorts existing rules and guidance on building height, density, setbacks and overall massing. It overwhelms the site, the nearby historic buildings and the neighborhood. However, TELUS Ocean could achieve many of its goals to become a downtown landmark even at a smaller scale. To this end, I urge TELUS ocean to:

1. Give more priority to the public south plaza by cutting back the second "prow" that extends over the plaza (current zoning requires a side yard setback of 4.5m instead of the UNACCEPTABLE reach right to the property line). This would respect the high traffic pedestrian crossing connecting the Victoria Conference Centre and the Crystal Garden. In the process, that would make the building better mirror the kite shape of its lot and more importantly reduce SLIGHTLY the massive expanse of the walls.
2. Reduce the height to the 45m allowed in the current zoning, decreasing the proposed density in the process. As I understand, buildings of 45m are now zoned (CA-4) for 11 storeys, if commercial (15 storeys, if residential) whereas the proposed building is over 53m about the size of an 18 storey residential tower.

I think that TELUS Ocean could achieve their goal of being a landmark building by scaling back on their initial proposal. I purchased by property depending on the City's Official Community plan and the Downtown Core Area Plan which indicated any proposed building on this lot would allow me to retain some of the advantages I have enjoyed.....not a massive building that would overwhelm the space and seem somewhat self-serving.

Please take these points into consideration when deciding on any applications for changes to zoning and variances to minimize harm to the neighbours.

Thank you for your time and consideration.

Sincerely  
Sandra Groot  
N602 737 Humboldt Street  
Victoria, BC V8W 1B1

Dear Mayor Helps and Council:

As a resident of the Humboldt Valley I would like to voice my support for the report prepared by The Humboldt Valley Committee and its recommendations, and in particular that the design as conceived overwhelms the site. The elegance and modernity of the design would be enhanced if it were scaled back to conform more appropriately to its setting.

The HVC Report states that it does not address traffic concerns specifically and I would like to address the issue of the impact on local traffic. The developer has addressed this concern by undertaking a Transportation Study Impact Assessment (TIA) which concludes that "TELUS Ocean is anticipated to have minimal impact on the adjacent road network, with all nearby intersections expected to continue to operate below their designated capacity thresholds post-development." At the same time, the area is described as a traffic hub, part of both Victoria's regional cycling network and Rapid Transit Corridor. As part of the cycling network, Humboldt Street has recently been turned into a one-lane vehicle traffic street serving three condominiums and two hotels with multi-level parkades, as well as services (buses, garbage collection, trades, customers, taxis) to which the proposal is to add 127 vehicle and 106 bicycle parking spaces to be served by this street. As a safety measure consideration should be given to making Humboldt a one-way vehicle street running towards Blanshard, which the addition of bicycle lanes on both sides has in effect done already.

The flow of traffic on Penwell Street needs to be considered as well. If it were to become one-way as well, with all vehicles from Blanshard or Burdett entering here, it would mean the loss of scarce parking spaces, and added traffic congestion on Fairfield, where the 700 block currently serves as a bus layover. If it is to remain two-way, serious consideration needs to be given to adding a stoplight at the junction of Penwell, Fairfield and Burdett, due to the almost total lack of visibility of traffic coming up the hill from Douglas, including buses heading for the Fairfield layover. The lack of visibility for oncoming traffic makes it a very dangerous turn.

I trust that Mayor Helps and Council will give these safety concerns due consideration.

Diane Teeple  
1604 - 751 Fairfield Road  
Victoria, B.C. V8W 4A4

Dear Mayor and Council,

I am writing to you to please reconsider the approval for the proposed Telus Ocean building. I understand of course that new development should and must occur to keep the economy of the city ticking along, however I ask that you please reduce the proposed dimensions of this building. Even Telus' own drawings illustrate that the Ocean will dwarf the surrounding neighbourhood buildings, including the Empress. As currently constituted I have no doubt that this will be a "world class building" but surely we don't need to destroy a neighbourhood just so a telecom giant can add an additional vanity project to its already large real estate portfolio. Indeed if they do want to build something that obtrusive perhaps they should do it in a part of town that needs revilitisation, not one that is perfect as is.

Yours Sincerely,

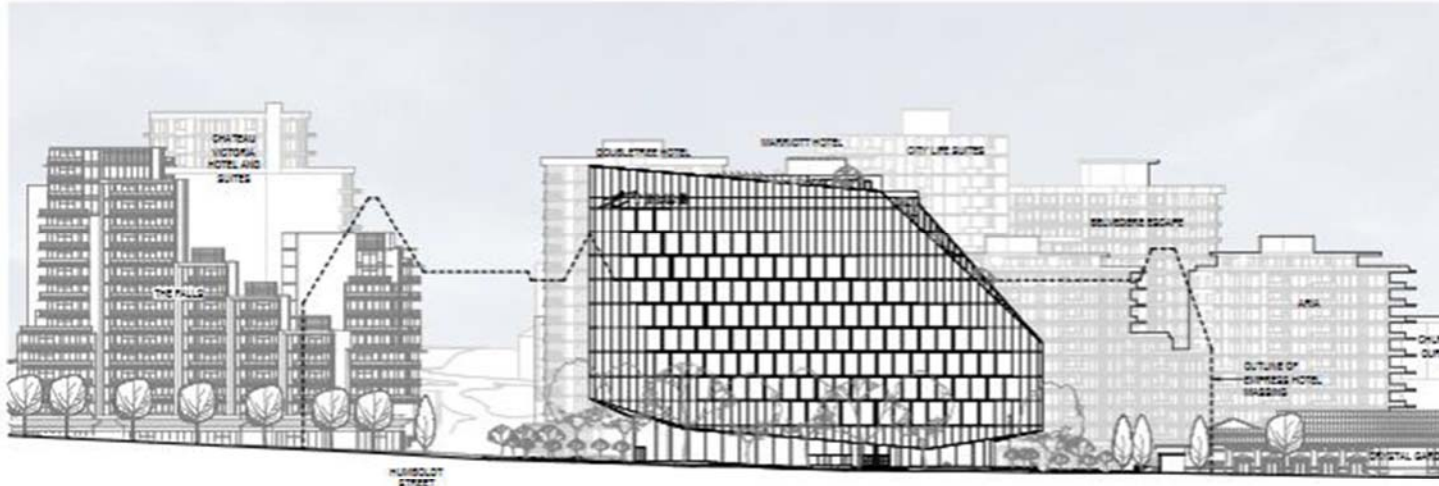
Kristopher Radford,  
Humboldt St.

Dear Victoria Mayor and City Council:

We are owners of a condo unit in the Falls Residence, located at 707 Courtney Street in downtown Victoria, BC. We have been owners in the building since it first opened in 2009. We have reviewed the information provided by Telus Communications Inc. in their proposal for the Telus Ocean building to be located 767 Douglas Street and are opposed to the currently proposed design.

Telus, in its proposal for a hulking, oversized building on a rather small, odd-shaped lot, has grossly overstepped the existing rules for development as outlined in Victoria's Downtown Core Area Plan. From its massive overheight, that is 23% higher than allowed in the current regulations for that location, to the ballooning upper floors with no setback, that extend from a much smaller footprint lot and overwhelm all buildings near and far to it, including the Falls, the Aria and the Empress Hotel. Before choosing to purchase a home at the Falls, we did extensive research to ensure that no outsized buildings could be built around us that could adversely affect us in our condo or the Falls. We reviewed all existing zoning regulations in each of the Districts in Victoria and expected that these precautions would be sufficient to protect us from outrageously large or grotesque buildings being constructed near the Falls.

The TELUS Ocean proposal in its current form, misconstrues or distorts numerous existing rules and guidance on building height, density, setbacks and overall massing. The illustrations below, demonstrate how massive and out of step with the neighbourhood, the Telus Ocean proposal is. Clearly it is so massive that it overwhelms all other buildings in the area and far exceeds the guidelines that the other buildings had to follow when they were constructed. It also is out of step with the historical culture of the Inner Harbour District. The proposal needs to be vastly reworked so that it adheres to existing guidelines for building development in the Inner Harbour District.



Picture along Douglas of **11 storey TELUS Ocean (53+M)** next to **18 storey Falls condominium**.

Picture along Humboldt of **11 storey TELUS Ocean (53+M)** next to **12 storey ARIA condo (37M)**.

In summary, TELUS Ocean is too big. It overwhelms the site, the nearby historic buildings, and the neighbourhood and needs to be reduced in size to conform to existing guidelines and regulations. The TELUS Ocean can still achieve its goals of being an iconic building in downtown Victoria, but at a smaller scale.

To this end, we urge TELUS Ocean to reduce the height to the 43m allowed in the current zoning, decreasing the proposed density in the process. Respect the setbacks, as other buildings in the area have done and reduce the Floor Space Ratio to 4.0. These changes would also protect the Empress from being overshadowed and prevent a corporate logo from piggybacking on its roofline.

As well, we suggest modifying the massive walls of glass so that they have more character than the current design and do not look like a solar array farm on each side of the building.

We are also concerned about light pollution emanating from the building during the evening and nighttime, that has the potential to disturb the quiet enjoyment of this part of downtown.

We would be pleased to discuss our objection to the Telus Ocean in more detail. Please contact us via return e-mail.

Yours truly,

Michele and Paul Beitel  
Owners at the Falls  
707 Courtney Street  
Victoria, BC

To whom it may concern,

I am writing regarding the Telus Ocean building proposed for site at Douglas and Humboldt. While I understand and appreciate the City of Victoria's interest in developing the site and am not wholly opposed to the project, it was my expectation that the building would be aligned with the site's zoning requirements and community development plan. I was surprised, however, to see that the project's proposal presents a building that exceeds the height and density of the site's zoning requirements. I strongly urge the City to decline this project's request for an exemption to the zoning requirements.

As an owner at The Falls, which will be completely eclipsed by the proposed building, I was deeply disappointed to hear of the extensive prior negotiations and accommodations that were made for the Aria and Hilton. It is unclear to me why these negotiations excluded The Falls residents but it is clear that the accommodations made for these buildings have come at the expense of The Falls.

For South-facing owners and residents of The Falls, the sun, sky and views will be completely blocked by the proposed Telus building. For all Victoria residents and its visitors, the views of the city from the inner harbour will be irreversibly compromised by the large glowing Telus sign towering over the City's iconic Empress Hotel. These impacts warrant direct engagement and negotiations with The Falls, as well as alterations to the project's plans to minimize the visual impacts to the inner harbour.

I strongly urge the City to decline the developer's requests to alter the site's zoning requirements and to insist the developers immediately initiate direct engagement and negotiations with The Falls before further refining the development plans.

I trust that the City of Victoria will give thoughtful consideration to this letter and directly respond to the concerns expressed herein.

Sincerely,

Mary Cameron



Dear City Council Members,

Please allow me to present my concerns regarding the current proposed plans for the TELUS Ocean building on Douglas Street.

As a property owner and taxpayer at The Falls, I see the following intentional encroachments to the neighborhood:

- The Fairmont Empress skyline: the height of the building (advertised at 11 storeys vs. the reality of 18) will in effect steal this iconic skyline, second only to the Parliament Buildings in the Inner Harbour.
- Shading on the DoubleTree, Aria , and The Falls: both residential and commercial properties will be negatively affected due to the sheer expanse of the resultant shadow of the building during daylight hours. Also, due to the proposed amount of glass, lighting will then impose on the same structures during nighttime hours.
- The Prow: the design of the southern south plaza prow will encroach on the vertical space and is not aligned with the existing structures. It is one thing to be on the cutting edge of building design, but it should not be ill-fitting for the space.
- Zoning Laws: the fact that the developer will require exemptions to several zoning laws is very telling; the design of the structure does not fit the neighborhood.

In order to mitigate the bad neighbor feel of this project it simply must be scaled down.

Respectfully,

Niels King

707-1801 Courtney St

Victoria, BC V8W 0A9, Canada

To the Mayor and City Council,  
Victoria, BC

The proposed Telus Ocean Project has some financial aspects that we would like you to consider. The City of Victoria will receive only \$8 million for the land from Telus. The 50% remediation cost is likely to be considerable because of polluted soil and blue clay, which will reduce the city's gain.

Consider the downside that will be produced by the Telus project. The Telus building will profoundly affect three existing buildings in a negative manner (as detailed in other letters)—buildings that make a major contribution to the City of Victoria in property taxes, yet occupy little land. Please consider the contributions from the three buildings: The Falls condominium, The Aria condominium and the Hilton Doubletree Hotel (see attachmen).

The 2020 BC assessed value of the three buildings is:

The Falls - 155 units	\$ 111,493,000
- Commercial space.	7,132,000
The Aria - 177 units.	\$ 123,925,000
Commercial space.	3,170,600
The Hilton Hotel.	<u>\$ 27,321,000</u>
Total.	\$ 273,041,600

The 2020 Property Tax that the City of Victoria received is:

(Based on available tax rates, but not including home owner or senior deductions)

The Falls	(\$111,493 X 5.0417/\$1000)	\$ 562,114/year
	(\$7,123 X 14.2747/\$1000)	101,807 "
The Aria	(\$123,206 X 5.0417/\$1000)	621,167 "
	(\$3,170.6 X 14.2747/\$1000)	45,259 "
Hilton Hotel	(\$27,321 X 14.0493/\$1000)	<u>383,840 "</u>
<b>Total.</b>		<b>\$ 1,714,187/year</b>

Our conclusion is that the three buildings most seriously affected are contributing (as close as we can calculate with data available to the public) well over \$1.5 million each year to the city in property tax. This would pay for the Apex lot in 5 years, but the Telus sale is a one-time income. And yet, we were not allowed to have any input into the decision to allow Telus to win the contest for the Apex or triangular lot. The six proposals received by the city were kept secret and the Telus proposal was announced without any consultation from the occupants of the three affected buildings.

Do the enormous property taxes we pay not offer some protection and fairness from the city council for our "homes"? This behemoth of a new building (equivalent to 18 residential storeys) will block the views and sun from all three buildings, increase pollution, traffic, noise and night light; finally, it will reduce the value of our homes by a considerable amount.

We ask that you do not just tweek the Telus plans, but relocate the building into an appropriate business space or reduce the size of the building by half. There are a number of one- or two-storey buildings

along Douglas that could be replaced by the Telus building to improve the city profile. IN COUNCIL WE TRUST, I hope!

Sincerely,  
Nancy Sherwood

Dear Mayor and Council,

Development of the Apex site is expected and improvements should be welcomed by the neighbourhood and the city. However, the proposed Telus Ocean building has several flaws in my opinion and does not meet the expectations of those most closely affected by it – its neighbours. As conceived, the development overwhelms the adjacent properties and streets and that will decrease the quality of life for existing residents and diminish the experience of visitors to the conference and accommodation district around the Douglas-Humboldt intersection.

First, I endorse the comments submitted by the Humboldt Valley Committee in their Information Bulletin entitled “The Elephant in the Room: Questions about the TELUS Ocean Development Application”.

**Summary: This review finds that the TELUS Ocean proposal, in its ambition to build a landmark office tower at the south end of the downtown, misconstrues or distorts existing rules and guidance on building height, density, setbacks and overall massing. If neighbours built or purchased property in the expectation that the Official Community Plan and its more elaborated Downtown Core Area Plan offered them some assurance that they could foresee the potential impact of further building, this proposal comes as a bad surprise. The proposal needs to be reworked to better respect the context in this historic district.**

Second, traffic resulting from the proposed development will have a much greater impact on the neighbourhood, particularly on Humboldt St, than the “minimal impact” anticipated in the developer’s traffic analysis.

- The location and size of the loading bay in the TELUS Ocean building means all service vehicles will have to reverse into or out of the loading bay to Humboldt St, resulting in obnoxious back-up beep-beep-beepers annoying hotel guests and condo residents from early morning everyday (the restaurant will require daily deliveries). Those vehicles will also have to reverse across the new bike lanes resulting in unsafe conditions for both.
- Larger service vehicles and probably many cars as well will not exit the building site via Penwell St due to its steep grade with a stop sign at the top and poor sight lines to Burdett Ave/Fairfield Rd. Those vehicles will stay on Humboldt St, that is now limited to a single “sharable” vehicle traffic lane, with bike lanes and parking on both sides, resulting in significant traffic impacts and safety issues.
- Construction vehicles must not be allowed on Humboldt St. Hundreds of large trucks will be required to remove all the excavated materials for the three level parking garage, deliver concrete and other construction materials during the expected two-three year construction period. There is no space for these large vehicles to turn around in the dead end street adjacent to the site. These vehicles must be restricted to Douglas St to avoid the destruction of the recently refinished Humboldt St.
- An alternative to partly address these concerns would be to permanently close Humboldt St on the west side of Penwell and re-open the Humboldt connection to Douglas.

Third, the north “prow” of the building will necessitate the destruction of a fine stand of trees on the corner of Douglas and Humboldt. Also, given the diversion and narrowing of the Douglas St right-of-way south of Humboldt, the prow blocks significant views along Douglas to both the north and south. This corner of the building should be cut back to save and protect these trees and the views.

I urge council to consider the views of the residents surrounding the proposed development and require that the building be scaled back and other design changes be incorporated to minimize its negative impacts.

Regards,  
Oscar Regier  
737 Humboldt St  
Victoria

Dear Mayor Helps and Council,

I am a long time resident of the Humboldt Valley and also want to express my concern about the design of the proposed TELES Ocean building and the negative impact it will have on our downtown community.

As detailed in an assessment prepared by the Humboldt Valley Committee there are many problems related to size and the impact on traffic, noise, light, etc., that should be resolved before the project proceeds.

Sincerely,

Robert Horner  
N1001-737 Humboldt Ave  
Victoria V8W 1B1

## **Scott & Karen Green**

606-788 Humboldt Street  
Victoria, BC V8W 4A2



September 30, 2020

Mayor & Council  
City of Victoria  
1 Centennial Square  
Victoria, BC V8W 1P6

### **Re: Telus Ocean Development Proposal**

Dear Mayor and Council:

As residents of the Humboldt Valley community we are very concerned about the Telus Ocean Development application as it has been presented to the City of Victoria and to the neighbourhood.

The building as proposed will have an objectionable impact on our neighbourhood and community and will overwhelm the building site as well as the surrounding buildings. How many more office spaces are truly needed in downtown Victoria when so many sit empty now?

While keeping in mind the goal for Telus Ocean wanting to create a downtown landmark, please consider the neighbourhood by reducing the density and height. As the application looks now, the magnificent Empress Hotel will be overshadowed by a towering, logo wielding, building that will forever be captured in photographs of our beautiful city and harbour.

As well, there is great concern that the recent positive changes to the 700 block of Humboldt Street will be reversed due to increased traffic accessing the new Telus building. Please contemplate changing the main vehicle access to Douglas Street.

Sincerely,

Karen & Scott Green

cc: Humboldt Valley Community,   
Telus Ocean Development Applicant, [hello@telusocan.com](mailto:hello@telusocan.com)

Hello Mayor & Council,

I am writing as a tax paying downtown Victoria property owner adjacent to the proposed TELUS Ocean building site. I am writing to express my extreme concern over the laws being broken for TELUS Ocean and the city of Victoria selling one their most prized possessions, the Fairmont Empress' skyline, to the highest bidder. While I am not opposed to TELUS Ocean having a building on the site, it is the scale of the project that is overwhelming and downright obnoxious for the area proposed.

The TELUS Ocean project is too big for the area. It overwhelms the site and destroys the nearby historic buildings and the neighborhood as currently proposed. Below are just a few of the reasons the build should not be allowed to move forward as currently proposed.

- The height proposed is higher than allowed, 43m, for the current zoning. The Empress' and Victoria's skyline will be **FOREVER** ruined by the project as currently proposed. Does the city of Victoria really want neon signs on top of one of their picture perfect postcard views, the Fairmont Empress?
- The public south plaza as proposed would be impacted by the "prow" that extends over that plaza. If this "prow" were to be removed the project would better mirror the shape of the lot and reduce the massive expanse of walls.
- Setbacks any other builders would have to abide by are being ignored and zoning laws broken.
- The false pretense of an 11 story building where the story heights are not the same as a residential building is disheartening. By allowing them to build to the height proposed you are essentially telling every homeowner in the downtown Victory area you do not care about private residences and the public, you only have corporate interests at heart.



- The initial proposal looks NOTHING like what is being proposed to be build in reality. False advertising and lies got them into the area. If they had shown the true height and massive size of the project initially the city may have made a different decision but now they have Victoria on the hook. Do not let them get away with ruining the city just for money. You will forever be held responsible for ruining a iconic and beautiful skyline. No tall building were to ever be built directly behind the Empress to ruin its iconic and beautiful skyline.
- The free advertising TELUS Ocean would get would cost Victoria millions in reduce tourist appeal. The city skyline would not be the same, you would be reduced to a cheap and average skyline where you once had a one of kind iconic skyline.
- The TELUS Ocean is NOT the landmark building, the Fairmont Empress and your Parliament buildings are landmarks, do not be fooled by cheap corporate ploys. Is anyone ever going to come and visit Vitoria to "see the TELUS Ocean building" NO! But they would come to see your beautiful Hotel and Parliament build. Do not cheapen and ruin your historic, iconic, and beautiful inner harbor area with Corporate logos.

Thank you for your consideration.

Terri King

707-1801 Courtney St.

Victoria, BC V8W 0A9, Canada

Hello Mayor and Council,

I would like to express my concern about the new development proposed by Telus. Please do not let Telus and the various investors to build as they have recently proposed. I am a resident of the Falls and this building will significantly change our community for the worse if allowed to proceed as planned. The main reasons I am concerned about this development are as follows:

- The number of proposed floors and permitted density; The revised proposal to go higher is far in excess of the original plans and traditional city limit for height.
- The visual impact of commercial signage on surrounding historical buildings and the city skyline. Victoria is a city of historical importance which will be overshadowed by this building. We need to balance their ambitions for a contemporary masterpiece with the heritage and values of the community. A compromise is best.
- Monumental building design and overhang will limit natural light on the street below and also alter the beautiful balance of open sidewalks in the area.
- Accessing the view for Residential and hotel occupants. Telus is essentially proposing building without any consideration of local resident and hotel occupants who will lose their views.

Thank you for your time!

Resident of the Falls North Tower Suite 1606, 707 Courtney Street.

**Christopher Redcliffe CFP®**

*President*

**REDCLIFFE & COMPANY**

Dear Mayor and Council

The Telus Ocean development is in an extremely important heritage area of Victoria. Our city prides itself on protecting and maintaining our heritage buildings. This is seen often in projects such as Customs House where the developer was required to maintain the heritage facade at a considerable expense to the project. So the same approach must be applied for the Telus Ocean development.

The objective of the Heritage Conservation policy requires conserving and enhancing the heritage value, special character, and the significant historic buildings, features, and characteristics of this area. It has been noted by the city staff and all of the businesses and residents in the area that the Telus Ocean development which is in the Heritage Landmark radius of the Empress Building does not meet the design guidelines of the Heritage Conservation policy.

This project is far beyond every part of the zoning criteria.

Zoning Criteria	Proposal	Standard IHH Zone
Density (Floor Space Ratio) - maximum	5.57*	3.0
Total floor area (m2) - maximum	1 14,378.96*	7745.85
Height (m) - maximum	51.0*	43
Setbacks (m) – minimum		
• Step Back at 10m (Douglas)	2.0*	8.2
• Step Back at 10m (Humboldt)	0.2*	8.2
• Interior Side (south)	0.00*	4.5
• Interior Side (east)	13.4	4.5

Every single zoning criteria has been totally ignored and the proposal far exceeds all of these.

The overall scale and massing do not respect the surrounding heritage landmark policy or the importance of the heritage buildings in that area. This project will be massive in size and reach which will be detrimental to the Empress Hotel and especially the Crystal Gardens. The Empress Hotel should always have visual prominence in this area and it should be protected by the City. Zoning criteria are put in place to ensure that buildings such as the Crystal Garden and the Empress are protected. So it is the responsibility of the staff, advisory committees, and the City Council to ensure that this happens. The tools are

there so they MUST be used. All developers must be held to the same level which Telus is not meeting. This building is far beyond the height restrictions, the floor space ratio restrictions, and total floor area restrictions. These are not slight overages they are monumental overages. The building is far too large for the land and it can not be built to these specifications.

Street setbacks are established and must be followed by all. So to allow this project to have ignored these setbacks is not appropriate. This building must be reduced in bulkiness and remain within the setback restrictions that have been put in place. They can not be allowed to overbuild an area that is so important to this heritage area.

The effect that this building will have is extremely detrimental to all aspects of this area. The massive amount of glass is not in keeping with the area, the overbuilt size will overpower and dominate heritage buildings which are a key part of the history and appeal of Victoria, the roofline will have a negative impact on the protected view from the harbour and the illumination will negatively affect the night views.

Victoria established a Downtown Core Area Plan. It is imperative that this plan guides the development in the area and that all stakeholders are considered. This project does not respect the guidelines, the zoning criteria or the neighbouring community.

Protect the heritage of the Empress, the Crystal Gardens and the Douglas Street corridor. This project must be sent back to address these issues in their design and reduce the scale, setback allowances, height restrictions and overall design that are required in this extremely important area of downtown Victoria. It can not be approved as presented.

Sincerely  
Diane Chimich  
788 Humboldt St.

Hello,

I'd like to register my concerns about the Telus Ocean Development. I've owned a condo in The Falls at 707 Courtney since 2012, and I've served on The Falls Strata Council for many years.

I am most concerned about the proposed height of The Telus Ocean Development and its visual impact on Victoria's skyline and historical buildings, such as the Empress Hotel. When viewed from various points around the city and from the water in the Inner Harbour, the proposed Telus Building will dwarf the structures around it. I am concerned that this tall and massive building will negatively impact the beautiful views of our inner harbour and its historical buildings.

I thank you for carefully considering the number of proposed floors and the density of the Telus Ocean Development plan.

Many thanks,  
Deanna Roozendaal

1008-707 Courtney Street  
Victoria, BC  
V8W 0A9

Just got notification from Brown Brothers —with your emails— that the deadline for writing in was September 30.

Writing in anyway.

Please can Council explain why it is so important to cluster so many high-rises together when there are plenty of actual derelict areas in downtown that need to be spruced up and could support the building with less disruption to actual residents of downtown. In other words, WHY in Council's brilliant thinking is it clever to put an office in the middle of an obviously residential area?

WHY?

Meanwhile, there is the huge empty entity that has been created by Chapters departure from downtown and Shoppers desire to just leave where they were — unlikely to be filled for sometime with Covid and the bus lanes deterring suburbia to come downtown.

Please think harder about what you are actually doing. It is one thing to keep feeding the city's coffers, it is another to make it ugly for the sake of making money and leaving the city with ugly empty spaces.

Hope Barrett  
The Falls

# **Executive House Limited Expression of Concerns Telus/Aryze Development Proposal For Apex Site**

## **ISSUE**

Executive House Limited has some serious concerns about the potentially negative tourism, neighbourhood and business impact on the company's DoubleTree Hotel and Suites related to the currently proposed 'Telus Ocean Building' by the partnership of Telus and Aryze Developments to be located at the corner of Douglas Street and Humboldt Street in downtown Victoria.

Executive House Limited is concerned that the proposed Telus Ocean Building is not in compliance with the City of Victoria's current zoning regulations for the Inner Harbour District and that the building design does not respect, or sensitively integrate into, the historic environment of the neighbourhood. The proposed Telus Ocean building exceeds current zoning regulations related to building height, density and setback, and as such will overwhelm the site, the nearby historic buildings, residential buildings, hotels and other area occupants, and overall skyline and character of the existing neighbourhood. The height, density and setback of the Telus Ocean Building will also significantly diminish the light quality of the immediate area in the neighbourhood. Further, the Telus Ocean Building will eliminate or reduce existing harbour views for many residential and commercial properties negatively impacting property values and business revenues.

Executive House Limited would like to work with the City of Victoria, Telus and Aryze Developments to identify and secure some design modifications to the currently proposed Telus Ocean Building to ensure that the building respects all of the current zoning requirements with regard to height, density, setback, and sensitivity to the historic character of the neighbourhood, and in this way mitigate any potentially negative impacts of the proposed building to the existing residential, business and government community members, while still enabling a Telus building development to proceed.

## **BACKGROUND**

### ***APEX Site - City of Victoria***

The City of Victoria initiated a Request for Expressions of Interest (RFEI) process in 2017 to develop a 27,790 square foot triangular parcel created as part of the original infilling of James Bay in the early 1900's. The parcel sits at the corner of Douglas Street and Humboldt Street in downtown Victoria, British Columbia. The property, commonly referred to as the 'Apex Site', is the last remaining development site in the downtown area known as the 'Inner Harbour District'.

The site rests on the Traditional Territory of the Lekwungen People. The Songhees and Xwsepsum people (Esquimalt Nations) have a continuing, historical relationship with the land.

The City of Victoria selected the RFEI submission made by the then partnership between Telus and Jawl Properties, from six bids submitted as part of the RFEI process. Jawl Properties has since pulled out of the partnership and is no longer the proposed developer for the Apex Site. Telus has since partnered with Aryze Developments to develop the APEX site development.

It is our understanding that Telus/Aryze Developments will acquire the city-owned Apex site for \$8.1 million, plus up to \$1.1 million depending on the final proposal submitted. It is also our understanding that the City of Victoria and Telus/Aryze will share the environmental and geotechnical costs to remediate the currently contaminated site. The City of Victoria is expected to contribute \$2.37 million in remediation costs.

## ***Proposed Telus Ocean Building***

Telus and Aryze Developments are proposing to develop a very modern 11 storey, 53 metre high, 155,000 square foot flatiron shaped building. The proposal submitted by Telus/Aryze is designed to accommodate the Telus Regional Headquarters and Innovation Centre and other leasable office space, including 117,000 square feet of office space and 5,000 square feet of retail and restaurant space. The proposal includes:

- ⇒ 117,000 of office space over eight upper levels
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- ⇒ Three underground floors of parking space to accommodate 127 vehicles and 140 bikes

## **Telus Ocean Building Proposal – Alignment with City of Victoria Planning Objectives**

Executive House appreciates that the proposed Telus Ocean Building aligns with some of the goals and objectives of the City of Victoria’s recent economic strategy “Victoria 3.0: Pivoting to a Higher Value Economy 2020-2041, Official Community Plan and Downtown Core Area Plan. For example, the proposed Telus Ocean Building will support the City’s economic strategy goals of continuing to grow the technology sector and maintain the sector as the City’s largest industry to create an Innovation District and support the creation of a high value economy and high-value jobs in Victoria.

The Telus Ocean Building proposal also supports some of the objectives of Victoria’s Official Community Plan (OCP) adopted in 2012, including new employment growth focused in the urban core specialized in the incubation, growth and retention of advanced technology.

The proposal also supports some of the economic activity policies of the Downtown Core Area Plan for the IHD including ensuring new development within the IHD accommodates uses that contribute to the vitality and economic health of the area.

## **Telus Ocean Building Proposal – Lack of Conformity to Zoning Regulations and Historic Context of Neighbourhood**

Executive Houses’ concerns about the proposed Telus Ocean Building are not related to the economic value and business activities associated with the proposed building, our concerns are related to the proposed Telus Ocean Building design – specifically the fact that the currently proposed design significantly exceeds the City of Victoria’s zoning regulations for the Inner Harbour District with regard to height, density, setback, and sensitivity to the historic character of the neighbourhood, and as such will overwhelm the site, the nearby historic buildings, other area occupants, and overall skyline and character of the existing neighbourhood. The height, density and setback of the Telus Ocean Building will also significantly diminish the light quality of the immediate area in the neighbourhood, and eliminate or reduce existing harbour views for many residential and commercial properties negatively impacting property values and business revenues

We believe that if the Telus Ocean Building was designed and built in accordance with the existing zoning regulations with regard to building height, density, setback, and, sensitivity to the historic character of the neighbourhood, the negative impacts of the proposed building to the existing residential and business community members could be mitigated, while still enabling a Telus building development to proceed.

## ***Victoria Downtown Core Area Plan***

The site of the Telus Ocean Building is located within the area designated as the “Inner Harbour District” (IHD) of the *Downtown Core Area Plan* Ensure that new development within the IHD accommodates uses that contribute to the vitality and economic health of the area:

- ⇒ Maintain the IHD as a focus for tourism-related activities as well as Provincial Government office and business activities



The proposal is not compatible with the Historic Context policies of the *Downtown Core Area Plan* for the IHD, including the following policies:

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The Telus Ocean Building, as currently proposed by Telus and Aryze Developments would require several zoning variances from the City of Victoria including, in accordance with Victoria’s current ‘Official Community Plan’ (OCP), and in accordance with Victoria’s ‘Downtown Core Area Plan’(DCAP):

- ⇒ **Building height zoning variance** – The Telus Ocean Building site is currently zoned (CA-4) for buildings up 43m in height and permits commercial, office and residential uses. Commercial buildings are permitted up to 11 storeys (based on a commercial storey height of 4.1m). The current Telus Ocean Building proposal is for a building of 53 m in height with an average storey height of 4.8m – 10 metres in excess of the current allowance.
- ⇒ **Density zoning variance** – The existing CA-4 zoning density allows a density of 3.0:1. The OCP allows for an increased density of up to 4.0:1 in strategic locations. The current Telus Ocean Building proposal is for a density of 5.57:1 – far in excess of the range of allowable density ratios.
- ⇒ **Set-back zoning variance** – Current zoning for the Telus Ocean Building site requires a side yard setback of 4.5m. The Telus Ocean Building proposal has no setback – the building would extend right to the property line and does not meet the current set-back zoning requirements for its location.
- ⇒ **Historic Context** - The Historic Context policies of the Downtown Core Area Plan for the Inner Harbour District (IHD) where the site for the Telus Ocean Building lies, requires that:
  - “New development be sensitively integrated into the historic environment” – Telus/Aryze is proposing a very modern architectural design which is a significant departure from the existing historic context of the neighbourhood. It would be a matter of how Council interprets this policy with regard to the proposed Telus Ocean Building.
  - “New development be designed with regard for the protection of inner harbour views” – The Telus Ocean Building obstructs the views of the DoubleTree Hotel (as well as other neighbourhood buildings). The obstruction of the DoubleTree Hotel and Suites existing harbour views will have a negative impact on the hotel’s revenue, reducing the room rate that the hotel could charge customers for rooms that would no longer enjoy a harbour view as a direct consequence of the current Telus Ocean Building proposal.

### **Telus Ocean Building Proposal - Overwhelming Massing**

The combined impact of the proposed variance in height, density, setback and lack of respect of the building design for the historic context of the neighbourhood, will create an enormous building mass that is not in scale with the existing buildings and area design. The resulting negative building ‘massing’ will significantly diminish the City of Victoria’s core visual concept for the area and will not respect the present special feel of the neighbourhood.

### **Telus Ocean Building Proposal – Downtown Core Area Plan Infractions**

The official City of Victoria development guide “The Downtown Core Area Plan” section 4.3 states:

“Supporting context-sensitive developments that complement the existing Downtown Core Area through siting, orientation, massing, height, setbacks, materials and landscaping.”

As noted above, the proposed Telus Ocean Building does not respect the vision of a “context-sensitive development” as stipulated in the DCAP with regard to massing, height, setbacks or materials. Rather the Telus/Aryze proposal is requesting exceptions to all the neighbourhood visions considerations related to massing, height, setbacks, and materials.

Understanding that the site known as the Apex site – the site of the proposed Telus Ocean Building – is the last remaining unbuilt lot in this area, the central development challenge for the building design will be to sensitively fit into the historic context of the neighbourhood and to meet the zoning requirements that were designed to preserve and protect the historic neighbourhood context.

### **Telus Ocean Building Proposal – City of Victoria Breaking Faith with Existing IHD Community**

The existing Inner Harbour District community – including residents, businesses and government – built, purchased or leased property in the expectation that the City of Victoria’s Downtown Core Area Plan, Official Community Plan, existing zoning requirements and other stated visions and regulations for the area, would be respected. The DCAP and OCP provide existing residential and commercial occupants in the IHD with some assurance that they can foresee the potential impact of further building development on their properties and neighbourhood experience. Continued adherence to the DCAP and OCP by the City of Victoria is essential to maintaining good faith with the existing residential and business community. To allow the Telus/Aryze building proposal to exceed the existing building development guidelines and zoning requirements would be for the City of Victoria to break faith with the existing residential and business community.

### **Telus Ocean Building Proposal – City of Victoria Negatively Impacting Investor Confidence**

Existing residents and businesses made property investment and leasing decisions based on the City of Victoria’s development guidelines and zoning regulations as stated in the Downtown Core Area Plan and Official Community Plan. If the City of Victoria does not respect its own development guidelines and zoning regulations as stated in the DACP and OCP, and does not require the Telus /Aryze partnership to develop a Telus Ocean Building that respects the current development guidelines and zoning regulations, a decision which will have negative business and revenue impacts for the DoubleTree Hotel and Suites, the City of Victoria will erode investor confidence in the City. How will residents, and businesses have future confidence that they can make sound property investment decisions in a City that does not follow or respect, but rather breaks its own business development and zoning regulations?

### **Telus Ocean Building – Negative Business Impact on DoubleTree Hotel and Suites**

In 2012, Executive House Limited, the local owner of the DoubleTree Hotel and Suites, made the decision to make a substantial business and commercial investment in the upgrading of the hotel property. This investment enabled the hotel to become part of a significant international hotel franchise – a franchise that brings a strong international brand to the City of Victoria, with all of the associated destination and marketing advantages of the franchise’s large tourist base.

Executive House made the property investment on the understanding that the City of Victoria would respect its own development guidelines and zoning regulations as stated in the DACP and OCP, which would assure our company that we could reasonably foresee the potential future impact of further building development in the hotel’s vicinity.

A failure on the part of the City of Victoria to require the Telus Ocean Building design to adhere to the existing building development and zoning guidelines, will result in numerous negative impacts on the DoubleTree Hotel and Suites, including:

- ⇒ ***Elimination of Hotel Views and Reduction in Light Quality***- The proposed height of the Telus Ocean Building (10 metres above the current zoning allowance) would permanently block the front-facing city and harbour views of the hotel and significantly diminish the light quality of the DoubleTree Hotel which would dramatically reduce the potential room rates associated with these rooms, and negatively impact the future marketability and customer experience of the hotel.
- ⇒ ***Reduction in Future Hotel Revenue Potential*** - The proposed height of the Telus Ocean Building would reduce the future revenue potential of the hotel (as described above). For example, a room with a view can be charged out at \$200/night compared to \$120/night for a room without a view – putting further strain on Victoria’s Premier Hotel

Facilities in an environment currently experiencing a diminishing hotel inventory. The DoubleTree Hotel would like to propose some design modifications to the Telus Ocean Building to retain some of the hotel's views and light quality, while still enabling the Telus building development to proceed.

- ⇒ ***Potential De-valuation of Renovation Investment in a Premier Victoria Hotel*** – In 2012, Executive House Limited made a significant \$20 million investment in the upgrade of the hotel to meet the standard of a Premier DoubleTree Inn Hotel franchise. That investment has enhanced the hotel offerings in the City of Victoria and supported the marketing of the City of Victoria to the National and International Club Members, bringing in tourists to the City of Victoria that may not otherwise have chosen Victoria as a tourism destination. The City of Victoria needs to respect this investment and beneficial City of Victoria marketing support associated with the DoubleTree Hotel brand by protecting the hotel's marketing advantages (views, sight lines and light quality) that will be negatively impacted by the Telus Ocean Building as currently proposed.
  
- ⇒ ***Protection of Existing Hotel Inventory in an Environment of Diminishing Hotel Inventory*** - The City of Victoria needs to protect – to the fullest extent possible – the existing hotel inventory in an environment characterized by diminishing hotel inventory. As a result of a variety of factors the number of available hotel rooms in Victoria has been significantly decreased. The decreased number of hotel rooms is having a negative impact on the City's tourism industry, which is the second largest industry in Victoria.

### **Protection of Hotel Inventory and Tourism Industry**

The Tourism industry is the City of Victoria's second largest industry creating significant revenue, jobs, and economic value to the city. The continued growth and development of the tourism industry in Victoria, as a leading creator of revenue, jobs and economic value for the provincial Capital, requires the protection of existing hotel inventory (not to mention a commensurate growth and development of new hotel inventory to provide sufficient hotel capacity to meet the requirements of major events and conferences). The City of Victoria can protect the tourism value some of its existing hotel inventory by requiring the Telus Ocean Building Design to respect the existing building development and zoning regulations.

### **CONCLUSION**

The Telus Ocean Building as currently proposed by Telus and Aryze Developments is not in compliance with the City of Victoria's current building development and zoning regulations for the Inner Harbour District. The proposed Telus Ocean building exceeds current zoning regulations related to building height, density and setback, and as such creates an enormous mass that will overwhelm the site. The proposed building design does not respect, or sensitively integrate into, the historic context of the neighbourhood and will significantly alter the overall skyline and character of the existing neighbourhood. The proposed building height, density, and setback – all of which exceed current zoning regulations - will also significantly diminish the light quality and sight lines in the neighbourhood. Further, the Telus Ocean Building will eliminate or reduce existing harbour views for many residential and commercial properties negatively impacting property values and business revenues.

As currently proposed the Telus Ocean Building will result in numerous negative impacts to the residents, businesses, the overall look and feel of the Inner Harbour District neighbourhood, the Tourism industry, and the City of Victoria.

The City of Victoria must not agree to the zoning variances being requested by the Telus/Aryze partnership and thereby break the City of Victoria's own building development and zoning regulations. To do so would risk generating bad faith with the existing residential and commercial community and breaking residential and commercial investor confidence in the City of Victoria.

Executive House Limited would like to work with the City of Victoria, Telus and Aryze Developments to identify and secure some design modifications to the currently proposed Telus Ocean Building to ensure that the building design respects all of the current building development and zoning requirements with regard to height, density, setback, and sensitivity to the historic character of the neighbourhood, and in this way mitigate any potentially negative impacts of the proposed building to the existing residential, business and government community members, while still enabling a Telus building development to proceed.

Please consider including anti-bird strike tech for the building. A lit glass building will cause many birds to be killed as they get confused by the lights at night and fly into the building this happens often with glass towers.

I don't want to see dead and dying birds about the building every morning.

I recommend considering the following:

- \* Turn off all lights at night
- \* include anti reflective film
- \* contact experts on what can be done to minimize birds hitting the building (Perhaps a good study for Uvic)

I'm by no means an expert on this topic, please seek out actual subject matter experts. From what I can tell this is not really expensive and can save a great number of birds

Best Regards,  
Mathew Moore

1507-751 Fairfield rd  
Victoria BC  
V8W4A4

Hi , I am a resident and owner in the fall building at 902- 708  
Burdett Ave. Victoria BC and have serious concerns about the proposed Telus development  
as following:

- The number of proposed floors and permitted density;
- Visual impact and commercial signage on surrounding historical building and the city skyline;
- Monumental building design, overhang, and public space;
- Accessing the view for my unit

Cheers!

Maliheh Sayah Sina

Hi Telus/Aryze,

I am a resident/owner/taxpayer in Victoria.

Please follow up on your promises of a view study and marking the outline of the proposed Ocean building on Douglas St.

warm regards, ron proulx

Hi ,

I am a resident and owner in the Falls building. When I heard about the Telus building and their plans for it, I was totally shocked. I am not talking about raising a 53m glass wall with signs on it just 17 meters from my condo. I am thinking about how on earth somebody accepts to build a monster building in a small triangle land in the lovely cozy heart of downtown. Such a building in a street like Fort is perfect and the city needs it but in this place I can't see any reason for that.

I am from Iran and am familiar with steps to deface a city and ruin all its characters, I am worried to see the same procedure here in beautiful Victoria.

Thanks

Ali Khashei

To whom it may concern,

I have a few concerns regarding the new Telus tower. I would appreciate any information you could provide me with this matter.

1) Light pollution. I already struggle from the light from the dollar tree hotel across the street. This problem is exacerbated when their light is put on loosely a continuously blinks throughout the night. My brother suffers from seizures and when he visits this is a cause of real stress. With the Telus tower going up I am concerned that the light pollution would get worst. Is there any way to limit this in some way with respect to neon signs going up and the hours that they can be left on?

2) Damage caused to surrounding buildings by the vibrations during excavation. Who would be responsible for the cost of such damage should it occur. Can we ensure the new developers will have to legally commit to covering the cost of such damage to surrounding owners prior to approval for the development?

3) Height and design. While I realize it is unreasonable to make a point about a fact that would be personal to me and those who live in the south tower at the falls. My mom bought this condo in Oct. 2017 at the peak of the market and paid a premium for the view that we would have. The proposed development would mean we would lose not only our view but the natural sunlight we get from the south-facing tower. While I doubt we could limit the height of the Telus Tower in any meaningful way, I hope the design could mimic that of the dollar tree in the angle of the development as this would help give symmetry to the buildings in the area and would help with the city's esthetics.

Looking forward to hearing from you.  
Sincerely,

**Masih Alaeitafti, RPh**

BSc. Pharmacy Class of 2015 | University of British Columbia



Hello:

I wish to voice my concerns over the TELUS Ocean Proposal:

1. The building is too large for the site
2. The signage on the West Face will forever destroy the vista of the Empress Hotel by appearing over the top of the Hotel.
3. The massive height and overall size of the building destroys the view from several buildings and casts shadows into areas where there was sunlight before.
4. The design of the building does not fit the area or the downtown core.

Please reconsider any approval being for this project going forward as proposed.

Debra Bingham

Resident of the Falls

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Stafford Bingham

Resident of the Falls

## Katie Lauriston

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**From:** Miko Betanzo  
**Sent:** October 6, 2020 9:49 AM  
**To:** Katie Lauriston  
**Subject:** FW: DoubleTree Hotel and Suites - Failure to Receive Notification of Telus Ocean Building Proposal for Consultation  
**Attachments:** Executive House Ltd. - Briefing Note - Telus Ocean Building- - Sep 28, 2020.docx  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Katie,  
Can you please add this email and its attachment to the communication record for 767 Douglas- Telus Ocean.

Thanks

Miko Betanzo  
Senior Planner – Urban Design  
Sustainable Planning & Community Development  
City of Victoria, 1 Centennial Square, Victoria BC V8W 1P6  
[mbetano@victoria.ca](mailto:mbetano@victoria.ca)

T 250.361.0604 F 250.361.0386



**From:** Francis Mairet [REDACTED]

**Sent:** October 5, 2020 12:10 PM

**To:** Miko Betanzo <[mbetano@victoria.ca](mailto:mbetano@victoria.ca)>

**Cc:** Andrea Phillips [REDACTED]; Alan Lowe Office [REDACTED]; Wpc [REDACTED]; Karin MacMillan [REDACTED]

**Subject:** RE: DoubleTree Hotel and Suites - Failure to Receive Notification of Telus Ocean Building Proposal for Consultation

Dear Miko,

Thank you for meeting with Alan Lowe and Karin Macmillan (via Zoom) last week to discuss the DoubleTree Hotel and Suites concerns about the proposed Telus Ocean Building, and in particular the volume of zoning variances being requested by Telus and Aryze Developments as well as the lack of sensitivity of the design with regard to the historic character of the neighbourhood.

I understand that the City of Victoria will not be holding a Public Hearing to consult with the community on the proposed design of the Telus Ocean Building as would normally be required as part of the approval process, as part of social distancing measures related to the ongoing COVID pandemic. I further understand that in lieu of the normal Public Hearing the City of Victoria determined to send out a Notification to residents and businesses within a 200 metre radius of the Telus Ocean Building site, and that those residents and businesses would have 30 days to submit comments and responses to the Telus Ocean Building proposal.

Please accept this letter as confirmation that the DoubleTree Hotel and Suites has not received that Notification. Further, please accept this letter as confirmation of our interest in receiving the Notification and our interest in responding to the Notification.

In the event that that there continues to be a disconnect communication challenge with regard to our receiving of the Notification, please also accept this letter as notification from the Double Tree Hotel and Suites that the Brief we submitted to the City of Victoria on October 1, 2020 is our formal response to the Notification, so that our voice may be heard in this process. I have attached the Brief again, for your convenience.

We are concerned that if the DoubleTree Hotel and Suites did not receive the Notification that other businesses and residents in the 200 metre radius may also not have received the Notification. Perhaps the City should consider verifying that all eligible respondents have indeed received the Notification and are in fact given a chance to be consulted about the Telus Ocean Building design, as they should be as part of the City's formal approval process. It seems only fair that a building with the proposed impact on the City in terms of the magnitude and mass of the current Telus Ocean Building design be properly considered by the community and by the City and that the building conform to required zoning variances.

Sincerely,

Regards,

Francis D. Mairet, MBA  
Principal  
Mairet Hotels

T: [REDACTED]

E: [REDACTED]

W: [www.mairethotels.com](http://www.mairethotels.com)

# **Executive House Limited Expression of Concerns Telus/Aryze Development Proposal For Apex Site Working Draft**

## **ISSUE**

Executive House Limited has some serious concerns about the potentially negative tourism, neighbourhood and business impact on the company's DoubleTree Hotel and Suites related to the currently proposed 'Telus Ocean Building' by the partnership of Telus and Aryze Developments to be located at the corner of Douglas Street and Humboldt Street in downtown Victoria.

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The Telus Ocean Building, as currently proposed by Telus and Aryze Developments would require several zoning variances from the City of Victoria including, in accordance with Victoria’s current ‘Official Community Plan’ (OCP), and in accordance with Victoria’s ‘Downtown Core Area Plan’(DCAP):

- ⇒ **Building height zoning variance** – The Telus Ocean Building site is currently zoned (CA-4) for buildings up to 43m in height and permits commercial, office and residential uses. Commercial buildings are permitted up to 11 storeys (based on a commercial storey height of 4.1m). The current Telus Ocean Building proposal is for a building of 53 m in height with an average storey height of 4.8m – 10 metres in excess of the current allowance.
- ⇒ **Density zoning variance** – The existing CA-4 zoning density allows a density of 3.0:1. The OCP allows for an increased density of up to 4.0:1 in strategic locations. The current Telus Ocean Building proposal is for a density of 5.57:1 – far in excess of the range of allowable density ratios.
- ⇒ **Set-back zoning variance** – Current zoning for the Telus Ocean Building site requires a side yard setback of 4.5m. The Telus Ocean Building proposal has no setback – the building would extend right to the property line and does not meet the current set-back zoning requirements for its location.
- ⇒ **Historic Context** - The Historic Context policies of the Downtown Core Area Plan for the Inner Harbour District (IHD) where the site for the Telus Ocean Building lies, requires that:
  - “New development be sensitively integrated into the historic environment” – Telus/Aryze is proposing a very modern architectural design which is a significant departure from the existing historic context of the neighbourhood. It would be a matter of how Council interprets this policy with regard to the proposed Telus Ocean Building.
  - “New development be designed with regard for the protection of inner harbour views” – The Telus Ocean Building obstructs the views of the DoubleTree Hotel (as well as other neighbourhood buildings). The obstruction of the DoubleTree Hotel and Suites existing harbour views will have a negative impact on the hotel’s revenue, reducing the room rate that the hotel could charge customers for rooms that would no longer enjoy a harbour view as a direct consequence of the current Telus Ocean Building proposal.

### **Telus Ocean Building Proposal - Overwhelming Massing**

The combined impact of the proposed variance in height, density, setback and lack of respect of the building design for the historic context of the neighbourhood, will create an enormous building mass that is not in scale with the existing buildings and area design. The resulting negative building ‘massing’ will significantly diminish the City of Victoria’s core visual concept for the area and will not respect the present special feel of the neighbourhood.

### **Telus Ocean Building Proposal – Downtown Core Area Plan Infractions**

The official City of Victoria development guide “The Downtown Core Area Plan” section 4.3 states:

“Supporting context-sensitive developments that complement the existing Downtown Core Area through siting, orientation, massing, height, setbacks, materials and landscaping.”

As noted above, the proposed Telus Ocean Building does not respect the vision of a “context-sensitive development” as stipulated in the DCAP with regard to massing, height, setbacks or materials. Rather the Telus/Aryze proposal is requesting exceptions to all the neighbourhood visions considerations related to massing, height, setbacks, and materials.

Understanding that the site known as the Apex site – the site of the proposed Telus Ocean Building – is the last remaining unbuilt lot in this area, the central development challenge for the building design will be to sensitively fit into the historic context of the neighbourhood and to meet the zoning requirements that were designed to preserve and protect the historic neighbourhood context.

### **Telus Ocean Building Proposal – City of Victoria Breaking Faith with Existing IHD Community**

The existing Inner Harbour District community – including residents, businesses and government – built, purchased or leased property in the expectation that the City of Victoria’s Downtown Core Area Plan, Official Community Plan, existing zoning requirements and other stated visions and regulations for the area, would be respected. The DCAP and OCP provide existing residential and commercial occupants in the IHD with some assurance that they can foresee the potential impact of further building development on their properties and neighbourhood experience. Continued adherence to the DCAP and OCP by the City of Victoria is essential to maintaining good faith with the existing residential and business community. To allow the Telus/Aryze building proposal to exceed the existing building development guidelines and zoning requirements would be for the City of Victoria to break faith with the existing residential and business community.

### **Telus Ocean Building Proposal – City of Victoria Negatively Impacting Investor Confidence**

Existing residents and businesses made property investment and leasing decisions based on the City of Victoria’s development guidelines and zoning regulations as stated in the Downtown Core Area Plan and Official Community Plan. If the City of Victoria does not respect its own development guidelines and zoning regulations as stated in the DACP and OCP, and does not require the Telus /Aryze partnership to develop a Telus Ocean Building that respects the current development guidelines and zoning regulations, a decision which will have negative business and revenue impacts for the DoubleTree Hotel and Suites, the City of Victoria will erode investor confidence in the City. How will residents, and businesses have future confidence that they can make sound property investment decisions in a City that does not follow or respect, but rather breaks its own business development and zoning regulations?

### **Telus Ocean Building – Negative Business Impact on DoubleTree Hotel and Suites**

In 2012, Executive House Limited, the local owner of the DoubleTree Hotel and Suites, made the decision to make a substantial business and commercial investment in the upgrading of the hotel property. This investment enabled the hotel to become part of a significant international hotel franchise – a franchise that brings a strong international brand to the City of Victoria, with all of the associated destination and marketing advantages of the franchise’s large tourist base.

Executive House made the property investment on the understanding that the City of Victoria would respect its own development guidelines and zoning regulations as stated in the DACP and OCP, which would assure our company that we could reasonably foresee the potential future impact of further building development in the hotel’s vicinity.

A failure on the part of the City of Victoria to require the Telus Ocean Building design to adhere to the existing building development and zoning guidelines, will result in numerous negative impacts on the DoubleTree Hotel and Suites, including:

- ⇒ ***Elimination of Hotel Views and Reduction in Light Quality***- The proposed height of the Telus Ocean Building (10 metres above the current zoning allowance) would permanently block the front-facing city and harbour views of the hotel and significantly diminish the light quality of the DoubleTree Hotel which would dramatically reduce the potential room rates associated with these rooms, and negatively impact the future marketability and customer experience of the hotel.
- ⇒ ***Reduction in Future Hotel Revenue Potential*** - The proposed height of the Telus Ocean Building would reduce the future revenue potential of the hotel (as described above). For example, a room with a view can be charged out at \$200/night compared to \$120/night for a room without a view – putting further strain on Victoria’s Premier Hotel



Facilities in an environment currently experiencing a diminishing hotel inventory. The DoubleTree Hotel would like to propose some design modifications to the Telus Ocean Building to retain some of the hotel's views and light quality, while still enabling the Telus building development to proceed.

- ⇒ ***Potential De-valuation of Renovation Investment in a Premier Victoria Hotel*** – In 2012, Executive House Limited made a significant \$20 million investment in the upgrade of the hotel to meet the standard of a Premier DoubleTree Inn Hotel franchise. That investment has enhanced the hotel offerings in the City of Victoria and supported the marketing of the City of Victoria to the National and International Club Members, bringing in tourists to the City of Victoria that may not otherwise have chosen Victoria as a tourism destination. The City of Victoria needs to respect this investment and beneficial City of Victoria marketing support associated with the DoubleTree Hotel brand by protecting the hotel's marketing advantages (views, sight lines and light quality) that will be negatively impacted by the Telus Ocean Building as currently proposed.
- ⇒ ***Protection of Existing Hotel Inventory in an Environment of Diminishing Hotel Inventory*** - The City of Victoria needs to protect – to the fullest extent possible – the existing hotel inventory in an environment characterized by diminishing hotel inventory. As a result of a variety of factors the number of available hotel rooms in Victoria has been significantly decreased. The decreased number of hotel rooms is having a negative impact on the City's tourism industry, which is the second largest industry in Victoria.

### **Protection of Hotel Inventory and Tourism Industry**

The Tourism industry is the City of Victoria's second largest industry creating significant revenue, jobs, and economic value to the city. The continued growth and development of the tourism industry in Victoria, as a leading creator of revenue, jobs and economic value for the provincial Capital, requires the protection of existing hotel inventory (not to mention a commensurate growth and development of new hotel inventory to provide sufficient hotel capacity to meet the requirements of major events and conferences). The City of Victoria can protect the tourism value some of its existing hotel inventory by requiring the Telus Ocean Building Design to respect the existing building development and zoning regulations.

### **Conclusion**

The Telus Ocean Building as currently proposed by Telus and Aryze Developments is not in compliance with the City of Victoria's current building development and zoning regulations for the Inner Harbour District. The proposed Telus Ocean building exceeds current zoning regulations related to building height, density and setback, and as such creates an enormous mass that will overwhelm the site. The proposed building design does not respect, or sensitively integrate into, the historic context of the neighbourhood and will significantly alter the overall skyline and character of the existing neighbourhood. The proposed building height, density, and setback – all of which exceed current zoning regulations - will also significantly diminish the light quality and sight lines in the neighbourhood. Further, the Telus Ocean Building will eliminate or reduce existing harbour views for many residential and commercial properties negatively impacting property values and business revenues.

As currently proposed the Telus Ocean Building will result in numerous negative impacts to the residents, businesses, the overall look and feel of the Inner Harbour District neighbourhood, the Tourism industry, and the City of Victoria.

The City of Victoria must not agree to the zoning variances being requested by the Telus/Aryze partnership and thereby break the City of Victoria's own building development and zoning regulations. To do so would risk generating bad faith with the existing residential and commercial community and breaking residential and commercial investor confidence in the City of Victoria.

Executive House Limited would like to work with the City of Victoria, Telus and Aryze Developments to identify and secure some design modifications to the currently proposed Telus Ocean Building to ensure that the building design respects all of the current building development and zoning requirements with regard to height, density, setback, and sensitivity to the historic character of the neighbourhood, and in this way mitigate any potentially negative impacts of the proposed building to the existing residential, business and government community members, while still enabling a Telus building development to proceed.

**From:** [Robert Gifford](#)  
**To:** [Development Services email inquiries](#)  
**Subject:** The Telus Building  
**Date:** October 5, 2020 9:50:13 AM  
**Attachments:** [2012 McCunn Gifford Green Offices.pdf](#)

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Dear Karen,

I happened to come across the letter in the *Times-Colonist* from the citizen who was concerned about birds' safety. I heartily agree with that, having spent 10 years at SFU for my graduate degrees and seeing the many dead birds there.

However, I believe Telus may not care that much about birds, and I have a different concern that should, I hope, be of concern to you as the sustainability person for the city.

(Let me interject first that I also find the building's height is taller than one would think from the number of stories, as someone else pointed out, and I think it helps to damage Victoria's attraction to visitors as a heritage town. But those two concerns are also not my main concern.)

My main concern is the unsustainability of a glass-walled building. They will tell you it is double- or triple-glazed, which doubles or triples the R-value. However, that is doubling or tripling an R-value of 1 (single-pane glass). Any normal wall has an R-value of 12, and usually greater than that. So, just imagine the energy and climate change impact of a very large all-glass building, over its lifetime! Are we not supposed to be going in the right direction, starting yesterday?

This does not get into, another concern, the impact on employees. Imagine how it feels to be in a glass bubble on a warm day. Oh...air conditioning! Yes, but more energy used.

One could say, well, that's Telus' problem. No, that is society's problem. Our problem.

I can cite, if you wish, studies about the impacts of buildings that look like a gem as a model or from the street, but are very tough on the poor folks who must work *\*in\** them...again,

over the long life  
of such a building. I attach one of my own, for now.

Thanks for reading.

Robert Gifford PhD FRSC  
Professor  
University of Victoria



## Do green offices affect employee engagement and environmental attitudes?

Lindsay J. McCunn & Robert Gifford

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## Do green offices affect employee engagement and environmental attitudes?

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Employees working in 15 public- and private-sector office buildings in a mid-sized Canadian city reported their level of work engagement (as measured by job satisfaction, perceived productivity and affective organizational commitment), environmental orientation, pro-environmental behaviour and opinions about the physical aspects of their buildings. The buildings' green attributes were assessed on an objective 36-item scale. Neither engagement nor environmental attitudes were correlated with green design attributes. However, employees' office impressions were significantly *negatively* correlated with the number of green design attributes. Surprisingly, the results suggest that green design in office buildings does not have a positive effect on employee engagement or on environmental attitudes and behaviours.

**Keywords:** Employee engagement; green building design; satisfaction

Employee engagement is a strong indicator of an innovative and stimulating workplace. Engagement has been defined as 'a positive, fulfilling, work-related state of mind that is characterized by vigor, dedication, and absorption' (Schaufeli *et al.* 2002, p. 74). It is often measured by means of the Utrecht Work Engagement Scale (UWES) (Montgomery *et al.* 2003, Durán *et al.* 2004, Schaufeli and Bakker 2004). However, the physical environment of the work setting is not mentioned in any of the 17 items that make up the UWES.

The government of British Columbia developed the Workplace Environment Survey (WES) in 2006. Its results provide insight into how the performance and satisfaction of the public service might be improved. However, the WES contains only a small number of questions about the physical environment of ministry office buildings. Despite this, in a recent survey, 28% of public sector employees reported that changes to the physical environment of their workplace would boost future productivity (British Columbia Public Service 2007).

Several agencies are working to ascertain how attributes of green buildings, such as enhanced ventilation, acoustics and thermal controllability, affect occupants. In the United States, the Center for the Built Environment (CBE) seeks to improve the design, operation and environmental quality of building systems. Research at the CBE often links physical aspects of occupied space with human behaviours such as energy consumption and productivity. In Canada, the National Research Council's Institute for Research in Construction examines sustainable technology and design concepts to learn how to make buildings less resource

intensive. Similarly, in the United Kingdom, an independent consultancy called Building Use Studies investigates how building characteristics affect occupant health, perceived comfort and control, and productivity.

Academic architectural literature also contains several studies that focus on one or more occupant outcomes in relation to building structure, operation or technology (e.g. Vischer 2008, Baird and Oosterhoff 2010, Drake *et al.* 2010). In particular, one study asked whether green buildings were perceived as better by users (Leaman and Bordass 2007). Users tended to accept insufficiencies more in green buildings than in conventional buildings. Another study explored the relations between the amount of personal control occupants had over heating, cooling, ventilation, lighting and noise, and whether such control was considered to be important (Baird and Lechat 2009). Occupants perceived the amount of personal control they had over lighting as reasonable. However, perceived control over heating and cooling, ventilation and noise was relatively low. In addition, a post-occupancy evaluation of the Council House 2 building in Melbourne showed that indoor environment quality positively affected perceived satisfaction, healthiness and productivity of its occupants (Paevere and Brown 2008).

Despite these efforts, researchers do not seem to have considered how sustainable built settings affect the array of attitudes and behaviours that make up employee commitment, engagement and pro-environmental conduct. Therefore, an appropriate next step for this body of research is to explore employee engagement in workplaces with different physical characteristics, such as varying degrees

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of 'greenness'. This initial study examines whether green design attributes in office buildings are associated with employees' engagement attitudes and reported environmental behaviours.

### The green workplace

Sustainable buildings maximize the use of natural and renewable resources in order to lower consumption of non-renewable energy and materials, and to decrease project and maintenance costs (Williams 2007). Leadership in Energy and Environmental Design (LEED) considers a building sustainable if it reduces waste and water use, increases reuse, recycling and energy-use monitoring through efficient appliances, fixtures and fittings (Canada Green Building Council 2009). Generally, LEED accredits commercial buildings based on performance in seven key areas: indoor environmental quality, regional priority, innovation in design, sustainable sites, water efficiency, energy and atmosphere and materials and resources (Canada Green Building Council 2009). The latter four of these areas are compatible with Williams' definition of sustainable design.

Healthy buildings are designed for occupant comfort and health. Although environmentally friendly materials and technologies may be integrated into a healthy building, non-renewable energy sources, such as fossil fuels, are typically used. Williams (2007) notes that if energy utilized in healthy designs is not sustainable, the building itself cannot be considered sustainable. In the present study, healthy buildings were defined as having contemporary daylighting and indoor air quality strategies, controllable thermal settings, non-toxic paint, low volatile organic compound carpeting and finishing materials, and employing strategies to reduce off-gassing and the growth of bacteria. Among LEED's seven areas of performance, the one that most closely represents healthy design is indoor environmental quality section. To receive credits in this area, a building must incorporate enhanced ventilation strategies and implement an indoor air quality management plan. Low-emitting materials, controllability of systems, thermal comfort and access to daylight and views are also requirements in this section (Canada Green Building Council 2009).

Despite the differences between the terms 'sustainable' and 'healthy', the word 'green' is often used to refer to both types of design attributes. LEED, the Canadian Mortgage and Housing Corporation (CMHC) and BOMA do not formally distinguish between these terms.

### Why green design may influence employees' attitudes and behaviours

Work environments ought to reflect an organization's sense of identity to promote positive employee attitudes and performance through teamwork and collaboration (McCoy 2002). Decoration, allocation of space, signs, artwork and colour are a few design features that help communicate this

to employees (McCoy 2002). Design features that facilitate task accomplishment also bolster employee satisfaction, productivity and commitment (e.g. the size and quality of workspaces, meeting spaces and designated areas for joint activities). Attributes such as these are commonly built into green buildings. Other green design attributes, such as environmental controllability, recycling options and showers can communicate an organization's environmental orientation.

The literature on biophilic architecture in relation to occupants' cognitive and emotional functioning suggests that contact with natural forms can be healthy and restorative (Joye 2007). Studies on the aesthetic appeal of natural content show that, in particular, calm water features and vegetative attributes contribute to positively valenced reactions towards settings (Joye 2007). Given that green buildings often incorporate features intended to positively affect attention restoration and stress reduction in occupants (e.g. outdoor views, indoor vegetation, landscape artwork, architectural imitations of natural forms), and because organizations that operate in green buildings would seem to be communicating their regard for the environment to employees and others, we hypothesize that employees working in offices with more green design attributes will report greater work engagement (i.e. higher job satisfaction, perceived productivity and affective organizational commitment) than those working in offices with fewer green design attributes. We also hypothesized that mere exposure to a green workplace is associated with employee concern for the environment and pro-environmental behaviour.

However, whether working in a green building is associated with pro-environmental behaviour in its occupants is unknown. We are unaware of any empirical studies of this question. In the closest study we could locate, mere exposure to sustainable products increased altruistic behaviour in consumers (Mazar and Zhong 2010). Perhaps exposure to green design attributes in the workplace influences employees' engagement and behaviours in a similar manner.

## Method

### Participants

Seventy-seven adults (52 women and 25 men,  $M = 40$  years) with varying education and job levels volunteered to participate. They were recruited by obtaining permission to circulate a questionnaire to employees by email in 15 urban office buildings. They had spent an average of 4 years working in their office building.

### Materials

A questionnaire was provided to employees electronically. Job satisfaction was measured with an 18-item subscale from the Job Descriptive Index (JDI; Smith *et al.* 1969).

Participants were asked to choose one of three options ('yes,' 'no' or 'I don't know') to indicate whether a specific word described their job (e.g. 'routine', 'frustrating' or 'useful').

Perceived productivity was measured by asking whether employees considered their hours spent at work as productive (e.g. McGuire and Liro 1986) using a 5-point scale ranging from 'strongly disagree' (1) to 'strongly agree' (5). Other measurements of perceived productivity included asking participants to estimate how many productive hours they experienced in a typical work week, whether they felt their office environment allowed them to be as productive as they would like using a 5-point scale ranging from 'strongly disagree' (1) to 'strongly agree' (5) and whether any concerns had been voiced about the impact of the office environment on productivity ('yes' or 'no'). Space for open-ended elaboration on this question was provided.

Organizational commitment is the degree of psychological identification with, or attachment to, an organization and is related to job satisfaction and motivation (Schultz and Schultz 1998), and three types of organizational commitment have been proposed: affective, continuance and normative (Allen and Meyer 1987). Essentially, employees with strong affective organizational commitment remain working for an organization because they *want* to, whereas those with strong continuance organizational commitment remain because they feel they *need* to and employees with strong normative organizational commitment stay because they feel they *ought* to (Allen and Meyer 1990). Only the affective form of organizational commitment correlates positively with job satisfaction and pro-social behaviour (Porter *et al.* 1974). Thus, the Affective Commitment Scale (ACS; Allen and Meyer 1990) was used to assess employees' emotional attachment to, identification with and involvement in, an organization (Solinger *et al.* 2008). Responses were made on a 7-point scale ranging from 'strongly disagree' (1) to 'strongly agree' (7).

The New Ecological Paradigm scale (NEP; Dunlap *et al.* 2000) was included to measure pro-environmental orientation. The NEP uses a 5-point scale ranging from 'strongly agree' (1) to 'strongly disagree' (5). In addition, participants were asked about their pro-environmental behaviour using the General Measure of Ecological Behaviour scale (GEB; Kaiser 1998), recently adapted by Gifford *et al.* (2009) for use in North America.

The authors created the General Office Opinion Scale (GOOS). Nine yes- or no-type questions were created to measure employees' opinions about the amount of general and personal space in their office, noise concealment from inside and outside the building, lighting conditions and whether they considered their office building as green.

Finally, participants reported their age, gender and highest level of education (e.g. 'bachelor's degree'; 'some post-bachelor degree', etc.). They also indicated the closest description of their job classification from a list of 4 (e.g.

executive (4), manager (3), supervisor (2) or staff (1), and the number of years spent working in the building.

The green attributes of the office buildings were assessed using a list of 18 sustainable and 18 healthy features gathered from LEED, Building Owner's and Manager's Association (BOMA) publications and literature on green design principles (e.g. Williams 2007). See Table 2.

### Procedure

Seventeen office buildings were chosen for inclusion in an attempt to gather data from a wide range of green structures (i.e. newly constructed, marketed as a LEED building, no obvious green features, etc.); 15 agreed to participate. A facilities management staff member working in each building was contacted to enquire about the number of green design attributes in the building. Features were then counted by the contacted staff member (i.e. one point given for each attribute present). The nature of work carried out in participating buildings was largely administrative, occurring in the public and private sectors, as well as in an office-oriented portion of a hospital, and in several buildings on a university campus.

A non-probability sampling method was used in obtaining permission from a managerial representative in each building to circulate 20 electronic questionnaires per building to employees. Completion of the questionnaire was voluntary and implied informed consent; participants returned questionnaires by email or post. On average, five employees responded per building; the overall response rate was 26%.

### Results

Descriptive statistics for all scales and demographic variables are displayed in Table 1. Each variable was tested for normality based on recommendations by Kline (1997). All variables met the criteria for skewness (values between +3 and -3) and kurtosis (values between +8 and -8). Reliability coefficients (Cronbach's  $\alpha$ ) were calculated for each scale. The 18-item subscale of the JDI had strong internal consistency,  $\alpha = 0.82$ . Similarly, the ACS and NEP scales were both quite reliable,  $\alpha = 0.86$  and 0.80, respectively.

The seven-item GEB scale's reliability improved when two items were removed. If deleted, questions concerning the degree to which participants agreed with purchasing local produce, and the degree they agreed with keeping their home cool and putting on a sweater in the winter increased the scale's alpha level from 0.68 to 0.74. Thus, the GEB was treated as a five-item scale in all analyses.

The Perceived Productivity Scale (PPS) had low internal consistency,  $\alpha = 0.50$ . This was not entirely unexpected because it contained only five items; the PPS as a whole was not used in further analyses (two items were retained; see below).

Table 1. Instrument, instrument type, means and standard deviations of all variables.

Instrument	Type of instrument	<i>M</i>	SD
Number of sustainable attributes ranges from 0 to 18	Expert-rated scale	5.82	4.65
Number of healthy attributes ranges from 0 to 18	Expert-rated scale	11.77	4.35
GDAS (combined number of sustainable and healthy attributes, number ranges from 0 to 36)	Expert-rated scale	8.80	4.40
Job Description Index (JDI); Smith <i>et al.</i> (1969), ranges from 'no' (1), 'yes' (2) and 'I don't know' (0)	Self-report scale; 18 items (one subscale)	4.61	1.46
PPS (one item open-ended; one item based on McGuire and Liro (1986), where number of productive hours are reported; two items range from 'strongly agree' (1) to 'strongly disagree' (5), one item ranges from 1 = 'no', 2 = 'yes')	Self-report scale; 5 items	2.52	1.47
Affective Organizational Commitment Scale (ACS); Allen and Meyer (1987), ranges from 'strongly disagree' (0) to 'strongly agree' (7)	Self-report scale; 8 items	3.86	1.47
EES (combined using JDI, two items from the PPS and ACS)	Self-report scale; 28 items	3.66	0.86
New Environmental Paradigm (NEP; Dunlap <i>et al.</i> (2000), ranges from 'strongly disagree' (1) to 'strongly agree' (5))	Self-report scale; 15 items	2.03	0.57
GEB scale (Kaiser 1998, adapted by Gifford <i>et al.</i> 2009, ranges from 'strongly disagree' (1) to 'strongly agree' (5))	Self-report scale; 7 items used (of 21 original)	2.46	0.97
GOOS (created for present study, range from 'no' (1), 'yes' (2) and 'I don't know' (0))	Self-report scale; 10 items	1.62	0.32
Year born		1969	12.58
Gender		1.68 (female)	0.47
Highest education level range from 'some secondary school' (1) to 'PhD or postdoctoral degree' (7)		4.53 (some post-bachelor degree)	1.28
Months worked in office		45.51	64.48
Job description (e.g. 'executive', 'manager', 'supervisor', 'staff')		3.29 (supervisor)	0.84

The nine questions on the GOOS somewhat reliably represented participants' overall impressions of their office building,  $\alpha = 0.68$ .

Affective organizational commitment in employees has been shown to positively relate to job performance (Meyer *et al.* 1989) and job satisfaction (Porter *et al.* 1974). Thus, we created an Employee Engagement Scale (EES) by combining the JDI subscale, the ACS and the two continuous items from the PPS. The reliability of this scale was excellent,  $\alpha = 0.84$ .

Given that the terms 'sustainable' and 'healthy' are often used synonymously, and the strong positive correlation found between these variables ( $r(75) = 0.88$ ,  $p < 0.01$ ), the two 18-item scales were merged to form a 36-item Green Design Attributes Scale (GDAS;  $\alpha = 0.94$ ) (Table 2).

### Hypothesis testing

When the number of green design attributes and scores on the EES were correlated, no significant positive correlation was found ( $r = -0.07$ ,  $p > 0.05$ ). In fact, no significant positive correlations were found between the GDAS and the EES's component scales, nor the NEP or GEB ( $r$ 's ranged from 0.06 to  $-0.14$ , all  $p$ 's  $> 0.05$ ). A *post-hoc* power

analysis revealed that 77 participants provides a power of 0.76 to detect a medium effect size ( $r = 0.30$ ) (Cohen 1988). Thus, the study's design had an excellent chance to detect a medium effect size, if one exists.

However, a significant *negative* correlation occurred between the number of green design attributes and scores on the GOOS,  $r(75) = -0.30$ ,  $p < 0.01$ , which is the reverse of the hypothesis. Thus, all relations between green design and work engagement and pro-environmental behaviour, across 15 buildings, were either null or negative.

### What might be related to engagement?

Because the GOOS's reliability was not very strong ( $\alpha = 0.68$ ), some of its items were likely more responsible for the negative association than others. Thus, correlations between each of its items and the number of green design features were computed. Only two significant correlations were found: One pertained to opinions about having enough access to a window,  $r(75) = -0.31$ ,  $p < 0.01$ . The other concerned employee opinion about enough decoration and aesthetic appeal inside the office,  $r(75) = -0.34$ ,  $p < 0.01$ . Thus, employee opinion about these aspects seemed largely responsible for the significant negative correlation between



Table 2. Green design attributes for building categorization.

Building type	Attribute
Sustainable	Emphasize energy efficiency and resource management
	Rely only on renewable energy and renewable materials, or materials that can be fully recycled or reused
	Have been certified under the sustainable sites, water efficiency, energy and atmosphere, or materials and resources sections within the LEED commercial interiors rating system
	Have a net zero energy flow (balanced imports and excesses)
	Deal with heat loss using ventilation and air tightness strategies
	Use solar photovoltaic (PV) electricity
	Reduce erosion, light pollution and construction-related pollution
	Achieve water reduction through efficient appliances, fixtures and fittings
	Monitor energy use
	Use sustainably grown, harvested, produced and transported products and materials
	Use low-flow showerheads and toilets
	Discourage development on previously undeveloped land
	Minimize impact on ecosystems and waterways
	Encourage regionally appropriate landscaping
	Control storm water runoff
	Use composite roofing
	Include solar shading where appropriate
Use rainwater harvesting systems	
Healthy	Emphasize occupant comfort
	Emphasize occupant health
	Provide access to views
	Provide access to natural daylight
	Improves acoustics
	Improves indoor air quality
	Have been certified under the indoor environmental quality section within the LEED commercial interiors rating system
	Continues to rely on some non-renewable resources
	Continues to produce some pollution
	Use non-reactive finishing materials
	Use low-emission finishing materials
	Operable windows
	High personal control within the space
	Showers for commuters
	Incorporate vegetation or water features into interior and/or exterior
	Effort to reduce off-gassing and growth of bacteria improve health of occupants
	Have recycling options for employees
Effort to reduce growth of bacteria to improve health of occupants	

their overall office opinions and the number of green design attributes in the office buildings.

### Other results

Among the attitudinal and behavioural scales, several significant correlations were found. Responses on the ACS significantly correlated with the job satisfaction subscale of the JDI,  $r(75) = .52, p < 0.01$ . This supports Mathieu and Zajac's (1990) finding that job satisfaction and affective organizational commitment are positively associated. Also, responses on the NEP significantly correlated with responses on the EES,  $r(75) = 0.24, p < 0.05$  and, not surprisingly, the GEB,  $r(75) = 0.38, p < 0.01$ .

Age positively correlated with responses on the GEB,  $r(75) = .07, p < 0.05$ . Also, a significant negative correlation occurred between job classification and responses on the NEP,  $r(75) = -0.30, p < 0.01$ . Finally, the number of

years employees spent working in their office negatively correlated with the number of green design attributes,  $r(75) = -0.28, p < 0.05$ .

### Discussion

This study did not find the expected positive relations between green design attributes in office buildings and employee work engagement (i.e. job satisfaction, perceived productivity, affective organizational commitment), or attitudes and reported behaviours concerning the environment. In fact, across 15 buildings with varying numbers of green design attributes, employees tended to have significantly more *negative* impressions of their offices as the number of green attributes increased.

Particular complaints, such as not having enough access to a window and not being allowed to decorate or personalize work areas may have contributed to the negative

correlation. These are common complaints in workplace settings. For example, in their evaluation of the Ann Arbor Federal Building, Marans and Spreckelmeyer (1981) found similar associations between adequate window views, space for personalization and employee satisfaction. In a later study, Marans and Spreckelmeyer (1982) found that the architecture of a building influences employees' reactions with their immediate workspaces, as well as their feelings about the 'ambience of the agency within which they work' (p. 333).

Decision makers should take employees' feelings about view access and decoration space into account throughout the design process, even when green design attributes are being integrated. If employee concerns about their work environment are addressed before green design attributes are in place, such attributes may have a measurable effect on employee attitudes and behaviours at work.

The lack of positive associations may have occurred in the present study because the number of years employees had worked in their office building ( $M = 4$  years) was negatively related to the number of green design attributes of a building. Time and novelty may have influenced whether employee attitudes and behaviours were affected by green design. Perhaps more than 4 years are necessary for employees to be positively affected by green design; perhaps the opposite was true and an average of 4 years was long enough for positive impressions to form, but then fade. This would be consistent with Fischer's (1997) statement that familiarity with an environment, along with values attributed to its features, help to define an individual's evaluation of a place.

Several other correlations of interest emerged. Employees with strong pro-environmental orientations on the NEP tended to perceive themselves as more engaged at work than those with weaker environmental orientations, and they reported higher job classifications. The former also reported engaging in more pro-environmental behaviour, and age positively correlated with more reported pro-environmental behaviour. These findings may be useful for understanding the behaviours and attitudes of those who strongly value the environment. We also confirmed Mathieu and Zajac's (1990) finding that affective organizational commitment significantly correlates with job satisfaction.

Some authors assert that factors such as autonomy, job enrichment and opportunities to use one's skills are associated with strong feelings of organizational commitment (Schultz and Schultz 1998). Had affective organizational commitment positively correlated with the number of green design attributes, the physical environment could be advanced as an additional factor to further develop models of organizational commitment. However, because this is an initial study with a small sample of respondents per building, further testing of an engagement scale that includes the construction of organizational commitment is necessary.

This study's results have implications for the manner in which the terms 'green', 'sustainable' and 'healthy' are

used in the design literature. Agencies such as the Canada Mortgage and Housing Corporation, Building Owners and Managers Association and LEED use these terms interchangeably. Future work probably should not distinguish between these terms, and the marketing of buildings that contain both sustainable and healthy features ought to use the term 'green' to best convey the design's environmental goals and attributes. In addition, some green design attributes may be more important than others. The GDAS treats all 36 attributes equally, which may not be the best way to measure how green buildings are perceived. Future research is needed to determine whether its green design attributes vary in importance.

Although further reliability testing of the methodologies used is essential, this initial study has augmented knowledge of social design in terms of how green office buildings affect occupants' attitudes and behaviours. More comprehensive research is needed to investigate the generalizability of these findings in other work settings.

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Disappointing to say the least.

Please review your clear city staff report which identifies non conformance to design, zoning or view guidelines.

Catherine Campbell

The Aria resident

To Mayor and Council

We are, again, writing to City Council review the Telus Ocean project. Specifically now, to express our distress at the recommendation by the Advisory Design Panel to approve the Telus Ocean application.

Except for three suggestions of palette changes, lowering signage, and changes to the South Plaza they dismiss the information on several aspects that do not conform to current zoning or design guidelines so carefully outlined in Miko Betzano's report.

Please have this project reconsidered. As noted previously this area of Victoria is very much the 'heart' of the city with buildings of heritage significance, a large residential community and hotels and businesses that have enhanced the OCP and the reason why we have one!

Charlotte and Bob Cronin  
S308 737 Humboldt St.

**From:** [Derek Lau](#)  
**To:** [Development Services email inquiries](#)  
**Cc:** [REDACTED] [hello@telusocean.com](mailto:hello@telusocean.com)  
**Subject:** RE: TELUS Ocean Development  
**Date:** October 9, 2020 1:07:16 PM

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I am requesting that the City of Victoria and Telus/Aryze adhere to the current height restriction for the new Telus Ocean development.

Residences and business owners make large investment decisions based on existing rules, restrictions, and guidelines. By altering the zoning requirements to allow Telus/Aryze to develop a building taller than the current 45 metre limit, you unfairly impact the hundreds of people in the vicinity that have made these measured investments in the Humboldt Valley area.

Of course, restrictions can and should be appealed for good reasons; however, the current 45 metre restriction is more than enough to build an 11-story development. In other words, there is no good reason for the City of Victoria to allow Telus/Aryze alter the current height restriction.

At 45 metres, the Telus Ocean building will still have unimpeded views of the Empress Hotel and inner harbour while having minimal impact on the hotels, businesses, and residences in the area.

Thank you for taking the time to read my letter.

Derek Lau

Homeowner & downtown business owner

## Katie Lauriston

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**From:** Miko Betanzo  
**Sent:** October 20, 2020 12:22 PM  
**To:** Katie Lauriston  
**Subject:** FW: 767 Douglas Proposal

Please add the below to the 767 Rezoning community feedback.  
Thanks

Miko Betanzo  
Senior Planner – Urban Design  
Sustainable Planning & Community Development  
City of Victoria, 1 Centennial Square, Victoria BC V8W 1P6  
[mbetano@victoria.ca](mailto:mbetano@victoria.ca)

T 250.361.0604 F 250.361.0386



From: [Diane Chimich](#)

**Sent:** October 12, 2020 11:21 AM  
**To:** [Miko Betanzo](#)  
**Subject:** 767 Douglas Proposal

To Mike Betanzo

The Telus Ocean development is in an extremely important heritage area of Victoria. Our city prides itself on protecting and maintaining our heritage buildings. This is seen often in projects such as Customs House where the developer was required to maintain the heritage facade at a considerable expense to the project. So the same approach must be applied for the Telus Ocean development.

The objective of the Heritage Conservation policy requires conserving and enhancing the heritage value, special character, and the significant historic buildings, features, and characteristics of this area. It has been noted by the city staff and all of the businesses and residents in the area that the Telus Ocean development which is in the Heritage Landmark radius of the Empress Building does not meet the design guidelines of the Heritage Conservation policy.

This project is far beyond every part of the zoning criteria.

Zoning Criteria	Proposal	Standard IHH Zone
Density (Floor Space Ratio) - maximum	5.57*	3.0
Total floor area (m2) - maximum	1 14,378.96*	7745.85
Height (m) - maximum	51.0*	43
Setbacks (m) – minimum		
• Step Back at 10m (Douglas)	2.0*	8.2
• Step Back at 10m (Humboldt)	0.2*	8.2
• Interior Side (south)	0.00*	4.5

• Interior Side (east)	13.4	4.5
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Every single zoning criteria has been totally ignored and the proposal far exceeds all of these.

The overall scale and massing do not respect the surrounding heritage landmark policy or the importance of the heritage buildings in that area. This project will be massive in size and reach which will be detrimental to the Empress Hotel and especially the Crystal Gardens. The Empress Hotel should always have visual prominence in this area and it should be protected by the City. Zoning criteria are put in place to ensure that buildings such as the Crystal Garden and the Empress are protected. So it is the responsibility of the staff, advisory committees, and the City Council to ensure that this happens. The tools are there so they MUST be used. All developers must be held to the same level which Telus is not meeting. This building is far beyond the height restrictions, the floor space ratio restrictions, and total floor area restrictions. These are not slight overages they are monumental overages. The building is far too large for the land and it can not be built to these specifications.

Street setbacks are established and must be followed by all. So to allow this project to have ignored these setbacks is not appropriate. This building must be reduced in bulkiness and remain within the setback restrictions that have been put in place. They can not be allowed to overbuild an area that is so important to this heritage area.

The effect that this building will have is extremely detrimental to all aspects of this area. The massive amount of glass is not in keeping with the area, the overbuilt size will overpower and dominate heritage buildings which are a key part of the history and appeal of Victoria, the roofline will have a negative impact on the protected view from the harbour and the illumination will negatively affect the night views.

Victoria established a Downtown Core Area Plan. It is imperative that this plan guides the development in the area and that all stakeholders are considered. This project does not respect the guidelines, the zoning criteria or the neighbouring community.

Protect the heritage of the Empress, the Crystal Gardens and the Douglas Street corridor. This project must be sent back to address these issues in their design and reduce the scale, setback allowances, height restrictions and overall design that are required in this extremely important area of downtown Victoria. It can not be approved as presented.

Sincerely  
Diane Chimich  
788 Humboldt St.



Good Morning Mayor and Council,

As nearby residents and property owners to the DVP 00155 we are excited to see this land being developed in such a wonderful manner.

The proposed use for the property will enhance the area and allow for good development of this land.

We DO OBJECT to the level of variances requested.

City of Victoria has guidelines to enable a flow or balance of aesthetics, proper usage and new construction.

To allow such a variation of doubling the total floor area and allowing for the extra storey does not do justice to the area.

We ask that the City consider this application on merits of staying within the guidelines especially of height.

Density/floor area increase is ok to increase and removing residential components is fine simply an office tower can sustain its financial costs by staying within the 43m height zoning.

We thank you for your consideration and understanding in this matter.

Sincerely  
Mark Havin  
707 Courtney St Victoria

To whom this concerns:

The owner of Unit 1604 strongly objects to the proposed development at 767 Douglas Street.

Sincerely yours,

Martin

Dear Mayor:

I am one of the owners of Belvedere on Humboldt Street. I am strongly against the proposal to change the zoning of the subject property and increase the building heights as this will change the city's skyline and impact the core area of downtown. Please use the right in your hand to protect our cultural heritage, not damage it!

Please kindly take my concern into consideration.

Best wishes  
Masaru Takanashi

To mayor and city council:

Here is my question: Why does the city adopt neighbourhood, plans, guidelines, bylaws (e.g., BHP) and then give themselves license to ignore them? For example, the information I received from HVC regarding the dramatically oversized height of the Telus Ocean building:

*This staff report clearly and comprehensively details aspects of the building proposal which do not conform to zoning or design guidelines. Despite this report, the Advisory Design Panel recommended that the TELUS Ocean application be approved and made only very minor comments*

Is it any wonder that citizens become cynical and jaded after observing the hypocritical antics of the mayor and city council. Why do we even bother? Citizen input and recommendations? Hardly; it's a charade.

Regards,  
William Rodger, PhD  
South 905 - 737 Humboldt Street,  
Victoria, BC  
V8W 1B1

发自我的华为手机

To whom this concerns:

The owner of Unit 705 of 788 Humboldt Street strongly objects to the proposed development at 767 Douglas Street.

Sincerely yours,

Jie

Good afternoon,

The proposed Telus Ocean Building does not respect the City's Downtown Core Area Plan because it does not adequately integrate into the neighbourhood and it exceeds the area's zoning regulations. The Downtown Core Area Plan values the sensitive integration of new developments within this desirable, historic environment. It would be dishonourable for a development to proceed that does not follow the Plan, which has been put forth and agreed upon by our City's political leaders.

The Inner Harbour District is a unique area that provides a significant draw for visitors to Victoria. The City's iconic skyline and the local area's old-world vitality will be harmed if the prescribed Plan is not followed. This will result in irreparable damage to the City's second largest economic driver, the tourism industry. In order to show some semblance of regard for the City's Plan, the building's massive size should be pared back to reduce its dominant impact on the surrounding area.

The proposed building surpasses current zoning regulations in all major areas – height, density, and setback. This lack of compliance, if approved, would be very concerning for individuals and businesses who have invested in the area with the fundamental expectation that the community plan put forth by our City officials would be respected. This disregard for basic process would damage the City's reputation and dissuade future investment.

In order to attempt to integrate into the neighbourhood, the Telus Ocean Building should be constructed within the height, density, and setback parameters contemplated in the City of Victoria's zoning regulations for the Inner Harbour District.

Your review and consideration of the above commentary is appreciated.

Logan Phillips

Tim Chmiliar  
#805 – 708 Burdett Ave.  
Victoria, B.C, V8W0A8

To:  
The Honorable Mayor and City Council

Copy:  
Ian Sutherland, Community Association Land Use Committee representative  
Luke Mari, ARYZE Developments

October 30, 2020


Re: Proposed development for the property at 767 Douglas Street.


I support the TELUS Ocean building design as it has been proposed, including the 51-meter height and 5.57:1 floor space ratio.

I also believe that an overwhelming majority of residents in the immediate area surrounding the site and the general population of Victoria are similarly in favor of the proposed design. Of course, the concerns of the minority must always be taken into consideration, and there could be refinements to the proposed project, but to argue that the building is too high is unjustified when the existing buildings right next to it are just as tall or taller (Falls north tower, Astoria, Chateau Victoria, Hilton Double Tree, Marriot Hotel).

Yes, we could have a shorter building on that site, but we could also have a building that is 17 meters closer to the Aria residential building, or one that does not include the slope from the 5<sup>th</sup> to 12<sup>th</sup> floor on the south end of the building, or the open double-spaced floors on the front corner facing north, all of which reduce the floor space for the developer. Do we really want to deny the zoning changes for an additional 8 meters in height and relatively inconsequential increased Floor Space Ratio? As they say, be careful of what you wish for.

I own the condominium on the 8th floor, south-west corner of The Falls and will no longer be able to see the mountains in Washington State or the BC Legislature, or enjoy any direct sunlight throughout the day. Please approve the changes to the zoning to allow this iconic Class AAA office building to proceed as it has been proposed.

  
Sincerely,  
Tim Chmiliar



Mayor and Council

As a Strata member and a long term resident of the Humbolt Valley. I welcome aesthetic and contributing neighbours to the street. However there are clear divergent interests of proposed commercial and existent residential. This proposed building must be properly adjudicated to serve both interests. This is the heart of the city, and constitutes a "bowl" of descending topography, allowing a share of air, space, view and light corridor. Our greatest concern is height. The building should not be higher than the area. Respect should be paid to our community. This height is out of proportion with what is reasonable. Paula Callahan 1208 the Astoria



Hello,

I am writing to express my concern about the zoning modifications being considered for the development at 767 Douglas St. I do not oppose the building itself it is the change in the zoning requirements that concern me. Most notably the height. I am very concerned on the impact to the fabulous Fairmont Empress Hotel. It will forever be cheapened & its divine beauty lessened if the height zoning requirements were violated to what they propose. The current zoning height should not be raised. The Fairmont Empress & Victoria deserve better than a skyline cheapened by corporate logos!

Thank you for listening.

Terri King

1801-707 Courtney St

Dear Mayor Helps and Council Members,

I have recently read this article published in the Guardian, a British news source I read. Although it refers to the state of a much larger city than ours in a different country, the same situation will eventually trickle down to smaller cities and other countries around the world. It got me thinking about the already unused office space in Victoria and the surrounding area and all the “for lease” signs I see in windows around our city. Perhaps the future will not be kind to the type of structure envisioned in our neighbourhood by you and our Council.

<https://www.theguardian.com/commentisfree/2020/nov/13/office-block-cities-coronavirus-cultural-activities-countryside>

Let us not build a modern day dinosaur in our city that both present and future residents in this neighbourhood will regret. I again ask that anything built on this site conform to the zoning established prior to any major development taking place here. After all, we may ask ourselves, what is the point of community standards and zoning bylaws if they are brushed aside at the whim of a shortsighted Mayor and Council only interested in vanity projects while ignoring the will of the people who actually live here?

Thank you once again for your time and consideration of my point of view.

Robert Newton  
405 - 708 Burdett Avenue  
Victoria, BC  
V8W 0A8

Dear Mayor Helps and Council Members,

I have recently read this article published in the Guardian, a British news source I read. Although it refers to the state of a much larger city than ours in a different country, the same situation will eventually trickle down to smaller cities and other countries around the world. It got me thinking about the already unused office space in Victoria and the surrounding area and all the “for lease” signs I see in windows around our city. Perhaps the future will not be kind to the type of structure envisioned in our neighbourhood by you and our Council.

## The office block has had its day. But what will replace it?

[Simon Jenkins](#)



Cities emptied by the coronavirus can focus on cultural activities, while the countryside we flee to must be protected

London's Square Mile, August 2020: 'Those totem poles of 20th-century prosperity, gleaming glass towers crammed with worker bees, are clearly past their peak.' Photograph: Martin Godwin/The Guardian  
Fri 13 Nov 2020 10.00 GMT

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**1,223**

# D

oes a Christian need a church? Does a shopper need a shop? Does an office worker

need an office block? We know these places help bring people together and can deepen the experience. But when the coronavirus has passed I believe the truth will be revealed. Technology means that we can perform most of these tasks from anywhere, including home. After the first lockdown, surveys suggested that the office's days were numbered. Since the 1990s, the internet has supposedly liberated white-collar workers from their desks, but it has taken a pandemic to truly break the ritual. When the initial lockdown ended in the summer and Boris Johnson ordered the nation back to work, surveys in July reported that most workers wanted to split their time between working at home and in the office. Even so, there was an assumption that most businesses would eventually return to almost pre-pandemic practices.

The second lockdown is making this most unlikely. This week, YouGov published a survey carried out in October, before the new lockdown was announced, which found support for the office had collapsed. A mere 7% of workers want to return to five-day office hubs rather than new hybrid arrangements. Fifty percent dislike commuting and 72% suggested comfort as the major benefit of working from home. A majority accepted that creativity and teamwork were diluted, but a quarter enjoyed having more time away from colleagues. The chief opposition was from bosses, with only 13% believing they can “manage or train teams as effectively when working remotely”.

What this means to the world of offices is already glaring. I walked through the City of London last week and it was an eerie place, as if the streets themselves had caught the plague. The market had spoken and giants were crashing. London's Landsec property empire has just declared an £835m half-year loss and slashed its portfolio value by almost £1bn. Great Portland Estates this week reported a £155m half-year loss. The residential prices tracker, Zoopla, has rents following that trend, with strong rises in suburbs and out of big towns but already falling by 5% in London, while also down in central Manchester and Birmingham. The fall is expected to continue. Not only do many people dislike offices, they see no need to live near them.

Even if the eventual decline in office working is confined to 30-40%, the impact on cities must be intense. Those totem poles of 20th-century prosperity, gleaming glass towers crammed with worker bees, are clearly past their peak. There will be offices for essential staff, but they can be anywhere. In cities, they are wanted in smaller, bespoke units in areas of character. As rents fall in the City of London, they rise in Soho, Shoreditch and Manchester's Northern Quarter. It's lucky that that city kept its old buildings.

This has to be good news, ultimately. A decade of reckless London non-planning – largely under Boris Johnson as mayor – has a wild 3m square metres of speculative offices in the pipeline, three quarters of it yet to begin construction and probably useless. The waste of building resources is a scandal. Sadly, the biggest and ugliest block in the City, the monstrous 22 Bishopsgate, has just been completed. Perhaps one day it will be occupied by squatters. But at least this era can be consigned to history. Falling rents should draw more

city-friendly creative and leisure activities into central areas, humanising and downscaling them.

[The 2010 student protests were vilified – but their warnings of austerity Britain were proved right](#)

*Dan Hancox*

[Read more](#)

What this means for out of town areas is more debatable. I know many people who have found being cooped up in confined spaces stressful. Modern families are seldom fashioned for claustrophobic living, especially if two people are working from home, with children tossed into the mix. At the same time, we know the pandemic has drawn people closer.

Streets have changed character from dormitories to neighbourhoods. The solitude of lockdown is relieved by the sense of community. I have lost count of how many people tell me they feel they now “live in a village”.

Such living is strangely like a return to a pre-industrial age, when people did not have to travel far from home to find work. The merchant delivers to the door. Services are essentially local. These benefits are real. They mean people have more time to [take on community responsibilities](#), as has been noted during the pandemic. Life might even return to declining institutions, to local shops, pubs, churches and sports.

One danger is clear. The Zoom generation is up and running across rural England, fleeing the cities for all it can. I have never seen more advertisements in Country Life magazine than in this summer’s [Cotswolds special issue](#). Villages and small towns are filling up: but when everyone wants to live in rural bliss, the countryside will go the way of Middlesex and not be countryside any more. This calls for a revival of a once great British profession now all but dead – that of town and country planning. If rural Britain is to be shared by all, it will need the most careful oversight. Yet Johnson’s [recent planning proposals](#) are a retreat of what he did for London – let money and capital dictate all.

• Simon Jenkins is a Guardian columnist

Let us not build a modern day dinosaur in our city that both present and future residents in this neighbourhood will regret. I again ask that anything built on this site conform to the zoning established prior to any major development taking place here. After all, we may ask ourselves, what is the point of community standards and zoning bylaws if they are brushed aside at the whim of a shortsighted Mayor and Council only interested in vanity projects while ignoring the will of the people who actually live here?

Thank you once again for your time and consideration of my point of view.

Robert Newton  
405 - 708 Burdett Avenue  
Victoria, BC  
V8W 0A8

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Humboldt Valley Committee

## An Open Letter to Victoria Mayor and Council

Recently, TELUS Ocean added a document to their website, titled *What We're Hearing 1.0* (November 2020). This document aims to outline the project's public engagement and communication initiatives and provide an initial response to some of the issues raised by the public. Unfortunately, this report contains a number of puzzling errors and distortions which further cloud rather than clarify the issues. The most consequential of these is the Project Team response to concerns expressed about the height and massing of the proposed building. [Note 1]

### **Claim 1. People should have expected a tall building on this site.**

The developers point out that the Humboldt Valley has become an area of tall (midrise and highrise) buildings and that the TELUS Ocean site is already zoned for a building up to 43m tall. They show the profile of their proposed building compared to the other buildings in the Humboldt Valley. [Note 2] Although that does illustrate that some other buildings are as tall as the proposed TELUS Ocean, it also shows clearly the relative overall size of the proposal compared to its neighbours. It looks much more massive than any of the neighbouring single tower buildings and as big or bigger than the two twin tower buildings nearby.

### **Claim 2. There are good policy and economic reasons for the building size.**

The developers argue that the Downtown Area Plan (DCAP) would support the construction of a 45m tall building, gaining another two meters to their base height. Then they go on to explain that their design, while significantly higher at 53m, represents a fair way of "balancing of local area policy with unique site conditions." [Note 3]

The developers show how they generate a maximal building envelope for the site by pushing up a volume defined by the site boundaries to the maximum permitted height and then applying rules on required setbacks (any distances the building must push back from the edges of the site) and what could be called stepbacks (the line that defines how much a building must push back from the street frontage at various heights to prevent the creation of highrise canyons).

### **Claim 3. The proposed building is smaller than it could be.**

The next part is the key distortion in this argument. The developers show how the sides of this building envelope compare with the facades of the proposed TELUS Ocean building. TELUS Ocean as proposed differs from the building envelope because it includes a significant setback along the "Penwell Connector" – the right of way separating the building from its nearest neighbour, the ARIA

condominium. [Note 4] Because of this setback, TELUS Ocean compensates by increasing its height from 43m to 53m and eliminating stepbacks (except for a slice back along the southern edge). The developers illustrate that the proposed TELUS Ocean facades are in fact comparable to or a little smaller in area to (3 of) the sides of the permitted maximal building envelope. Thus, nobody can complain that the building massing is greater than they should have expected under the existing zoning. Any argument that Humboldt Valley neighbours were blindsided by the size of TELUS Ocean should be dismissed.

### **Counterargument. The zoned density tells a different story.**

This argument is remarkable because it is blatantly false! **The building envelope the developers display is meant to define not the volume of the permitted building but the edges within which the proposed building is meant to fit.** Any edges or protrusions that extend outside that (like the height above 43m or the shear wall that ignores the required stepbacks) are the subject of variance or rezoning applications. The actual size of the building is constrained by another major consideration that the developers have not applied here. That is the zoned density, the floor space ratio (FSR) – a comparison of the total floorspace of the building with the total area of the lot. **The TELUS Ocean lot is currently zoned for an FSR of 3:1 and, under Official Community Plan guidelines, could be increased to a maximum of 4:1 if appropriate bonusing were merited.**

It is simply false that there is permission to build out to the maximal building envelope limits. Such a building would be enormous; no neighbour would have considered that scenario possible. In fact, under current zoning, a building built out to roughly the lot boundaries would result in a squat bulky TELUS Ocean only three storeys high; four storeys if maximal bonusing were achieved. [Note 5] **That the developers are asking for an increase to 5.6 FSR – more than 85% bigger than current zoning - is hardly an indication of concessions on the part of the developers.**

### **Conclusion and Request for City Council Action**

In short, this whole display put forward by the developers is designed to mislead. If we can't have any trust in the developers, we must depend on City Council to be a fair arbiter. Existing community interests deserve to have some consideration and be protected from the self-interest of powerful developers. The City, as the seller of this property, needs to take special care to ensure that the developers are upholding the City's own planning policies. TELUS Ocean as proposed is bigger than anyone had reason to anticipate on this relatively small site and it should be reduced to be appropriate in its context.

Sincerely,

Ruth Annis, Chair, Humboldt Valley Committee

Diane Chimich, President, Belvedere Strata Council  
Brenda Dean, President, Astoria Strata Council  
Stafford Bingham, President, The Falls Strata Council  
Ryan Mueller, President, ARIA Strata Council



## Notes

[Note 1] The TELUS Ocean document covers other issues raised by residents, including shading of neighbouring properties, traffic (during construction and afterwards), parking, and danger of bird strikes (bird deaths caused by flying into the glass facades). These are legitimate concerns, have not yet been adequately addressed by the developers, and deserve City attention once the major design issue of height and massing has been settled. We hope to engage in those discussions as well.

[Note 2] It is a niggling point but there are some minor errors in TELUS Ocean documents which persist. Here, the Astoria condominium, at 751 Fairfield, is again identified as City Life Suites, the name of an AirB&B rental in the building which comes up when viewing Google Maps. This mistake might be understandable for the TELUS Ocean architectural firm, which is not local. But it does not speak well for the local developer that is a partner in this proposal, who should be providing local context. Just to underscore that, the height of the Astoria is also mis-stated.

[Note 3] Because the proposed increased height is considerable, the developers seek to buttress their argument by tying it to the “Urban Amphitheatre Concept”. They explain that City planning goals encourage the proposed building height to be tall enough to be visible behind the Empress Hotel and provide a backdrop to its historic roofline. Unfortunately, this is a mischaracterization of downtown zoning to implement the amphitheatre concept, which ramps up north of the TELUS Ocean site.

[Note 4] In fact, the developers explain that this setback was introduced specifically to provide “an appropriate” building separation from the ARIA condominium, which would otherwise be only a few meters away. While this separation is indeed a welcome feature for residents in the ARIA, the explanation is somewhat suspect because the “Penwell Connector” was initially proposed explicitly as a concession to help preserve a view corridor for the Hilton Doubletree and Marriott Hotels across Humboldt Street and only afterward was restated as a concession to the ARIA. (*TELUS Ocean Development Concept*, May 25, 2017, from a redacted version of the proposal to Victoria City Council)

[Note 5] As the developers themselves explain, because typical storeys in commercial buildings are 40% higher than typical residential storeys, an office building at an FSR of 3:1 will be 40% bulkier than a residential building at the same density.

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Michael Faulkner  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Romi Lagadin  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Erik Bentzon  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Chris Cutlan  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Donald Sutherland  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Valerie York  
Victoria Resident,

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Bruce Edmundson  
Interested Stakeholder



City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Eric Hoffman  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.

Thank you for your consideration.

Sincerely,

Ryan Geddes  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors (the sector I work in and one that is growing in Victoria and creating a lot of well paying jobs for individuals and young families).
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location (please redevelop all surface parking lots into place we can live, work and play, please).
- o Complement the surrounding community with world-class, iconic architecture. I have spent time in London where new and old buildings intermingle beautifully together. Victoria can benefit from this as well.

Thank you for your consideration.

Sincerely,

Sarah Nickerson  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Tyson Villeneuve  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Lisa Edwards  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Mira Vance  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Chris Fitzpatrick  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Chanah Aviva Caplan  
Victoria Resident



City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Glen Ferguson  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Werner Tillinger  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Harold Crouch  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Contribute to a stronger, more resilient economy.
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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Jeff Pardee  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Joseph Willson  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.

Thank you for your consideration.

Sincerely,

Reg Boyd  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Steve Sharlow  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Karen Sharlow  
Victoria Resident



City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria. Their philanthropic grants add core support to many organizations in our region and often also bring volunteer investment. Beyond that, they have chosen a location that already is high density so neighbours cannot really object.

I agree that the resulting structure will contain public beneficial space and design that also will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Marg Rose  
Dallas Rd,  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Tessa McLoughlin  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Gina Sindberg  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Max Olesen  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Daniel Andrews  
Victoria Resident,

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

John Robert Pickersgill SR.  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Contribute to a stronger, more resilient economy.
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- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

J Purvis  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
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- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Scott Dutchak  
Victoria Resident



Greeting to the City of Victoria Mayor and Councillors,

I respect the time and energy that Aryze Developments puts into all their projects, and truly believe the TELUS Ocean will present an opportunity for Downtown Victoria to present a modern, thoughtful, engaging face to the world.

As such I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria for a host of reasons, but most specifically I believe it will:

- Create high-value jobs in the tech and innovation sectors.
- Create new vibrant, inviting, and productive public space.
- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

I appreciate your consideration on this project, and all the valuable infrastructure you've developed in Victoria over your term(s),

Thanks,  
Jordan Stout  
Downtown Victoria Resident

City of Victoria Mayor and Councillors,

As a resident of Broughton Street, only blocks away from the proposed project, I would greatly welcome Telus Ocean to my neighbourhood. It will bring a new energy into this commonly overlooked corridor of the city. Further, it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.

Thank you for your consideration.

Sincerely,

Aaron Bergunder  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Kip Clancy  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Clint Plett  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Mark Donahue  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Graham Finch  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

I live in the downtown core and think that specific area could use a touch of innovation and beautifying!

Thank you for your consideration.

Sincerely,

Justine Shu  
Victoria Resident

Hello, Lisa Helps and city of Victoria Councillors,

I'd like to express my support for the TELUS Ocean building. I bike by this corner almost daily and think it will make a fantastic addition to the city's core. It will draw beneficial commercial interest to the southwest part of downtown (an improvement from a few mobile-offices for rental car companies). I think the project team is fantastic, and the resulting development will:

- Create high-value jobs in the tech and innovation sectors.
- Contribute to a stronger, more resilient economy.
- Create new vibrant, inviting, and productive public space.
- Offer sustainable office space in the Central Business District.
- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,  
Jesse Campbell  
A resident of Cook Street Village



City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Daniel Gao  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Sarah Ueland  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Charron Hamilton  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Contribute to a stronger, more resilient economy.
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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Kayle Rizzo  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Peter Machnee  
Victoria Resident

This development will catalyze more growth around the Leg and lower Douglas Street. All much needed.

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Contribute to a stronger, more resilient economy.
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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Andrew Armstrong  
Victoria Resident,

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Contribute to a stronger, more resilient economy.
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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Sarah May  
Victoria Resident



City of Victoria Mayor and Councillors,

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- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Amrit Pal Singh  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Yvonne Blum  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.

Thank you for your consideration.

Sincerely,

Terry Bergen  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Joanne Jenkins  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Talin Mirzayan  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Lisa Reinhardt  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria for the following reason(s):

It will create high-value jobs in the tech and innovation sectors.

It will contribute to a stronger, more resilient economy.

It will create new vibrant, inviting, and productive public space.

It will offer sustainable office space in the central business district.

It will bring life to an existing vehicle parking lot in a prominent downtown location.

It will complement the surrounding community with world-class, iconic architecture.

Thank you,  
Leslie Dube

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Krysta Mae  
Victoria Resident



City of Victoria Mayor and Councillors,

I am a resident of the city of Victoria. I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to downtown Victoria for the following reasons:

- It will contribute to a stronger, more resilient economy
- It will create new vibrant and productive public space
- It will offer sustainable office space in the central business district
- It will bring life to an existing vehicle parking to in a prominent downtown location
- It will complement the surrounding community with world-class, iconic architecture

Thank you for your time!

Best,  
Emily

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.
- o Create new vibrant, inviting, and productive public space.
- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Sarah Prows  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Victoria Wells  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Sebastien Brotherton  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Fabrice Christen  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Marlon Coy-Veliz  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Contribute to a stronger, more resilient economy.
- o Offer sustainable office space in the Central Business District.

Thank you for your consideration.

Sincerely,

Kevin Klasen  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Contribute to a stronger, more resilient economy.
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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Paola Moore  
Victoria Resident



City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Kyle Milloy

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- e

Thank you for your consideration.

Sincerely,

e e

Victoria Resident

City of Victoria Mayor and Councillors,

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- Offer sustainable office space in the Central Business District.
- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

asdf asdf

Interested Stakeholder

City of Victoria Mayor and Councillors,

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- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

SEAN MIDWOOD  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- o Offer sustainable office space in the Central Business District.
- o Bring life to an existing vehicle parking lot in a prominent Downtown location.
- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Laura Feeleus  
Arc.hive artist run centre founder  
Gage Gallery Treasurer  
Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Contribute to a stronger, more resilient economy.
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- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Paul Butler

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- Create new vibrant, inviting, and productive public space.
- Offer sustainable office space in the Central Business District.

Thank you for your consideration.

Sincerely,

Kyle Harrison

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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Thank you for your consideration.

Sincerely,

Mary Sandwith

Victoria Resident



City of Victoria Mayor and Councillors,

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- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Phil Richardson

Victoria Resident

City of Victoria Mayor and Councillors,

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- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Don Hill

Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Victoria need new growth and by encouraging this, it will show other developments that this city welcome creative developments that will fit it's needs. Change is good if we are willing to open ourselves to new technology and innovations.

Thank you for your consideration.

Sincerely,

STEPHEN TRAN

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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Thank you for your consideration.

Sincerely,

Sean Donnelly

Victoria Resident

City of Victoria Mayor and Councillors,

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- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Michelle Harrington

Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Contribute to a stronger, more resilient economy.
- Create new vibrant, inviting, and productive public space.
- Offer sustainable office space in the Central Business District.
- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.
- I love the TELUS buildings in Vancouver and other cities in Canada.
- Victoria would have a nicer downtown with TELUS Ocean

Thank you for your consideration.

Sincerely,

Aaron Slingsby

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Contribute to a stronger, more resilient economy.
- Create new vibrant, inviting, and productive public space.
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- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Bruce Yoshida

Interested Stakeholder

City of Victoria Mayor and Councillors,

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- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Kelly Rawson

Victoria Resident



City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Begum Kabatas

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Contribute to a stronger, more resilient economy.
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- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Nikki Warnock

Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Contribute to a stronger, more resilient economy.
- Create new vibrant, inviting, and productive public space.
- Offer sustainable office space in the Central Business District.
- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

I am proud to be a TELUS team member and am so excited for a world-class, LEEDcertified space in which to work. TELUS Ocean will be a beautiful addition to Victoria's downtown.

Thank you for your consideration.

Sincerely,

Melanie Jagiello

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- Contribute to a stronger, more resilient economy.
- Create new vibrant, inviting, and productive public space.
- Offer sustainable office space in the Central Business District.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Anthony Redmond

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- Create high-value jobs in the tech and innovation sectors.
- Contribute to a stronger, more resilient economy.
- Create new vibrant, inviting, and productive public space.
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- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Charlene Tikk

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Contribute to a stronger, more resilient economy.
- Create new vibrant, inviting, and productive public space.
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- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Kathy Baan

Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Offer sustainable office space in the Central Business District.
- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Sherri Lehan

Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Create new vibrant, inviting, and productive public space.
- Offer sustainable office space in the Central Business District.
- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Craig Adams

Victoria Resident



City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Contribute to a stronger, more resilient economy.
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- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

The area where this building is planned is currently a Budget Car Rental/Car Park next to the Crystal Gardens. I think it would be an asset to the lower end of Douglas Street just across the road from the Victoria Conference Centre. I think this would be a huge asset to the City of Victoria. Thank you.

Thank you for your consideration.

Sincerely,

Kate Braunizer

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Contribute to a stronger, more resilient economy.
- Create new vibrant, inviting, and productive public space.
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- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Jill Healey

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- Create high-value jobs in the tech and innovation sectors.
- Offer sustainable office space in the Central Business District.

Thank you for your consideration.

Sincerely,

Brian Marshand

Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- Contribute to a stronger, more resilient economy.
- Create new vibrant, inviting, and productive public space.

Thank you for your consideration.

Sincerely,

Maurice Popescu

Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Contribute to a stronger, more resilient economy.
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- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Adam Kozyniak

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Lori Polukoshko

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Contribute to a stronger, more resilient economy.
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Thank you for your consideration.

Sincerely,

Donald Mclsaac

Victoria Resident

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- Create high-value jobs in the tech and innovation sectors.
- Contribute to a stronger, more resilient economy.
- Create new vibrant, inviting, and productive public space.
- Offer sustainable office space in the Central Business District.
- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.
- It will strengthen the city's brand, it's image and reputation as a great place to do business.

Thank you for your consideration.

Sincerely,

David Turgeon

Interested Stakeholder



City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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Thank you for your consideration.

Sincerely,

Lisa Knechtel

Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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- Bring life to an existing vehicle parking lot in a prominent Downtown location.
- Complement the surrounding community with world-class, iconic architecture.
- TELUS always has the unwavering commitment to improve the environment with their
- LEED-certified buildings. Their beautiful architectural designs are also impactful to any city skyline.

Thank you for your consideration.

Sincerely,

Cindy Chan

Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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Thank you for your consideration.

Sincerely,

Michael Louie

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Andrea Blaylock

Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Mary Verissimo

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Christopher Ridge

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Melody Mui

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

James Avery

Victoria Resident



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Thank you for your consideration.

Sincerely,

Diane Singh

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Theresa Fong

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Ron Prasad

Victoria Resident

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Thank you for your consideration.

Sincerely,

Nick Rainbow

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Dan Watson

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Jacquie Engman

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Loren Pedersen

Victoria Resident

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Thank you for your consideration.

Sincerely,

Suzanne Morris

Interested Stakeholder



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Thank you for your consideration.

Sincerely,

Lee Tanner  
Victoria Resident,

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Pete Pietramala

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Sarita Sall

Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Kari McLeod

Interested Stakeholder

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- o Complement the surrounding community with world-class, iconic architecture.

Thank you for your consideration.

Sincerely,

Lisa Knechtel  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean.

I met my husband in Victoria when I was at school at Royal Roads University. We ended having to leave Victoria, and move to Toronto as the job opportunities on the island were extremely limited. I hope to eventually move back, as that is where all my husband's family lives, however only possible if the island invests in the economy and development. We need to be creating more job opportunities in tech for this generation and future ones, especially with tourism on-hold and the industry expected to face a slow recovery for years ahead.

This is why: I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

- o Create high-value jobs in the tech and innovation sectors.
- o Contribute to a stronger, more resilient economy.

Thank you for your consideration.

Sincerely,

Kristin Izumi  
Interested Stakeholder

City of Victoria Mayor and Councillors,

I am writing to express my support for TELUS Ocean. I welcome the proposed TELUS Ocean development vision to Downtown Victoria because I believe it will:

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Thank you for your consideration.

Sincerely,

Karin Kondas  
Victoria Resident

City of Victoria Mayor and Councillors,

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- o Bring life to an existing vehicle parking lot in a prominent Downtown location.

Thank you for your consideration.

Sincerely,

Jim Young  
Interested Stakeholder



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Thank you for your consideration.

Sincerely,

Jason Macdonnell  
Interested Stakeholder

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Thank you for your consideration.

Sincerely,

Rob Inkster  
Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Lisa Gruosso  
Victoria Downtown Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Rachael Clarke  
Greater Victoria Resident/ Downtown Victoria Employee

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Kyle Empringham

Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Maureen Shaw  
Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Beth Gibson  
Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Brandon

Brandon Williams  
407-860 View Street



City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Anthony Thorne  
Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Doug Millen  
Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Toni Bramley  
Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Kimberly Banfield  
Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Brad Wigard  
Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Norra Mirosevic  
Victoria Resident

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Jack Bates  
Interested Stakeholder

City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Sheila Nykwist  
Victoria Resident



City of Victoria Mayor and Councillors,

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Thank you for your consideration.

Sincerely,

Terry Ann Lyon  
Victoria Resident

Re: TELUS Ocean proposal  
To: Victoria Mayor and Council  
From: the Humboldt Valley Committee  
January 8, 2021



Dear Mayor Helps and Councillors:

In December 2020, the developers of TELUS Ocean have provided revised plans and also their response to questions from various city officials – now posted on the City’s Development Tracker. These documents prompt this letter to City Council.

As the resubmitted plans make clear, the design changes made by the developers are relatively minor. There are various tweaks and refinements – notably to the geometry and to some extent the materials of the facades - but the clear statement is that everything is now ready to go.

That same position runs all through responses to city department questions, which in terms of height, density and setback issues largely echoed questions that the Humboldt Valley Committee has raised. Where there are City policies, guidelines or regulations that would appear to constrain the development program, the developer sees only design opportunities.

On even the most fundamental questions of building scale and placement on the site, the answers given are that TELUS Ocean is contextually responsive and suitable. Indeed, the developers argue that, in their desire to give back as much as possible to the public realm, the building footprint has been reduced to a “functional minimum”.

Unfortunately, for the majority of us who do not have the ability to visualize architecture in the round, the many illustrations and renderings presented by the developer, while instructive, do not help us see the building in its full context. We see drawings of each façade in relation to a neighbouring building but never the complete ensemble. One of the first requests Humboldt Valley residents made, in public meetings with the developer, was to help us visualize TELUS Ocean in its context. We were promised a “drone study” and a mapping of the building outline - but those have not materialized.

The Developers urge us to accept that a landmark building is rising in our midst and to give them all the variances and zoning changes they want to make it a standout. But we continue to worry about the scale of the building and how that will impact our community. We want to determine that claims of contextual suitability made by the developers are accurate and that the building does not overwhelm the site and all its neighbours. In some instances, the City can ask for a maquette of a proposed design. **We request that City Council ask the developers to provide a scale model of TELUS Ocean, shown among the neighbouring buildings** – simplified massing of the Empress, the Conference Centre, the Crystal Garden, the Aria, the Marriott, the Hilton Doubletree, the Falls, and Nootka Court – so we can all see how well it fits. Please help us achieve this level of understanding.

Respectfully,

Ruth Annis  
Chair, Humboldt Valley Committee  
737 Humboldt Street

*HVC is an informal network linking the strata councils of the ARIA, Astoria, Belvedere and the Falls, and includes outreach to local businesses and Church of Our Lord.*

To you, Madame Mayor and Council of Victoria, B.C.  
Hoping that you will at least read my plea.  
It's short, you are busy, 'no reply needed'.

\*\*\*

We came here in 2002 from Toronto.  
Every early-morning, at the base of their tall buildings, city workers found  
piled-up bodies of dead birds.  
A F.L.A.P. of people formed, on a daily dawn-hunt for any still alive, to help keep-them-alive-  
then-fly-away.

\*\*\*

Recently, here in our new Victoria home, we read about the 'intended' very tall building  
gauged at seventeen (17?) stories, businesses on the gd. flr. included.  
You should not approve that .. please lower the height.

Most all of Victoria's residents *love* our ornithological beauties. Sadly a public response in  
the Times Colonist had none/few letters about this major lack of awareness. Such height  
should *never* happen in our unique and bird attractive city.

And why was there no evident *Comment* by Mr. Obee?

\*\*\*\*

Please do not decimate such wonderful visuals of Victoria.  
Most especially think of our heart-warming birds.

Thank you.  
*Ann Kroeker*

Dear Mayor Helps and Victoria Council,

I am reaching out because of concerns with the proposed Telus Ocean building at 767 Douglas St (DPV00155). I submitted comments previously about bird collision concerns given the huge amount of reflective glass they plan to use. However, when I heard about their responses to concerns about bird collisions, I wanted to send additional comments, and with the comments period officially over, this appears to be the only way.

The applicant's response contains methods that are insufficient or ineffective at preventing collisions, and does not follow any science-based guidelines for preventing collisions, such as the Toronto Green Standard or the CSA bird-friendly building guidelines.

The applicant says that glazing in proximity to trees will be treated with frit or film that is only visible to birds, such as Ornilux. Unfortunately Ornilux glass, which has UV-reflective patterns in it, has shown mixed results when tested for effectiveness. In some conditions, it was actually found to [increase collisions](#). UV treatments are also less effective than visible collision deterrents because many species of birds cannot see UV light, and there is little UV light available to be reflected early in the morning, when most collisions occur.

The Toronto Green Standard requires that 85% of glazing within the first 16 m of the building be treated to prevent collisions, as well as 4 m above rooftop terraces. The applicant's proposal to treat only the areas around trees is insufficient to prevent collisions occurring elsewhere on the building.

The proposed mitigation measures are insufficient to prevent collisions, and use materials with unproven effectiveness. To show their commitment to effective bird collision prevention, the applicant should ensure their proposal follows science-based bird-friendly design guidelines such as the Toronto Green Standard or the CSA bird-friendly design standard.

Thank you,

Willow English

Mayor Helps and Council,

I am writing in support of the Telus building proposal.

I can see that it would be a beautiful and functional addition to the Victoria Downtown scene. It is only a few blocks from my residence and I would be able to add it to the many spots that I frequent in non Covid 19 times.

The architects have presented a clear vision and a great presentation and an honest effort to improve on the core of the city. Please vote for this important building.

Yours truly,

Ben Levinson, B. Arch, MRAIC Life Member, MAIBC Member for Life, BEP, Retired.

501- 636 Montreal Street

Victoria, BC V8V 4Y1

P. S. I am not involved in this project in any way.

I would like to strongly express my support for Telus Ocean. This city property has been underutilized for decades. I can't find the date of the city's proposal to sell 2 lots, and build a Children's museum on the 3rd lot. Also the Crystal Gardens,, same situation. City turned down a brewery proposal, however the RFP, request for proposal also went unanswered. Diversity is the most important issue facing Victoria's business community. Business vacancies, lack of tourism, unsafe downtown are factors in the movement out to the West Shore. Thousands of new condo/apartment units....Jobs are needed to attract a more stable community.

I do not need to state all the other reasons to support this proposal. Others are more eloquent than I.

Thank You

Catherine Brankston

314 999 Burdett Ave

Victoria BC

V8V 3 G7

**To: Mayor and Councilors, City of Victoria**

**Re: TELUS Ocean applications for development permit variances and rezoning**

**Date: February 23, 2021**

Dear Mayor Helps and Councilors:

I have not submitted a picture with this letter but it may be helpful for you to go to the Aryze Developments Instagram site and view the scale model of TELUS Ocean in amongst the surrounding buildings: <https://www.instagram.com/p/CLaL4DKD3qv/>

I have written to City Council before, arguing that TELUS Ocean's neighbours deserve consideration by City Council for our call to scale back the proposed rezoning because we could not reasonably have expected a building of this magnitude to be proposed for this site. In response to this and many similar questions about size, height and density, TELUS / Aryze, the applicants, have responded that we all knew there was going to be a big building here as the site was already zoned CA-4, with a maximum building height of 43meters and an FSR (floor space ratio) of 3.0:1. They argued further that the constraints of the site, need to create some separation from the adjoining condo (The ARIA), choice of building technology, and intent to construct a landmark structure that is economically viable, together forced the need for variances affecting height, density, and setbacks. This results in a proposed building 10 meters taller, over 85% denser, and with essentially sheer glass walls up against the lot frontages along Douglas and Humboldt. But, TELUS / Aryze assure us that this building remains sensitive to the local context. If neighbours see the building as too large, it is merely because, as the last site to be developed, everyone notices the newcomer.

In the face of this comprehensive argument, it is necessary for those who say that TELUS Ocean is too big to explain why development on this scale was not anticipated, is unprecedented, and is indeed out of context.

Let me start with the assertion that a "big" building was always intended for this site. The current zoning, with its density and height limits and required setbacks, suggests that a typical building on this site would present a relatively slender 14 storey tower centered on the kite-shaped lot. Even if building amenities merited a bonus density of 4.0:1, the building would be considerably shorter and less massive than the Hilton Doubletree Hotel that is on an a fairly comparable triangular lot immediately across Humboldt. Indeed, because the Hilton Doubletree has an FSR similar to that which is being sought by TELUS / Aryze, we might expect the new building to be noticeably smaller than its neighbour.

By contrast, what we see in the developers' scale model is that TELUS Ocean presents a much more massive appearance and, in particular, is a building with enormous facades. The wall that the Doubletree Hilton and the much smaller south tower of the Falls condo face rises roughly 18 storeys and runs the full length from Douglas to Penwell. The wall facing the 12 storey ARIA condominium, the nearest building to TELUS Ocean, is about twice the condo's width and 16 meters taller; and this is TELUS Ocean's smallest façade.

TELUS / Aryze argue that such massive facades should also have been anticipated. They take the unusual stance that the entire theoretical building envelope can be built out, entirely disregarding the maximum height, density and required setbacks in the current zoning. Seeking rezoning to make that position possible, they continue to base their façade areas on the theoretical ones they calculated.

What accounts for these dominating façades? The first cause is TELUS Ocean's unusual shape. For any given volume, a building with a triangular floorplate necessarily has larger sides than a more conventional rectangular one. Indeed, when we remember that a triangle's area is half its length times its height, we can see that the façades it presents are the size one would expect in a rectangular building of twice the density, in this case a notional FSR of over 11:0:1. Of course, no one would anticipate this scale.

The other reason for TELUS Ocean's enormous façades is that commercial buildings tend to have greater storey height than residential ones. That means that, for the same FSR, a commercial building will have bigger walls than a residential one. That would be tempered if the maximum building height were enforced but TELUS / Aryze argue that, instead, the building height should be increased to account for the larger storey size. While it is true that the City has been sympathetic to developer arguments for height variances in the downtown, that has been because it created more slender towers – improving view corridors and limiting shading effects. But TELUS / Aryze argue for increased height and, except for a cutback at the south edge, keep the full width. Surely, no one would anticipate this approach.

The triangular floorplate of TELUS Ocean relates to another source of its monumental presence, the commitment to literally stand out, to be a landmark building.

TELUS / Aryze identify it as a "flatiron building". Indeed, this is an iconic design seen in many cities. For example, dating from another era but demonstrating its enduring appeal, there are the *Europe Hotel* in Vancouver's Gastown, the *Gooderham Building* on Wellington Street in Toronto, and of course the famous *Flatiron Building* on Fifth Avenue in Manhattan. Such buildings – typically triangular with a prominent front point and a stubby rear – are natural focal points. And this is true regardless of their absolute size; even at the current height and density limits, such a building would be monumental.



TELUS / Aryze describe the site as “a key apex terminus”. However, choosing this flatiron design is a bold decision on the part of the developers because the site location is not ideal. The Downtown Core Area Plan’s urban design section describes “Terminated Vista street conditions” at some length and shows how this works for an “inflected street intersection”. It is true that the TELUS Ocean lot is situated where the regular street grid is broken at the 5 corner intersection and Douglas Street narrows slightly. But it is mainly the fact that the Hilton Doubletree Hotel stands quite far back from its corner that makes a pointed design pushed as far forward as possible at the Douglas and Humboldt corner visible from afar, looking south down Douglas.

TELUS / Aryze spend considerable effort arguing how the building placement on the lot is the result of their care to provide the best possible separation between TELUS Ocean and neighbouring buildings. Indeed, once they create a street width separation from their nearest neighbour, the ARIA (thus forming the “Penwell Extension”), they are more or less “forced” to position TELUS Ocean in the Douglas and Humboldt corner. It is true that ARIA residents are very interested in having as much separation as possible from TELUS Ocean (and are concerned by the TELUS / Aryze assertion that TELUS Ocean could be built 3 meters from the ARIA). The Doubletree Hilton is also interested in preserving the “Penwell Extension” as a sliver of a view corridor. That said, the fact that this separation pushes the new building into much greater prominence raises questions about whether sensitivity to its neighbours was the main driver here.

That placement on the lot means that TELUS Ocean crowds the sidewalk on both Douglas and Humboldt Streets. In this regard, the building is quite different than nearly all its neighbours (the partial exception being the podium of the Hilton Doubletree Hotel along Humboldt) which feature at least very wide sidewalks and in many cases front “plazas” (or a side yard in the case of Church of Our Lord at Humboldt and Blanshard). TELUS / Aryze mitigate this crowding at street level by undercutting the building to increase the sidewalk width. However, that does not change the fact that at any distance the building’s street wall hugs the sidewalks. The effect of this placement is that the views down both Douglas and Humboldt are visibly narrowed.

The Developers never followed up on their promise to temporarily paint the outline of the building’s triangular cross-section (footprint) on the ground so Humboldt Valley residents could understand TELUS Ocean’s dimensions and placement. However, you can get some sense of that in their rendering showing the view south down Douglas, where TELUS Ocean’s prow stands out very prominently and you can’t see any buildings beyond it.

That said, TELUS Ocean is not a typical flatiron design. It has a triangular floorplate with an acute point at the north end at Humboldt and Douglas and, unexpectedly, another acute point

at the south end facing the Crystal Garden. If one focal point as viewed from Douglas looking south is good, then how about another focal point from south Douglas looking north? However, this design decision introduces a number of additional problems. First, it is the origin of the extreme façade length along Douglas which the cut at the south corner seeks to remediate at roof level. But for the lower floors, the south point extends right to the lot line. In doing so, it visually extends towards the Crystal Garden and changes the feel and orientation of the south plaza, one of the very few public plazas downtown. The point cuts the south plaza off from direct access to the Conference Centre entrance and crosswalk across Douglas and thus changes the sense of connection between the Conference Centre and the Crystal Garden. Instead, it emphasizes the plaza as being behind TELUS Ocean. While the proposal notes that the public realm is being enhanced and extended, it is perhaps equally accurate to say that TELUS Ocean borrows space and extends its presence by using the surrounding public areas at the south and north points.

In conclusion, my argument remains that TELUS Ocean is unexpectedly massive and simply overwhelms its neighbours. Even the Empress, mostly a little further away, suffers from the proximity. For these reasons, I ask the City to: **reject the current rezoning application and give some direction for a reapplication. Please ask the applicant to take into account existing buildings, not just in terms of separation but in terms of appropriate scale. Reduce size to something near current allowed density. Relate more sympathetically to existing building relationships and streetscapes and protect the south plaza.**

Yours respectfully,  
Andy Wachtel  
737 Humboldt Street

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737 Humboldt Street

# THE STRATHCONA



**The Strathcona Hotel | 919 Douglas Street, Victoria, B.C. | 250.383.7137 | [strathconahotel.com](http://strathconahotel.com)**

*February 23, 2021*

*Mayor Helps  
City of Victoria  
1 Centennial Square  
Victoria BC  
V8R 1P6*

*Dear Mayor Helps,*

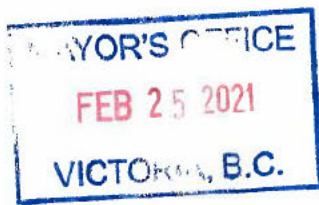
*Re: Telus Ocean (REZ00746/DPV00155)*

*I am writing to express my support for the Telus Ocean (REZ00746/DPV00155) Project. I am excited to see such a dynamic and environmentally sustainable project coming into the neighbourhood. The public spaces look very interesting and inviting. The smart and connected people working in this building will certainly help strengthen and diversify the local economy and help grow our tech and innovation sectors.*

*I believe this project will help stimulate more investment in Victoria's downtown.*

*Yours truly,*

*Grant Olson, owner  
Strathcona Hotel*



**Mel Cooper**  
Whitehall  
#905 - 1120 Beach Drive  
Victoria BC, V8S 2N1

February 24, 2021

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Dear Mayor Lisa Helps & Council,

This is a message I feel I must pass on at this moment in time.

It has been the greatest privilege of my life to have been given the opportunity by Darren Entwistle, President & CEO of TELUS, to serve on the TELUS Victoria Community Board; seventeen wonderful years!

Almost 2 years ago, I was personally tasked by Darren to create an awesome, iconic and welcoming destination for our community and a new home for the TELUS Victoria team. Although my role has been a minor one, when compared to the amazing team of consummate professionals who have come together since that day, I have been witness to something beyond my wildest expectations - something truly awesome.

The TELUS Ocean that has been put before you will be a magnificent, landmark addition to our wonderful island home. It will be a presence that will demonstrate an enduring, ever-growing commitment to our community, our ocean and our planet – to “give where we live”; and I sincerely believe, it will also be an inspiration to the global community.

TELUS Ocean, as envisioned in such rich detail, is an inviting, welcoming and awe-inspiring presence; a people-place that is vibrant and alive with spaces and places for learning and sharing, for human-friendly technology that amazes, and art and imagery that is both grounding and glorious. It is an environment that celebrates and encourages communication, creativity and enlightenment.

I have never been more inspired, or excited, about what is going to come alive at the corner of Humboldt and Douglas Streets, in the heart of our beautiful city. You have seen the truly thorough Development Permit Application presentation, and as outstanding as it is, for me, nothing could surpass being present, on opening day, to witness the realization of this most remarkable vision.

Sincerely,

A handwritten signature in black ink that reads "Mel Cooper".

Mel Cooper,

Chair Emeritus of the TELUS Victoria Community Board

A solid black rectangular redaction box covering the bottom portion of the page.