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City of Victoria  
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September 1, 2023

Sent via email: [LegislativeServices@victoria.ca](mailto:LegislativeServices@victoria.ca)

Attention: City of Victoria Mayor and Council

**RE: ZONING REGULATION BYLAW, AMENDMENT BYLAWS (No. 1309) No. 23-073 AND (No. 1310) No. 23-074**

I am writing to express concern regarding the proposed blanket rezoning of all industrial and service zones to prohibit self-storage and the use of storage lots for vehicles intended for sale, rent, or lease. The proposed blanket rezoning may negatively affect operations at the Breakwater District at Ogden Point, which is currently zoned as M2 and is a regional strategic asset servicing passenger and cargo vessels throughout the year. Its strategic relevance is a product of its geographical location and design characteristics, which provide flexibility and adaptability to service many types of ships and cargo.

This capability is increasingly important in the Pacific Northwest region as growth in population and trade is resulting in congested traditional supply chains. Limiting the flexibility and adaptability of this regional asset through the proposed bylaw amendments will constrain the capabilities of the site and will impact existing and future commercial operations.

GVHA intends to reevaluate this facility's potential uses through an integrated planning process, including GVHA's Indigenous partners, Songhees Nation and Xwsepsum (Esquimalt) Nation, and the City of Victoria. While master planning for this area had occurred before 2020, the COVID-19 pandemic halted the effort, and we intend to restart the process in late 2024.

With this in mind, we strongly encourage Victoria City Council to support this process and consider exempting the Breakwater District at Ogden Point from the proposed bylaw amendments. While the intent of the amendments is acknowledged, their application to our facility is incongruent with operating a geographically critical port facility.

The facility's capacity to respond to emergencies and support local supply chain provision/shipping is also at risk through the proposed amendments. This deep-water facility is one of the only remaining underutilized coastal industrial spaces in British Columbia and a critical asset for our working harbour and region.

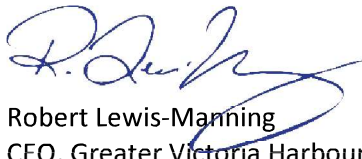
Activity at our deep-water port at Ogden Point plays a vital role in supporting Victoria's economic recovery. Over **800 local people are employed** due to cruise operations: engineers, entrepreneurs, accountants, mechanics and others generate over **\$40 million annually in wages**.

**Cruise visitors and crew contribute \$56 million** to the local economy, purchasing tours and local transportation, retail goods and food and beverages. **Cruise lines spend \$84 million** on warehousing, ship agents, repairs and maintenance, port fees and docking services.

GVHA is a not-for-profit organization that owns and operates deep-water, marina and upland holdings throughout Victoria's harbour. GVHA's assets include four deep-water berths capable of berthing most large vessels calling on ports in British Columbia under certain load conditions, a 9,300 square meter warehouse and a sizable laydown area capable of temporary storage of many products such as vehicles, small vessels, modular housing, public transportation vehicles and windmills.

Thank you for the opportunity to provide feedback before considering the proposed bylaw amendments. Should you or City staff have further questions, we would be pleased to engage further in this critical process.

Sincerely



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- cc. Kaye Krishna, Deputy Minister, British Columbia Ministry of Transportation and Infrastructure  
Lori Halls, Deputy Minister, British Columbia Ministry of Water, Land and Resource Stewardship  
Neilane Mayhew, Deputy Minister, British Columbia Ministry of Tourism, Arts, Culture and Sport  
Robert Dick, Assistant Deputy Minister Pacific Region, Transport Canada  
Derek Moss, Assistant Commissioner Pacific Region, Department of Fisheries, Oceans, and the Canadian Coast Guard

