



Mayor Helps and Council  
City of Victoria  
No.1 Centennial Square  
Victoria, BC V8W 1P6

07 December 2021

**Re: 767 Douglas – Telus Ocean: Rezoning and OCP Amendment/Development Permit with Variance**

Dear Mayor Helps and Council,

Further to our letter of 26 February 2021 the DRA LUC has reviewed the most recent version of the proposal for a twelve-storey (53.21m) office building with ground floor commercial with an FSR of 5.2:1. The subject property is within the Core Inner Harbour Legislative Urban Place Designation in the Official Community Plan, which envisions building up to 45 m in height with a maximum density of 1:1 FSR (increased density up to a total of 4:1 may be considered in strategic locations for the advancement of plan objectives).

Despite the staff recommendation presented to Council on 26 August 2021 to refer the application back to staff to *“improve its consistency with the heritage Conservation area and Landmark Building Form and character design guidelines and siting and massing policies”* there have only been some minor siting tweaks, removal of some interior mezzanine floor space to reduce the FSR number and the removal of the proposed exterior facing video screen. The proposal in terms of its massing and compliance with OCP and DCAP planning policy remains effectively unchanged.

We understand that the project now requires an amendment to remove the OCP reference to the protected view, described in DCAP Appendix One: Public Outward View Guidelines, *“Ensure that new development along the Douglas Street corridor is designed to help frame and enhance this view corridor.”* The Telus Ocean proposal severely impacts this view corridor but rather than attempt any substantive form of mitigation, the application simply proposes to eliminate the requirement for the protected view from the OCP. We also note that the proposed new site specific zone for this property will be called CA-OV Olympic View District. This name appears to be an appropriate if not ironic choice of name considering the approval of this zoning will privatize the public view of the Olympic Mountains from Douglas Street.



*Original Jawl Properties/Telus REI Design – DCAP Compliant 45m height*

Concerns also remain regarding the disposition of public property through a Request for Expressions of Interest selection process that takes place in secrecy and provides for no public examination. We know that the application now before us abides by none of the original commitments for DCAP compliant height and setbacks and a more modest density that were key in Council's original choice to select Telus and the highly respected local partner, Jawl Properties as the developer for this site. Jawl Properties, who provided those assurances, has since withdrawn from the project and the original commitments have subsequently been abandoned. This "bait and switch" calls into serious question the transparency and legitimacy of the City's disposition of this public land, and Council's conflicted role as both the vendor and the adjudicator of what is now a noncompliant application for this extremely valuable property.

The CALUC Terms of Reference specifically empowers CALUCs to *"comment on the interpretation of the relevancy of policies and whether development applications fit with the spirit and intent of the Neighbourhood Plan"* and *"Communicate to everyone involved regarding the adequacy of the community consultation"*. We have attached our letter of 26 February 2021 as it remains a valid summary of both the comments and concerns from the public consultation process and Land Use Committee commentary on the specifics of how this application fails to comply with both the spirit and intent of the neighbourhood plan. Regarding the adequacy of public consultation, the DRA has been offered no additional consultation from the applicant since our one and only meeting on 04 August 2020.

We strongly support the earlier staff recommendation to refer the application back to staff to *"improve its consistency with the Heritage Conservation Area and Landmark Building Form and Character design guidelines and siting and massing policies"*. As none of these improvements have been attempted with the current design we strongly advise that Council decline this project as proposed.

Sincerely,

A handwritten signature in black ink, appearing to be 'Ian Sutherland'.

Ian Sutherland  
Chair Land Use Committee, Downtown Residents Association



Mayor Helps and Council  
City of Victoria  
No.1 Centennial Square  
Victoria, BC V8W 1P6

26 February 2021

**Re: 767 Douglas – Telus Ocean: Rezoning and OCP Amendment/Development Permit with Variance**

Dear Mayor Helps and Council,

The DRA LUC has reviewed the proposal for a twelve-storey (53.21m) office building with ground floor commercial with an FSR of 5.47:1. We understand that the project requires an Official Community Plan (OCP) amendment for density as well as a Rezoning for density and a Development Permit with Variances for height and setbacks.

In accordance with the City's alternate CALUC process during the provincial PHO, no in-person or virtual CALUC meeting has been held for this project. Instead, the community was asked to provide feedback on the Telus Ocean proposal based on documents provided by the applicant posted to the Development Tracker.

**Timeline**

On 04 August 2020, several members of the DRA LUC met on-site with a representative of Telus' Community Partner, Luke Mari of Aryze, for a brief overview of the proposal. On 06 August 2020, the two-document Telus Ocean submission was posted to the Development Tracker. Between 08 October and 03 November 2020, members of the public submitted feedback on the proposal and that feedback was subsequently provided to the DRA LUC. Of the 128 responses recorded, 11 people voiced unqualified support for the project as presented. (A summary of the public's comments and a review of detailed public comments are appended to this letter.) On 04 December 2020, revised plans and a document labeled "Applicant Response" were posted to the Development Tracker. Revised plans show minor changes to the proposal that do not substantially address or resolve the major concerns expressed by members of the community. The Applicant Response reiterated justifications for their project approach as originally submitted.

The applicant has not provided the following requested information, materials, or public engagement:

- No view studies for Humboldt Valley residents: On 05 August 2020 at meetings with the Humboldt Valley Committee (HVC), Aryze committed to conducting drone studies to show how residents in neighbouring buildings will experience the project.
- No demonstration of the footprint of building: On 05 August 2020 at the HVC meetings, Aryze committed to painting the outline of the triangular cross-section of the building (its footprint) on the site to help stakeholders understand its placement on the site, the wall length, and separation from neighbouring buildings.
- No scale model of the project has been made available for the community to view.
- No online community meeting as committed to by Aryze on 05 August 2020 – We understand that an online meeting was held extremely late in the application process (23 February 2021) but was limited to only those individuals who had signed up for information on the Telus Ocean website. The DRA was not informed of this meeting and no public notification was provided through an official city mail out so all the people in the 200 m-notification could have an opportunity to participate in that meeting.

**Response from the LUC:**

Having reviewed the proposal relative to the City's core planning documents and the public feedback the DRA LUC notes the following:

- There are several overlapping and complementary components of the OCP and DCAP that apply to the subject property to inform design and massing considerations for any proposal at this site. According to the Applicant Response, many of these policies and guidelines were considered but the applicant chose to take an alternate approach that represents a departure from what was envisioned for this site. This approach fails to achieve the objectives and goals outlined in the City's planning documents.
- The subject property is within the Core Inner Harbour Legislative Urban Place Designation in the Official Community Plan, which envisions building up to 45 m in height with a maximum density of 4:1 FSR. The designation also promotes formal building and public realm design to respect the form and character of neighbouring heritage buildings of historic significance. The applicant is seeking an 18% increase in height and a 37% increase in density over what is prescribed without meeting the objectives and goals of the OCP or fulfilling the intent of the Urban Place Designation.
- The site is within the Heritage Conservation Area: Inner Harbour. The objectives of this area include conserving and enhancing the heritage value of the area as well as the special character and significant historic buildings. The overall scale and massing of the proposal relative to the heritage landmark policies do not respect the visual prominence and character-defining importance of heritage landmark buildings.
- The subject property is within the 180m Heritage Landmark radius of the Empress Building. This proximity protection was established in the OCP to maintain the visual prominence and character-defining importance of 16 significant heritage buildings in the City of Victoria while development continues around them. The proposal is not consistent with design guideline considerations in terms of its general fit, character and materiality within a heritage landmark area.

- It is unfortunate that the Advisory Design Panel did not comment on the specific areas of significant concern highlighted by City staff. These areas included such issues as:
  - Overall scale and massing relative to the heritage landmark policies that seek to respect the visual prominence and character defining importance of heritage landmark buildings
  - Overall scale and massing with respect to building floor plate and street setback policies aimed to reduce the bulkiness of buildings and shadowing impacts
  - Impact on protected views to the harbour in terms of policies that seek to ensure new developments complement and respond to the surrounding context
  - Massing along Douglas street in terms of the length of building relative to policies that promote a human scale and visual interest through building articulation
  - Materiality approach with respect to the extent of proposed glazing within a heritage landmark radius and in terms of the general form and character of the area

In addition, when the applicant was questioned about how they had chosen to respond to the applicable policies in the OCP and the Design Guidelines they stated that the site was unique and should not be considered in the context of the surrounding areas or relevant guidelines. It appears that the ADP considered the application within a complete vacuum in terms of policy.

- The massing along Douglas Street, in combination with the orientation of the building, will function as a wall of glass and spandrel without distinct articulation that will block the protected view corridor to the Olympic Mountains. The protected view is referenced in the OCP and described in DCAP Appendix One: Public Outward View Guidelines, View 5: Olympic Mountains from Douglas Street. Design Guideline 2 states, “Ensure that new development along the Douglas Street corridor is designed to help frame and enhance this view corridor.” The Telus Ocean proposal contradicts the goals of this bylaw and should require an additional OCP Amendment along with the associated public consultation process if it proceeds as proposed.
- The sheer bulk of this proposal will negatively impact adjacent buildings, their residents and occupants, in addition to the experience of people on the street through excess shadowing and a massing that is nearly double that of what is envisioned for the site. The OCP for Core Inner Harbour/Legislative, clearly states density up to a total of 4:1 may be considered in strategic locations for the advancement of plan objectives. This is consistent with neighbouring properties including the Aria 3.6:1, Marriott 4.3:1, Astoria 4.7:1, Belvedere 3.1:1. This application is requesting an increase of 37% over the OCP maximum to 5.47:1. Telus is also requesting an average storey height 60% taller than what is typical of its residential and hotel neighbours. The result is a compounding of the buildings bulk by an additional 60% over a residential building of a similar density. Neighbouring Humboldt Valley buildings are effectively half as bulky and will be overshadowed and overwhelmed by the Telus Ocean Building.
- The local area is dominated by hotel, tourism, ground floor commercial and residential uses. The proposed office use will provide little vitality after hours other than evening light pollution. The proposed giant media screen facing the Crystal Garden, originally promoted by the applicant for broadcasting events like the Stanley Cup playoffs,

highlights the inappropriateness of this proposal and the proponents being tone-deaf to the interests and concerns of hundreds of immediately adjacent residents. Whether the media screen is intended for sporting events, art displays, or advertising, it would be intrusive and utterly noxious to permit a situation where moving video is broadcast immediately adjacent to this heritage/museum/residential area much as it is at the Save on Foods Memorial Arena.

- The developer has offered to provide 127 parking spots within the building. Bylaw (Schedule C) requires 221 parking spaces for the proposed development. Despite conjecture that building occupants will utilize public transit or cycle, this shortfall will instead likely create additional parking pressures in the surrounding residential neighbourhoods. Bike parking has not been increased proportionally beyond the minimum requirements in compensation for this 43% shortfall in required parking.
- The purchase price for this land from the City is \$8.1 million, plus up to an additional \$1.1 million purchase price adjustment depending on the final proposal submitted and approved as part of the rezoning process. Assuming this proposal will net the City the full \$9,200,000 contract price for the 152,000 sq ft of floor area proposed, this represents \$60 per square foot of buildable floor area. Recent sales of development property in Harris Green of property with similar geotechnical difficulties has repeatedly confirmed the land price of around \$80 per square foot of buildable density for highrise residential rental development. Land value for residential development on this site should yield at minimum a 30% higher price than currently negotiated. Site remediation aside, it is obvious offices are not the “highest and best use” for this property and will contribute far lower funding for City priorities such as affordable housing. If the property were sold for residential development, it would yield the same net price to the City for a building of half the size and bulk of what is now proposed which could comply with all of the OCP and DCAP regulations.

The DRA has obtained through a Freedom of Information request a redacted copy of the original Request For Expressions of Interest application pitch letter from Jawl Properties and Telus outlining the proposal. This original proposal states:

*“As proposed the Project complies with the 45 metre height guideline contained in both the OCP urban place designation and DCAP’s urban design directions applicable to the Site... Specifically when viewed from key perspectives to the west identified in the DCAP, the Project is not visible over the Empress Hotel’s roofline and this has been confirmed by digital modeling. Additionally, the Project substantially complies with the urban design guidelines contained in the DCAP with respect to street wall configuration and upper floor setbacks and the Project’s place making, open space and urban design strategies are in sync with the principles and specific strategies outlined in the OCP”.*

We know that the application now before us abides by none of these early commitments made to secure the contract of purchase and sale from the City and that the highly respected local partner, Jawl Properties, has since withdrawn from the project.

We find ourselves again asking why City-led initiatives are permitted to be politically leveraged by applicants to become the most egregious violators of our core planning documents while at the same time providing little benefit for the community. The public feedback on what appears to be a corporate vanity project is unambiguous in its opposition to the height and bulk of this

proposal yet the application moves forward with no substantive mitigating revisions. Telus will only be a tenant, occupying two floors, and the rest of the building will be made available for lease, just like any other speculative development. In our opinion the re-deployment of a few hundred existing Telus office workers from around the city to an office building inappropriately placed in a residential and tourism enclave is hardly a sound economic argument in support of Victoria 3.0 or one sufficient to risk the potential for catastrophic damage to the city's most important tourist and heritage precinct.

We strongly advise that Council decline this project as proposed.

Sincerely,

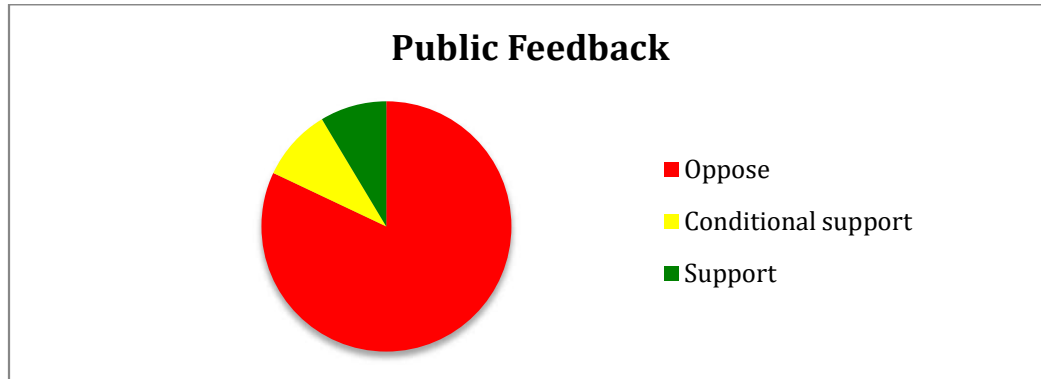
A handwritten signature in black ink, appearing to read 'Ian Sutherland', with a large loop at the start and a trailing flourish.

Ian Sutherland

Chair Land Use Committee - Downtown Residents Association

**Comments and concerns raised by the public via the City's Development Tracker:**

During the 30-day period available on the City's Development Tracker, there were 128 responses from members of the public, the majority of who live in the Humboldt Valley.



From those responses:

- Eleven people (8.6%) offered unqualified support. Three of the ten responses were from individuals who registered an address outside the notification area and did not indicate that they have an interest in property in the area.
- Twelve people (9.4%) offered conditional support requesting changes to a variety of aspects of the project. Traffic (vehicles, bikes, congestion, patterns, design) concerns were most referenced as well as concerns around the illuminated screen and signage. Concerns were also raised about wanting improvements to public/pedestrian spaces.
- One hundred and five people (82%) registered opposition to the project, or offered support only if substantial changes to the building's height and massing were made.

An overview of the concerns raised by the public is outlined below with the full comments appended.

- Does not align with City of Victoria planning objectives
- Not compliant with requirements of the City of Victoria's Inner Harbour District
- Fails to comply to Official Community Plan
- Proposal is inconsistent with the Downtown Core Area Plan
- Absolute height of Telus building – too tall for site
- Insufficient setbacks on Douglas
- Insufficient setbacks on Humboldt
- Too tall relative to other residential buildings
- Too tall relative to Empress Hotel
- Height & massing will obstruct/have negative impact on downtown views and silhouette of Empress
- Building mass is too large/bulky
- Density is too high

- Proposed total floor area is too high
- Building does not sensitively integrate into the neighbourhood
- Building design is incongruous within historic context
- Proposed development overwhelms the surrounding historic buildings and would change the character of the neighbourhood
- Telus building would occupy entire views of many units in adjacent buildings without relief
- Increased shadowing: adjacent buildings need access to light and air
- Concerns about potential loss in value of real estate in adjacent units that are negatively impacted by proposed building
- Too much traffic along the Humboldt corridor. This project will compound the issue.
- Concerns about traffic flow (bikes, vehicles, construction, buses)
- Safety concerns regarding traffic volumes in area and recently redesigned Humboldt with shared single lane for vehicles going two directions and two bikes lanes
- Large video screen on exterior for public events not supported
- Nighttime lighting “lantern” of building not supported as proposed – light pollution
- Telus sign visible above the Empress is not supported
- More priority for public space
- Insufficient consideration for public space
- Environmental assessments needed
- Concerns regarding glass walls and impacts on environment & energy efficiency
- Need counter measures to prevent bird impacts
- Concerns re developer’s rationale that project aligns with “Victoria 3.0” to create high-tech jobs as Telus plans to centralize existing offices and rent out remaining space

## 767 Douglas Street - Telus Ocean - Public Feedback Review

	Position	Comments	Address
1	but with conditions	I feel the Telus tower should be, maximum, the same height as the Aria. Anyone taking pictures of the empress shouldn't see Telus sticking up behind the hotel. Plus, the shadows these big towers create (in an already dense neighborhood) isn't great for mental health.	737 Humboldt
2	see below	There is a tremendous amount of vacant office space downtown. The proposed building should be set back 5 metres instead of 2 from Douglas Street and 3 metres instead of .19 from Humboldt. We have to have breathing space. Height of building should be reduced to 27 metres. Again, breathing space and views for current residential buildings. The proposal for the Telus Ocean Building does not follow Victoria's Official Community Plan because it does not sensitively integrate into the neighbourhood. The development, as proposed, will dominate the area and reduce its appeal for both visitors and local owners. The developer should not be able to proceed unless they adhere to the existing zoning regulations (height, density, and setback).	751 Fairfield
3	with modifications	The site could be improved by a Telus development but its current design will cause far too much traffic during construction especially on Humboldt Street. Humboldt is narrow, often clogged with garbage and other bins in mornings and is supposed to be a major bike artery! Mayfair shopping centre has direct access off Douglas. What is there not direct access fo here? If that is impossible at least make left turns onto Humboldt from Blanshard illegal.Even after completion the extra traffic will be too much for this corridor. Reduce parking and office space.	788 Humboldt
4	An adjustment to reduce the building size is necessary.	Building height needs to be reduced to maintain the iconic downtown view and the silhouette of beautiful Empress Hotel.	751 Fairfield
5	building should not be as tall or massive as development plan indicates	As indicated above I would like to see a smaller (height and width) building planned for this lot. I am also totally opposed to the large video screen showing sporting events etc. (This had been discussed at the outdoor meeting held in the summer.) I would like the lighting of this new building to be subdued as this is a residential neighbourhood.	788 Humboldt
6	I don't support the current plan for the building, but have no problem with Telus being there.	The current plan for the Telus building at 767 Douglas seems too tall for the site. Having the Telus logo visible above the Fairmont Hotel from the harbour is a BIG mistake. It will ruin and corporatize that iconic view. Also, it is my understanding that the lot is not currently zoned for a building this tall, but that City Hall is considering changing the zoning for Telus' sake. Why can't Telus change its plan? Try a little harder to fit in with the neighbourhood?	737 Humboldt
7	I have some concerns (see Comments)	I am concerned about the height (over 53m) and that more priority should be given to the public south plaza by cutting back the second "prow" that extends over that plaza.	737 Humboldt
8	I oppose if there the intent is to not have counter measures to prevent birds hitting the building and also I don't think the building should be lit up at night as it could disturb the units facing he building	I think the idea of bringing jobs to the area is good as long as there are environmental assessments are made and considerations made for the units facing the building.	751 Fairfield

9	I support a Telus building that adheres to existing height limits and has a building facade with more traditional building materials and design features that enhance the surrounding historic buildings and neighbourhood.	The proposed height is totally inappropriate for a downtown residential neighbourhood. The building needs to adhere to existing height limitations which are in place for good reasons. The all glass modern design is too incongruous with the nearby historic buildings. It picks up absolutely no common design elements from the surrounding buildings and historic neighbourhood. It will stick out like a sore thumb for decades to come. I support a Telus building that adheres to existing height limits and has a building facade with more traditional building materials and design features that enhance the surrounding historic buildings and neighbourhood.	737 Humboldt
10	Less height please to blend with other buildings	Concerned about traffic flow since Humboldt does not connect to Douglas except for bikes	788 Humboldt
11	Needs Modification	The Telus Ocean Proposal is too large for the site and needs to be down scaled significantly to not only meet City Restrictions but neighborhood impact and scaling.	707 Courtney
12	Not really in favour due to its huge size, but realize it will ultimately go ahead.	I live in 737 Humboldt, but do not face the site of the Telus development. However, I am very concerned about traffic in and out of the construction site. I have some suggestions: 1. Truck traffic should use Douglas whenever possible. 2. If it does use Humboldt and Penwell, a number of things must be done: - have a traffic signal at Humboldt/Penwell as vehicles descending Penwell will face a blind corner and will inevitably have a collision with cyclists. - have a traffic signal at Penwell/Fairfield. This intersection is already a problem as parked buses block the view of traffic trying go across Fairfield: with vehicles going up Penwell (a steep climb), doing either a left or right turn onto Fairfield or to Burdett, there would be very poor sightlines so a traffic signal is essential. - If traffic goes along Humboldt to Blanshard, it should turn right so as to meet Douglas. (Turning left would mean going up the steep Blanshard Hill). - as Humboldt between Douglas and Blanshard has been ripped up three times in the past year, it would be VERY desirable that heavy trucks stay off this part of Humboldt. 3. Consider a bicyclist education program so that they have mandatory flashers so that they can be seen when when motorists do left turns across Humboldt from Penwell - at present, it is exceptionally difficult to see oncoming bicycles when doing this turn. 4. If the staging area must be on the Humboldt side of the building site, keep it as small as possible as pedestrians heading to Douglas use this part of Humboldt, as do a lot of bicyclists, and also patrons of Bart's Pub.	737 Humboldt
13	Oppose		737 Humboldt
14	Oppose		788 Humboldt
15	Oppose	This building is far too large. It is important that developments are required to stay within the guidelines that are established. This building exceeds every zoning restriction, height setbacks, land density. It does not support the heritage context of the community and will be detrimental to the downtown area in its present plan. It does not align with the City of Victoria planning objectives. It is imperative that the mayor and council do not accept this development plan in the present state. The hotels, businesses, and residents of the downtown area should have their voices respected. We are adamant that this development can not proceed without significant changes. Telus and Aryze Developments must revise the plan so that it is in compliance with the City of Victoria's current building development and zoning regulations for the Inner Harbour District. This development can not be allowed to proceed at the expense of the Doubletree Hotel, the Marriott Hotel, the Empress Hotel, the Crystal Gardens, the residents in the Humboldt Valley and the businesses in this area also. Scale back the Telus Ocean project and stay within the zoning guidelines for this area.	788 Humboldt

16	Oppose	The proposed development is a large business operation being situated in among a number of residential buildings....five condos and a hotel. The business activity and accompanying traffic would not be suitable in that location.	788 Humboldt
17	Oppose	This building is too tall and bulky. It dwarfs the historic sites in the area and diminishes quality of life for Humboldt Valley residents and tourists, the life blood of our economy. The Telus building would be better located away from the downtown core.	788 Humboldt
18	Oppose	The building is far too big for the site and does not follow city guidelines. Reduce the height to the 45m allowed in the current zoning, decreasing the proposed density in the process. Give more priority to the public south plaza by cutting back the second "prow" that extends over that plaza.	788 Humboldt
19	Oppose	This is too big a project for the character of the neighborhood	788 Humboldt
20	Oppose	The proposed building is too large. Please do not grant any exceptions to the existing zoning regulations.	788 Humboldt
21	Oppose	Am opposed to the current proposal as I feel it is too intrusive on the site. Would accept a proposal presenting a shorter building. Am an owner of a condo on Humboldt Street. Condo is rented out at present but I fully intend to retire to the building in the very near future.	1304 -18 st. S Cranbrook
22	Oppose	Based on the plans and artist impressions submitted by Telus, the construction of the building as proposed would overpower the area, change the cityline, and ruin the visual beauty and heritage of the Empress Hotel as seen from the water.	788 Humboldt
23	Oppose	Proposed Telus building is way too tall and design does not belong to Victoria	737 Humboldt
24	Oppose	Height of the building needs to be lowered.	737 Humboldt
25	Oppose	The proposed development overwhelms the surrounding historic buildings and would fundamentally change the character of the neighborhood. The development should be downsized significantly.	737 Humboldt
26	Oppose	This building does not fit the character of the city. It will dwarf the Empress Hotel and diminish the beauty of the Crystal Pool building. It is also presents a sidewalk interface that is not supportive of a sense of safety to pedestrians.	828 Rupert Terrace
27	Oppose	In my opinion, the proposed building is too tall, and will obstruct rather than add to to skyline of our city.	737 Humboldt
28	Oppose	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 I feel, should to be scaled down.	737 Humboldt
29	Oppose	Too tall and too large foot print.	737 Humboldt
30	Oppose	Too many requests by the developer to raise this property's specifications.	737 Humboldt
31	Oppose	Concern over increase in traffic and over adding another tall structure to a relatively high density block	737 Humboldt
32	Oppose	I don't believe that this is the best site for this proposed building. The height of 54 meters is simply too tall. The city has spent a lot of money quieting traffic, and introducing a bicycle corridor on Humboldt Street. How will the extra traffic affect these improvements? Does Victoria really need more office space at this time, when more people are working from home? I don't see hoe this giant glass wedge will "complements the surrounding community".	788 Humboldt

33	Oppose	The building is way too tall and TELUS has misled the public by declaring it an 11 story building. Which it is except 11 commercial stories equates to 17 residential stories. It is totally out of place. And traffic at the intersection of Fairfield and Penwell is dangerous enough now. With added traffic it will be a nightmare.	737 Humboldt
34	Oppose	Too high & overwhelms the surroundings.	737 Humboldt
35	Oppose	Telus Ocean is too tall! Will overpower our heritage Empress Hotel in a heritage location. Also, your traffic analysis is very flawed. Expecting cars, with only one lane to share in two directions! to compete with bikes going both ways on Humboldt is crazy. The morning and evening commute with traffic exiting three apartment buildings and a Hotel between Douglas and Blanchard is an accident waiting to happen. Close off Humboldt in front of The Marriot Hotel to cars! ,between Penwell and Blanchard! Use Penwell for the Ocean Telus traffic..a traffic circle there would be a better choice..please! Do something about these problems before you steam roll ahead! Think!!	737 Humboldt
36	Oppose	The building is too big for the space available. It will diminish our iconic landmark, the Empress, by its height and its sign will be an ugly blemish on our skyline. Its design is entirely contradictory to the historical designation of the area in which it is located. Further, the traffic pattern it creates will create chaos on Humboldt St, and likely endanger lives, despite the traffic study submitted.	737 Humboldt
37	Oppose	This proposed building is simply too big for the space available!	737 Humboldt
38	Oppose	The building has been reviewed by Miko B., Senior Planner. His comments seemed to have been dismissed by the Design panel?? Reasons?? Traffic flow is even a concern with the use of Penwell and Blanchard access! Why would City Council not review and discuss the City Planner's work on this project and the Traffic study. Height is not the only concern by a long shot.	737 Humboldt
39	Oppose	The building has been reviewed by Miko B., Senior Planner. His comments seemed to have been dismissed by the Design panel?? Reasons?? Traffic flow is even a concern with the use of Penwell and Blanchard access! Why would City Council not review and discuss the City Planner's work on this project and the Traffic study. Height is not the only concern by a long shot.	737 Humboldt
40	Oppose	I do not oppose the building itself. However, the height in respect to the surrounding buildings needs to be addressed as well as the proximity to the West side of the Aria building.	737 Humboldt
41	Oppose	While I like the idea of the building and its dramatic desire to create a post-modern character to downtown Victoria, it exceeds the zoning requirements in four areas. I think that drama can be created in a smaller size.	737 Humboldt
42	Oppose		737 Humboldt
43	Oppose	The building is far too big for the site and does not follow city guidelines. Reduce the height to the 45m allowed in the current zoning, decreasing the proposed density in the process. Give more priority to the public south plaza by cutting back the second "prow" that extends over that plaza.	788 Humboldt

44	Oppose	<p>Outlined below are some concerns about/objections to various aspects of the Telus project proposed for the Apex lot at the corner of Douglas and Humboldt Streets. • As proposed, the Telus building will loom over the plaza by the Crystal Garden (internal side lot). To avoid stifling this rare public open space, we want to see: o A. application of the set back requirement of 4.5 meters to ALL FLOORS of that side of the Telus building; and o B. the Telus building cut back and the edge terraced as of the second floor (per the DCAP, 6.187, p94). § (Note: We understand that in Telus's proposal the terracing doesn't start until the eighth floor of the Telus building. If this is so, the Telus building, which is marketed as a landmark project, will not impress, but oppress.) • We don't want the Telus building to reflect light and heat around the neighbourhood, to include into our unit in the adjacent residential building, through Telus's use of metal and "high-reflectance glass" as well as the mirroring effect on the façade of the Telus building. • We don't want light beamed into our unit from the Telus building acting as an "alluring lantern at night," per the Telus marketing literature. • We don't want our privacy being violated by individuals having a view into our unit from the Telus building, its terraces/tiers, and its restaurants.</p>	737 Humboldt
45	Oppose	I do not support the request for additional height and change in density. I believe the original height of 43 m is also too high for the neighbourhood.	707 Courtney
46	Oppose	Too high for neighbourhood.	707 Courtney
47	Oppose	Too high.	707 Courtney
48	Oppose	<p>Little consideration is being given to the fact that this is a very residential area that is valued for its existing green spaces and open areas. It's also an area that is valued for being close to yet tucked away from downtown and is generally quiet after dusk. Not enough consideration is being given to the impact the proposed building will have on residents and hotel guests after dusk in relation to light pollution. Additionally, the proposed height and scale of this building will over shadow and greatly impose upon the existing businesses and residences.</p>	737 Humboldt
49	Oppose	The proposed building is far too large and the Telus sign will be seen right overtop of the Empress from the view of the harbour. The City staff's report has raised a number of important questions and I ask that Council review that report.	737 Humboldt
50	Oppose	As currently proposed, this project would have an overwhelming presence in the neighborhood thereby diminishing the presence of existing structures. It should be required to conform to existing height bylaws. If not, what's the purpose of a bylaw?	788 Humboldt
51	Oppose	The building is far to large for the space. This building will needlessly impact it's neighbors in negative ways.	788 Humboldt
52	Oppose	<p>This is a high density area already. Withing a short walking distace there are several hotels: Hilton, The Marriott, and the Chateau Victoria. On the same street, withng a very short walking distance, there are condominium buildings: Aria, Astoria, Belvedere, The Falls. In addition, there are restaurants and pubs. To change the zoning to accommodate the proposal, will result in a much higher density area than we already have. The site coverage, 69.45% leaves a small area for green space. The traffic, which is high density now, will be much worse, considering the movement that the new office building will experience, The pollution will increase, a very serious concern. Thank you for the attention you have given to my comments.</p>	751 Fairfield
53	Oppose	This building is too high and will overwhelm other buildings around it. Development should stay within the current zoning height requirements.	751 Fairfield
54	Oppose	<p>Firstly the development as proposed is a nice project but wrong for the proposed location which is the start of the residential area of the Humboldt valley. This is a quiet street with condos and hotels. An office building of this size is just not a good fit for our community. Secondly if Telus and the city are determined to build this high floor space density, glass (terrible hazard for birds) monster then the guidelines for this location should be adhered to and the height should be 43m or less. Also construction traffic on Humboldt should be held to a minimum. We are terribly disappointed in the city and our elected officials for encouraging this type of development at this location.</p>	788 Humboldt

55	Oppose	<p>Firstly the development as proposed is a nice project but wrong for the proposed location which is the start of the residential area of the Humboldt valley. This is a quiet street with condos and hotels. An office building of this size is just not a good fit for our community. Secondly if Telus and the city are determined to build this high floor space density, glass (terrible hazard for birds) monster then the guidelines for this location should be adhered to and the height should be 43m or less. Also construction traffic on Humboldt should be held to a minimum. We are terribly disappointed in the city and our elected officials for encouraging this type of development at this location.</p>	788 Humboldt
56	Oppose	<p>Opposition to requested height increase; 43 m is sufficient for an 11-12 storey building. A height increase would have a negative impact on surrounding commercial and residential property owners, who invested in their properties expecting building regulations in the area to be adhered to. Conversely, maintaining the current height restriction would have minimal impact on the function and views of Telus Ocean.</p>	751 Fairfield
57	Oppose	<p>To the council, please review and consider the entire staff report which is far more than the the Design Panel rubber stamping the Telus/Aryze proposal. The size of this building would have a huge negative impact on us in the immediate area.</p>	737 Humboldt
58	Oppose		751 Fairfield
59	Oppose	<p>The proposed floor space ratio is nearly double what is permitted for this site. Presumably we have regulations that were put in place for a reason. The height variance should not be allowed. Developers seem to think they can propose whatever they want and not keep within what they are supposed to be working with.</p>	1231 McKenzie
60	Oppose	<p>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.</p>	708 Burdett
61	Oppose	<p>I would like to lodge my opposition to this project. After reviewing the documents put forward by the developers and Telus, it is clear to me that this building will dwarf the surrounding buildings and fundamentally distort the character of this heritage neighbourhood. I have no doubt that a better location for this large building could be found elsewhere in the city, or failing that a smaller building that conforms to existing zoning regulations. I am also concerned about a significant uptick of traffic on Humboldt Street, as well as increased light pollution from the planned screens.</p>	788 Humboldt
62	Oppose		788 Humboldt

63	Oppose	When I moved into this neighbourhood I full expected this property to be developed within a few years. What I didn't expect was for a rezoning application doubling the density and floor area. This proposal in what is now a residential area is as large as anyone could have imagined for the site. I would have applauded city council if they had consulted with us before approving this project in principal. It is as if we don't count when it comes to decisions about OUR neighbourhood. To put this eyesore in the middle of several condo towers and hotels is an idea too late to the table. When the condos and hotels were built ten to fifteen years ago, that was what was decided to be the use of the land. To inject a new building that will block several of the existing buildings is a bad idea. We did not vote in this council and mayor to ruin our lives and devalue our investment in Victoria. We chose to live here based on what was zoned for the area and we happily pay taxes to keep the area for what it was intended. I implore the council and mayor to maintain the zoning guidelines as decided.	708 Burdett
64	Oppose	The size of the building should be scaled down and kept within existing city requirements and guidelines. It is far too big for the site.	788 Humboldt
65	Oppose	This Telus Ocean Building, as proposed, is far too large, both in height and overall dimensions, which obviously they know because of the variances requested. It will not be at all in keeping with anything near by. It's height will dwarf the iconic Empress hotel, ruin the sightlines of several other key hotels along with several local condominium towers. The issues of the reflective quality, excessive lighting at night for "trees" growing inside, lack of foresight for wildlife (bird-strike) have not been addressed nor has the total enjoyment of open spaces currently existing that will be crowded out and over shadowed, especially the taxpayer funded closure of Humboldt Street, brand new bike lanes and creation of the new seating area. Both the Convention Centre, built in keeping with the style of the area and the Crystal Garden will also be negatively impacted but such a huge, inappropriate looking building. The proposal also does not adequately address then overuse of Humboldt and Penwell Streets for excessive traffic. The "Transport Impact Assessment" presented on July 8, 2020 was obviously done during not only during on-going construction on Humboldt Street before it was narrowed even more by more bike lanes but in the midst of almost total lock-down due the COVID-19 pandemic! There were no workers or tourists in the area at all to -generated "traffic". "4. Our analysis indicates that the proposed development will have minimal impact to the adjacent road network. Most vehicle trips generated by the development will travel through signalized intersections that are currently operating well within operational capacity thresholds." How can this possibly be a valid study? With the number of "expected" offices planned, both service vehicles (recycling, deliveries, etc) will obviously increase significantly. The expectation that BC Transit Passes "may" be issued, and the thoughts that everyone who might work in that building actually will live nearby enough to bike to work seems a bit of a dream. The last issue I wish to address is what seems to be the proposed excessive number of "offices" and "workers" expected to be employed in this building. Even long before the COVID-19 pandemic took hold, there already was a lot of empty office space due mostly to high rents and adding to that trend when it appears more work-from-home, downsizing etc. is being encouraged, it does not seem to make any sense to just add more empty, expensive office space.	737 Humboldt
66	Oppose	WHERE IS THE THE 3D ANALYSIS OF THE IMPACT OF THIS BUILDING ON THE VICTORIA SKYLINE, PARTICULARLY THE PROTECTED VIEWS FROM THE HARBOUR EASTWARD, ALSO AT NIGHT WHEN A BRILLIANTLY LIT TOWER WOULD SERIOUSLY DOMINATE THIS VIEW AND DETRACT FROM THE HARBOUR-SCAPE.	1760 Patly Place
67	Oppose	the proposed building is to large for the site. It should follow city bylaws. It should be shorter, have much larger setbacks and be a friendlier building to walk around.	751 Fairfield
68	Oppose	I feel that the proposed building is out of place for the surrounding area and will affect a large residential population.	788 Humboldt
69	Oppose	That corner should not have anything constructed higher than the surrounding buildings in thst block on Douglas Street.	751 Fairfield
70	Oppose	The proposed building appears quite imposing in a currently nice mixed-use area. I do object to the proposed changes to the density and height zoning requirements.	751 Fairfield

71	Oppose	I would support this application if it were smaller, and consistent with existing height guidelines. As it is, the application is contrary to many of the guidelines and the reasons for them in the Community Plan. It is too high for this plot, and should be kept to 43 m. If it proceeds as proposed, at 51 meters, it will fail to respect the visual prominence and character of important heritage landmark buildings such as the Empress Hotel; it will be inconsistent with guidelines for setbacks, particularly at its upper storeys; and it will be far too intrusive to neighbouring residential condo homes, and impact unnecessarily on light and on views. It also exceeds recommended density levels and for the above reasons, is inconsistent with the otherwise residential character of the Humboldt Valley.	751 Fairfield
72	Oppose	Everything about this is wrong. The size and the height are way above what is allowed by the city. Why are the restrictions there in the first place if they can easily be changed or broken? Looks like the city is being bought. This project should be stopped.	751 Fairfield
73	Oppose	While I support the anticipated positive aspects of the Tellus plan, I note the plan requires existing zoning limits on building height to be relaxed. My family and I do not approve of relaxing the height restrictions. We value light and air and view.	751 Fairfield
74	Oppose	My primary concern is that at the scale planned the Telus Ocean development is too big for the neighbourhood in which it is to be situated. The Humboldt Valley neighbourhood, is a relatively high density residential neighbourhood that acts as a border, or transition zone, between downtown Victoria and the lower density residential neighbourhoods of James Bay and Cook St Village. It provides value as a border area by contributing the population needed for a vibrant downtown, through its pleasant, public walking areas to and from downtown, and as a backdrop to the beautiful inner harbour. The large scale of the proposed Telus Ocean Development has two main impacts that negatively affect the unique character of this neighbourhood and the overall feel of the heart of Victoria: 1. The Telus Ocean building seriously risks overwhelming the human scale developments that have currently been achieved in the Humboldt Valley neighbourhood, with existing zoning requirements. For example, the building proportions and heights increase as one moves east on Humboldt Street and away from the Inner Harbour. These are currently proportionate to both the Fairmont Empress Hotel and the Provincial Legislature buildings - 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. Maintaining the current zoning requirements would protect the Empress from being overshadowed and prevent a potential corporate logo from piggybacking on its roof line. 2. At the proposed size, the Telus Ocean building will significantly reduce the quality of life for both the residents and visitors. Because the building is so big it will create a very large shadow on Humboldt street with areas where sunlight will never reach. Much of the street will be in near-constant shadows. Such dark, cold areas are not inviting for tourists or residents. The area is at risk of becoming dank and empty for the better part of each day. At the same time such a huge building will be overly lit and bright at night - also very disruptive to residential life. Therefore, assuming the City of Victoria Development Plan is built upon valuing and respecting both the contribution the Humboldt Valley neighbourhood makes to the overall feel of downtown Victoria, and the specific residential nature of the neighbourhood, then the issues raised here are significant. To address them we urge the City of Victoria to hold the Telus Ocean building project to current zoning requirements. Specifically we urge the City to compel Telus to: 1. Reduce the storeys/height to the 43m as allowed in the current zoning; 2. Decrease the proposed floor space ratio/density from 5.57:1 to the 3:1 ratio allowed in current zoning; and 3. Reduce the total floor area from 14379m <sup>2</sup> to that which is allowed in the current zoning - 7746m <sup>2</sup>	788 Humboldt
75	Oppose	I purchased my property knowing that the zoning requirements for this area would only be at a certain height. Now, with this application for rezoning, my view will be lost. Not to mention the loss of real estate value and the noise that will come. A big corporate company enters the downtown core and city hall buckles. What about ordinary citizens concerns or, are you simply looking at the taxes that will be generated from this very large building? A very upset taxpayer	751 Fairfield
76	Oppose	I have two concerns with the proposed zoning application. First, removal of a Residential component to the zoning. We have an affordable housing crisis and this is a missed opportunity to provide additional housing units downtown. Second, I am concerned with the proposed adjustment to the height limits. Douglas Street is already a very windy street and tall buildings, narrowly spaced will channel more gusts down the street. The existing 43m limit is already too high in my opinion; I do not agree with going even taller.	655 Douglas

77	Oppose	Permanent damage to the iconic Empress skyline and encroachment on several existing residential buildings. The proposed height is just too tall.	707 Courtney
78	Oppose	The request to rezone the triangular lot at 767 Douglas Street is shocking in the amount of variance that is requested compared with the Official Community Plan. As to height, the Telus plan states 53 m in their booklet, but 51 m in the development notice. Either height is 11-12 commercial storeys, but over 18 residential storeys. It will be higher than the Hilton and much higher than the Falls or Aria condominiums. All light will be blocked from the South for the Falls condominium and the Hilton, an inhumane situation. The Telus building will tower above the Empress; as one enters from the harbour, the TELUS sign and building will rise above the Empress. This is unacceptable. Even 45 m will overshadow the Neighbourhood and Empress. As to total floor area, Telus requests almost double the amount that the current zone allows. This massive building will destroy the Heritage/Neighbourhood feel of this vital area for residents and tourists alike. At present, the neighbourhood is small businesses and condo/hotel buildings. Telus only needs 2 floors for their employees, so what possible justification explains the need for the massive building with so many office spaces on a small area of land. The design presents a massive and unattractive wall along Burdett Avenue. With the high density and huge floor area, there will be traffic and pedestrian problems. Humboldt Street was closed for a bike path, which is good, but the traffic moved to Burdett. Now, in late afternoon one sometimes has to wait for the light at Burdett and Douglas to change 4 times before one can cross the intersection in a car. The addition of 500 more people in the Telus building will not help. On Douglas Street at present it is very difficult at times to pass on the sidewalk as people waiting for city buses accumulate on the sidewalks. Telus pedestrian traffic won't help as the building is very close to the property line (sidewalk). The point of the building to the North with its 18 story height is particularly offensive as little floor space is gained, but light to surrounding buildings is cut. The Hilton is on a triangle, but the bulk is in the widest part of the triangle. The point of the lot has only a two-storey building. We argue that the Telus Proposal should be rejected. They could achieve all their aims if they move the building toward the Downtown by 3 or 4 blocks into the HA-2 zone where they could have more land and build up to 60 m. Then their only disappointment would be that they could not dominate the skyline behind the Empress. But they could improve Douglas Street.	708 Burdett
79	Oppose	Building is too tall and obtrusive	708 Burdett
80	Oppose	The building does not fit in with the landscape and is much too high	751 Fairfield
81	Oppose	The proposed development is in opposition to Victoria's Official Community Plan because it does not respect the historic neighbourhood. The proposed building's massive size will dominate the area and diminish its appeal. The developer should be required to follow the existing zoning regulations (height, density, and setback), as set out by the City of Victoria, to proceed.	347 Windermere Place
82	Oppose	We really should not permit more high rise buildings in downtown Victoria as this would take away the special old town feeling of this beautiful city. If we let this get out of hand, then Victoria will become another Vancouver and large cities will end up costing the city a lot of money to deal with big city issues.	751 Fairfield
83	Oppose	In other correspondence to Mayor and Council, I stated my opposition to TELUS Ocean plans because the mass of the building was so out of scale in its context. The developer's rationale for rezoning to permit a density almost twice what the current zoning permits involves systematic self-serving distortion of the OCP. Here, I would like to comment briefly on a rationale the Developers use to try to bolster their case, the alignment of TELUS Ocean with the City's "Victoria 3.0" vision. It is not clear that the development will stimulate the creation of high-tech jobs. For TELUS, the building allows them to centralize a number of existing local worksites. For other tech companies, it represents very high-priced office space, certainly not what much of the sector is looking for. It is not clear that any of the publicly available amenities that the building proposes complement the conference and event meeting services offered by the Conference Centre and Crystal Gardens. And TELUS Ocean's design affects the Public Plaza next to the Crystal Gardens by disrupting the sense of flow across Douglas from the Conference Centre and by reorienting the plaza to serve the building predominantly.	737 Humboldt

84	Oppose	<p>The Telus Ocean building as currently proposed is not in compliance with the City of Victoria's building development and zoning regulations for the Inner Harbour District, including the City's "Downtown Core Area Plan", and the City's "Official Community Plan. The proposed building design exceeds current zoning regulations - and would require multiple zoning variances - related to building height, building density, building setback, and as such creates an enormous mass that will overwhelm the site and the City's Inner Harbour skyline. In addition, the proposed building design does not respect, or sensitively integrate into, the historic context of the neighbourhood. As currently proposed the Telus Ocean Building design will result in numerous negative impacts to the residents, businesses and overall look and feel of the Inner Harbour District neighbourhood, Tourism Industry and the City of Victoria. Perhaps the most concern zoning variance request related to the Telus Ocean Building proponents is the building height. The currently proposed building height will forever change the Inner Harbour District skyline, historic character of the neighbourhood and diminish light quality for existing residents, businesses and tourists to this area. 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 mitigate against the worst neighbourhood and business impacts of the proposed building design, in a manner that would still enable a modified Telus Ocean Building development to proceed.</p>	777 Douglas
85	Oppose	<p>I would support this proposal if they kept within the height limit defined in the official community plan for downtown Victoria.</p>	788 Humboldt
86	Oppose	<p>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 to 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 over sized 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 over populated. 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.</p>	708 Burdett
87	Oppose	<p>We attended an info session hosted by the developer of Telus Ocean. The fellow hosting it did little to satisfy any question asked by the audience, and answered condescendingly. He left everyone with the impression that they are building their building and all residents in surrounding areas have to just live with it. He had absolutely no answer as to shadows and darkness imposed by the new building, sound from large fans on the roof, or lighting creating by the building at night, and many more. This is a residential neighbourhood, with streets that are not equipped to hold the increase in traffic, and hundreds of taxpaying citizens who will lose their light and views if the City gives them the green light to violate building codes and extend the building height. I truly don't know why their are limits to buildings, as the City seems to approve any and all applications for developers to violate the codes. A restaurant is hounded to license their sandwich board on the street, while all of these buildings can be taller and larger than is set out in the bylaws. It makes no sense, and only seems to serve the developers. I trust City Council will do the right thing, and ensure Telus Ocean adheres to current code. It would be refreshing, appreciated, and go very far in keeping good neighbour relations between this new Telus head office and all of the surrounding residential homes. I trust the city has received a copy of the 'Elephant in the room' in relation to this building. It was researched and written by Andy Wachtel Which summarized: 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.</p>	708 Burdett

88	Oppose	<p>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.</p>	349 Windermere Place
89	Oppose	<p>The design proposal for the Telus Ocean Building is a modern glass and steel facades that reflect sunlight like a magnifying glass. This creates unbearable microclimate conditions to neighbourhood buildings, pedestrians and vehicles. This style of design is energy inefficient and contributes to global warming. Major cities in the Northern hemisphere have restricted modern glass and steel construction. <a href="https://theconversation.com/glass-skyscrapers-a-great-environmental-fooly-that-could-have-been-avoided-116461">https://theconversation.com/glass-skyscrapers-a-great-environmental-fooly-that-could-have-been-avoided-116461</a> If the City finds this design acceptable then minimizing size and height by adhering to the existing zoning would be the best direction going forward. The developer should not be able to proceed unless they adhere to the existing zoning regulations (height, density, and setback).</p>	St. Charles Street
90	Oppose	<p>Too modern of architecture. Too dense for the size of the lot. Too high. Locals are in need of more amenities to make downtown living more convenient and attractive (ie: cafes, restaurants and of most importance, a small grocery store).</p>	737 Humboldt
91	Oppose	<p>Telus is asking that the permitted density be increased to 5.56:1 (+39%) and then is applying a storey height 60% taller than the norm which will require a height variance from the DCAP maximum. There are also significant setback variances from DCAP guidelines. The combination of a taller storey and the increase in density will result in the bulk of the building over double what the OCP maximum and the standard storey height for a hotel/condo would produce. Additionally, the Aria was developed next door at a density of 3.6:1 and provided a significant financial amenity contribution of \$275 K to the city. The request for a substantial departure from our OCP and DCAP for a national corporation, is not in the public's interest. I cannot support this project as proposed.</p>	1715 Government Street
92	Oppose	<p>Glass wall more suited to Toronto, not beautiful Victoria. Tourists will NOT be impressed. Construction rumbling down Humboldt will destroy any prospect of retaining the bike lanes — thus destroying another tourist attraction. This building will kill thousands of birds over it's life span. Does this design really respect the Lekwungen people as they claim. Really? This shameful design COULD NOT be more disrespectful.</p>	788 Humboldt
93	Oppose	<p>Victoria Harbour is a Migratory Bird Sanctuary. The first bird sanctuary in Pacific Canada. This glass building will kill thousands and thousands of birds. Please see our website: <a href="https://hvra.ca">https://hvra.ca</a>. for extensive details.</p>	751 Fairfield

94	Oppose	<p>1. The building design is not congruous with the balance of the architecture in its surround. Paris tried to go modern and high, and it was a disaster, the La Défense area an eyesore to this day. The City of Victoria has done an amazing job maintaining much of the historic architecture, and this would stomp on that, not least The Empress Hotel. 2. The entrance on Humboldt, with parking, delivery and every day car traffic would seriously endanger the wonderful bike corridor Victoria is building, an important part of the city going green, critical to combat the climate crisis. If the building must exist, why not move this vehicle traffic to enter off Douglas, that street can handle it. 3. Birds are going to be killed hitting this totally glass building, which would be a travesty, since this is just next to a bird sanctuary and migration route. 4. And finally, why not have a design that embraces the island culture and heritage, particularly something representing native Lekwungen people. Again the city of Victoria has done an amazing job incorporating this culture in other areas of the city. Doing so for this new building would be something tourists and Canadians, and Islanders would want to come and see.</p>	788 Humboldt
95	Oppose	<p>I am opposed to the changes in zoning requirement. If the building were to be built as zoned I would not oppose. The height is my biggest concern as the Fairmont Empress will be ruined and its beauty diminished and cheapened by the corporate logo they are trying to put above it with the request to raise the height of the building. The height is my only opposition.</p>	707 Courtney
96	Oppose	<p>The request to rezone the triangular lot at 767 Douglas Street is shocking in the amount of variance that is requested compared with the Official Community Plan. As to height, the Telus plan states 53 m in their booklet, but 51 m in the development notice. Either height is 11-12 commercial storeys, but over 18 residential storeys. It will be higher than the Hilton and much higher than the Falls or Aria condominiums. All light will be blocked from the South for the Falls condominium and the Hilton, an inhumane situation. The Telus building will tower above the Empress; as one enters from the harbour, the TELUS sign and building will rise above the Empress. This is unacceptable. Even 45 m will overshadow the Neighbourhood and Empress. As to total floor area, Telus requests almost double the amount that the current zone allows. This massive building will destroy the Heritage/Neighbourhood feel of this vital area for residents and tourists alike. At present, the neighbourhood is small businesses and condo/hotel buildings. Telus only needs 2 floors for their employees, so what possible justification explains the need for the massive building with so many office spaces on a small area of land. The design presents a massive and unattractive wall along Burdett Avenue. With the high density and huge floor area, there will be traffic and pedestrian problems. Humboldt Street was closed for a bike path, which is good, but the traffic moved to Burdett. Now, in late afternoon one sometimes has to wait for the light at Burdett and Douglas to change 4 times before one can cross the intersection in a car. The addition of 500 more people in the Telus building will not help. On Douglas Street at present it is very difficult at times to pass on the sidewalk as people waiting for city buses accumulate on the sidewalks. Telus pedestrian traffic won't help as the building is very close to the property line (sidewalk). The point of the building to the North with its 18 story height is particularly offensive as little floor space is gained, but light to surrounding buildings is cut. The Hilton is on a triangle, but the bulk is in the widest part of the triangle. The point of the lot has only a two-storey building. We argue that the Telus Proposal should be rejected. They could achieve all their aims if they move the building toward the Downtown by 3 or 4 blocks into the HA-2 zone where they could have more land and build up to 60 m. Then their only disappointment would be that they could not dominate the skyline behind the Empress. But they could improve Douglas Street.</p>	708 Burdett
97	require changes before considering	<p>I believe that the TELUS Ocean plans must be modified before being considered for rezoning. A minimal list of changes would include: Addressing the overall scale (density and height) of the building to be more in line with the site – without decreasing the proposed setback from the ARIA and the resulting partial view corridor for the Doubletree. Pulling the corner of the building back from the South Plaza so the existing crosswalk across Douglas continues to connect the Conference Centre main entrance with the plaza and the Crystal Garden, and maintains the southwest corner of the plaza. Pulling the building back along the line proposed for the cutback terrace at floor 7 would reduce the building size by only about 10% but significantly reduce the inordinate size of the building façade facing Douglas Street. Ensuring that no signage appears above the Empress roofline as viewed from the Inner Harbour. Proposing an effective strategy for minimizing bird strikes.</p>	737 Humboldt

98	Scope of building is too large	The scope of this building is too large. When it was brought forward we were led to believe it was going to be 12 stories high. The actual height is 17 stories high. It will wipe out view for established businesses and residences in the Marriott, doubletree and the Falls. These buildings have been paying taxes and supporting this community for a very long time.	751 Fairfield
99	Support	The "scales" on the fascade to reduce the wind is a nice design feature. The all glass façade is uninspiring and lacks the richness, warmth and variations found in surrounding heritage buildings. But by far, if one could wish for one thing, are to have the presences of soft corners / forms to be more be interesting of a building to look at. The sharp angles appeals more to construction practicality and business as usual rather than art and curiosity.	777 Blanshard
100	Support	I am in favour only IF the building proposed by Telus is changed to satisfy the current zoning restrictions (i.e. the total height, including logo, does not exceed the allowable height). Telus must not be granted an exception.	788 Humboldt
101	support with adherence to OCP heights/setbacks	We support the proposed Telus tower but feel that a reduced height and mass, to something more graceful is warranted. The "blockiness" of their design doesn't relate to anything in the area and is really kind of "in your face" architecture. Please ensure that their adhere to the OCP guidelines. thank you	737 Humboldt
102	Telus Ocean must be redesigned to have all vehicles enter/leave via Douglas Street.	Telus Ocean, as currently proposed, would generate an enormous additional volume of vehicles onto the portion of Humboldt St. which runs between Blanshard and Douglas Streets. Included would be the vehicles of workers in the building, visitors, clients, etc. The loading docks and waste areas accessed off Humboldt will also generate significant traffic from trucks and vans involved in the delivery of supplies and the removal of trash and recycling. All of this vehicular traffic should access Telus Ocean from Douglas St. which is designed for heavy traffic use. Humboldt Street, specifically between Blanshard and Douglas Streets, has just undergone a major reconfiguration resulting in a single lane for vehicular traffic going east and west. Humboldt's second vehicular lane has been reallocated to two bike lanes, one going east, the other west. In the short block and a half of this section of Humboldt there are three large condo buildings (Belvedere, Aria and Biltmore) with hundreds of cars/trucks used by residents and various suppliers, waste disposal companies, etc., the Marriott Hotel with 236 rooms which generates considerable vehicular traffic by guests, staff, taxis, tour buses and supply trucks, also a church, a pub, several businesses (real estate offices, jewellers, medical and dental clinics, financial advice office, mortgage brokers, and skin clinic. Most importantly this stretch of road also services a day care centre with parents constantly dropping off and picking up children. In short there is a lot of vehicle use over this small stretch of Humboldt and drivers are still getting used to the dramatic change in the new layout of the street. It will take time to assess the impact, good or bad. Victoria has been developing a network of biking lanes in an attempt to encourage commuters to give up vehicle usage in favour or transit, walking or biking. Studies supporting this goal have emphasized the need for cyclists to feel safe in using city streets. If Telus Ocean is allowed to create a whole new vehicular traffic problem on Humboldt Street, the result will not be safe for cyclists or the drivers of vehicles already making use of this road on a daily basis. If Council allows the Telus Ocean development to proceed as proposed. The additional traffic load on Humboldt Street between Blanshard and Douglas Streets, will turn this small section of road into a major artery and, in so doing, defeat Council's goal of providing a safe cycling route through this neighbourhood. Council has spent a lot of money to close off access from Humboldt St. onto Douglas, introduce speed bumps and reconfigure the road to encourage cyclists. It wouldn't make sense to reverse all that by inviting the users of Telus Ocean to commute down a one-lane road flanked on both sides by cyclists. Please insist that Telus change its plans to allow vehicle access from Douglas only.	788 Humboldt
103	This building is too large and overwhelming	I think a statement building could be achieved without the height variance requested. It is deceptive and devious to call this an 11 or 12 storey building when in fact it TOWERS above the 12 storey residential building next door to it! I realise commercial buildings have more height per floor, but the fact that the logo shines brightly above the roofline of the Empress (along with much of the building) seems to overwhelm the site and surrounding buildings.	737 Humboldt

104	We like the general concept but want Telus Ocean to be scaled down to be closer to the zoning guidelines.	The developer is asking permission for the Telus Ocean building to relax zoning to allow a floor space almost twice what the zoning regulations allow for this property. If built, this building would overshadow everything else in the surrounding neighbourhood, including the Empress. Those of us down Humboldt in the Belvedere building, just over 100 m from the proposal, would see significant shadowing, particularly in late afternoon and evening from April to the end of August (see <a href="https://www.suncalc.org">https://www.suncalc.org</a> to verify). We agree with many of the concerns about this development presented in the Humboldt Valley report on the Telus Ocean proposal, and believe this will still be an iconic and important building in Victoria even when it is scaled down in size. Thanks, and good luck!	788 Humboldt
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1	Support	I think the one lane for vehicle traffic on this already very busy street needs to be changed to reflect the numerous vehicles coming to the two hotels and 3 strata buildings and this will only increase with the addition of the Telus building and it's underground parking. The cycling route needs to be diverted to another roadway before there is a serious accident.	737 Humboldt
2	Support	it's a BIT too tall otherwise it's better than the car lot the city has allowed to exist there for SO long!	828 Rupert Terr.
3	Support with reservations about traffic patterns.	In general, I support this project. However, I have serious concerns about how the increase in traffic on Humboldt -- which is already a recipe for accidents with the recent shared lane changes -- will be managed. I've seen nothing in the documents from the builders that suggests this is being dealt with in a realistic way. I'm also concerned about the impact on surrounding buildings, such as the Aria. Mostly, however, I would like to see the traffic issues addressed. I don't think that the current set up of Humboldt will provide a safe means for the Telus workers and others going to the new building to go to and from. It will also make getting in and out of the Aria parkade and onto the street a lot more difficult, particularly with the shared lane arrangement that currently exists. At the very least, Humboldt should be put back to being a normal street, or access to the Telus building should be from Douglas and not Humboldt.	737 Humboldt
4	Support	We think this development looks beautiful and would be a welcome addition to the Humboldt street corridor. We realize it is taller has a larger footprint than some local residents might prefer, and that there are concerns about increased traffic. But having read a great deal of the material that the proposer and city officials have provided, we do not think those concerns outweigh the aesthetic value of the completed building, and what we believe will be its positive economic effect on the area. We note as well the concerns about increased traffic, but since the existing, recently imposed traffic pattern is a terrible hodge-lodge that is very difficult to comprehend (a development on which we were not consulted), we think that most traffic issues could be ameliorated by returning to a normal traffic configuration for all of Humboldt Street.	788 Humboldt
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6	Support	I am opposed to a large screen and telus sign. Otherwise, I am happy that the regional Telus building will be in this location as it will benefit our local business sector.	737 Humboldt
7	We object to the proposal to include a large screen on the exterior of the building for public celebrations.	The most recent proposal included a large screen on the exterior of the building. We feel this is inappropriate or the residential location. It is not a suitable place for public gatherings.	737 Humboldt
8	We object to the proposal to include a large screen on the exterior of the building for public celebrations.	The most recent proposal included a large screen on the exterior of the building. We feel this is inappropriate or the residential location. It is not a suitable place for public gatherings.	737 Humboldt
9	Support	I think the addition of the TELUS building is an improvement over the existing rental car lots on such a prominent street corner in the downtown core. Obviously, the construction for the duration of the time required to complete this project will be a nuisance; however, I believe the overall benefit of the result of the project outweighs the negative aspects. The biggest concern I have is to ensure the pedestrian spaces are maintained and the safety for those who bike through this route. I do hope that there will not be any gaudy signage or any light up billboards or screens. Otherwise, I am in support of this building.	737 Humboldt
10	Support	I think it will be a great improvement compared to a car lot. One thing I would like to see is improved public/ pedestrian spaces as a result of this development. I do believe that bringing in some architecturally unique is key to the future and present health of the city, as well will promote density vs endless, uninspiring sprawl that we are seeing in the Westshore	737 Humboldt
11	Support	Largest concern is the parking entrance. The whole point of blocking off Humboldt S street from direct access to Douglas Street was to reduce the traffic going up and down Humboldt Street. Additional bike lanes were installed all last year to facilitate reducing the car traffic up and down this street. It is entirely counterproductive to have access to parking for this building on Humboldt Street. If access to parking for this building is on Humboldt Street, the newer barrier to car access directly off Douglas should be removed. Otherwise, you are going to have a significant increase in vehicle traffic using the already tight Humboldt Street or Penwell Street.	737 Humboldt
12	Support	I am concerned about the new two bike lanes and only one lane for 2-way traffic for cars on Humboldt. It is a dangerous hazard for everyone because there are 3 condo buildings and 2 hotels. Traffic will be even worse with the TELUS building.	737 Humboldt
1	Support		788 Humboldt
2	Support		737 Humboldt
3	Support	This will be a welcome asset to the community. No mess involved with loading docks, that might occur with an example of a grocery store, etc. Therefore, business hours, & no loitering. Further, it brings us into the 21 st. Century in design, public access and concern for landscape. TELUS has proven itself to be community aware and brings a positivity in supporting local cause while managing a complicated business. Onwards & Upwards!	737 Humboldt
4	Support		737 Humboldt
5	Support		737 Humboldt
6	Support	We need more densification and development downtown, and I am in support of this project replacing a current ground level parking / car rental area.	751 Fairfield
7	Support		3381 Cook
8	Support		751 Fairfield

9	Support	I appreciate the way it meets the street, and how it pays homage to the flat iron building shape. I only wish it was taller. It seems a shame for such a prime location to have such a short building. I also hope the project doesn't cheap out and use spandrel glass.	785 Caledonia
10	Support	Excited to see such an architecturally interesting proposal for this space. Looking forward to a splash of vibrancy in this section of the city. It's a great location and deserves a great project.	937 Caledonia
11	Support		788 Humboldt

**Notes:**

- 1 Respondents that indicated "Support" but requested changes in form, shape, massing, etc that would amount to a building redesign, were marked as NOT in support.
- 2 Respondents that indicated "Support" but requested changes to peripheral aspects of the project (traffic, lighting, signage) and not related to a building redesign were marked as QUALIFIED support.
- 3 Respondents that indicated "Oppose" but requested changes to peripheral aspects of the project (traffic, lighting, signage) and not related to a building redesign were marked as QUALIFIED support.