

From: [Dean Rysstad](#)
To: [REDACTED] [Development Services email inquiries](#)
Cc: [X H Rysstad](#)
Subject: Re: Opposition to the 50 Douglas St. Proposed Mega-Plex Care Home
Date: December 23, 2021 9:42:36 PM

To whom it may concern:

I completely and utterly OPPOSE the proposed development for 50 Douglas St.

Myself and other neighbors are shocked at the scale of the proposed development, which has NOT been well advertised. We received one letter in the mail inviting us to an open house type thing, which we could not attend as a busy family with two small children.

I have lived at 648 Niagara st. for over 11 years and I am greatly concerned with this project proposal. My greatest concerns are around noise and increased traffic where we are raising our kids. We love this neighborhood, and would be extremely upset if we had to move due to non-stop noise from the building, as a member of our family is particularly sensitive to sounds. We are located very close to the proposed development, almost across the street.

I strongly urge the developers to reduce the height of the proposal, and to not increase it from the current Amica building height.

The few apartment high-rises that exist are garish and depreciate the quality, beauty and value of the neighborhood. A mega-complex as proposed by Amica would be even worse for the following reasons:

A building rising 4-5 stories higher than what is already built there would remove existing mature growth trees, which provide privacy both for and FROM residents of the current building.

Parking is a nightmare on this street already due to the staff who work at Amica and Trillium. I AM A RESIDENT of Niagara st., not a staff member. When I can't park in front of the home I own and pay taxes for, I can't safely bring my small children across the road with ease. The staff who already feel entitled to free parking on a residential street will only become 10-fold worse with a mammoth care facility, as proposed. I am aware a parkade is part of the proposal, the trade off of 1-2 stories higher for the mega-plex is NOT worth approving this glutenous build.

The development timelines will be lengthy for a building this size. The disruption to traffic flow will last for years, further depreciating home values on this end of Niagara st. As homeowners, we lose equity in our largest asset, while Amica shareholders set out to pad their pockets at our expense.

Once the building is finally done, the people who live in the vicinity will be subjected to ongoing, unrelenting noise pollution from the new mega-plex Amica HVAC system. This is what happened to the surrounding neighborhood of The Summit on Quadra. The homes in this area are ALL heritage homes with little to now insulation. I can only imagine the shrill, penetrating drone of the HVAC system 24/7, 365 for a senior care home of this size. I will commit myself to campaigning in this neighborhood to stop this mammoth build with the voice of those who live, and want to keep living here, in peace.

<https://www.vicnews.com/news/work-to-resolve-the-summit-hum-in-victoria-continues-through-winter/>

Regards,
Dean Rysstad
648 Niagara St.

From: [X H Rysstad](#)
To: [REDACTED] [Development Services email inquiries](#)
Cc: [Dean Rysstad](#)
Subject: Opposition to the 50 Douglas St. Proposed Mega-Plex Care Home
Date: December 23, 2021 8:11:23 PM

To whom it may concern:

I completely and utterly oppose the proposed development for 50 Douglas st. I have lived at 648 Niagara st. for over 11 years and I am greatly concerned with this project proposal. An 8-story anything has NO place in James Bay. The few apartment high-rises that exist are garish and depreciate the quality, beauty and value of the neighborhood. A mega-complex as proposed by Amica would be even worse for the following reasons:

- A building rising 4-5 stories higher than what is already built there would remove existing mature growth trees, which provide privacy both for and FROM residents of the current building.
- Parking is a nightmare on this street already due to the staff who work at Amica and Trillium. I AM A RESIDENT of Niagara st., not a staff member. When I can't park in front of the home I own and pay taxes for, I can't safely bring my small children across the road with ease. The staff who already feel entitled to free parking on a residential street will only become 10-fold worse with a mammoth care facility, as proposed. I am aware a parkade is part of the proposal, the trade off of 1-2 stories higher for the mega-plex is NOT worth approving this glutenous build.
- The development timelines will be lengthy for a building this size. The disruption to traffic flow will last for years, further depreciating home values on this end of Niagara st. As homeowners, we lose equity in our largest asset, while Amica shareholders set out to pad their pockets at our expense.
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- <https://www.vicnews.com/news/work-to-resolve-the-summit-hum-in-victoria-continues-through-winter/>

I will also be taking these concerns directly to City of Victoria council.

Regards,
Xela Rysstad
648 Niagara st.

Dear Members of the Victoria City Council and CALUC,

I am a resident of James Bay and am asking for you to oppose the massive 8-story development being proposed by Amica Seniors Living for 50 Douglas st. (bordering Niagara and Battery Street). Amica is an Ontario-based senior care corporation, owned by the largest seniors' care corp in Canada (BayBridge Senior Housing Inc.). Amica is a private-care facility seeking to maximize their profit at the expense of the peace and livability of our neighborhood. Amica seniors care caters to the upper 1% of wealthy seniors who can afford the exorbitant monthly fees (upwards of \$10-15k/month). Amica must amend their project proposal to build something lower (no higher than the allowable max. height) or better yet, refurbish their existing buildings (the most environmentally and sustainable option).

I am greatly distressed with this project proposal. An 8-story anything has no place in the residential heart of James Bay. Not even the grandiose Capital Park is above 5-6 stories at max height. The few apartment high-rises that exist 8-stories or larger in James Bay are garish, imposing and depreciate the quality, beauty, and value of the homes in the vicinity.

An 8-story mega-complex as proposed by Amica would be even worse for the following reasons:

- The development timelines will be lengthy for a building this size. The disruption to traffic flow, power and water will last for years, meanwhile depreciating home values in the vicinity. As homeowners, we lose equity in our largest asset, while Amica shareholders set out to pad their pockets at our expense.
- A building rising 4-5 stories higher than current will block out significant sunlight from the surrounding homes and apartment buildings. We will be shadowed in darkness by the looming mega-plex. Amica's goal is to maximize profit. Simply, the higher the building, the more likelihood of views and higher monthly fees, thus the more profit that is made for the corporation.
- Such an immense building would remove existing mature growth trees, which provide privacy both for and FROM residents of the current buildings. Privacy will become obsolete in the vicinity surrounding the mega-plex.
- Once the building is finally done, it is a high probability the people who live in the vicinity will be subjected to ongoing, unrelenting noise pollution from the new mega-plex Amica heating and cooling system (HVAC). This is what happened to the surrounding neighborhood of new senior's care build "The Summit on Quadra". Google "Summit on Quadra Noise" and/or read more hear: <https://www.vicnews.com/news/work-to-resolve-the-summit-hum-in-victoria-continues-through-winter/>
- The homes in this area of James Bay are almost ALL heritage homes with little to no insulation. I can only imagine the shrill, unrelenting hum of the HVAC system 24/7, 365 for a senior care home of this size.

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Please act on behalf of the interests of the community, the people, of James Bay and not on behalf of a corporation and developer that has set out to make the most profit at the expense of the people who make this area a vibrant community. While we all agree senior care is important, I emphatically request that Amica greatly reduces the height of their proposed project.

Thank you for your help.

Sincerely,
Xela Rysstad
Owner of 648 Niagara St.

Dear Mayor and City Council,

As a James Bay resident, I urge you to reject the proposed eight story facility on the current Amica site. The scale is vastly unsuitable for the location. Light, noise and traffic pollution will decimate the immediate area. Long established residents will find their homes barely habitable.

The proposed expansion does not support a mandate to increase adult housing. This purely profit-driven, alleged "campus-of-care" proposed by the Ontario corporation will serve only the wealthiest seniors while devastating the rest of this middle-class neighbourhood. I urge you to stop this ill-considered project.

Sincerely,
Ellen Lyons

Dear Mayor Helps and Council Members,

We would like to register our strong opposition to the massive re-development proposed by Amica Seniors Living for 50 Douglas Street.

We live in a single-family designated heritage building just down the block from the proposed "campus". This is a beautiful neighbourhood with a healthy mix of single and multi-family homes - heritage and newer, small apartment buildings and many relatively low-rise seniors care facilities. The size and scale of the proposed development is massively out of proportion to the neighbourhood, contravenes the Official Community Plan, and is being proposed for no other reason than to increase the profits of a large private corporation based in Ontario.

We urge you to respect this wonderful neighbourhood of James Bay, already one of the most densely populated areas of Victoria. You should also note that this proposal comes at the same time as another major proposed re-development a few blocks further down Niagara Street at the corner of Menzies. At least in that instance, the re-development has the redeeming feature of providing additional rental accommodation in the community, not simply retirement care for those who can afford it. The implications of two major development projects within a few blocks of each other on Niagara Street would have a serious deleterious impact on current residents of the neighbourhood.

In addition to the lasting negative impact of the proposed re-development of 50 Douglas on local residents, Council should consider seriously the tourism implications of permitting an out-sized commercial development immediately opposite Mile Zero and the Terry Fox Memorial, among the prime tourism attractions in the city, and one of the entry points to the heritage district that is James Bay. This location is frequently the introduction to the city for many visitors, and earlier Councils have previously determined that the streetscape immediately surrounding Mile Zero is worthy of preservation.

For these and numerous other reasons, which I am sure you will hear from other James Bay residents, we ask you to reject this re-development proposal.

Yours truly,

Lynda Cronin & Peter Heap

614 Niagara Street
Victoria, BC V8V 1H9

Good Afternoon

I wish to register my objection to the proposed redevelopment of 50 Douglas Street

I reside at 667 Beacon Street and enjoy a sunny south facing garden. The proposed building will block the sunshine and light into my house and garden.

the disruption to peace in the immediate vicinity and the ongoing building will adversely affect traffic and pedestrian flow.

The Environmental impact with respect to the building products used for construction and the ongoing noise pollution from the HVAC System .

The majority of residents of James Bay live in heritage houses or low rise apartment buildings it is not fair to inflict this type of development on the local community.

I am also concerned that the proposed developer of this project donated a \$1,000,000 to the housing reserve fund after approval of a similar project 1900 Richmond Road

As far as I am aware there is no evidence of a shortage of seniors care homes in the locality and I think that the Council should focus their priorities on providing affordable housing for the residents of Victoria

Yours sincerely

Mervyn Hulbert

Dear Mayor and City Council,

I am a resident of James Bay writing to express my opposition to the proposed changes to Amica House on Douglas Street.

The proposed project by a large outside cooperation, Bay Bridge in partnership with Milliken Developments, "a wholly owned subsidiary of Ontario Teachers' Pension Plan" is in business to maximize profits not what is in the best interests of the local community. I am sure that Donald Millikan will give us a glossy sales pitch. A million dollars always helps.

What we need in Victoria are affordable long term care facilities that benefit the whole community.

We lose big business wins.

Sincerely,

Ruth Schreiet

Hello dear council members. I live at 115 Government st and I received a letter about the 8story building planned at the Amica site. The building will completely shade the housing on the other side of the street in the winter. Please stick with the 6story community plan there or better yet just use the completely fine building that exists. Don't let these pushy manipulative developers bully you. Keep with the plan. Thanks. Kama Ringwood.

From: Emmanouela Stathopoulou
Sent: January 10, 2022 3:34 PM
To: Development Services email inquiries
Subject: regarding CLC00369 - James Milliken

Hello,

I am writing to you regarding the development CLC00369 - James Milliken about the present Amica Lifestyles building on 50, Douglas street in James Bay.

The news of the development, it's mass and elevation have brought a lot of distress to the neighbourhood.

Firstly as far as the building itself is concerned we fear that it will destroy the character of the area by towering over the rest of the buildings as well as set a negative precedent for similar future developments. If this building is approved, this could mean the end of our neighbourhood as we know it and love it. Peaceful with character low rise buildings.

Secondly for what will happen to the present residents of the Amica building, who are all elderly, fragile and cognitively impaired individuals with only a few years to live. It would be cruel for these people to be displaced, suffer the stress and anxiety such a displacement will bring and some of them die during the process.

Why not build a new building in a different area where the building's mass will not be an aggression to the existing neighbourhood and where no residents will have to suffer from the process?

Sincerely,

Emmanuelle Stathopoulos

To all the above: I am a nearby resident of the proposed development at 50 Douglas Street, as I live at 188 Douglas Street. I am in complete support for housing for the elderly and am glad to see that the use of this property will continue to be for Victoria's oldest residents. I am concerned about the major change in elevation that the developers are proposing at 8 storeys, 37 metres from the existing six storeys, 22 metres. As the developers are already asking to increase the floor space ratio / density significantly, I am not in favour of both concessions. I hope Council will look closely at how that shift in height will effect the most immediate neighbours natural light and that feeling of being "dwarfed" by proximity. Thank you, Jim de Goede.

Dear Mayor and Council,

Thank you for your letter on the proposed development for 50 Douglas St. I have been happily living at 110 Douglas St. for more than four years. I work online at home as a hypnotherapist and teach meditation classes. I'm also a full-time Ph.D. student at UVic and all of my coursework is online. However, I'll be unable to work if there is construction noise during the day which will directly threaten my ability to 1) earn income and 2) continue with pursuing my degree.

I also have a diagnosed connective tissue disorder which causes severe migraine headaches that result in vomiting and choking in addition to other medical conditions that are worsened by noise. I cannot move because this building is the only one in James Bay that was able to accommodate the medical equipment that is keeping me alive.

If you move forward with this development I will lose some if not all of my income. And no, I do not receive disability payments so that is not an option. I have no family or government help and am fully self-supporting. Furthermore, if I have to move because of this construction in order to seek out a quiet space so that I can stay employed and remain in school I would not be able to find an alternative accommodation that can accommodate my medical equipment. There is no medication or alternative treatment for my rare disorder. I simply must have this equipment to survive. And I need to stay employed to pay my rent so I can keep this equipment plugged in. I'm sure you can understand and sympathise with my dilemma and concern.

Considering the threat to my health and ability to earn income, I am asking you to please reconsider this development, which I strongly oppose. I am hopeful that you will make the most compassionate decision.

With gratitude,

Kyra Lin
110 Douglas St., Victoria, BC V8V2N9

I expect you will receive many submissions opposing this development for a variety of reasons within the overall issues of a) direct negative impact on existing residences in the area, and b) negative impact on the character of the neighborhood and its attractiveness for both residents of the CRD and our many visitors from elsewhere. I will not attempt to itemize my many concerns, some of which are of direct personal impact because I live nearby (101 – 660 Battery Street) and most of which will be addressed by submissions from others. Instead, I wish to emphasize the latter issue.

Approval of this project, which to me should clearly be proposed for a less dense and a less multi-use use area of the region, will forever change the character of this important part of Victoria – Beacon Hill Park, Mile Zero, the waterfront, James Bay. The forces driving the proposal for these particular properties are driven primarily by a profit-motive for the developers and operators of the facility. The facility itself, by purpose and size, is much more institutional in nature than existing care facilities in James Bay. There is no justification (especially owing to its enormous size) for this corporate, commercial undertaking to alter the character of this part of Victoria, reducing the enjoyment of the region for residents and visitors alike **forever!**

In the interest of future generations, and to meet your obligations for the longterm well-being of Victoria, I ask that this project and associated rezoning be rejected. I prefer the concept of more smaller care developments, preferably owned and operated by the provincial government or health authority. However, if such a large, private development is seen as necessary by health authorities (professionals, academics, public agencies) to meet the needs of our aging population (as a senior myself, I can easily relate to the need for care facilities), it should be located in a CRD area of less density with more greenspace and without disrupting/destroying existing public usage and enjoyment.

Brian Cousins
101-660 Battery St
Victoria V8V1E5

Response re Amica Douglas House redevelopment proposal CLC00369 (1) as resident of James Bay and (2) as daughter of resident

My concerns as a James Bay resident

I am opposed to this redevelopment proposal for the following reasons:

- **Luxury profile:** This is a luxury-style development — aimed at what market? It seems out of range for most long-term James Bay residents. If it must be redeveloped, I would prefer something more modest and affordable for more people. My mother moved to Douglas House from a modest apartment in James Bay. I am sure the new Douglas House would have been out of range for her.
- **Cost increases for residents:** What will rates be? Who can afford this? Are all the proposed amenities necessary?
- **Size, scale and character:** It is a massive, luxury development and proposes to replace the current low-profile Douglas House, which has fit in with the existing neighbourhood for decades.
- **If the current building needs improvements, what about a simple renovation of Douglas House and a new building elsewhere?** Why not a refurbishment with modest improvements (for example, replace balconies, replace and improve the ramp between the buildings, redo the siding)? This approach would improve and extend the life of the current building, allowing residents to remain in place. And if there's a case for this many new units, why can't Amica and Milliken develop on available land elsewhere, without forcing residents to move?
- **Loss of mature green space:** As with several James Bay developments of late, I worry about loss of mature trees and shrubs (four mature birches and two copper beeches along Niagara; a mulberry tree in front; mature evergreens along Battery; mature shrubs on all sides)
- I can't tell from the plans which existing trees and shrubs would be retained. Too many James Bay developments are removing all greenery, digging everything out, filling it with concrete and gravel and then topping it with paving or a layer of turf. New plantings cannot replace existing long-term mature growth and actual earth in the ground.
- The entire mature green space, not just trees, of James Bay is an extension of the greenscape of the park. It is an important part of James Bay's heritage and character. Numerous birds feed, shelter and breed throughout this area.
- We need to preserve and protect our existing mature trees and shrubs.

My concerns as the daughter of a Douglas House resident

This redevelopment proposal cannot be considered, I believe, without first taking into account the impact it will have on current residents of Douglas House.

And first, I would like to stress that staff at Douglas House – care staff, dining, concierge, activities, housekeeping, maintenance and others – are wonderful. They do an excellent job. My comments are no criticism of them. Secondly, due to my mother's personal situation, it is possible she will need to leave Douglas House prior to the redevelopment. That is not yet certain, though, and my concerns remain about the process and proposal generally.

Residents moved in expecting to live at Douglas House for the rest of their lives, or as long as they wished or were able, at existing rates with predictable increases. Now they must move, with timeline and costs uncertain.

My mother (now almost 99 years old) moved in, in 2018 at age 95; there was no mention of a redevelopment then. Like many others, she moved to Douglas House because it was in her own neighbourhood of James Bay, in a comfortable, non-fussy environment, close to familiar places. She walks with us almost every day along Dallas Road and enjoys where she is, like other residents who live there. My husband and I live in James Bay, without a car, and are her daily support. If she moves elsewhere, it will pose significant challenges to us for supporting her.

Another resident we know, also in her 90s and with no family support in Victoria, has expressed to us her upset about this change. She loves her apartment and doesn't want to move. She is also a former James Bay resident. She feels there is nothing can be done. People in their 90s are not generally able to be assertive and vocal about something that may still cause them a lot of worry and stress.

I would guess it is upsetting to virtually all residents to know that they must soon leave their familiar surroundings, their cozy apartment and familiar supports, and move to (at this point) who knows where. Residents will be scattered to different facilities, lose familiar staff and the Douglas House community and neighbourhood.

If it doesn't meet the definition of a renoviction, it certainly feels like one, and is following on the stresses of two years of COVID and counting --- months of lockdown in the first year and continuing restrictions. The idea of pulling up stakes, relocating and trying to resettle in a new place is immensely stressful to both residents and their families.

Amica has committed to "open transparent communications." The building condition and supposed need to renovate were never mentioned up until we received a BlueJeans Network calendar invite on October 31 with a very brief description of the project. That is the first we ever learned of it. The only recognition of resident impact I have seen in Amica communications is this: "This is no reason for residents and their families to be concerned because services and amenities at Amica Douglas House are not impacted; there are no changes to the current operations."

I was unable to attend the two information sessions, which were held during weekday times when I am working. At the open house, I appreciated the efforts of Mr Milliken to answer questions that I had then, and his staff answered questions about the plans. At the CALUC evening session this week, which is really meant to focus on the building proposal itself, I was able to briefly express some concerns about the impact on residents and their families.

To date, general information from Amica has been scant and not overly informative. I have received very little despite asking for updates. I could find no information about the proposed redevelopment on the Amica Douglas House website and wonder how the redevelopment is being conveyed to prospective and new residents.

Following are questions that I sent to Amica on January 2, their answers provided on January 12, and my comments:

- **When will current residents be expected to move?**
AMICA: We don't have exact dates yet. The developer will be submitting the proposal to City of Victoria, which could require amendments. We will update you with information as we receive it.
RR: In the meantime, we are left to wonder when this huge change will happen.
- **Where will [residents] go, and how will that be determined? Who will arrange that, families or Amica?**
AMICA: The sales team here will work individually with each resident and their families to find another suitable location, whether this is another Amica, or somewhere else. Amica Oak Bay is set to open June 2023
RR: This is vague and leaves a huge amount of uncertainty for current residents.
- **How much will rates increase in the new, temporary locations?**
AMICA: We don't know this. It would depend on several factors that we cannot foresee including the location that you/the resident chooses and possible level of care changes for each person as time goes on.
RR: This is not helpful. We all know that care needs can change. Surely at least a rough idea could be provided, based on each resident's current situation and a range of known locations. This would help give some idea of the scope of rate change to come.

- **What will rates be if or when current residents return to the redeveloped Douglas House?**
AMICA: Rates have not been set yet, and again that also depends on level of care.
RR: Same as above: We all know that care needs can change. A rough idea could surely be provided, based on each resident's current situation and the current plans for the "new" Douglas House.
- **Will there be an interim discount or other mitigation for current residents (who moved in expecting to live at Douglas House indefinitely at stated rates and now must move, with costs uncertain)?**
AMICA: Moving costs will be taken care of.
RR: My mother's costs to move to Douglas House in 2018 were \$447. This is minuscule relative to monthly costs at Douglas House and likely increases elsewhere and in the new Douglas House. Residents and families did not ask to move anywhere. A rate discount or a freeze would go some way to mitigating the uncertainty and stress that they will now live with.
- **Was the option ever considered to renovate the current building? If yes, why was it decided against? If no, why not?**
AMICA: Based on the age of the existing buildings, retrofitting life safety and other upgrades required for building licensing, resident care and quality of life, it is not feasible.
RR: From this I take it to mean that the existing building has aged out. It's not clear if the complete rebuild is a must, or a desired change by Amica. As noted above, the building condition and need to renovate were never mentioned up until we received a BlueJeans Network calendar invite on Oct. 31, with a very brief description of the project. That is the first we ever learned of it.
- **Why is Amica moving toward less independent living in relation to assisted living and dementia care?**
AMICA: As our general population ages, there is and will continue to be additional need for assisted living and dementia care, as well as independent living suites – which are all included in the plans for the redevelopment of Douglas House.
RR: The plans indicate fewer independent living suites than are currently at Douglas House. This says to me that at least some current residents will not have the option to return.
- **Why is Amica moving toward a "luxury" style complex in this location?**
AMICA: The Amica Difference is our commitment to provide a premium lifestyle for seniors along with the option to have care. Seniors choose Amica to continue living on their terms in an elegant setting with outstanding dining, amenities, activities, senior care and safety measures.
RR: Douglas House is comfortable and homey. I think that's why many people choose it. Dining is good and also homey. I suspect that Douglas House, as it is, no longer fits the Amica brand that you see on their websites. A comfortable home for many people is being taken away from them to replace it with a luxury style development.

IN SUMMARY: My belief is that Amica wants a luxury development in this location to fit with their brand, and Douglas House no longer fits that brand – the "Amica Difference." I can't see it as anything but a renovation, and I oppose it strongly. The impact and stress for current residents is not acknowledged or accommodated. Communications have been vague and unsatisfactory.

I oppose this development for all the reasons stated above.

Robin Rohrmoser
15 January 2022

I live on Paddon close to this proposed development
I do not and will not support a development this size.
We are a residential mostly heritage neighborhood

I oppose
Theresa Gillan

I OPPOSE the CD zoning which will allow Amica to build 8 storys high and use more land space.
This would more than triple the existing building height and almost use the entire lot.
The James Bay Neighbourhood Plan states future development should be limited to 3-4 storeys
and future development should be encouraged to enhance existing heritage/character with
regard to scale, form, etc...
We have many heritage listed homes in this immediate area. I own one of them.
The development falls partially within the Battery Street Heritage Conservation Area (HCA-1)
and
does not meet the criteria such as architecture which "responds to its historic setting" and the
importance of matching existing densities.

Theresa Gillan
23 Paddon Avenue

Please consider a lower height building for the proposed Amica building at 50 Douglas . Please consider the considerable traffic mayhem when demolition and construction starts and continues for years .

Please consider some crosswalks in this area that is dangerous right now , before any construction starts .

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Please consider that the current proposal is inappropriate for the area directly across from beacon hill park .

Thank you ,
kevin Timney # 115 - 30 Douglas

Subject: Amica Douglas House redevelopment
Date: January 19, 2022 7:59:34 AM

Good Morning,

I am writing to you to express my strong objection and concern about the proposed redevelopment of Amica Douglas House , by the Milliken Development Group.

The proposed building at 8 stories, 37 m high, covers almost the entire lot ,with a density ratio of 3:25.1 , triple the existing facility in both height and density , and is not in a strategic location.

The Official Community Plan of 2012, which is still in effect, states buildings should be limited to 3-4 stories (6 stories only in the village centre) and should enhance the existing heritage character. It will tower over the many heritage homes on both Niagara and Battery Streets and will have a detrimental effect on the neighbourhood. Battery Street is a Heritage Conservation Area.

Part of this enormous development will face Douglas Street, across from Beacon Hill Park and in fact be higher than Beacon Hill itself. The Park, Mile Zero, the Dallas Road walkway , waterfront and the heritage homes, including a beautiful B & B , are prime tourist areas.

This development must not be allowed to proceed as proposed.

Thank you

Shirley Roberts, Battery Street.

The Amica Douglas House redevelopment at 50 Douglas Street absolutely does not fit the character of our Battery Street heritage community. Where Douglas House and its residents have long been welcome neighbours, the proposed replacement is too big and too institutional.

In my view, even six storeys are too much for this site. The [James Bay Neighbourhood Plan](#) recommends limiting existing buildings in residential areas such as ours to three or four storeys, reflecting their existing height. The proposed redevelopment doubles the height to eight storeys, with far greater lot density.

The design drawings show a structure that towers over Battery and Niagara Streets and does nothing to conserve and enhance local heritage values. It will inevitably cut off much of our sunshine and generate excessive traffic in this quiet corner of James Bay.

I am a senior so I know how important it is to provide housing options. I also know this should not come at the expense of a much-loved neighbourhood. Council should turn down this proposal.

Margaret Rice
203-660 Battery Street

I am vehemently opposed to the Amica Douglas House expansion proposal that is currently before Council.

This proposal disrespects the heritage character of this neighborhood, will disrupt the lives of many residents during a prolonged construction period, will increase traffic and noise pollution on completion and shows a total disregard for the guidelines contained in the Official Community Plan.

It seems the city has reached a point where the Community Plan means absolutely nothing. Proposal after proposal is submitted containing so many variances that one begins to wonder if developers even bother to read the plan anymore. The disturbing part is that Council seems to go along with many of the requests thereby making a mockery of tax payer's wishes and creating a new version of the city which has not been agreed to by the citizens who live here and pay the bills.

If the Community Plan is so out of touch, would it not make sense to re-visit it and allow tax payers to debate the contents and up date them if they feel so inclined or simply remind Council that developers should be told to stick with the plan or go elsewhere.

Perhaps it is even time to temporarily hit the pause button on development long enough for the city to catch up with services and infrastructure. There is a feeling of serious imbalance here. The city is leaping wildly ahead out of control and not within the vision created by the hard fought Community Plan. It would not hurt to step back, take a breath and observe what is happening to our city and how it all fits with the wildly expanding neighboring municipalities, each one having tremendous effects on the other but with little co-operation or co-ordination between the jurisdictions. "Planning in silos", I call it, something that Victoria is definitely guilty of and now the cancer has spread throughout the GVRD.

In the meantime, this proposal must not be allowed to go ahead as put forward. Let the proponent come back with a design that meets the criteria envisioned by the people who live in the James Bay neighborhood.

Thank you.

R. G. Persson

Good Morning,

I am writing to you to express my strong objection and concern about the proposed redevelopment of Amica Douglas House , by the Milliken Development Group.

The proposed building at 8 stories, 37 m high, covers almost the entire lot ,with a density ratio of 3:25.1 , triple the existing facility in both height and density , and is not in a strategic location.

The Official Community Plan of 2012, which is still in effect, states buildings should be limited to 3-4 stories (6 stories only in the village centre) and should enhance the existing heritage character. It will tower over the many heritage homes on both Niagara and Battery Streets and will have a detrimental effect on the neighbourhood. Battery Street is a Heritage Conservation Area.

Part of this enormous development will face Douglas Street, across from Beacon Hill Park and in fact be higher than Beacon Hill itself. The Park, Mile Zero, the Dallas Road walkway , waterfront and the heritage homes, including a beautiful B & B , are prime tourist areas.

This development must not be allowed to proceed as proposed.

Thank you

Shirley Roberts, Battery Street.

Re: development of new, massive 8 storey Amica building at 50 Douglas Street

I'm a long-time senior resident in the adjacent building directly across the street from 50 Douglas Street. I spend 90% of my time indoors (particularly now with pandemic restrictions) and have been a resident here for 8 years. The ongoing disruption of constructing a mega building of this size will be substantial and will greatly affect my quality of life and about 40 others seniors in this building.

When you consider the ongoing construction noise and the excavation of an underground garage means substantial jack hammer and machine noise and possible bedrock shifting and possibly affecting the foundation of the heritage building where I live in and the other older buildings in close proximity...

Parking is an issue. Where will all the construction workers park? Workers at Amica already compete with residents for parking spaces on the narrow street (Battery) we live on.

Also such a large building, sunlight will be blocked which is already an issue for us here. Our older building is not isolated from noise and as it stands, we often can hear people walking outside talking on the streets.

I remember the renovation of one of the heritage homes next door - it was daily and ongoing - even on weekends and it was debilitating. And that was just a renovation... I couldn't imagine how catastrophic the ongoing noise would be constructing a mega building of that size. And the amount of time it will take... 3-4 years?

Amica should not be allowed to disrupt this quiet, peaceful historical community of James Bay and capitalize at the expense of others - seniors, residents and homeowners who have been living here for years. I am highly opposed to this new development.

Thank you for your consideration,

Tina Fischer

30 Douglas Street, Victoria, BC

Justine Wendland

From: Jordan Zinovich <[REDACTED]>
Sent: January 20, 2022 1:13 PM
To: Development Services email inquiries
Subject: The 50 Douglas Street AMICA House application for rezoning
Attachments: Photo #1 Battery St at Olympia (1).jpg; Photo #2 view from Olympia between two flanking buildings.jpg; Photo #3 from the roof of 660 Battery St.jpg

To Whom It May Concern,

My name is Jordan Zinovich. My wife and I live at 660 Battery Street, which shares a property line with 50 Douglas Street/AMICA House. Though we would have had trouble attending, we *never* received a Milliken/AMICA mailing announcing the Preliminary Public Consultation Meetings at the Victoria Edelweiss Club on 21 and 22 November 2021. So it was with interest that we attended the 12 January Zoom presentation sponsored by CALUC and the JBNA.

Frankly, I was astounded by the inadequate, unprofessional presentation the developers offered. Victoria's "Rezoning Information and Application" requires an applicant to "Be prepared to provide a rationale for your proposal (*the information required for your letter to Mayor and Council* [emphasis added])." The rationale that Milliken offered us (repeatedly with slight variations) for its proposed gargantuan development was that it would provide "greatly needed Assisted Living and Memory Care beds," that the existing building had "outlived its useful life," and **that we should compare it existing park side high-rise structures along Douglas Street.**

- No mention was made of local neighbourhood land use issues;
- No rationale was given for negating the current zoning requirements in Victoria's OCP, the James Bay Neighbourhood Plan, and the Battery Street HCA;
- No justification was provided for the excessive site coverage (45%), the towering 37-metre height, the reduced setbacks from neighbouring property lines, and the FSR of 3.25:1 (in James Bay, only The Royal BC Museum CD-Zone has a greater FSR);
- Oversized impacts on the surrounding 3-4-storey structures were minimized;
- No mention was made of the fact that, excepting only the Heritage-designated cupola on 120 Douglas Street, the current structure is already the highest structure at the south end of Douglas Street;
- No adequate justification was offered for completely upending the Bed and Breakfast business of Heritage-designated Ashcroft House and the lives of the current AMICA House residents; and
- Though the elevation of the 50 Douglas Street lot is 31 meters above sea level, so the proposed structure will rise approximately 30 meters (98 feet) higher than the crest of nearby Beacon Hill, no mention was made of the fact that it will directly impact Victoria's Heritage-designated signature park and block views west from Beacon Hill.

Application requirements also oblige that illustrative renderings show "(to scale)" the "Building in relation to flanking buildings," yet all flanking buildings in the architectural drawings have been erased — and, particularly on the Niagara Street profile, the generalized flanking silhouettes offered are deceptively high,. Moreover, the **street widths are not represented to scale**, and all the drawing and photomontage

perspectives are skewed to dramatically reduce the impact that the proposed structure will have on its surroundings.

On Tuesday 18 January 2022, a neighbor and I raised a helium balloon marker to **34 meters** above the northeast corner of our 660 Battery Street lot, which lies about 15 meters west of the center of the courtyard of the proposed structure. I attach three (3) photographs illustrating how completely the Milliken structure will dominate the Battery Street HCA.

Please compare Photo #1 (a fisheye view taken from the corner of Olympia and Battery Streets) to Milliken's "Douglas House – Battery Street" architectural drawing; Photo #3 looks north from the curb of Battery Street down the drive between two "flanking" structures — 660 Battery Street and the Heritage-designated Ashcroft House Bed and Breakfast; and Photo # 3 looks east and north from the roof of 660 Battery Street over 50 Douglas Street AMICA House.

Because of its manifest professional inadequacies and obvious unsuitability to the site, I respectfully urge you to reject this current Milliken/AMICA application for rezoning. Perhaps, by accepting increased input from City Staff and the Area Planner, the developer can propose a development better suited to this James Bay community location.

Thank you for your consideration,

Jordan Zinovich
202-660 Battery Street
Victoria, BC V8V 1E5

[REDACTED]

[REDACTED]







January 20, 2020

From: Kelly Bohlken ([REDACTED])
Sean Hern ([REDACTED])
648 Battery Street, Victoria, V8V 1E5

To: City Council members and Development Services

Re: Proposed development at 50 Douglas Street in James Bay

We are residents of 648 Battery Street in James Bay. We are writing to provide input on the recent development proposal to create a new comprehensive development zone that varies the set-backs, height restrictions, and footprint ratio at 50 Douglas Street to allow for the construction of an eight story, oversized building.

Our property will be directly impacted by the proposed variances. Our backyard is essentially one residential property width to the west of the subject property. With reduced setbacks and eight stories, the proposed new building will loom over our back dining room, porch and garden, blocking light and sky from the east. As with our neighbours to the east, this proposed building will significantly diminish the beauty of our property at 648 and our enjoyment of it.

The proposed building is absolutely massive for the site, and totally out of step with the neighbourhood, the OCP and the heritage location. This is a downtown-sized institutional building sought to be crammed into a residential neighbourhood. It is contrary to the existing zoning, the Battery Street Heritage Conservation Area guidelines, and the James Bay Neighbourhood Plan.

When a developer seeks one or more variances and spot-zoning, the starting place for the City must be “no”. The onus is on the developer to show why each variation should be granted – why the existing zoning and restrictions, and the careful thinking that went into them, warrants a change.

This proposal by Milliken Real Estate Corporation in partnership with Amica Senior Lifestyles (the “Developer”) is unusual in that there is no justification advanced to support the new comprehensive development zone other than the Developer’s assertion that in Victoria there is “rising demand” for memory care facilities and “growing demand” for assisted care beds. That may be so (although no reports supporting that proposition have been cited), but it doesn’t answer the question of why these proposed variances are warranted. The developer is free to build a memory care facility at 50 Douglas Street, within the zoning parameters that have been established, and if the Developer wishes to build more such units to expand its business, it can purchase another property in Victoria and build an additional facility.

According to an article written in the summer of 2020,¹ Amica Senior Lifestyles plans to “deploy approximately \$2 billion to essentially double the size of the company’s holdings” by 2025. This aggressive growth is to maximize profits for its shareholders. The difference between building and operating a enormous facility and an appropriately sized one may be a slightly smaller return on investment for Amica’s shareholders, but that, of course, is not the city’s concern. It is not the City of Victoria’s role to maximize the Developer’s potential profit on the land at 50 Douglas Street by allowing it to build a massive complex.

The zoning that is in place now is appropriate for the site. There should be no spot zoning granted, and no variances for height, footprint ratio or setbacks. The owner of 50 Douglas Street purchased the property knowing what zoning was in place, and knowing that it was within a heritage area. This Developer should work with what they have. It is a beautiful location with plenty of density for the area.

We also note that the variance / rezoning process should not encourage developers to ask for the stars in the hopes of landing on the moon; or in this case, asking for eight stories, reduced setbacks and a massive footprint in the hopes of getting a variance for something in between. Such proposals should be rejected outright.

In summary, there is no justifiable basis to allow such a huge building to be constructed at this location. This is a proposal from people in Vancouver and Toronto who simply want to maximize the value of their investment at the neighbourhood’s expense. Don’t let them. Send them back to the drawing board to come up with a proposal appropriate for the site and neighbourhood.

Yours truly,

Sean Hern & Kelly Bohlken

¹ <https://insigniam.com/issue-the-pivot-issue/>

Dear Mayor Helps,

I am writing to you to express reasons for opposing Milliken's proposal on behalf of Amica/Douglas. They propose to replace the existing structures with an eight storey structure which will entail independent living accommodations on the top floor. Gym, dining and entertainment rooms e.t.c. for the street level entrance floor. The middle floors will accommodate seniors with memory loss challenges.

Listed are the following reasons why I am against this proposed project.

1. Environmental: The site is too close to the road and Beacon Hill Park. The noises from possible blasting and building will threaten wild and tame animals from Beacon Hill Park. Ducks and peacocks often cross Douglas Street charming neighbourhood residents and walking tourists alike. Also, Douglas Fir trees that line the Beacon Hill side of Douglas St. are habitats for the endangered species, the blue heron. The Douglas Fir trees themselves could be threatened, themselves, especially if blasting is involved. Potentially the exhaust fumes from the cars of staff, visitors and residents of this eight storey building poses air pollution for people who live in neighbouring buildings. One of the highlights of living in this part of the city is fresh air. That won't be the case if this structure is allowed to be built.

2. Lack of respect to the integrity and character of the historical houses in the James Bay neighbourhood. The planners state that the bricks used in the new design will reflect the historical character of neighbouring houses. They don't !

3. Insensitivity to residents already residing at 50 Douglas Street and 685 Niagara Street.

Planners (Milliken family) have said they would be transferred to other Amica, independent and assisted living facilities. These are old and frail people who thought the existing structures would be their last homes. Also the rates they presently pay aren't promised to be the same as they are now.

4. Insensitivity to staff workers, Nurses maintenance workers and gardeners who thought they had permanent jobs at Amica Douglas.

5. Traffic problems on Niagara and Battery Streets. These streets are narrow and already have problems accommodating cars going in both directions with resident parking on the road. Buses and cars on Niagara have to stop at the side of the road to let other vehicles pass in the opposite directions. It's the same situation on Battery St. sans the buses.

Both streets won't be able to accommodate the extra strain of Staff, Residents and visitors from an eight storey facility. They are barely adequate as it is and can't be widened.

6. House values on Niagara and Battery Streets near the proposed eight storey structure will plummet. People who live there enjoy daylight sunshine as 50 Douglas and 685 Niagara currently stand. Their homes will be in shadow. This doesn't seem fair!

Mayor Helps, you have created a city which encourages less car use and more cycling, running and walking. This is especially true of what you've created on Dallas Road and Clover Pt.

I applaud you for it. Thank you!

In all due respect though, wouldn't it be counterproductive to allow the Amica/ Douglas proposal be approved, with all the noise traffic and pollution it could potentially create?

I urge you to veto this proposal.

Sincerely,

Diane Curtis,

concerned James Bay resident

Dear Mayor and Council,

As the owner of a condominium at 660 Battery Street and resident of the James Bay area, I hope you will consider my opposition to the redevelopment proposal at 50 Douglas Street. I believe the project will negatively impact the immediate community and be a detriment to our Heritage Conservation area. The proposal conflicts with provisions of the OCP designating density, height limitations and retaining the heritage character of the community. I urge the Mayor and the City Council to reject the proposal in its present form.

The James Bay area is the historic heart of Victoria. It has been described as the hub of Victoria's tourist industry and is a designated Heritage Conservation area. Of the eight tourist attractions prominently listed for the city, two are within 300 meters of the proposed redevelopment. It is home to the Emily Carr House and Mile Marker "0". It is characterized by well-preserved Victorian homes built in the late 1800s sited next to two and three storey apartment and condo buildings. Under the OCP, the neighbourhood falls into the Traditional Residential and Urban Residential categories.

The Amica redevelopment proposal conflicts with several OCP's requirements. The proposal calls for an eight storey, high-density, institutional structure with miniscule set-backs and potentially high levels of visual and noise pollution. This building will tower over the neighbourhood, drastically increase density and destroy its heritage character.

Section 6.21 of the OCP states that redevelopment should be "consistent with the density...established in the plan, permitting their increase only as the plan provides...." The Urban Residential section requires between 1.2:1 to 2:1 Floor Space Ratio. The current Amica proposal suggests a floor space density of nearly double the appropriate number of residents, at 3.25:1. This is not in keeping with the City's plan.

Section 6.21 and 6.22 of the OCP requires three storey structures in Traditional Residential neighbourhoods and up to six storeys in Urban Residential. At eight storeys, the proposal is well in excess of the maximum number of storeys.

The proposal calls for minimal set-backs and will cast an enveloping shadow over most nearby two and three storey structures. This can hardly be called a sensitive transition to the lower land uses provided by nearby residences requires by the Official Community Plan.

While the OCP is intended to be flexible, I do not believe it should be flouted with such an extreme proposal. The proposed (Amica) 50 Douglas Street building would decimate the heritage character of the neighbourhood, drastically increase population density and physically overwhelm the surrounding area. I urge the Mayor and City Council to reject the proposal.

Thank you for your attention.

Sincerely,

Ellen Lyons

Dear Mayor and Councilors,

As an owner of a residence in James Bay at 660 Battery Street, I urge you to consider my opposition to the redevelopment proposal at 50 Douglas Street. The proposed building will negatively impact the community and destroy our Heritage Conservation area. The proposal conflicts with OCP limitations for density, building height and retaining the heritage character of the community. I believe the Mayor and the City Council should reject the redevelopment proposal.

The James Bay area is the historic tourist centre of Victoria. It is designated a Heritage Conservation area. Major attractions are within 300 meters of the proposed redevelopment. It is home to the Emily Carr House and Mile Marker "0". James Bay, and this particular area has Victorian homes next to 2 -3 storey apartment buildings. The Official Community Plan designates the neighbourhood "Traditional Residential" and "Urban Residential".

The 50 Douglas proposal conflicts with OCP requirements in Sections 6.21 and 6.22. The redevelopment proposes an eight storey, high-density, institutional building with undersized set-backs and extreme sound pollution. This building will tower over nearby buildings, increase density and destroy the heritage character of the community

The OCP, at Section 6.1, requires redevelopment to be "consistent with the density...established in the plan, permitting their increase only as the plan provides...." The Urban Residential section requires between 1.2:1 to 2:1 Floor Space Ratio. The current redevelopment proposal demands a density of nearly double, at 3.25:1.

The OCP, at Sections 6.21 and 6.22, require three storey structures in Traditional Residential neighbourhoods and up to six storeys in Urban Residential. At eight storeys, the proposal is far in excess of the maximum number of storeys.

The redevelopment proposal calls for minimal set-backs and will tower over all the two and three storey buildings nearby. This is not a sensitive transition to lower land use residences required by the OCP.

The OCP should not be ignored. The current 50 Douglas proposal does just that. It will destroy the heritage character of the neighbourhood, drastically increase population density and overwhelm every nearby building in the neighbourhood. I urge the Mayor and City Council to reject the proposal.

Sincerely,

Hillary Leviant

Dear Mayor Helps and Council,

My name is Jordan Zinovich. My wife and I live at 660 Battery Street, which shares a property line with 50 Douglas Street/AMICA House. Though we would have had trouble attending, we *never* received a Milliken/AMICA mailing announcing the Preliminary Public Consultation Meetings at the Victoria Edelweiss Club on 21 and 22 November 2021. So it was with interest that we attended the 12 January Zoom presentation sponsored by CALUC and the JBNA.

Frankly, I was astounded by the inadequate, unprofessional presentation the developers offered. Victoria's "Rezoning Information and Application" requires an applicant to "Be prepared to provide a rationale for your proposal (*the information required for your letter to Mayor and Council* [emphasis added])." The rationale that Milliken offered us (repeatedly with slight variations) for its proposed gargantuan development was that it would provide "greatly needed Assisted Living and Memory Care beds," that the existing building had "outlived its useful life," and **that we should compare it existing park side *high-rise structures along Douglas Street***.

- No mention was made of local neighbourhood land use issues;
- No rationale was given for negating the current zoning requirements in Victoria's OCP, the James Bay Neighbourhood Plan, and the Battery Street HCA;
- No justification was provided for the excessive site coverage (45%), the towering 37-metre height, the reduced setbacks from neighbouring property lines, and the FSR of 3.25:1 (in James Bay, only The Royal BC Museum CD-Zone has a greater FSR);
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- Though the elevation of the 50 Douglas Street lot is 31 meters above sea level, so the proposed structure will rise approximately 30 meters (98 feet) higher than the crest of nearby Beacon Hill, no mention was made of the fact that it will directly impact Victoria's Heritage-designated signature park and block views west from Beacon Hill.

Application requirements also oblige that illustrative renderings show "(to scale)" the "Building in relation to flanking buildings," yet all flanking buildings in the architectural drawings have been erased — and, particularly on the Niagara Street profile, the generalized flanking silhouettes offered are deceptively high,. Moreover, the **street widths are not represented to scale**, and all the drawing and photomontage perspectives are skewed to dramatically reduce the impact that the proposed structure will have on its surroundings.

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Because of its manifest professional inadequacies and obvious unsuitability to the site, I respectfully urge you to reject this current Milliken/AMICA application for rezoning. Perhaps, by accepting increased input from City Staff and the Area Planner, the developer can propose a development better suited to this James Bay community location.

Thank you for your consideration,

Jordan Zinovich
202-660 Battery Street
Victoria, BC V8V 1E5





Chelsea Medd

From: Jordan Zinovich [REDACTED]
Sent: January 20, 2022 12:43 PM
To: [REDACTED]
Cc: Chelsea Medd
Subject: the 50 Douglas Street AMICA House development application
Attachments: Photo #1 Battery St at Olympia (1).jpg; Photo #2 view from Olympia between two flanking buildings.jpg; Photo #3 from the roof of 660 Battery St.jpg

Dear Mr. Van Alstine

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Because of its manifest professional inadequacies and obvious unsuitability to the site, I respectfully urge you to reject this current Milliken/AMICA application for rezoning. Perhaps, by accepting increased input from City Staff and the Area Planner, the developer can propose a development better suited to this James Bay community location.

Thank you for your consideration,

Jordan Zinovich
202-660 Battery Street
Victoria, BC V8V 1E5





:Kelly Bohlken
Sean Hern
648 Battery Street,
Victoria, V8V 1E5

To: City Council members and Development Services
Re: Proposed development at 50 Douglas Street in James Bay

We are residents of 648 Battery Street in James Bay. We are writing to provide input on the recent development proposal to create a new comprehensive development zone that varies the set-backs, height restrictions, and footprint ratio at 50 Douglas Street to allow for the construction of an eight story, oversized building.

Our property will be directly impacted by the proposed variances. Our backyard is essentially one residential property width to the west of the subject property. With reduced setbacks and eight stories, the proposed new building will loom over our back dining room, porch and garden, blocking light and sky from the east. As with our neighbours to the east, this proposed building will significantly diminish the beauty of our property at 648 and our enjoyment of it.

The proposed building is absolutely massive for the site, and totally out of step with the neighbourhood, the OCP and the heritage location. This is a downtown-sized institutional building sought to be crammed into a residential neighbourhood. It is contrary to the existing zoning, the Battery Street Heritage Conservation Area guidelines, and the James Bay Neighbourhood Plan.

When a developer seeks one or more variances and spot-zoning, the starting place for the City must be “no”. The onus is on the developer to show why each variation should be granted – why the existing zoning and restrictions, and the careful thinking that went into them, warrants a change.

This proposal by Milliken Real Estate Corporation in partnership with Amica Senior Lifestyles (the “Developer”) is unusual in that there is no justification advanced to support the new comprehensive development zone other than the Developer’s assertion that in Victoria there is “rising demand” for memory care facilities and “growing demand” for assisted care beds. That may be so (although no reports supporting that proposition have been cited), but it doesn’t answer the question of why these proposed variances are warranted. The developer is free to build a memory care facility at 50 Douglas Street, within the zoning parameters that have been established, and if the Developer wishes to build more such units to expand its business, it can purchase another property in Victoria and build an additional facility.

According to an article written in the summer of 2020,¹ Amica Senior Lifestyles plans to “deploy approximately \$2 billion to essentially double the size of the company’s holdings” by 2025. This aggressive growth is to maximize profits for its shareholders. The difference between building and operating a enormous facility and an appropriately sized one may be a slightly smaller return on investment for Amica’s shareholders, but that, of course, is not the city’s concern. It is not the City of Victoria’s role to maximize the Developer’s potential profit on the land at 50 Douglas Street by allowing it to build a massive complex.

The zoning that is in place now is appropriate for the site. There should be no spot zoning granted, and no variances for height, footprint ratio or setbacks. The owner of 50 Douglas Street purchased the property knowing what zoning was in place, and knowing that it was within a heritage area. This Developer should work with what they have. It is a beautiful location with plenty of density for the area.

We also note that the variance / rezoning process should not encourage developers to ask for the stars in the hopes of landing on the moon; or in this case, asking for eight stories, reduced setbacks and a massive footprint in the hopes of getting a variance for something in between. Such proposals should be rejected outright.

In summary, there is no justifiable basis to allow such a huge building to be constructed at this location. This is a proposal from people in Vancouver and Toronto who simply want to maximize the value of their investment at the neighbourhood's expense. Don't let them. Send them back to the drawing board to come up with a proposal appropriate for the site and neighbourhood.

Yours truly,
Sean Hern & Kelly Bohlke

Dear Councillor Alto,

I am writing you today regarding the Amica/Milliken Developments project proposed for 50 Douglas Street (along Niagara and Battery streets). My husband and I moved to the 600-Block of Niagara Street over a decade ago and have laid deep roots in James Bay, where we now raise our young family in our heritage, residential neighbourhood. We have recently become aware that Milliken Developments is proposing to vacate and demolish their current buildings at 50 Douglas, in order to build a single, towering 8-storey "Campus" for premium, private-pay senior's care. I am greatly distressed with this project proposal, as an 8-storey, high-density anything has no reasonable place in the residential, heritage heart of James Bay. For comparison, not even the expansive Capital Park project, closer to the commercial core of James Bay, is above 5-6 stories at maximum height.

The Amica/Milliken Developments project proposal will have a lasting, negative impact to the community. Some of the key concerns and issues with the proposed project for 50 Douglas Street include, but are not limited to:

- The development falls partially within the Battery Street Heritage Conservation Area (HCA-1). The purpose of this historic designation is to "To conserve and enhance the heritage value... of low-scale residential areas." Further, any enhancements must have a high-quality architecture that "responds to its historic setting" ([Official Community Plan Appendix A](#), pgs 261-263). [Standards and Guidelines for the Conservation of Historic Places in Canada](#) are also to be considered, and the developers have shown no understanding of the heritage value.
- [The City of Victoria's 2018-2022 Strategic Plan](#) (pg.11) states "In addition to the strategic objectives and the actions proposed to achieve them, Council and staff have the following operational priorities. These priorities reflect the values of City Hall and of our residents and business community. BULLET 1: "Heritage conservation and heritage designation"".
- Within the HCA-1, the property is currently zoned as Urban-Residential, which allows for low and mid-rise buildings up to 6 stories in *strategic* locations. The property is located on a secondary arterial but it is not identified as a strategic location in the [Official Community Plan](#) (p.38). The developers are proposing an 8-storey building, 37m high. The new building would be more than triple the current buildings' height of 12.2m. For height comparison, the Empress Hotel is "only" 35m in height!
- The [James Bay Neighborhood Plan](#) states that future development should be limited to 3-4 storeys outside of the village center (Map 2). Further, new developments should be encouraged to enhance existing heritage/character with regard to scale, form, quality and materials" (p. 19).
- The developers are proposing to essentially triple the density of the building from 1.2 to 1 (1.2:1) to 3.25 to 1 (3.25:1). Such high density negatively impacts the diversity of this neighbourhood, as well as contributes to the institutional features of the building. Furthermore, this building will have a site coverage of more than 43% of the lot size, whereas current zoning states buildings of this height and density are currently required to cover no more than 20% of the lot it is situated on.
- The developers are also requesting variance to significantly reduce property setbacks, further contributing to the imposing presence of the institutional structure. As poignantly articulated in

recent research about the impacts of urban development by a cognitive neuroscientist and UVic alumni, Robin Mazumder, PhD Candidate:

“What [was] found was that tall buildings make people uncomfortable when they’re surrounded by them. Conversely, people have less of a stress response when they’re in environments that are built at what’s considered “human scale,” or the European model where buildings tend to top out at five storeys.” (Quoted from Robin Mazumder’s UVic Torch magazine article: <https://www.uvic.ca/news/publications/torch/2021+torch-city-stress+news>)

“We have to be more thoughtful and aware about how the decisions that we make, about the infrastructure that we build, or about the policies that we create, impact well-being.” (Quote from Robin in the 3.5 minute UVic video/interview on Youtube: <https://www.youtube.com/watch?v=-hXqXjrTwzs&t=197s>)

- MEE-qan (or colonially named Beacon Hill) stands at an elevation of 8m. According to the proposed plans, the new AMICA building will be ~29m higher than the crest of MEE-qan. As possibly the closest building to the historical Lekwungen site, such an imposing structure, which caters to wealthy, predominantly white settlers, on the slopes of an indigenous landmark feels like a step backwards in meaningful indigenous reconciliation.

While I think we can all agree that seniors care is an important consideration for any community, Amica/Milliken Developments will not be addressing the need for *affordable* memory care in our community. Quite the contrary in fact, as Amica’s building proposal is for luxury, private-pay care and is highly motivated by the singular priority of increasing their annual corporate profits and holdings. I am pleading with you, Councillor Alto, to listen to the collective concerns of the citizens of James Bay and, as our elected official, please uphold the objectives of the Official Community Plan, the Heritage Conservation Area (HCA-1), and the James Bay Community Plan. Please request that the developers re-design their project to meet (and not exceed) the parameters of the current reasonable, existing land use guidelines/zoning bylaws and instead build a lower-scale, lower-density smaller building which will enhance and respect the heritage character of our neighbourhood.

Thank you for your consideration and your dedication to listening to the voice of the citizens of this wonderful city.

Regards,
Xela Rysstad
648 Niagara St.
James Bay

Justine Wendland

From: Jim & Susan Johnston <[REDACTED]>
Sent: January 22, 2022 5:25 PM
To: Jim & Susan Johnston
Subject: Comments on the Proposed Amica Development at 50 Douglas Street, James Bay

Dear Mayor, Councillors and Council Staff,

In your careful review of this redevelopment proposal please take our following concerns and comments into account.

Introduction and Context.

We live at 619 Niagara in a 1907 heritage dwelling that we have lovingly restored. We have been enthusiastic residents in this very friendly James Bay neighbourhood for twenty six years and are appreciative and staunch defenders of its walkable, heritage and largely low-rise character. We continue to enjoy our interactions with our immediate neighbours including passing residents of Amica House at 50 Douglas Street who sometimes stop for a rest and a chat.

We strongly support the James Bay Neighbourhood Plan and the local efforts to ensure that a number of high and medium rise, “blots on the landscape” of the 1950’s, 60’s and 80’s are not repeated. Along with a large number of other local residents, we were heavily involved in the 2004 and 2005 visioning and strategic planning process initiated by the James Bay Neighbourhood Association. We also participated in the protests against the excessive height of the development proposals for 225 Menzies and have warmly welcomed the sympathetic development of Capital Park.

Comments on the Proposed Redevelopment of Amica House at 50 Douglas Street.

With respect to the presentation that the owners of 50 Douglas Street made to the CALUC meeting on 12 January, we understand their need to renovate or redevelop the existing buildings on the site given the age of the buildings, the construction materials, changes in the demand for aged care services, etc.

However, in the above context we vigorously object to a number of aspects of the proposal, specifically concerning its height, density, negation of heritage values and likely road traffic/pedestrian impacts. The owners and/or their architects appear not to have read or understood the Official Community Plan and the James Bay Neighbourhood Plan.

Height:

- The property is currently zoned as Urban Residential, which allows for low and mid-rise buildings up to six stories in *strategic* locations. The property is located on a secondary arterial road but it is not identified as a strategic location in the [Official Community Plan](#) (p.38). **The developers are proposing an 8-storey building, 37m high. The new building would be more than triple the current building’s height of 12.2m.**
- The [James Bay Neighborhood Plan](#) states that future development should be **limited to 3-4 storeys** outside of the village center (Map 2). Further, new developments should be encouraged to enhance existing heritage/character with regard to scale, form, quality and materials” (p. 19).

Density:

- Current zoning and land-use restrict buildings to a floor space ratio of 1.2 to 1 (1.2:1). A floor space ratio of 2:1 can be considered in strategic locations. As we shared above, this is not a strategic location. **The developers are requesting a floor space ratio of 3.25 to 1 (3.25:1), which effectively triples the current density of the buildings.**
- If a 6-storey building was approved, the permitted heights would restrict the building to 20% of the lot size. **The proposed building takes up almost the entire lot.**

Heritage Conservation:

- The development falls partially within the **Battery Street Heritage Conservation Area (HCA-1)**. The purpose of this historic designation is to “To conserve and enhance the heritage value... of low-scale residential areas.” Further, any enhancements must have a high-quality architecture that “responds to its historic setting” ([Official Community Plan Appendix A](#), pp. 261-263, section 4). [Standards and Guidelines for the Conservation of Historic Places in Canada](#) are to be considered.
- The 600 block of Niagara consists largely of single and multi-family dwellings and the vast majority of these are either heritage buildings or mimic their heritage styles. At least ten of the houses are either heritage designated or registered.
- Conservation guidelines note the importance of matching existing densities and providing a transition to lower density uses. **An 8-storey building, adjacent to the low built forms in the HCA, does not provide a sensitive transition.** From this height choice and other aspects revealed in the artist’s impressions, it appears the developers have shown no understanding of, or sensitivity to, the heritage value of Battery Street Heritage Conservation Area or the adjacent heritage buildings in the 600 block of Niagara.

Traffic and Interactions with Pedestrians.

- The plans presented on January 12 provides for 100 parking spaces on two basement levels. Vehicles will enter and exit through one ramp to Niagara Street on the north-west corner of the building roughly 100 metres from the corner with Douglas Street. Those presenting noted that the spaces would be largely utilised by staff as well as active clients in independent living units. (They also said they anticipate not all spaces will necessarily be utilised. Our expectation is that if there were initially unutilised parking spaces, management would find it financially attractive to rent out such spaces and ensure that spaces are used).
- (The presenters also said they would be submitting to Victoria City a copy of their independent transport consultant’s report on the expected impacts of the proposal and invited comment on it. However we have not yet been able to find and study the report prior to filing these comments).
- It is laudable that off street parking is being provided. **However we are concerned that the potentially large number of vehicles exiting/entering onto Niagara Street will significantly increase traffic congestion on Niagara at the Douglas Street T intersection** and in diverted traffic to adjacent St Andrews, Beacon and Simcoe Streets onto Douglas. **This may result in the need for traffic lights at this Niagara-Douglas junction which would detract from the adjacent natural area of Beacon Hill Park and Mile Zero Park.**
- The large number of these entering and exiting vehicles may also deter residents on their walkers from exercising along Niagara Street as they currently do.
- A substantial reduction in the number of floors in the building and planned parking spaces would significantly reduce the risk of this anticipated problem.

Your sincerely

Jim and Susan Johnston

619 Niagara Street

Justine Wendland

From: [REDACTED]
Sent: January 22, 2022 12:51 PM
To: Development Services email inquiries
Subject: *Important* CLC00369 50 Douglas St Redevelopment
Attachments: Letter to Development Svcs CLC00369 50 Douglas St.pdf

Hello,

Re: Milliken Redevelopment at 50 Douglas Street CLC00369

We are the current owners of Ashcroft House Bed & Breakfast at 670 Battery Street.

To give you some perspective of our location, we have the Milliken owned heritage house at 674 Battery Street directly beside us to the east, and the Amica building all along the back of our property to the north. In this neighbourhood, we are the closest property to the potential Milliken redevelopment.

We are **firmly against** the Milliken plans, as presented to us on the January 12, 2022 zoom call with Milliken, JBNA and the neighbourhood. Our reasoning comes from two perspectives: one as the property owners of 670 Battery Street and the other as small business owners of Ashcroft House Bed & Breakfast.

As property owners, our objections are fact-based:

- **Size and density of the building goes against OCP and JBNP:**
 - The 8 story (37m) proposed building goes against the urban residential zoning which allows low/mid-rise buildings to 6 stories in strategic locations. Amica is on a secondary arterial route but it not identified as a strategic location according to the *Official Community Plan* (P.38). Therefore, even 6 stories is too much.
 - If a 6 story building was approved, the height would restrict the building to 20% of the lot size. As it is currently proposed at 8 stories, the building takes up almost the entire lot.
 - The floor space ratio proposed is too much at 3.25:1. The current zoning and land-use say floor space ratio should be 1.2:1. A greater floor space ratio of 2:1 can be possible in strategic locations but this is not a strategic location.
 - According to the *James Bay Neighbourhood Plan*, future development should be limited to 3-4 stories outside the village centre (map 2).
- **Heritage Conservation is not being adhered to:**
 - The *James Bay Neighbourhood Plan* encourages development to “**enhance existing heritage/character with regards to scale, form, quality and materials**” (P.19). This proposed building in no way enhances the neighbourhood. It is way too large, it towers over everything and does not blend into the neighbourhood. The materials and design are not visually in keeping with the architecture, style, design, heritage-look or historical feel of this very special neighbourhood.
 - We have the *Battery Street Heritage Conservation Area 1* in this neighbourhood. This historic designation has a purpose: “To conserve and enhance the heritage value...of low scale residential areas”. Enhancements must have a high quality of architecture that “responds to its historic setting” (Official Plan Appendix A, Section 4). Again, this redevelopment in no way enhances the heritage nature of this area. In fact, it is an affront to the history of the neighbourhood. The massive size and modern design of the proposed building disrespects the history and heritage so loved by this community.
 - Conservation guidelines mention the importance of matching existing densities and providing a transition to lower density uses. A new building of the proposed 8 stories next to low buildings in the heritage conservation area would not have a sensitive transition.

As small business owners:

- **We are worried about the sustainability of our business.** We have a lovely, 124 year old, heritage designated house which has been providing forms of guest accommodations since the mid 1900s. Guests choose to stay at Ashcroft House for the heritage style, the history, the architecture of our building but also for those features in our neighbourhood. Our business has already suffered because of COVID, but the negative long term impact of the proposed building could cause us to close our doors permanently.
- Being that Ashcroft House is so close to the proposed 8 story monster building, it would dominate over us, it would dwarf us. It would tower over us and everything in our neighbourhood. It would destroy the character, charm, ambience, heritage and historic feeling of the neighbourhood. It would be a giant eyesore, standing out as something that doesn't fit in, which would have a negative impact on our ability to stay in business.

This proposed building does not belong in this neighbourhood because it goes against the Official Community Plan, the James Bay Neighbourhood Plan, and the Battery Street Heritage Conservation Area guidelines.

Thank you for taking the time to read our letter. Please feel free to contact us if you want to discuss anything.

Kind regards,

Shannon and Jonas Stahr

Ashcroft House Bed & Breakfast

██████████

████████████████████

January 21, 2022
Development Services
Victoria, BC

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Re: Milliken Redevelopment at 50 Douglas Street CLC00369

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As property owners, our objections are:

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 - The 8 story (37m) proposed building goes against the urban residential zoning which allows low/mid rise buildings to 6 stories in strategic locations. Amica is on a secondary arterial route but it not identified as a strategic location according to the *Official Community Plan* (P.38). Therefore, even 6 stories is too much.
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670 Battery Street Victoria, BC V8V 1E5
Office: (250) 385-4632 Toll-free: 1-866-385-4632
www.ashcrofthouse.com

The materials and design are not visually in keeping with the architecture, style, design, heritage look or historical feel of this very special neighbourhood.

- We have the *Battery Street Heritage Conservation Area 1* in this neighbourhood. This historic designation has a purpose: “To conserve and enhance the heritage value...of low scale residential areas”. Enhancements must have a high quality of architecture that “responds to its historic setting” (Official Plan Appendix A, Section 4). Again, this redevelopment in no way enhances the heritage nature of this area. In fact, it is an affront to the history of the neighbourhood. The massive size and modern design of the proposed building disrespects the history and heritage so loved by this community.
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Kind regards,

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Ashcroft House Bed & Breakfast 604 830 5550 info@ashcrofthouse.com



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I am conveying to you my opposition to the proposal by AMICA Douglas for extensive redevelopment.

I am intensely opposed. I live 2 blocks away in the surrounding neighbourhood that has remained livable for traditional families and has rarely exceeded a 4 story limit for building. We do not want project to heighten Amica to 8 stories. Amica should find an existing building elsewhere to redevelop (or even build anew) for this need of space for serving the mentally infirm.

Our local neighbourhood does not want to undergo the proposed blasting of a very deep basement. Not only would the terrible noise abuse; the reverberations could risk our own foundations of structures.

Further, this proposal defies key elements of the 'James Bay Neighbourhood Plan '. The proposed height far exceeds 3 to 4 stories. Moreover I am heated about this disregard, which I say is so demeaning for our traditional, gently livable, family residential area.

And..our area has accommodated a well-used locale for tourists, walkers, bikes, busses and casual drivers. This plan would see what has proved workable and a blessing to Victoria greatly diminished. The proposal would definitely set back many persons' recreation opportunities as well as further schmozz traffic density i.e. the post pandemic return of tour busses to visit the revered memorial end of Douglas and also the ever increasing use of Dallas Road.

Finally this hurts me: the proposal overturns the 'heritage' situation, long in place and long respected, which should be highly honoured--not given the boot! Such ill regard should not be shown to century of local history.

Thank you for listening. I pray for your wise assessment.

Emily Huston

Hello,

Thanks for the opportunity to express my opposition to the project by Milliken Developments.

This proposed building contravenes every planning policy currently in place for this area.

The effect on this surrounding neighbourhood are detrimental:

A building rising four stories higher and more than double the height of existing buildings will block out significant sunlight from the surrounding homes and low scale apartment buildings.

The environmental impact will affect surrounding mature trees and the wild life at Beacon Hill park. If blasting is necessary to build the 100 car underground parking; this will magnify the environmental impact.

The construction period impact will be significant due to noise and traffic.

Having worked in the Island Health planning department for six years; my opinion is that the type of memory care offered at the proposed facility does not meet the needs of this community. The high end type of seniors care proposed will attract clients from out of province and beyond.

Helga Avila

609 Battery Street Victoria

Notice: as a resident in the neighborhood paying high property taxes We soundly reject the proposed development. It is a money grab, pure and simple.

The disruption to the well being, harmony and peace of the neighborhood would be too disturbing and disruptive...

pLEASE don't allow it. Judith and jean Pierre Schachter

Dear Mayor, Councillors and Council Staff,

In your careful review of this redevelopment proposal please take our following concerns and comments into account.

Introduction and Context.

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- The large number of these entering and exiting vehicles may also deter residents on their walkers from exercising along Niagara Street as they currently do.
- A substantial reduction in the number of floors in the building and planned parking spaces would significantly reduce the risk of this anticipated problem.

Your sincerely

Jim and Susan Johnston

619 Niagara Street

Dear Mayor Helps and Council,

I understand that our Victoria Mayor and Members of Council welcome citizen input. I stay hopeful this is true.

I have owned my 1907 house at 120 St. Andrews Street for 50 years (including becoming married, raising children and now retirement) and have felt blessed to live in such a beautiful city and especially in James Bay. I have been grateful to the work of the JBNA, CALUS and to the City for the development of an Official Community plan and Heritage Conservation Areas (HCA). This has allowed James Bay to continue as a heritage character neighbourhood rather than being a mass of high rises. I am not opposed to change and welcome the development on Menzies, Michigan and Superior which houses the library, grocery store, offices and residential condos etc. This complex was built compatible with the neighbourhood character. I also welcome the proposed rezoning at 580-582 Niagara St.

This is not true of the proposal at 50 Douglas . It is massive, overwhelming and an example of a large Ontario based company joined with MD wanting to over build to maximize their profits at the expense of a beautiful neighbourhood. Four stories maximum, Yes. Anything over is contrary to the neighbourhood plan. This is so obvious that I am astounded we are even discussing this For Profit senior care "campus". I sincerely hope that our Mayor and every council member votes No!

Milliken Developments building a Memory Care facility on a parking lot near Richmond and Fort , requiring only the removal of the medical building and within the allowed five story height is one thing. However a 8 story campus with penthouse views of the Park, Ocean and City for the wealthy is totally unacceptable!

Thank you.

Joan Tuttle.

To Mayor Helps and Council,

I'm very concerned about and opposed to the proposed massive 8 story development by Amica Seniors Living, at 50 Douglas Street. I think that the size of that development is incongruent and disruptive to our James Bay neighborhood. The amount of disruption caused by the construction, over a few years, would be huge. Also, I'm a close neighbor to that address and am very sensitive to and concerned about noise pollution and light pollution. I've already petitioned all of my neighbors, to turn out their backyard lights at night, so that we can see the stars. That is also an issue that I think 'council' should generally address, in our city.

I ask that this proposal be opposed, as I feel that it would be executed at the expense to the livability of our James Bay neighborhood.

Thank you for hearing, considering, and responding to my concerns.

Lisa Tyler

A James Bay Resident and tax payer

I am very much opposed to the expansion of the private care industry, which demonstrated its indifference to client welfare and commitment to profit during covid. All studies also confirm that caregiving is best done in smaller sites with a unionized workforce, if it cannot be obtained at home. Please prohibit this development.

Veronica Strong-Boag, CM, Ph.d., FRSC
Historian and Historical Consultant
Professor Emerita
Institute for Gender, Race, Sexuality and Social Justice/Educational Studies
University of British Columbia
Vancouver, Canada V6T 1Z2
Adjunct Professor, Departments of History and Gender Studies,
University of Victoria
Victoria, Canada V8W 2Y2

Justine Wendland

From: Derek Peach [REDACTED]
Sent: January 23, 2022 3:02 PM
To: [REDACTED] Development Services email inquiries; Victoria Mayor and Council; Jeremy Loveday (Councillor); Lisa Helps (Mayor); Marianne Alto (Councillor); Stephen Andrew (Councillor); Sharmarke Dubow (Councillor); Ben Isitt (Councillor); Sarah Potts (Councillor); Charlayne Thornton-Joe (Councillor); Geoff Young (Councillor)
Cc: X Rysstad
Subject: AmicaProposal @ 50 Douglas St

re: proposed Amica development at 50 Douglas St. Victoria I am a resident of this neighbourhood, at 151 St Andrews St and I am opposed to council's granting a development permit to the applicant.

This would be an unnecessary project with a negative impact on traffic flow, pedestrian movement and especially neighbourhood aesthetic.

Other objections have been put forward by more informed individuals and groups noting the inadequacy or misrepresentation of dimensions in artist's renderings, the need for adherence to official development plans for Victoria and James Bay Neighbourhood in particular and questioning the need for situating such a large commercial structure in a primarily residential area. I protest the development on purely aesthetic grounds. I don't want any more large buildings (tall or wide) in the neighbourhood. Regardless of design or landscaping, they are offensive in that they block views, shade gardens, detract from heritage properties and are out of place so near our park and waterfront walkways.

Respectfully

Derek Peach,

Even though I do not live in this area I strongly support this development. Density is good! SFD, not so. I live in a sfd in VicWest. I am encouraged when I see dense redevelopment of single family lots.

Regards,

Barton Bourassa
Victoria West, Pine Street.

re: proposed Amica development at 50 Douglas St. Victoria

I am a resident of this neighbourhood, at 151 St Andrews St and I am opposed to council's granting a development permit to the applicant.

This would be an unnecessary project with a negative impact on traffic flow, pedestrian movement and especially neighbourhood aesthetic.

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Regardless of design or landscaping, they are offensive in that they block views, shade gardens, detract from heritage properties and are out of place so near our park and waterfront walkways.

Respectfully
Derek Peach,

Dear Mayor and Council,

Eight stories is simply too high for the location of this development.

As you all know, James Bay is a unique and wonderful neighbourhood (I don't live there but I appreciate it) and Dallas Road is loved - and used - by so many. A development of this size signals the beginning of changes that will take away too many precious Victoria assets.

Trusting that you will turn this development down, or direct Amica to find ways to stay in keeping with the neighbourhood.

Thank-you

Maria Wenth

[REDACTED]

From: Barb Wilson <[REDACTED]>
Sent: January 24, 2022 2:24 PM
To: Lisa Helps (Mayor); Marianne Alto (Councillor); Stephen Andrew (Councillor); Sharmarke Dubow (Councillor); Ben Isitt (Councillor); jlovday@victoria.ca; Sarah Potts (Councillor); cthorton-joe@victoria.ca; Geoff Young (Councillor); timothyvanalstine@gmail.com;
Subject: Development Services email inquiries
Re: Proposed redevelopment of Amica on Douglas at 50 Douglas Street.

Greetings to all recipients of this email,

Re: Proposed redevelopment of Amica on Douglas at 50 Douglas Street.

The proposed reconstruction of Amica on Douglas is objectionable on many levels. In opposition to the current proposal I make the following points.

The current Amica building is situated in a sensitive Heritage area that is of paramount importance to our tourist industry. This Mile Zero locale is visited and viewed on a daily basis by tourists and visitors to our city who are walking or riding in horse drawn carriages, tour buses and pedicabs. Battery Street is a well loved street and, even during the covid crises, has had many visitors strolling the street and taking photos of the many heritage houses, gardens and buildings such as Beacon Lodge (1946) at 30 Douglas Street and Ashcroft House (1898) at 670 Battery Street.

The current Amica building is loved by many as a beautiful and welcoming home for our elders in the last years of their life. They have neighborhood friendly walking access to the park and seaside as well as being able to enjoy the incredible views from many of the suites. These valuable elders have chosen to spend their hard earned retirement dollars and last years living in close proximity to the park and ocean. As many of these residents are still independent or require only light assisted living, they can get out and enjoy this beautiful neighborhood and be greeted on the streets by neighbors that truly care that they are here. The love of the glass windowed suites of the current Amica building along Douglas Street are a testament to our love for graceful retirement living in this remarkable district of Victoria and James Bay.

The proposed purpose of the new build is essentially a hospital for memory compromised guests in which locked wards are a common reality. No doubt there is a need for this type of facility due to our aging population but the location of such a facility should not be in an area that is so valuable to elders that can still enjoy independent or lightly assisted living. This amazing heritage area of James Bay should continue to be host to elders that are able to be part of the neighborhood and enjoy the full beauty of the park, ocean and streets. In addition to being very walkable there is the benefit of readily available public transportation that the well used bus routes along Niagara Street provide.

The skyline of this area of James Bay from the water, streets and avenues, and Beacon Hill Park has maintained a low profile. It lends itself to solid heritage preservation in Victoria that has not, to date, been disrupted or violated by high rise structures. The very fabric of this James Bay Heritage neighborhood stands to be ripped apart with the construction of any building higher than the four stories as stated in the community plan.

There are many things that I am sure you have heard numerous times by now about the current proposal as far as building size - height and area, density, street access, parking, falsely depicted street width drawings etc. All of these objections are valid and certainly must be considered when looking at this proposal. My hopes and prayers are for a council decision that also takes into account the human value in this situation.

With full respect,

Barbara Wilson
30 Douglas Street

[REDACTED]

From: Joan Ryan [REDACTED]
Sent: January 24, 2022 1:46 PM
Subject: 50 Douglas St Redevelopment Proposal Opposition

My name is Joan Ryan, and I have lived for most of my 71 years at 651 Battery St., the designated heritage house which the Ryan family built in 1912/13. We are located within 200 metres of 50 Douglas St.

This proposed redevelopment and expansion needs to transition and fit into this charming, low key, low scale, peaceful and friendly Heritage Conservation Area. The present houses and the apartments and condos adjacent to them, including Amica Douglas House, respect the 3 to 4 story urban residential zoned character of the neighbourhood.

Similarly, the proposed redevelopment and expansion would need to take into account and transition naturally into the much loved and frequented Beacon Hill Park, and the Dallas Road waterfront which begins only one block away, and is frequented by tourists and locals alike.

But the proposed 8 story complex would loom over both the park and Beacon Hill itself, and take away any feeling of being part of nature and separated from the intrusive gaze of high rises and their many overlooking windows.

This part of James Bay, which is not a Strategic Location, is planned for lower heights of 2 and 3 stories. A 3 story or even 4 story building with setbacks and landscaping is now allowed and accepted within the neighbourhood. But a 6 story building would only be permitted in a Strategic Location.

I would support the redevelopment of 50 Douglas St if it kept its setbacks, didn't block out any more light, and remained sympathetic to the neighbourhood and stayed at 4 stories.

Anything higher than that would also be detrimental to public transit because of the increase in traffic.

Thank you for reviewing my concerns,

Joan M Ryan

Justine Wendland

From: P H <[REDACTED]>
Sent: January 24, 2022 7:11 PM
Subject: Objection to the Milliken/AMICA expansion in James Bay

I would like to add my objections to the development plan of the Milliken/AMICA project in James Bay.

Thank you.

P Hollister

Justine Wendland

From: Rashmi Patel [REDACTED]
Sent: January 24, 2022 1:39 PM
To: Development Services email inquiries
Subject: Amica development - 50 Douglas St – Concerns

Hello

I am writing to you today with great concern about the proposed 50 Douglas St ([Amica/Milliken](#)) development application. The scope of the project does not fall into the community plan and zoning laws. I'm unclear as to why the developers have even proposed such a large-scale development knowing the current plan does not fall into the rules and laws set for the James Bay community. The size and traffic that this project will bring will greatly disrupt the community surrounding it. Let me be clear, I'm not against re-development, but such projects should meet the parameters of the community plans, otherwise this will open the door to additional projects of this size in James Bay, which will quickly lose its character and charm. It's especially upsetting as friends and neighbours have already expressed their desire to move if the project as currently proposed is allowed to be built. These are people who welcomed me and supported me when I moved to James Bay from Ontario 6 years ago. I'm fearful of the change this project will bring. Below are some facts for your consideration:

My concerns about the development height:

- The property is not identified as a strategic location in the Official Community Plan (p.38) and is currently zoned as urban residential. This designation allows for low and mid-rise buildings up to 6 stories in strategic locations this proposal is for an 8 storey building, 37m high .
- The James Bay Neighborhood Plan states that future development should be encouraged to enhance existing heritage/character with regard to scale, form, quality and materials" (p. 19) and should be limited to 3-4 storeys outside of the village center (Map 2).

My concerns about the development density:

- The developers are requesting a floor space ratio of 3.25 to 1 which is far beyond the current zoning and land-use restrict buildings to a floor space ratio of 1.2 to 1.
- In the unlikely scenario that this location was identified as a strategic location (as per bullet one above) and a 6 storey building was approved, the proposed footprint which takes up almost the entire lot is far beyond the 20% of the lot size which is approved. . The proposed building takes up almost the entire lot which is significantly more than the 20% of the lot size approved in the community plan.[\[R1\]](#)
- The scope of this project also raises concerns regarding parking and traffic on arterial streets not equipped to manage the additional load.

Heritage Conservation:

- This development overlaps partially with the Battery Street Heritage Conservation Area 1. This historic designation's purpose is "To conserve and enhance the heritage value... of low-scale residential areas." Further, any enhancements must have a high quality architecture that "responds to its historic setting" (Official Plan Appendix A, Section 4).
- Conservation guidelines require development to match existing densities and providing a transition to lower density uses. An eight storey building, adjacent to the low built forms in the Battery Street HCA, simply does not.

Thank you for your time. I appreciate you.

Rashmi Patel
660 Battery Street

Justine Wendland

From: Susan Aylard <[REDACTED]>
Sent: January 24, 2022 9:23 PM
To: Development Services email inquiries
Subject: Amica Douglas House at 50 Douglas St

Re: Amica proposal to rebuild Amica Douglas House at 50 Douglas Street, 675/685 Niagara Street, and 674/676/678 Battery Street

I live at 660 Battery Street and am writing in **opposition** to the proposed redevelopment by Amica Senior Lifestyles of their Amica Douglas House facility. The eight storey building proposed by Amica and their development partners (Miliken Real Estate Corporation) is a massive expansion of their existing building that currently occupies the property.

The property is zoned as urban residential (R3-2), which allows for low and mid-rise buildings up to a maximum of six storeys. Their proposed **eight storey building (37 metres in height)** is substantially taller than what is allowed for that site. The James Bay Neighbourhood Development Plan (JBNDP) states that future development should be limited to three or four storeys except within the commercial village area to maintain the character of the neighbourhood and enhance the existing heritage buildings. The developers plan for **45% coverage of the property** more than doubles the current maximum (20%) allowed by this residential zoning. Additionally, the floor space ratio will be almost **tripled from the currently allowable 1.2:1 to 3.25:1** (note: a ratio of 2:1 is allowed in strategic locations, but this property is not designated as such).

The development lies partially within the Battery Street Heritage Conservation Area 1, a historic designation the purpose of which is to “conserve and enhance the heritage value...of low scale residential areas.” Neither the architecture nor the size of the proposed building fits the existing character of the neighbourhood and it will loom over the heritage houses on Niagara and Battery Streets. **Section 2 of the JBNDP states that any development in the area “should be encouraged to enhance existing heritage/character with regard to scale, form, quality and materials.”** The proposed 8 storey building covering 45% of the property will in no way blend into nor enhance the character of the neighbourhood. This is clearly illustrated by the architect’s drawings which show both the proposed building and the existing heritage house that is part of the Amica Douglas complex. Existing conservation guidelines stress the importance of new developments matching the existing density of an area and providing a transition to lower density uses – this development makes no attempt to do either.

The Amica Development House redevelopment proposal ignores and disregards many of the objectives, guidelines and recommendations stated in the James Bay Neighbourhood Development Plan and the City of Victoria’s Official Community Plan for the neighbourhood. This proposal is unsupportable and should **not** be approved.

Yours respectfully,

Susan Aylard

[REDACTED]

From: Sharlene R [REDACTED]
Sent: January 24, 2022 9:54 PM
To: Development Services email inquiries
Subject: Proposed development at 50 Douglas Street

As a resident of the city of Victoria I am writing to you with concerns regarding the proposed Amica Development at 50 Douglas Street, 675/685 Niagara Street and 674/676/678 Battery Street:

The first concern is regarding the building height. The proposed eight story building is situated on an elevated part of Douglas Street effectively dominating the landscape from every side. The side of the building facing Douglas Street is just that the side of a large building - quite commercial in appearance in my opinion. I feel it will negatively impact the quaint feel of the residential neighbourhood and be imposing and unattractive as a view from the park. I believe eight stories from this location will even disrupt the views to the west from Beacon Hill!

My second major concern is that the proposed building entrance and underground parking entrance and exits are on Niagara Street. This block of Niagara is already very congested with bus traffic and residential parking. I often use bus transportation and it is usual that buses must stop to let another bus pass on this block, the idea of adding more traffic congestion with this size of a development sounds like a traffic nightmare.

Please consider what the impact of this size of a development in this particular location will have on the neighbouring residents and the overall ambiance of Victoria and Beacon Hill Park.

It's too large.

It does not fit in with the community.

Sincere regards
Sharlene Rysstad

Sent from my iPhone

Greetings to all recipients of this email,

Re: Proposed redevelopment of Amica on Douglas at 50 Douglas Street.

The proposed reconstruction of Amica on Douglas is objectionable on many levels. In opposition to the current proposal I make the following points.

The current Amica building is situated in a sensitive Heritage area that is of paramount importance to our tourist industry. This Mile Zero locale is visited and viewed on a daily basis by tourists and visitors to our city who are walking or riding in horse drawn carriages, tour buses and pedicabs. Battery Street is a well loved street and, even during the covid crises, has had many visitors strolling the street and taking photos of the many heritage houses, gardens and buildings such as Beacon Lodge (1946) at 30 Douglas Street and Ashcroft House (1898) at 670 Battery Street.

The current Amica building is loved by many as a beautiful and welcoming home for our elders in the last years of their life. They have neighborhood friendly walking access to the park and seaside as well as being able to enjoy the incredible views from many of the suites. These valuable elders have chosen to spend their hard earned retirement dollars and last years living in close proximity to the park and ocean. As many of these residents are still independent or require only light assisted living, they can get out and enjoy this beautiful neighborhood and be greeted on the streets by neighbors that truly care that they are here. The love of the glass windowed suites of the current Amica building along Douglas Street are a testament to our love for graceful retirement living in this remarkable district of Victoria and James Bay.

The proposed purpose of the new build is essentially a hospital for memory compromised guests in which locked wards are a common reality. No doubt there is a need for this type of facility due to our aging population but the location of such a facility should not be in an area that is so valuable to elders that can still enjoy independent or lightly assisted living. This amazing heritage area of James Bay should continue to be host to elders that are able to be part of the neighborhood and enjoy the full beauty of the park, ocean and streets. In addition to being very walkable there is the benefit of readily available public transportation that the well used bus routes along Niagara Street provide.

The skyline of this area of James Bay from the water, streets and avenues, and Beacon Hill Park has maintained a low profile. It lends itself to solid heritage preservation in Victoria that has not, to date, been disrupted or violated by high rise structures. The very fabric of this James Bay Heritage neighborhood stands to be ripped apart with the construction of any building higher than the four stories as stated in the community plan.

There are many things that I am sure you have heard numerous times by now about the current proposal as far as building size - height and area, density, street access, parking, falsely depicted street width drawings etc. All of these objections are valid and certainly must be considered when looking at this proposal. My hopes and prayers are for a council decision that also takes into account the human value in this situation.

With full respect,

Barbara Wilson
30 Douglas Street

IS A NO GO!!! WHEN ARE YOU PEOPLE GOING TO WAKE UP TO CLIMATE CHANGE AND REALIZE YOU ARE
SIMPLY ADDING TO THE DEMISE OF THIS PLANET!! WAKE UP.

Jan Yoder

In light of all the information presented regarding the proposed Amica takeover of the Douglas House located at 50 Douglas Street to teardown and rebuild a monstrous 8-9 story facility; I respectfully submit my veto to this project.

This proposed facility will neither enhance or benefit the neighbourhood.

As the daughter of an owner of a unit located at 660 Battery Street, I can only see her being forever in the shadow of this monstrous facility.

I urge the Mayor to be guided by the health and well-being of the residents of James Bay and not by the pocketbook.

Regards,

Michelle Doucette
220 Winona Ave
Oshawa, ON L1G3H5

I would like to add my objections to the development plan of the Milliken/AMICA project in James Bay.

Thank you.

P Hollister

I live in a 4 story rental bldg at the corner of Niagara & Douglas, opposite the Amica building. The buildings on Niagara Street are all 4 stories or less, most of them Victorian style homes.

The 8 story building Milliken is proposing will: (a) absolutely block all the natural sunlight from that side of my apartment, and our building; and (b) block my view of the sky & the sunsets which is important to my mental health; and (c) be an absolute contrast to the heritage culture of this neighbourhood, especially in this particular location.

They have also designed their entrance on Niagara Street, which is a narrow street, already filled with city buses travelling in two directions, a bus stop, parked cars, tourist horse drawn carriages and local traffic. We already have to stop our cars to allow buses to get through.

The current Amica entrance is on Douglas Street, which is far more suitable for traffic coming and going all day, which currently includes relatively frequent ambulances, firetrucks, visitors picking up seniors & dropping them off, small tourist buses to transport the seniors and food delivery trucks. We have traffic problems already at this corner of Niagara Street, without adding traffic for a huge seniors' residence.

Their project design has a 6 story brick wall on Douglas Street which is going to look like a prison and destroy the ambiance of the neighbourhood.

I am concerned about the loud & disturbing noise of air conditioning and heating units which have been causing a problem for a neighbourhood up on Quadra Street where another seniors' residence was built.

I am concerned for the seniors themselves who will be taken from their current homes and separated from their own community in the current building. Will equivalent and suitable homes be found for them?

This development is aimed at very wealthy senior people who can afford what will be very high monthly fees & provide wealth for Milliken & Amica.

Where are the plans to accommodate the middle class of seniors who cannot even imagine being able to stay in such a residence?

Pat Nichols
110 Douglas Street, Apt. # 401
James Bay

Hello Mayor and Council

I am writing to you today with great concern about the proposed 50 Douglas St ([Amica/Milliken](#)) development application. The scope of the project does not fall into the community plan and zoning laws. I'm unclear as to why the developers have even proposed such a large-scale development knowing the current plan does not fall into the rules and laws set for the James Bay community. The size and traffic that this project will bring will greatly disrupt the community surrounding it. Let me be clear, I'm not against re-development, but such projects should meet the parameters of the community plans, otherwise this will open the door to additional projects of this size in James Bay, which will quickly lose its character and charm. It's especially upsetting as friends and neighbours have already expressed their desire to move if the project as currently proposed is allowed to be built. These are people who welcomed me and supported me when I moved to James Bay from Ontario 6 years ago. I'm fearful of the change this project will bring. I am attaching some photos that show the height of the new project in relation to the surrounding buildings. The yellow balloons are at the approximate height of the proposed new building. Below are some facts for your consideration:

My concerns about the development height:

- The property is not identified as a strategic location in the Official Community Plan (p.38) and is currently zoned as urban residential. This designation allows for low and mid-rise buildings up to 6 stories in strategic locations this proposal is for an 8 storey building, 37m high .
- The James Bay Neighborhood Plan states that future development should be encouraged to enhance existing heritage/character with regard to scale, form, quality and materials” (p. 19) and should be limited to 3-4 storeys outside of the village center (Map 2).

My concerns about the development density:

- The developers are requesting a floor space ratio of 3.25 to 1 which is far beyond the current zoning and land-use restrict buildings to a floor space ratio of 1.2 to 1.
- In the unlikely scenario that this location was identified as a strategic location (as per bullet one above) and a 6 storey building was approved, the proposed footprint which takes up almost the entire lot is far beyond the 20% of the lot size which is approved. . The proposed building takes up almost the entire lot which is significantly more than the 20% of the lot size approved in the community plan.[\[R1\]](#)
- The scope of this project also raises concerns regarding parking and traffic on arterial streets not equipped to manage the additional load.

Heritage Conservation:

- This development overlaps partially with the Battery Street Heritage Conservation Area 1. This historic designation's purpose is “To conserve and enhance the heritage value... of low-scale residential areas.” Further, any enhancements must have a high quality architecture that “responds to its historic setting” (Official Plan Appendix A, Section 4).
- Conservation guidelines require development to match existing densities and providing a transition to lower density uses. An eight storey building, adjacent to the low built forms in the Battery Street HCA, simply does not.

Thank you for your time. I appreciate you.

Rashmi Patel
660 Battery Street

Hello to all,

Re: Milliken Redevelopment at 50 Douglas Street

We are the current owners of Ashcroft House Bed & Breakfast at 670 Battery Street. To give you some perspective, we are located directly beside the proposed redevelopment.

We have the Milliken owned heritage house at 674 Battery Street directly beside us to the east, and the Amica building all along the back of our property to the north. In this neighbourhood, we are the closest property to the potential Milliken redevelopment.

We are firmly against the Milliken plans, as presented to us on the January 12, 2022 zoom call with Milliken, JBNA and the neighbourhood. Our reasoning comes from two perspectives: one as the property owners of 670 Battery Street and the other as small business owners of Ashcroft House Bed & Breakfast.

As property owners, our objections are fact-based:

- **Size and density of the building goes against OCP and JBNP:**
 - The 8 story (37m) proposed building goes against the urban residential zoning which allows low/mid-rise buildings to 6 stories in strategic locations. Amica is on a secondary arterial route but it not identified as a strategic location according to the *Official Community Plan* (P.38). Therefore, even 6 stories is too much.
 - If a 6 story building was approved, the height would restrict the building to 20% of the lot size. As it is currently proposed at 8 stories, the building takes up almost the entire lot.
 - The floor space ratio proposed is too much at 3.25:1. The current zoning and land-use say floor space ratio should be 1.2:1. A greater floor space ratio of 2:1 can be possible in strategic locations but this is not a strategic location.
 - According to the *James Bay Neighbourhood Plan*, future development should be limited to 3-4 stories outside the village centre (map 2).
- **Heritage Conservation is not being adhered to:**
 - The *James Bay Neighbourhood Plan* encourages development to **"enhance existing heritage/character with regards to scale, form, quality and materials"** (P.19). This proposed building in no way enhances the neighbourhood. It is way too large, it towers over everything and does not blend into the neighbourhood. The materials and design are not visually in keeping with the architecture, style, design, heritage-look or historical feel of this very special neighbourhood.
 - We have the *Battery Street Heritage Conservation Area 1* in this neighbourhood. This historic designation has a purpose: "To conserve and enhance the heritage value...of low scale residential areas". Enhancements must have a high quality of architecture that "responds to its historic setting" (Official Plan Appendix A, Section 4). Again, this redevelopment in no way enhances the heritage nature of this area. In fact, it is an affront to the history of the neighbourhood. The massive size and modern design of the proposed building disrespects the history and heritage so loved by this community.
 - Conservation guidelines mention the importance of matching existing densities and providing a transition to lower density uses. A new building of

the proposed 8 stories next to low buildings in the heritage conservation area would not have a sensitive transition.

As small business owners, our concerns are immediate and for the long term:

- **We are worried about the sustainability of our business.** We have a lovely, 124 year old, heritage designated house which has been providing forms of guest accommodations since the mid 1900s. Guests choose to stay at Ashcroft House for the heritage style, the history, the architecture of our building but also for those features in our neighbourhood. Our business has already suffered because of COVID, but the negative long term impact of the proposed building could cause us to close our doors permanently.
- Being that Ashcroft House is so close to the proposed 8 story monster building, it would dominate over us, it would dwarf us. It would tower over us and everything in our neighbourhood. It would destroy the character, charm, ambience, heritage and historic feeling of the neighbourhood. It would be a giant eyesore, standing out as something that doesn't fit in, which would have a negative impact on our ability to stay in business.

This proposed building does not belong in this neighbourhood because it goes against the Official Community Plan, the James Bay Neighbourhood Plan, and the Battery Street Heritage Conservation Area guidelines.

Thank you for taking the time to read our letter. We respectfully ask that you support our community in stopping this redevelopment. Please feel free to contact us if you want to discuss anything.

Kind regards,

Shannon and Jonas Stahr

Ashcroft House Bed & Breakfast

Re: Amica proposal to rebuild Amica Douglas House at 50 Douglas Street, 675/685 Niagara Street, and 674/676/678 Battery Street

I live at 660 Battery Street and am writing in **opposition** to the proposed redevelopment by Amica Senior Lifestyles of their Amica Douglas House facility. The eight storey building proposed by Amica and their development partners (Miliken Real Estate Corporation) is a massive expansion of their existing building that currently occupies the property.

The property is zoned as urban residential (R3-2), which allows for low and mid-rise buildings up to a maximum of six storeys. Their proposed **eight storey building (37 metres in height)** is substantially taller than what is allowed for that site. The James Bay Neighbourhood Development Plan (JBNDP) states that future development should be limited to three or four storeys except within the commercial village area to maintain the character of the neighbourhood and enhance the existing heritage buildings. The developers plan for **45% coverage of the property** more than doubles the current maximum (20%) allowed by this residential zoning. Additionally, the floor space ratio will be almost **tripled from the currently allowable 1.2:1 to 3.25:1** (note: a ratio of 2:1 is allowed in strategic locations, but this property is not designated as such).

The development lies partially within the Battery Street Heritage Conservation Area 1, a historic designation the purpose of which is to “conserve and enhance the heritage value...of low scale residential areas.” Neither the architecture nor the size of the proposed building fits the existing character of the neighbourhood and it will loom over the heritage houses on Niagara and Battery Streets. **Section 2 of the JBNDP states that any development in the area “should be encouraged to enhance existing heritage/character with regard to scale, form, quality and materials.”** The proposed 8 storey building covering 45% of the property will in no way blend into nor enhance the character of the neighbourhood. This is clearly illustrated by the architect’s drawings which show both the proposed building and the existing heritage house that is part of the Amica Douglas complex. Existing conservation guidelines stress the importance of new developments matching the existing density of an area and providing a transition to lower density uses – this development makes no attempt to do either.

The Amica Development House redevelopment proposal ignores and disregards many of the objectives, guidelines and recommendations stated in the James Bay Neighbourhood Development Plan and the City of Victoria’s Official Community Plan for the neighbourhood. This proposal is unsupportable and should **not** be approved.

Yours respectfully,

Susan Aylard

As a resident of the city of Victoria I am writing to you with concerns regarding the proposed Amica Development at 50 Douglas Street, 675/685 Niagara Street and 674/676/678 Battery Street:

The first concern is regarding the building height. The proposed eight story building is situated on an elevated part of Douglas Street effectively dominating the landscape from every side. The side of the building facing Douglas Street is just that the side of a large building - quite commercial in appearance in my opinion. I feel it will negatively impact the quaint feel of the residential neighbourhood and be imposing and unattractive as a view from the park. I believe eight stories from this location will even disrupt the views to the west from Beacon Hill!

My second major concern is that the proposed building entrance and underground parking entrance and exits are on Niagara Street. This block of Niagara is already very congested with bus traffic and residential parking. I often use bus transportation and it is usual that buses must stop to let another bus pass on this block, the idea of adding more traffic congestion with this size of a development sounds like a traffic nightmare.

Please consider what the impact of this size of a development in this particular location will have on the neighbouring residents and the overall ambiance of Victoria and Beacon Hill Park.

It's too large.

It does not fit in with the community.

Sincere regards
Sharlene Rysstad

From: Dean Rysstad [REDACTED]
Sent: January 25, 2022 1:45 PM
To: Chelsea Medd
Subject: RE: 50 Douglas-end of CALUC and advice on when rezoning should be approved

Thank you Chelsea for following up with that and getting back to me about the signs. Some people told me excitedly that the application was withdrawn, so it sent a mixed message to the neighbourhood having them removed for a few days.

Now that the community consultation period has ended and I've sent my feedback letter to Development services, I have a number of lingering concerns that I would like your feedback on.

I would support a reasonable development proposal at this location (adjacent to designated heritage houses) that respects the objectives of a Heritage Conservation Zone. It would be great to get your feedback on when you (as a person that may influence the report with recommendations to Council,) would recommend approving a re-zoning application with numerous and significant variances in a historic area.

The concerns in brief are:

- No comparison of applicable land use policies (between existing structures, to current zoning, to the proposal) was presented at the CALUC meeting. This was pointed out after their presentation at the meeting, and they chose not to speak to applicable land use policies when questioned about it. This leaves the onus on each individual in the community to dig up this information themselves. The amount of work required to self-inform ourselves of the issues of the proposal regarding land use, should amplify the informed voices in each letter of opposition sent to the city staff and Council.
- Despite this, by investigating ourselves, we have found the existing buildings on the site to be 12m high, current zoning to allow up to 18.5m, and the proposal is for a 37m tall building, which is a significant variance.
- Same goes for the density/Floor Space Ratio (FSR), zoning is 1.2 or 1.6; the proposal is for 3.3:1, which is a significant variance.
- Setbacks are also a significant variance that have a large impact to the feel of a residential neighbourhood.
- The applicant did not provide shadow drawings for December, or traffic analysis, during the CALUC period, as promised at the CALUC meeting. So residents have not been able to comment on those. However, I can see out my window that my house will be shadowed until 11:30AM in the fall and winter by a structure that is twice as tall as the existing Amica buildings. Alarming, the current proposal is for a structure 3-times taller than the existing buildings.
- The Heritage Conservation Area (HCA-1), which 50 Douglas is located within, was not mentioned by the presenters at the CALUC meeting, nor was justification presented as to why the objectives of the HCA-1 (i.e. low-scale development) were not considered. In fact, the developers defiantly stated during the CALUC meeting something to the effect of, 'I guess Council will have to decide that.' It was far from a collaborative meeting, nor was there any apparent flexibility shown by the developers on their plans.
- Many of the perspective drawings did not include neighbouring houses.
(I've included my much longer letter to Development Services as an attachment with more detail on land use policy findings.)

- Informed consent is an important principle in healthcare, because patients cannot ask the questions that they need to make the best healthcare decisions for themselves if they do not have an understanding of the potential risks involved with each decision. So healthcare providers have an ethical responsibility to educate the patient on the situation so that they may make an informed decision. I think of this principle during this process because the CALUC process feels opposite of that. I have found this CALUC process to be far from an open collaborative process because the information needed to educate the community on the proposal has not been openly shared. As a result, many people in the community do not know the scope or scale of the proposal and how it blows the current zoning and land use policy out of the water with numerous significant variances. I understand that each individual resident is not the decision maker in this scenario, Council is, but we are electors of the Council and we are the ones who are directly impacted by land use proposals such as this one, that will be detrimental to the well-being of the community.

All this emphasizes that each of the voices that have shared their concerns have done so much work to educate themselves in order to make an informed stance and provide substantive feedback on the matter.

I have found this process to be very concerning, because it seems as every step in the process is slanted towards the developer, and the community is fighting an uphill battle to have their valid concerns heard. The developers' approach to the CALUC meeting of presenting minimal information, that tells me that they know they do not need to provide very much information to the community in order to check the box on the CALUC process. They can say that it has been completed, move on, and pay cash in lieu to the city to dismiss any valid concerns that remain. I hope that I am wrong, but I have little optimism on the application being much different than what is currently proposed.

Can you please give me some advice or your thoughts on this? The extreme nature of this proposal has roused a lot of new community activists and amateur land use policy analysts!

Thank you for your consideration on this matter, and I hope to connect with you at some point again in the future.

Thanks again,

Dean Rysstad

648 Niagara Street

(We own, maintain, and preserve a registered heritage house, c. 1891, that is not "at the end of its useful life", to quote the developer's rhetoric as to why the existing Amica buildings (c. 1966 & 1971) are to be demolished.)

January 26, 2022

Re: Development proposal at 50 Douglas St. by Milliken/Amica

Dear City of Victoria staff, planners, council members, and mayor,

I am generally supportive of development, and of moderate increases to density in residential neighbourhoods, that may increase diversity of housing and affordability. When I first heard that Amica was planning to re-develop the property at 50 Douglas, I made an assumption that the proposal would be for a building that fit-in with the neighbourhood. I agree that there is a need for assisted living spaces in greater Victoria, and I would support a development proposal at 50 Douglas that was reasonable for the neighbourhood, that was sympathetic in design to the surroundings, (including the many heritage houses, Mile-Zero, and Beacon Hill), and that showed an understanding of and commitment to preserving the heritage value of the neighbourhood.

However, when I learned of the height of this proposal, 37m, I compared it to the existing buildings at 50 Douglas and 685 Niagara, which stand at 12m high, and I was shocked. The proposal is to build the tallest building that has been built on Douglas Street along Beacon Hill Park since the 1960s, when the high-rises at 250 and 350 Douglas (much closer to downtown) were built, in 1961 and 1965 respectively. Since those high-rises were built, the Victoria Heritage Foundation was created (in 1974) to help preserve heritage houses in Victoria, and since then the James Bay Neighbourhood Plan was implemented to direct land use and planning towards low-scale, 3-4 storey buildings.

I find this proposal unsupportable by the City of Victoria and its residents due to its numerous and extreme inconsistencies with current land use policy, zoning, Heritage Conservation Zone objectives, and neighbourhood plans for this location. Secondly, I find it unsupportable because there is a relatively small increase in assisted living spaces compared to the numerous and extreme variances being requested in a historic neighbourhood.

If zoning and land use policy are in place to maintain a cohesiveness of an area and for future developments to be sympathetic to the surrounding buildings, then there is a risk in permitting variances that do not fit the neighbourhood and that may result in a building so out of place that it forever changes the neighbourhood's view and feel. With this in mind and while weighing the pros and cons of this development proposal, there is a relatively small community benefit compared to the negative impact on the community.

I ask you, as the decision makers with the City of Victoria and those that may advise the decision makers, to work with the developers to significantly reduce the mass and scale of the proposed project, or to decline the proposal if it is to be moved forward by the applicant without significantly reducing the size of the proposed building.

I ask that city staff recommend that Council not approve OCP amendments and rezoning applications at 50 Douglas and 685 Niagara that would increase the massing and scale of buildings at this location beyond what is currently permissible under current zoning.

I would ask that city staff and Council reconsider accepting cash in lieu contributions with this application that effectively dismiss valid questions to how this building proposal fits (or does not fit) with the City of Victoria's Strategic Objectives, and that they do not offer "bonus density provisions" to

account for cash in lieu contributions as they did at 1900 Richmond. Instead, I would ask that an application is not approved if it requires variances to current zoning.

LAND USE CONTEXT

The Amica building at 50 Douglas is part of the Battery Street Heritage Conservation Area (HCA-1) in the City of Victoria's Official Community Plan (2021). This Heritage Conservation Area has objectives which support low-scale development that are sensitive to the value of the surrounding houses. Development in an HCA must also consider the Standards & Guidelines for the Conservation of Historic Places in Canada, which speak to conserving the heritage value of historic places. As such, the impact of this proposed development on the heritage value of the neighbouring houses, (including a heritage designated bed and breakfast), must be considered. Therefore, the applicant should be challenged if they are to propose any structure higher than the existing buildings.

This site is given Urban Residential designation in the OCP. Developments are generally supported towards the higher end of the range along secondary arterial roads; Douglas Street is a secondary arterial, and Niagara Street is not a secondary arterial. To build a tall building from the corner of Douglas Street 90m down Niagara Street would have a significant negative impact on the low-scale feel of this traditional residential neighbourhood along the top of Niagara Street.

Once one has taken the time to understand the current zoning and land use planning tools applicable to this proposal, we find that the variances being requested are numerous and extreme. I would ask that the city not allow any variances to the current zoning for this site. I do not see how this is a supportable project for the following reasons:

- **The net increase in assisted living spaces is only 55 in total, plus 15 premium penthouse independent living spaces.** The applicant will demolish 125 assisted living spaces in order to build 180 assisted living spaces and 15 independent living spaces (the top floor penthouse suites). Not to mention, that the entire building is "luxury, boutique" private care assisted living, which will not be accessible to the vast majority of Victorians that may need this type of care due to the high cost.
- The need for luxury, private memory care is already addressed at new Amica at 1900 Richmond Road.
- Alternative sites are available in Greater Victoria where a building proposal such as this would have a larger net increase in assisted living spaces, such as in Royal Bay, where there is unused land that is ready to build.
- The applicant said that the current building are at the end of their useful life. 50 Douglas was built in 1971 and 685 Niagara was built in 1966. Many of the surrounding houses are over 100 years old, and the owners make a choice to invest in maintaining these old heritage houses. The condominium at 25 Government was built in 1972, and the owners have recently invested in residing the entire building; a choice to preserve and maintain it. The applicants are choosing not to invest in maintaining these buildings, and instead they are choosing to remove the current residents, to demolish the buildings, and to re-build. The statement that a 50-60 year old building is at the end of its useful life falls flat in this neighbourhood.
- Density/Floor Space Ratio (FSR):
 - 1.2 based on current R3-2 zoning or up to 2:1 at 50 Douglas because it is on a secondary arterial road; current proposal is 3.3:1. This is too extreme of a variance.

- Setbacks: the proposal is inconsistent with current zoning. Setbacks are important to the residential feel of the neighbourhood. Comparably tall buildings along Dallas Rd and Douglas (beside Beacon Hill Park) have a greater setback from the road than what the applicants are asking for.
- Height:
 - 18.5m permitted in R3-2; this proposal is for 37m. This is unbelievably tall and unsupportable at this location.
- Site coverage: the current proposal is for site coverage of 45%, whereas current zoning permits up to 30% (if all parking is provided underground).

When considering the site coverage and height of the buildings, the mass and scale of the proposal is nearly unimaginably large, especially for this little corner of James Bay at Mile Zero.

- During the CALUC meeting, the applicant stated that there are many other tall buildings along Dallas Road and Douglas Street. However, the applicant failed to note that most of those buildings were built prior to 1970. Buildings that are comparable in height to this proposal along Dallas Road and Douglas Street (south of Southgate St) were built in the 1960's when all of James Bay was zoned for high-rises, which was prior to the Victoria Heritage Foundation (c. 1974) and prior to the James Bay Community Plan's objectives of low-scale, 3-4 storey residential development. The most recently constructed 5+ storey buildings nearby are 188 Douglas (built in 1990), and 200 Douglas (built in 2014), both of which are 15-20 meters shorter than the current proposal at 50 Douglas. Notably, neither of these buildings are located within a Heritage Conservation Area.
This proposal needs to scale down and work within the current R3-2 zoning limits in order to be consistent with the development and land use planning of the area.
- R3-2 zoning allows for 20-30% site coverage, and the applicants are asking for a variance of 45% site coverage. Comparably tall buildings along Dallas and Douglas (south of Southgate St) have a lower site coverage percentage than this proposal.
- 50 Douglas is on a secondary arterial road, which may generally support development towards the high end of the current zoning; however, 50 Douglas is also within the Heritage Conservation Area for which the objectives are for low-scale development. Therefore, a respectful, reasonable proposal would be something that would not require such an exorbitant height variance.
- 685 Niagara is not on a secondary arterial road, which does not generally support development towards the high end of the range of current zoning. Just because the applicant owns this long property, that is partly within a Heritage Conservation Area and partly not, doesn't mean that the corporate developers should be able to build a mid-high-rise building, measured from the highest point of land (which is what they said in the community meeting) along the entire length of the property (down both Battery and Niagara St.). Because Niagara Street is not a secondary arterial, the section of the building along Niagara Street should be lower than the section of the building along Douglas. I suggest working with the applicant on designing a proposal with a modest increase in height (compared to existing buildings) along Douglas Street, and no increase in height from the current buildings along Niagara Street.
- In this application, I fail to see an effort to apply applicable land use policies to the design. Instead, the community has been presented with a fully designed, unjustifiably large building for the location.

January 26, 2022

I would like to share a recent quote from a University of Victoria alumni, Robin Mazumder, PhD Candidate, who is a cognitive neuroscientist interested in helping design cities that support well-being, equity, and our planet.

"We have to be more thoughtful and aware about how the decisions that we make, about the infrastructure that we build, or about the policies that we create, impact well-being."

(Reference: <https://www.youtube.com/watch?v=-hXqXjrTwzs&t=197s>)

Thank you for your thoughtful consideration of the long-term impact of the proposal at 50 Douglas and 685 Niagara, (the mass and scale of which would be suitable downtown), could have on the well-being of Victorians, the nearby landmarks, and the historic, heritage residential neighbourhood.

Regards,
Dean Rysstad
648 Niagara St.
James Bay

Dear Mayor and Council,

We are residents of 638 Battery Street in James Bay and wish to explain our objection with the proposed plans for the redevelopment of the Milliken/Amica Douglas House and voice our dismay at the unprofessional and untruthful manner in which the developer has communicated with the community.

We are a few properties west of Amica and a prolonged shadowing will result from the proposed construction that will tower over our home and backyard . Our morning sun will be lost and our food garden will be negatively affected and it will greatly diminish our privacy and ability to enjoy our backyard as we do now. The developers presentation failed to show this and they choose instead to show shadows at only two times of day on two days in the year — a poor attempt to mitigate our concerns and not representative of how their building will greatly reduced our yards daylight hours.

Let me also comment further on other concerns...

The design as presented is not conforming to existing zoning, height restrictions, FSR (increase to 3.25:1) and seeks greatly reduced setbacks. And the building will vastly exceed the height of Beacon Hill and present an unflattering facade to visitors to the park!

It's quite evident that the James Bay OCP has been ignored as has the Heritage District of Battery Street. The developers went so far as to falsely claimed they had support from Heritage for the design during the recent JBNA zoom meeting where Milliken/Amica were questioned and given ample opportunity to respond to why the official community plan and the heritage district are being disregarded. They failed to justify why they should be granted such sweeping deviations or offer any meaningful dialog addressing the concerns of nearby neighbours and community at large, instead we were shown a massive institutional “campus” that does not fit into the neighbourhood or meet the OCP or any of the current zoning. I believe the OCP is there for a reason and needs to be adhered to. The OCP and local zoning is one of the deciding factors many consult when choosing to purchase, reside and invest in the neighbourhoods they do..

And finally...

This high end, exclusive type accommodation, contrary to the developers claims, is not the type of senior housing needed in Victoria. No viable rationale was given for the re-zoning and construction variations from the OCP and Heritage designations and it is rightfully assumed this is essentially a business seeking to maximize profits at the cost of the quality of life for its neighbours’.

We urge you reject the redevelopment as presented and require the developer to follow the existing OCP and zoning and be a good neighbour to the community.

Thank you for hearing our concerns,

Bradley Funk

638 Battery Street

Good Evening Mayor, Council and Staff,

I'm wishing to share my thoughts regarding Amica Douglas House redevelopment.

When I made the decision to purchase a house in James Bay, I made a commitment to a Heritage House, an unspoken agreement to a neighbourhood Heritage District and started a long term relationship with the community and our city. I know few people think of their time in a house as a commitment, but that truly is the case or should be with a heritage house. It is ours to look after, maintain, protect and leave better than we found it until the next owner takes on the role of custodian and the care that accompanies.

One does not go into such situations lightly, however knowing that there is additional assurance of being in a Historic District allows a sense of security in the long term investment towards household projects to maintain the house and makes it worthwhile to give our time and finances to ensure longevity.

It's been a shock to learn about the presented plans regarding the redevelopment for Amica Douglas House. These proposed ideas go against all existing zoning and expectations around building in our neighbourhood. The current buildings are appropriate in scale to the Heritage buildings on Battery and Niagara. The proposed buildings are intrusive and will significantly change our light and privacy. The buildings facing Niagara & Douglas will change the streetscape on Battery due to their height and scale, balloons were raised by our neighbours to show the estimated height and the buildings will loom over our heritage neighbourhood. Amica should be honouring our block and responding to the James Bay official community plan and the Heritage District rather than ignoring all of the existing expectations.

I'm very concerned that they will attempt to push their way through by writing a large cheque to appease council and attempting to override the community they should be respecting.

Please note that they will present this as "much needed housing", however this isn't housing for most of our James Bay & Fairfield seniors who would like to be able to stay in their own community. This is very expensive luxury services for seniors we will likely rarely see due to dementia and high end penthouse all inclusive assisted living which ironically isn't very inclusive at all. We need affordable seniors living spaces that allow our seniors to stay in the community that they call home. Seniors housing and care with Amica is big business, in fact one of the largest in Canada, their insistence of need is their need to increase profits at the expense of our neighbourhood. Their current residents will be renovicted, moving seniors in their final years can be more than stressful, it can be the tipping point that leads to confusion, accidents and depression.

There are many places throughout Victoria that could be considered for this massive "campus" project. This is a large institution and not appropriate for a residential neighbourhood. The HVAC systems and industrial services to support such a large facility are not welcome in such a quiet neighbourhood. I ask you to honour and consider our heritage district, streetscape, residents and privacy.

Thank you for listening. Looking forward to your thoughts,

Christine Smart
638 Battery Street

As residents and homeowners at 624 Battery Street, we oppose the proposed Amica development at 50 Douglas Street. The proposed plans show an 8 storey building with a FSR of 3.25:1, both the height and density do not conform to the Official Community Plan, the James Bay Neighbourhood Plan and current zoning and land-use policy. The development as proposed does not fit the intent of the Heritage Conservation goals of preserving or enhancing the low scale historic residential neighbourhood.

The building elevations show a continuous 6 storey front with the upper two floor inset. This massing will create a “wall” in the neighbourhood, restricting visual connection to Beacon Hill Park, Mile Zero, and Dallas Road. When viewed from street level, the inset upper floors will not reduce the forbidding character of the structure, especially when considering the set backs and the narrow widths of Battery Street and Niagara Street.

The development is more institutional then residential, the developers have indicated that 87% of the housing will be for memory care and assisted living, this will displace the independent seniors living in the existing building. These seniors are a part of our community, they are our neighbours that we interact with on the sidewalks, at the park, and in our local shops. The memory care residents will not be interacting in our community. According to the developers, they will be primarily confined to their rooms in the new building. Losing the vast majority of the current 125 independent living spaces will deprive the community of the independent seniors that are a part of our diverse neighbourhood fabric and will deprive independent seniors of the opportunity to enjoy this special residential gem.

Lastly, the existing wood frame 1960s building can be rehabilitated to enhance fire and seismic safety. This would be a much more eco-friendly and sustainable approach that would also maintain the character of our neighbourhood.

Sincerely,

Kate Ulmer and Dan Dykstra

Please oppose this 8 story development in the residential area of JamesBay.

..totally unsuited to this old residential area of the city.

thank you

Victor Turkington
611 Battery St,
Victoria, BC V8V 1E6.

From: [Pat Nichols](#)
To: [Development Services email inquiries](#)
Subject: Amica Development @ 50 Douglas Street / Niagara Street
Date: January 25, 2022 4:22:40 PM

I live in a 4 story rental bldg at the corner of Niagara & Douglas, opposite the Amica building. The buildings on Niagara Street are all 4 stories or less, most of them Victorian style homes.

The 8 story building Milliken is proposing will: (a) absolutely block all the natural sunlight from that side of my apartment, and our building; and (b) block my view of the sky & the sunsets which is important to my mental health; and (c) be an absolute contrast to the heritage culture of this neighbourhood, especially in this particular location.

They have also designed their entrance on Niagara Street, which is a narrow street, already filled with city buses travelling in two directions, a bus stop, parked cars, tourist horse drawn carriages and local traffic. We already have to stop our cars to allow buses to get through. The current Amica entrance is on Douglas Street, which is far more suitable for traffic coming and going all day, which currently includes relatively frequent ambulances, firetrucks, visitors picking up seniors & dropping them off, small tourist buses to transport the seniors and food delivery trucks. We have traffic problems already at this corner of Niagara Street, without adding traffic for a huge seniors' residence.

Their project design has a 6 story brick wall on Douglas Street which is going to look like a prison and destroy the ambiance of the neighbourhood.

I am concerned about the loud & disturbing noise of air conditioning and heating units which have been causing a problem for a neighbourhood up on Quadra Street where another seniors' residence was built.

I am concerned for the seniors themselves who will be taken from their current homes and separated from their own community in the current building. Will equivalent and suitable homes be found for them?

This development is aimed at very wealthy senior people who can afford what will be very high monthly fees & provide wealth for Milliken & Amica.

Where are the plans to accommodate the middle class of seniors who cannot even imagine being able to stay in such a residence?

Pat Nichols
110 Douglas Street, Apt. # 401
James Bay

Dear Mayor and Council,

I have been studying the redevelopment plans for 50 Douglas Street.

I wanted to write to share my support for this project. Good quality seniors facilities are in increasing demand in our area. The new development will provide improved ventilation, fire safety and temperature control. I believe increased density on this site is appropriate. There are several other buildings in this neighbourhood that are this height, or taller, and I do not see a negative impact.

Thank you,

Ruth Rogers

Justine Wendland

From: Caitlin Stokes [REDACTED]
Sent: January 27, 2022 9:48 AM
To: Victoria Mayor and Council
Subject: Opposition to the 50 Douglas st proposal

Hello,

I am writing because I strongly oppose the Millikin/Amica proposal for 50 Douglas street.

I live around the corner from the site (within 200 M) and I attended the JBNA CALUC meeting, where I witnessed overwhelming community opposition to the plan. The next day the Millikins removed all of their redevelopment signs from the Amica site, which are required to be displayed during the input phase. I mistakenly believed this meant that the Millikins had retracted their proposal. The signs were never replaced. Because of this misunderstanding, I did not submit a vote or commentary to the city survey. My neighbors have informed me that the proposal was not retracted, however the survey link is now expired. I am writing to you instead to voice my strong opposition to this project.

My primary complaint is that this proposal is far too massive for the site. It is seeking an extraordinary number of exemptions in terms of its height, site coverage, and floor space ratio. This is an area identified in the James Bay Neighborhood Plan as traditional residential. All of the buildings in this area are single family homes and low rise multifamily dwellings. A massive building such as this will be out of place and dramatically change the feel of our quiet low-rise residential neighborhood.

Second, this site is within the Battery Street Heritage Conservation Area 1. This is a very special area of the city and one of only five HCAs comprised of residential housing. This makes it special and worth preserving. My family recently bought a heritage home on an adjacent street that we have been pouring money into restoring. We love the special feel of the neighborhood and have noticed that many others do too. There is a constant stream of "tourists" who visit our street – the horse carriages are constantly going up our road, there are heritage walking tours, and lots of folks taking neighborhood detours from the Dallas Road path. It is a very special area. The building proposed by Amica would significantly detract from the heritage streetscape and natural environment. My understanding is that the HCA designation provides provisions that protect against exactly this kind of development that seek to alter the character of the neighborhood.

The height and massing of this proposal would make it visible far above the treeline all the way out to Clover Point. This development would significantly alter the view one has along that glorious walk. Further, it would be taller than the tallest point of Beacon Hill itself. This seems inappropriate and rude to the important First Nation's site. It would tower over Mile Zero and over the neighborhood, and would be taller than the buildings in the city center of James Bay. This is a preposterous and out of place proposal for our residential heritage neighborhood.

I do support redevelopment of the site, but I strongly feel the developers must be held to the James Bay Neighborhood Plan and Appendix A of the Official Plan. Specifically that the building must fit into the context of the site. It should be limited to no more than 3-4 stories, as specified by the JBNP, and must be of a scale, form, and architectural design that is sympathetic and harmonious to the heritage neighborhood. The architecture doesn't need to be Edwardian or Craftsman, like many of the adjacent houses, but it should absolutely include some elements of these styles. It is a non-contributing property within the HCA, but it is still within the HCA. This designation has been there a long time and they are responsible for adhering to the guidelines.

I would also like to say that this is a huge proposal that would radically transform our neighborhood. And for such an important proposal seeking as many exemptions as it is, I am disappointed by how the process has been handled thus far. The developers were underprepared at the CALUC meeting. Not only did they have very little information to share

(no accurate scale drawings, shadow studies done at only the midday point), but they hid and mischaracterized the important land use issues at stake here. Further, they misrepresented the words of the heritage planner; the Millikins claimed to have the heritage planner's support, but in reality the planner told them the scale and massing of the proposal was inappropriate to the site.

The Millikins removed all of the required signage from their site two weeks too early – I am sure there were others, like me, who assumed their proposal was retracted after that meeting and failed to submit a survey response. Taken together, this feels like one attempt after the next to mislead the community and stifle opposition. I believe this process should be taken more seriously by them, not just because they are our neighbors, but because this proposal would radically reshape our neighborhood.

I hope you will support our community's opposition to this plan and uphold the vision of our neighborhood as outlined in the James Bay Neighborhood Plan and guidelines of Appendix A of the Official City Plan. I hope you will support redevelopments on this site that are limited to 3-4 stories, with appropriate site coverage, and that are sympathetic in design, scale, and form to the surrounding heritage neighborhood.

Thank you very much for your time,

Caitlin Stokes

34 Olympia Ave, Victoria BC, V8V2N4

[REDACTED]

From: Lavinia R [REDACTED]
Sent: January 27, 2022 4:37 PM
To: Development Services email inquiries
Subject: 50 Douglas St. Amica development

I am writing to state that the new development will affect the people who live around in a negative way. The noise from their pumps for 6 months, and the height will interfere with the view. Also, construction as such will take years; dust, noise, and traffic would be another very unpleasant situation.

More suitable will be the parking lot of the cruise ship, or any other area in Victoria where neighbors won't be impacted. In addition, I heard that **private** care long-term has been unable to fill vacancies.

Lavinia T Rojas

Victoria, BC
V8V 1S9
CANADA

Hello,

I am writing because I strongly oppose the Millikin/Amica proposal for 50 Douglas street.

I live around the corner from the site (within 200 M) and I attended the JBNA CALUC meeting, where I witnessed overwhelming community opposition to the plan. The next day the Millikins removed all of their redevelopment signs from the Amica site, which are required to be displayed during the input phase. I mistakenly believed this meant that the Millikins had retracted their proposal. The signs were never replaced. Because of this misunderstanding, I did not submit a vote or commentary to the city survey. My neighbors have informed me that the proposal was not retracted, however the survey link is now expired. I am writing to you instead to voice my strong opposition to this project.

My primary complaint is that this proposal is far too massive for the site. It is seeking an extraordinary number of exemptions in terms of its height, site coverage, and floor space ratio. This is an area identified in the James Bay Neighborhood Plan as traditional residential. All of the buildings in this area are single family homes and low rise multifamily dwellings. A massive building such as this will be out of place and dramatically change the feel of our quiet low-rise residential neighborhood.

Second, this site is within the Battery Street Heritage Conservation Area 1. This is a very special area of the city and one of only five HCAs comprised of residential housing. This makes it special and worth preserving. My family recently bought a heritage home on an adjacent street that we have been pouring money into restoring. We love the special feel of the neighborhood and have noticed that many others do too. There is a constant stream of “tourists” who visit our street – the horse carriages are constantly going up our road, there are heritage walking tours, and lots of folks taking neighborhood detours from the Dallas Road path. It is a very special area. The building proposed by Amica would significantly detract from the heritage streetscape and natural environment. My understanding is that the HCA designation provides provisions that protect against exactly this kind of development that seek to alter the character of the neighborhood.

The height and massing of this proposal would make it visible far above the treeline all the way out to Clover Point. This development would significantly alter the view one has along that glorious walk. Further, it would be taller than the tallest point of Beacon Hill itself. This seems inappropriate and rude to the important First Nation’s site. It would tower over Mile Zero and over the neighborhood, and would be taller than the buildings in the city center of James Bay. This is a preposterous and out of place proposal for our residential heritage neighborhood.

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did they have very little information to share (no accurate scale drawings, shadow studies done at only the midday point), but they hid and mischaracterized the important land use issues at stake here. Further, they misrepresented the words of the heritage planner; the Millikins claimed to have the heritage planner's support, but in reality the planner told them the scale and massing of the proposal was inappropriate to the site.

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I hope you will support our community's opposition to this plan and uphold the vision of our neighborhood as outlined in the James Bay Neighborhood Plan and guidelines of Appendix A of the Official City Plan. I hope you will support redevelopments on this site that are limited to 3-4 stories, with appropriate site coverage, and that are sympathetic in design, scale, and form to the surrounding heritage neighborhood.

Thank you very much for your time,

Caitlin Stokes

34 Olympia Ave, Victoria BC, V8V2N4

Totally opposed.

Lavinia T Rojas

Victoria, BC
V8V 1S9 JAMES BAY
CANADA

Dear Mayor and Council. I live in James Bay and am very strongly opposed to Amica's proposed 8 storey development . It goes against James Bay OCH and zoning laws. It is way too tall and casts shadows on the houses and streets below. Four stories is ideal for our community. These overly tall buildings are already ruining our friendly , walkable Community. We don't need way more polluting , carbon dioxide spurring cars. 125 Seniors in one building is plenty- more than that creates a death house factory- not friendly or intimate. Please Do Not support or approve this project that goes against everything the OCP stands for. The OCP plan was developed by Community members who live here. John Allan

Dear Mayor and Council,

I am writing to voice my concerns with the proposed development at 50 Douglas St. I have seen signs going up about this project, and as I've read about it, I believe it will do irreparable harm to the neighborhood.

The proposed scale and height of the development is not in keeping with the character of the street. I would suggest this proposed development not proceed as planned, and consider something much smaller to a maximum of the current 4 stories.

The proposed 8 story development will block light, create parking nightmares, and will lead to unsustainable activity in the area.

The area is a quiet mixed residential neighborhood with many heritage houses, and an 8 storey monstrosity simply does not fit in and would ruin the character of the heritage neighborhood.

Nathan Hoag
629 Niagara St

Dear Mayor and Council,

My family would like to add our voices to the list of those opposed to the Amica Douglas house redevelopment.

We recently purchased a character home in James Bay which we have restored. We have met many of our neighbours who are extremely warm and welcoming showing the tight knit community of James Bay. We frequently walk through the area and marvel at the beauty of the character homes and gardens. This small area of Victoria is an incredible asset to any city and must be preserved for the good of the James Bay residents, the city of Victoria and the many tourists who frequent our community.

James Bay has already suffered at the hands of developers to the detriment of those living here, it is a unique and historical neighbourhood, with turn of the century buildings that can never be replaced once lost.

This proposed development will further degrade that atmosphere, will overwhelm the Battery, Niagara, and Douglas St area turning it into another concrete jungle so familiar in many cities, will block light from coming into the streets on the north side. But most importantly will displace those elderly residents currently living in the existing buildings for years, and likely the rest of their lives for many. Where are these seniors going to be moved to, obviously away from everything they are familiar with like their friends, neighbours and caregivers.

We need to keep as small a footprint as possible and current height restrictions to retain the atmosphere of this neighbourhood, the tourists that are coming from all over the world who enjoy the horse drawn carriage tours want to see the charm of James Bay, not another development that brings nothing to the neighbourhood.

The current zoning is in place for a reason and must remain in place. We cannot allow these massive structures into this incredible asset known as James Bay. Victoria will not sustain it's own unique character so sought after by tourists and residents alike if we redevelop large segments of our James Bay neighbourhood with high rise structures.

Thank you for protecting the interests of your constituents and not allowing this proposal to go through.

Best Regards,

Greg Sabo
Jean Delaney
Sarah Sabo
Dayne Sabo

Hello Mayor and Council members,

I presently live on Battery Street and have for 28 years .. this is my home and community.

I am an RN with 18 years experience and have a few concerns about the design and size of the proposed re/build of Amica building at the James Bay location.

I don't feel the building should go over the 5/6 floors. And that any kind of variance on the height should not be approved. The size of an 8 story building will affect too many residences on Niagara street and on Battery street with shade and potentially affect heating cost. On the second floor they plan on having memory care .. my concern is with the rooms having a balcony and an open patio above the entrance to the facility.. also it appears the elevators at one end of the second floor cannot be observed from the nursing desk ,the balcony in rooms and open patio and elevators are a safety concern. Where will the residents be housed when the existing building is removed .. and will they have an option to return to their community once the facility has been rebuilt .. are the residents paying independently or is there government subsidy in place for residents. The residents who live independently now in the facility have enjoyed this community for years .. there is no comparable housing in this area for them to be, James Bay is their home and that should be considered. Perhaps a better use of the top floor should be for the enjoyment of all residents .. put the dining room on the top floor so that the residents can look out over at the mountains and lets enrich the lives of those residents who may not be able to afford independent living at a high cost being in the penthouse which was a desired location for their independent living suites.. I feel like the redevelopment of this property is more about profit than caring for the elderly.

thank you for your time

Jane Lowe

From a Concerned James Bay Resident:

I watched the James Bay Neighbourhood Association Zoom meeting on January 12th. I wanted to gather more information on the Milliken Developments/Amica proposal to build a larger Seniors residence on the site at 50 Douglas Street which is the current site of the much smaller Amica Douglas House. Before the meeting, I was opposed to this development but I wanted to hear from representatives at Milliken Developments to be fair and hear their side of the proposal.

After watching the Zoom meeting, I can 100% honestly say that my opposition to this proposal is set in stone. The team from Milliken Developments failed to demonstrate that the proposed 8-story building, on the site of the current smaller Douglas House, would bring any positive benefits to the residents and neighbourhood of James Bay. In fact, there were several times when participants' questions were not answered even if they were repeated later on in the meeting. Participants' concerns were also brushed aside by the developers. Another issue was that the developer's drawings of the proposed building did not accurately show the immediate area in a realistic manner. The roads in the drawings look much wider than they actually are in reality. In addition, there were no drawings offered that showed the reality of what such a large building would look like compared to the smaller surrounding houses and buildings nearby.

It was apparent to me that Milliken Developments/Amica does not understand the neighbourhood of James Bay and what type of development is a good fit for the area. Both companies are responsible to their investors and stakeholders and not to the community of James Bay. Their priority is maximizing land usage to gain the largest profits regardless of whether a development is appropriate or not.

The height requested (8 stories) is much too large for that area of land. The community has a height restriction in place for very good reasons! If Amica wants to build a large residence, why not chose an empty lot in an area or other municipality that welcomes large developments and has the space? James Bay is already a crowded neighbourhood that does not suit or want a large building.

James Bay is a unique neighbourhood with many heritage houses. A large imposing 8-story modern building squished onto the corner of 50 Douglas Street does not fit with the existing neighbourhood. The developer in the Zoom meeting stated that the building would fit into the area but how can a modern building do this? Adding some bricks to the outside of a modern building does not make it fit into a neighbourhood with heritage houses.

The area around 50 Douglas Street is very busy and a large 8-story building will only add to the congestion and increase the dangers to drivers and pedestrians. Many buses travel on Niagara and Douglas Streets. I do not drive and take transit in and out of James Bay on a regular basis. I know first-hand how often buses have to pull over to the side on Niagara Street to let a car or another bus go by. Adding more cars pulling out from a larger underground of the proposed 8-story Amica building will make it more difficult for bus drivers to travel down Niagara Street.

My final point of opposition to this proposal is concern for the current residents of Amica Douglas House at 50 Douglas Street. What will happen to the residents that currently live there if the proposal is passed. Where will they live? How can Seniors deal with a move so late in life? Why do they have to suffer the stress of moving because a company wants more profits? Why are we not placing a priority on the current residents? Several years ago, my Aunt's Seniors residence in Richmond was torn down and

she had to move to a new residence in her 80s. The move was stressful and I am certain her health suffered because of it.

The bottom line is that this proposed development is not appropriate land usage for 50 Douglas Street.

Thank you,

Christine Hagen

From: [REDACTED]
Sent: February 23, 2022 9:19 PM
To: Development Services email inquiries
Subject: Letter of concern re: CLC00369 50 Douglas Street

To Development Services:

Re: Milliken Redevelopment at 50 Douglas Street

We are the current owners of Ashcroft House Bed & Breakfast at 670 Battery Street.

To give you some perspective of our location, we have the Milliken owned heritage house at 674 Battery Street directly beside us to the east, and the Amica building all along the back of our property to the north. In this neighbourhood, we are the closest property to the potential Milliken redevelopment.

We are **firmly against** the Milliken plans, as presented to us on the January 12, 2022 zoom call with Milliken, JBNA and the neighbourhood. Our reasoning comes from two perspectives: one as the property owners of 670 Battery Street and the other as small business owners of Ashcroft House Bed & Breakfast.

As property owners, our objections that are fact based are:

- Size and density of the building goes against OCP and JBNP
 - The 8 story (37m) proposed building goes against the urban residential zoning, it is too big for the lot size, the floor ratio is too high.
- Heritage Conservation is not being adhered to:
 - The *James Bay Neighbourhood Plan* encourages development to “enhance existing heritage/character with regards to scale, form, quality and materials” (P.19). This proposed building in no way enhances the neighbourhood. It is way too large, it towers over everything and does not blend into the neighbourhood. The materials and design are not visually in keeping with the architecture, style, design, heritage-look or historical feel of this very special neighbourhood.
 - We have the *Battery Street Heritage Conservation Area 1* in this neighbourhood. This historic designation has a purpose: “To conserve and enhance the heritage value...of low scale residential areas”. This redevelopment in no way enhances the heritage nature of this area.

As small business owners:

- **We are worried about the sustainability of our business.** We have a lovely, 124 year old, heritage designated house which has been providing forms of guest accommodations since the mid 1900s. Guests choose to stay at Ashcroft House for the heritage style, the history, the architecture of our building but also for those features in our neighbourhood. Our business has already suffered because of COVID, but the negative long term impact of the proposed building could cause us to close our doors permanently.
- Being that Ashcroft House is so close to the proposed 8 story monster building, it would dominate over us, it would dwarf us. It would tower over us and everything in our neighbourhood. It would destroy the character, charm, ambience, heritage and historic feeling of the neighbourhood. It would be a giant eyesore, standing out as something that doesn't fit in, which would have a negative impact on our ability to stay in business.

Community Disruption

In addition to the proposed building not fitting in properly to the neighbourhood, there are very serious repercussions for the people living not only in the current Amica building but all the neighbours in the area. The community disruption this development would cause is unacceptable. It would cause extreme stress for the seniors living in the current Amica building, most of whom believed they would live out the rest of their lives in this quiet, idyllic neighbourhood.

It would negatively impact all the people living here, not only through the noisy disruptive construction period but long after as the building looms over our homes, stealing sunshine, creating constant noise and machine humming from the building systems, impacting traffic and generally not fitting in to its environment.

And as we've already mentioned, on a personal level, the disruption to our livelihood would likely force us to close our bed and breakfast business.

This proposed building does not belong in this neighbourhood because it goes against the Official Community Plan, the James Bay Neighbourhood Plan, and the Battery Street Heritage Conservation Area guidelines, and the community disruption would cause extreme stress to many people.

Thank you for taking the time to read our letter. We hope you support our community in stopping this redevelopment. Please feel free to contact us if you want to discuss anything.

Kind regards,

Shannon and Jonas Stahr

Ashcroft House Bed & Breakfast



From: Alison Spriggs [REDACTED]
Sent: March 8, 2022 4:29 PM
To: Lisa Helps (Mayor); Marianne Alto (Councillor); Stephen Andrew (Councillor); Sharmarke Dubow (Councillor); Ben Isitt (Councillor); Jeremy Loveday (Councillor); Sarah Potts (Councillor); Charlayne Thornton-Joe (Councillor); Geoff Young (Councillor)
Cc: [REDACTED] Development Services email inquiries; [REDACTED]
Subject: Re: Milliken/AMICA- Hold Fast to Better Vision

Dear Mayor Helps and Victoria City Council,

In 1999 a coalition of environmental organizations held a news conference on Beacon Hill to launch a campaign to add a huge new tract of wild forest land toward completion of the Region's Sea to Sea Greenbelt. We chose Beacon Hill because from there the TV cameras could capture the full extent of the Sooke Hills, Victoria's beautiful green backdrop. Something worth protecting for all time.

Thankfully Milliken/AMICA hadn't built an 8 story high-rise at the corner of Battery and Douglas to obstruct a view that is still 'out of this world'. That's what parks are supposed to be... places that take us 'out of this world'. Wide open natural spaces that dwarf the concerns of our day, quieten our minds, lift our spirits and open our hearts.

During Covid people from all over the Region flocked to Beacon Hill Park and the Dallas Road waterfront to get that healing hit of big open space..... the ocean, the sky and the visible expanse of the Sooke Hills on our western horizon.

Big high-rise developments that hem in the park, shorten the viewscape and leave you looking at big buildings will rob us all of something we will not even fully realize until it's gone. It's not just an inappropriate proposal for James Bay, and that it is, for all the very good reasons residents have already expressed, but this massive development proposal, approximately 30 meters higher than the summit of the park and very near the waterfront will also impact everyone who loves the park and the walk in that beautiful open rejuvenating public space.

I feel strongly that all building around the Dallas waterfront and the park boundary should be scaled down in height so that the impact of nature is what is felt most keenly not the other way round. This is what heals and nourishes us and this is why we say over and over again to ourselves how lucky we are to live in Victoria.

Please lets keep it that way. I ask that you don't support this (or any other) new building of this scale adjacent to our park and waterfront sanctuary.

I applaud the vision of this Mayor and Council on your stand to make Victoria a model green, cycle friendly, liveable city. Please stand strong to protect Beacon Hill Park and the Dallas waterfront from further adjacent high-rise development. It undermines the quality of life in our city for all.

Alison Spriggs,
Former Parks Campaigner
Member of the Elders Council for Parks in BC
City of Victoria Honorary Citizen

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Alison Spriggs,
Former Parks Campaigner

Member of the Elders Council for Parks in BC
City of Victoria Honorary Citizen

Dear Mayor and City Council,

Re: Douglas House Seniors Housing OCP / Rezoning / DP / Heritage Alteration

I am writing in response to the Milliken/Amica proposal that was resubmitted to the city on May 27th, 2022. I've been living at Beacon Lodge Apts right across from the Amica Seniors building at the corner of Battery and Douglas St. (30 Douglas St.) for the past 8 years. My apartment is directly facing Amica and I can see the building clearly from my window.

As there have been some improvements to the initial proposal, the changes are still minor compared to all the concerns that had been put forward by the many concerned residents who attended the Milliken/AMICA zoom presentation meeting back on January 12, 2022.

Amica's revised proposal:

"They reduced the number of floors from 8 to 7, and they have increased the height per floor from 3.3 meters per floor to 3.6 meters per floor. So the overall height reduction is only about 1.5 meters, which is not significant."

"They have decreased the density from 3.4 to 2.5. Again, while this is a small improvement, the overall mass of the building is very big for this neighbourhood. Lower density did not seem to translate to smaller building size."

"They have shifted the massing of the building more towards the corner of Douglas and Niagara. This means the side of the building facing Battery St steps back a few stories up, so that it does not appear as tall if you are standing on Battery Street." A small improvement but not a significant one.

Many residents are deeply concerned about the massive size and height of the building, the current zoning/land-use restrictions, and heritage conservation, I myself share those concerns. However, I am also deeply concerned about the **negative impact such a colossal development will have directly on the lives of the residents** who live adjacent and next door to Amica.

There are about 40 suites in the Beacon Lodge and it is "a residence for friends of nature seeking beauty, rest and contentment". Should the proposal go ahead, **the amount of daily construction noise, increased traffic, parking concerns, etc. over a span of 2-3 years is very overwhelming and daunting.** Many residents, like myself, are seniors and are living here because of its serenity and quiet neighbourhood.

To date, there has been no mention of how a massive development of this nature will unfold. A construction site/development of this magnitude is best suited in a major artery and not in a small, quiet residential area of James Bay. Being an older heritage building, it is not soundproof and the ongoing construction noise, traffic, dust, etc. will negatively impact lives. Particularly to those of us who are housebound and work from home. Not to mention, these apartments are low-rentals and options of finding affordable housing elsewhere in Victoria is really non-existent.

How will Amica compensate for all the loud construction noise, pollution, traffic and disruption that will take place? Just the other day I saw some seniors outside my window who regularly walk down the sidewalk everyday. What is going to happen to them? I personally am without words to say, and fearful

of what the future holds. I, like many of the retired residents, relocated to Victoria 8 years ago to live in the Beacon Lodge not only because it is quiet, close to nature, but because of its affordability. The vacancy rate in Victoria is the lowest it's ever been. And apartments that become available are more than what seniors can afford.

Thank you very much in advance for taking the time to read and consider my letter. I hope I have enlightened you to concerns that in my opinion, cannot be stressed enough. I look to your compassion and empathy in this matter for some viable solution as I speak not only for myself, but also for those who are vulnerable and not able to.

Yours sincerely,

Tina Fischer
238-30 Douglas St.
Victoria, BC V8V 2N7

Dear Mayor and Council,

We own a property in James Bay which we lovingly restored to remain in keeping with the heritage nature of the neighbourhood.

The proposed development in James Bay does not fit within the established character of the area and is considered out of context for the locality.

The existing buildings that will be torn down, for no reason other than maximizing corporate profits, should not be a consideration for this council. All the occupants will be displaced from their homes which would be very challenging for so many of these seniors to be moved at this point in their lives. James Bay is a unique and valued asset to the city of Victoria and needs to be protected by our elected Mayor and Council and not left to the mercy of the developers whose only goal is to increase profits.

Creating a massive concrete edifice for a seniors complex adds no economic benefits to business owners and residents of James Bay and detracts from the livability and tourism appeal. Allowing this development creep in James Bay is the wrong approach to maintaining this community oriented heritage neighbourhood.

There is a reason for the height restriction, it is to maintain light and openness for the surrounding neighbourhood and to remain in keeping with James Bay's heritage character and it is what the residents want.

Since tourism is a major economic driver for the city of Victoria, Mayor and Council should not be entertaining another proposal that detracts from this important consideration. Whether meandering through the streets of James Bay, or taking a leisurely carriage ride, seeing the original buildings and hearing about the history, no one is interested in yet another over height concrete structure.

Thank you for your consideration,
Greg Sabo and Jean Delaney

Greetings,

As a long time resident of James Bay it is incredulous and disheartening to find James Bay residents having to fight at every turn to keep our beautiful community intact. Developers are vying for ground and air space to turn our neighborhood into an unrecognizable jungle from locked dementia units towering above Beacon Hill (50 Douglas Street) to monolithic shiplap monstrosities for the "hard to house" population (Menzies Street at Simcoe). These developments, if approved, will destroy the heart of our community.

City council seems blind to the historic value of this incredible neighborhood that is home to a large elder and diverse multicultural population.

James Bay is host to the majority of visitors to the city from cruise ships, historic walking tours, pedicabs, horse drawn carriages and folks just strolling the streets and avenues enjoying the peace and beauty of the historic buildings and beautiful gardens throughout the community.

The vision for James Bay, especially the large property to be redeveloped along the east side of Menzies at 5 corners, should be one of vibrancy. It could be a showcase of community oriented housing above an exciting combination of shops, art walks, cafes and calm gathering spots.

This redevelopment is an opportunity to make Victoria's James Bay community an "absolutely don't miss" experience for visitors and a positive, safe and nourishing neighborhood for the current and future populations of elders, families and working folks.

I pray that council will take a step back from the rapid push to approve these developments without forethought of the negative impacts to this incredible community. Intelligent thought and public consultations are a must to these huge redevelopments that will either showcase an already beautiful neighborhood or turn it into a district to be avoided due to an unsafe and unhealthy atmosphere.

In trust that discernment and common sense will prevail.

Barbara Wilson
30 Douglas Street
James Bay

Hello Alec and development services staff,

I am pointing out that one of the slides in the Millikens' revised plans (dated June 20th) seems to misrepresent the distance between the property line of Amica and Trillium next door to it. This is important to me and my family because there is a large tree located on the Trillium property that offers significant privacy, and I would like to ask city staff to consider requesting/requiring special mention of the tree and its root zone to be protected during construction.

Below is a screenshot of the seemingly inaccurate representation from page 13 of the plans dated June 20th. Below that are photos from today of the property line between Amica and Trillium on Niagara Street, and of the tree from my front bay window.

Thank you and all the staff for their work on the technical review of these plans. I hope the revised plans cannot be supported as currently proposed due to the size, especially height, being so far above what is expected following land use policy for this location.

Thanks again,

Dean Rysstad

648 Niagara Street



Niagara Street





Dear Mayor Helps and Council Members,

We are writing further to our comments on this development dated January 5, 2022 (see below). At that time, we registered our strong opposition to the development proposed by Amica Seniors Living. Our main concern was, and remains, that this proposed development is massively out of proportion to the James Bay neighbourhood and contravenes the Official Community Plan.

We understand that the proponents have resubmitted their plan as of May 27, 2022. Our assessment is that the tinkering being suggested makes no difference to the objections we outlined in our earlier note. The proponents have offered no compelling reason why they should not be obliged to comply with existing planning requirements; their desire to increase their profits is no reason for the neighbourhood to suffer. The overall scale of the building remains much too big for its position, and the impact of imposing this huge “campus” on James Bay will be significantly damaging to the quality of life of this very special place.

We ask that you reject this re-development proposal. We have no desire to see this very large building looming over the end of our street and cutting us off from the sea and the park.

Yours truly,

Lynda Cronin & Peter Heap

614 Niagara Street
Victoria, BC V8V 1H9

To Rob Bateman
City Planner for Development

Dear Mr Bateman

I live in James Bay close to the intersection of Dallas Road and Douglas Street. Since the first announcements of the proposal to rebuild a multi-facility for elder retirement and care, on the site Amica Douglas House extending from Douglas Street down both Niagara Street and Battery Street, I have been concerned at how unsuitable the proposal is related to the site they have chosen for it.

I have lived in James Bay for twenty years, loving the location and its amenities such as access to the shore below Dallas Road, to Beacon Hill Park, to shopping and service facilities at James Bay Square. I love that the neighbourhood is walkable. I love that the streets and gardens have mature trees, even if continually under threat from development. I appreciate the 'mixed' character of the neighbourhood, that housing is a mix of large and small, old and new, for rent and to own, inhabited by a wide spectrum of young families and the retired, long-time residents and new comers.

I support my neighbours in criticizing the proposed development of the Amica Douglas House site as over-sized and out-of-character for its location (see the pdfs attached below). Housing needs in James Bay are different from a mammoth institution like this which is designed to turn a profit for the builders and the future managers of the facility, whereas hardly any of the existing population of James Bay could expect to be able to afford it.

As someone who enjoys walking in the neighbourhood, I am concerned that the proposed development will increase traffic on Douglas Road as staff and visitors come and go to the facility. Weekend and holiday traffic is already non-stop as families and groups of friends come into Beacon Hill Park, to walk, and play and picnic, to enjoy trees and flowers and water. Parking for leisure is already stressed as people come down to Dallas Road to take advantage of the new cycle route and walking trail along the shore. Buses serving cruise ship visitors as well as horse drawn carriages also have to be accommodated on the streets, with the attendant noise and particulates pollution.

The proposed development will interrupt sight lines from Beacon Hill flagstaff, and transform the scale of existing building in relation to the mature trees that border Douglas Street. In order to build, the developers are asking for permission to flout so many planning provisions advocated for by residents who value what James Bay offers. I urge the city not to lightly over-rule the bylaws which on the whole, have served the neighbourhood well.

All these arguments were presented to the City Council just retiring. Why do residents have to make their case all over again? This proposed development is too large and too dense to fit in this place, which has its own history and charm which survives because people value it and care for it.

In James Bay, we trust that the larger entity of the City of Victoria appreciates this community in its midst and will consider its character worth protecting as an asset for the whole city.

Alexina Murphy
670 Dallas Place, #902
Dallas Road, Victoria, BC, V8V 1B7

We write to you with regard to the above with great concern due to the fact that despite their 10th February 2022 application being refused by city council staff citing non compliance with land use policies relevant to property as set out in the Official Community Plan (OCP), James Bay Community Plan(JBCP),Niagara St DPA-16 and Battery St Heritage Conservation Area(HCA1), Amika/Milliken's 3rd October 2022 revised proposal is nearly identical to their original 10th February 2022 application in scale.

An application to build a seniors complex on this scale in our James Bay neighbourhood would be to the detriment of the area and it's existing neighbours. It would also set a precedent for future large build applications which would threaten to change the very nature and charm of James Bay.

We urge you to refuse the re application dated 3rd October 2022 and to request that Amika/Milliken respect the above mentioned pre set regulations before re negotiating their proposed rebuild plans for the site.

Sincerely,

Jeanette Stacey & Peter McGuire.

102, 660 Battery St,
Victoria, V8V 1E5.

November 1, 2022

Re: Amica Senior Lifestyles proposal to rebuild Amica Douglas House at 50 Douglas Street, 675/685 Niagara Street, and 674/676/678 Battery Street

To Rob Bateman, City Planner for Development

My name is Brenda Clark and I live at 660 Battery Street. In November 2021 my neighbours and I learned that Amica Senior Lifestyles, an Ontario-based group along with Milliken Real Estate Corporation (a Vancouver-based group) and dHKarchitects are planning to tear down and construct a huge edifice to replace Amica Douglas House. Their proposal of February 10, 2022 was reviewed by city staff who, in a 10 page, detailed technical review of the proposal (March 8, 2022) refused to support the application. Nevertheless, the most recent application by Amica/Milliken, October 3, 2022, is almost identical to that application and none of the city staff requirements were addressed. What arrogance! What an insult to your city staff!

Personally, I strongly oppose this redevelopment for the following reasons among many others.

Land Use (height, land coverage and density): the area is currently zoned at R3-2 (urban residential) which has land use restrictions that the proposed development does not adhere to. The proposed **8 storey, 31.1 meter high (but really more like 32.6m with mechanical platforms and elevator overruns)** building exceeds the allowed 3-4 stories (with possibility for 6 stories) (Official Community Plan). City staff in their technical review stated that 8 storeys is inappropriate in the context of the heritage neighbourhood. The proposed development nearly triples the floor space ratio (from the allowable 1.2:1 to 3.25:1/3.3:1). The developer has requested setbacks that are at least twice the minimum permissible taking up almost the entire lot. The outdoor space for the memory care and assisted living residents will be miniscule.

The proposed building will be much closer to the surrounding low profile multiplexes and the clusters of heritage houses on Battery and Niagara Streets.

Heritage Preservation: The development is adjacent to the Battery Street Heritage Conservation Area and other historic streetscapes on Niagara Street and Douglas Street. The JBNDP states, in Section 3 under Heritage Preservation, the objective to “encourage retention of clusters of heritage houses including streetscapes”. Section 2 states that “Any redevelopment in the above areas should be encouraged to enhance existing heritage/character with regard to **scale, form, quality and materials**”. The proposed 8 storey building with a massive footprint will dwarf the Heritage homes including the one on Battery Street that is already part of the Amica Douglas complex as can be seen from the architect-rendered drawings. Conservation guidelines emphasize matching existing densities and providing a transition to lower density uses. **This proposed development at 8 storeys cannot possibly provide a sensitive transition to the lower built single family dwellings and multiplexes adjacent to it.**

Amica already has two facilities in Victoria in addition to Amica Douglas House: Somerset House with a relatively low architectural profile and Amica Jubilee, their new 6 storey development. Why do they need an 8 storey building in this location? In addition, James Bay has many other senior living residences for all level of care. Importantly, many of these are actually affordable senior's housing of which there is a dearth in our city. And here is an important issue that all of you recently campaigned on: affordable housing. In what possible way are any of the Amica senior residences affordable? So building a massive replacement for the existing Amica Douglas House only serves to put a lot of money into the pocket of Amica investors because Amica caters to the wealthy. Where is the public benefit here?

As a final point, I hope the new Mayor and Council will appreciate that James Bay is already the densest community in Victoria according to StatsCan. We will be hard-pressed to densify further without destroying the historical heart of Victoria that people from around the world come to visit.

Having read the Application Review Summary done by City of Victoria staff, the James Bay Neighbourhood Plan, the Official Community Plan and zoning requirements for the area where Amica House is located, it is alarming just how many of the Objectives, Recommendations and Guidelines have been ignored by the Amica Douglas House proposal showing a complete lack of understanding and respect for our diverse community. I conclude that this proposal is unsupportable and definitely not an asset for the citizens of James Bay.

Yours respectfully,
Brenda Clark

November 1, 2022

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The proposed building will be much closer to the surrounding low profile multiplexes and the clusters of heritage houses on Battery and Niagara Streets.

Heritage Preservation: The development is adjacent to the Battery Street Heritage Conservation Area and other historic streetscapes on Niagara Street and Douglas Street. The JBNDP states, in Section 3 under Heritage Preservation, the objective to “encourage retention of clusters of heritage houses including streetscapes”. Section 2 states that “Any redevelopment in the above areas should be encouraged to enhance existing heritage/character with regard to **scale, form, quality and materials**”. The proposed 8 storey building with a massive footprint will dwarf the Heritage homes including the one on Battery Street that is already part of the Amica Douglas complex as can be seen from the architect-rendered drawings. Conservation guidelines emphasize matching existing densities and providing a transition to lower density uses. **This proposed development at 8 storeys cannot possibly provide a sensitive transition to the lower built single family dwellings and multiplexes adjacent to it.**

Amica already has two facilities in Victoria in addition to Amica Douglas House: Somerset House with a relatively low architectural profile and Amica Jubilee, their new 6 storey development. Why do they need an 8 storey building in this location? In addition, James Bay has many other senior living residences for all level of care. Importantly, many of these are actually affordable senior's housing of which there is a dearth in our city. And here is an important issue that all of you recently campaigned on: affordable housing. In what possible way are any of the Amica senior residences affordable? So building a massive replacement for the existing Amica Douglas House only serves to put a lot of money into the pocket of Amica investors because Amica caters to the wealthy. Where is the public benefit here?

As a final point, I hope the new Mayor and Council will appreciate that James Bay is already the densest community in Victoria according to StatsCan. We will be hard-pressed to densify further without destroying the historical heart of Victoria that people from around the world come to visit.

Having read the Application Review Summary done by City of Victoria staff, the James Bay Neighbourhood Plan, the Official Community Plan and zoning requirements for the area where Amica House is located, it is alarming just how many of the Objectives, Recommendations and Guidelines have been ignored by the Amica Douglas House proposal showing a complete lack of understanding and respect for our diverse community. I conclude that this proposal is unsupportable and definitely not an asset for the citizens of James Bay.

Yours respectfully,
Brenda Clark

[REDACTED]

From: Edward Pechter <[REDACTED]>
Sent: November 13, 2022 9:31 AM
To: Rob Bateman
Cc: Development Services email inquiries; X Rysstad
Subject: 50 Douglas development

Dear Mr. Bateman,

Here is a letter sent individually to the Mayor and members of City Council, representing the views of the 22 residents of Saint Andrews Street listed at the bottom. We hope that you will give our concerns some sympathetic attention.

Thanks and all best,

Ed Pechter

Dear Councillor [Mayor] -----

Congratulations on your election and all good wishes for success in your new position.

We are following up on the letter sent last January to the previous Mayor and Council, expressing concern about the revised proposal for 50 Douglas around the corner from where we live. That proposal, by continuing to request substantial variances from the height, density, and setbacks established in the land-use documents, had consequences for the neighborhood no less devastating than the original proposal.

We have now seen the further-revised proposal submitted to the City on October 3, requesting even more extensive variances from the land-use guidelines. As suggested in the City staff's response to the revised proposal, this development, if approved, will irremediably degrade the neighborhood's residential and heritage characteristics—precisely what the guidelines are designed to protect.

We appreciate that your responsibilities extend beyond the interests of particular neighborhoods and write now about the impact of this development on Victoria as a whole, specifically on the critical problem of affordable housing.

The developers propose to tear down a functionally sound and neighborhood-friendly building at Amica, replacing it with a vast and towering complex of high-priced penthouse suites and elder-care facilities. The 102 moderately-priced units currently available at Amica will be permanently eliminated from the City's already inadequate supply. Our affordable housing problem will become significantly worse.

This development is bad for the neighborhood and it's bad for the City. It violates the City's own land-use guidelines and it ignores the suggestions of the City's own planning staff. We respectfully urge you to turn the proposal down.

Thank you for your consideration.

Signed by the 22 residents of Saint Andrews Street identified below:

Mitch Anthony 109 Saint Andrews

Renée van Campen 142 Saint Andrews

Margaret Danylchuk 126 Saint Andrews

André Fontaine 128 Saint Andrews

Karen Froebe 130 Saint Andrews

Marjorie Garson 114 Saint Andrews

Brad Hannah 117 Saint Andrews

Erin Hannah 117 Saint Andrews

Mia Kalef 144 Saint Andrews

Bonnie Laird 134 Saint Andrews

Chris Leung 626 Niagara

D'Arcy McPherson 128 Saint Andrews

Darlene Nickerson 626 Niagara

Edward Pechter 106 Saint Andrews

Lesley Pechter 106 Saint Andrews

Roberta Pridmore 140 Saint Andrews

Paul Richards 114 Saint Andrews

Catherine Ryan 121 Saint Andrews

Bruce Sanguin 144 Saint Andrews

James Stevens 136 Saint Andrews

Helga Strauss 136 Saint Andrews

Joan Tuttle 120 Saint Andrews

Dear Mayor Alto,

Congratulations on your election and all good wishes for success in your new position.

We are following up on the letter sent last January to the previous Mayor and Council, expressing concern about the revised proposal for 50 Douglas around the corner from where we live. That proposal, by continuing to request substantial variances from the height, density, and setbacks established in the land-use documents, had consequences for the neighborhood no less devastating than the original proposal.

We have now seen the further-revised proposal submitted to the City on October 3, requesting even more extensive variances from the land-use guidelines. As suggested in the City staff's response to the revised proposal, this development, if approved, will irretrievably degrade the neighborhood's residential and heritage characteristics—precisely what the guidelines are designed to protect.

We appreciate that your responsibilities extend beyond the interests of particular neighborhoods and write now about the impact of this development on Victoria as a whole, specifically on the critical problem of affordable housing.

The developers propose to tear down a functionally sound and neighborhood-friendly building at Amica, replacing it with a vast and towering complex of high-priced penthouse suites and elder-care facilities. The 102 moderately-priced units currently available at Amica will be permanently eliminated from the City's already inadequate supply. Our affordable housing problem will become significantly worse.

This development is bad for the neighborhood and it's bad for the City. It violates the City's own land-use guidelines and it ignores the suggestions of the City's own planning staff. We respectfully urge you to turn the proposal down.

Thank you for your consideration.

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Edward Pechter 106 Saint Andrews

Lesley Pechter 106 Saint Andrews

Roberta Pridmore 140 Saint Andrews

Paul Richards 114 Saint Andrews

Catherine Ryan 121 Saint Andrews

Bruce Sanguin 144 Saint Andrews

James Stevens 136 Saint Andrews

Helga Strauss 136 Saint Andrews

Joan Tuttle 120 Saint Andrews

[REDACTED]

From: Rob Bateman
Sent: November 21, 2022 9:13 AM
To: [REDACTED]
Cc: Victoria Mayor and Council; Development Services email inquiries
Subject: RE: Proposed Development at 50 Douglas Street by Amica/Milliken

Hello Shannon and Jonas,

Thank you for your sharing your comments on this proposal. We will add your email to the Committee of the Whole agenda to accompany the staff report when the proposal moves forward. Feel free to contact me if you have any questions about our policy, regulations, and processes.

Thanks,

Rob Bateman, MCIP, RPP

Pronouns: he, him, his

Senior Planner

Sustainable Planning and Community Development

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6

T 250.361.0292 F 250.361.0557



From: info@ashcrofthouse.com [REDACTED]
Sent: November 18, 2022 11:40 AM
To: Rob Bateman [REDACTED]
Cc: Victoria Mayor and Council <mayorandcouncil@victoria.ca>; Development Services email inquiries <DevelopmentServices@victoria.ca>
Subject: Proposed Development at 50 Douglas Street by Amica/Milliken

Hello Rob,

Re: Proposed Development at 50 Douglas Street by Amica/Milliken

We are the owners of Ashcroft House (a residence and a Bed & Breakfast) at 670 Battery Street. Our property is immediately adjacent to the heritage home that is included in the proposed development, and to the main building. There are no other buildings or houses that are as close to this Amica development as we are.

On all of the plans submitted to the city by Amica/Milliken, our house is shown as a giant white box. See page 15 of their plans for a good example. If intentional by the developer, this shows a true lack of respect for the neighbourhood, its history and heritage. Our house was built in 1898. It is a beautifully restored landmark in this neighbourhood. We understand that Ashcroft House is not part of the redevelopment but having our house as a big white box is misleading to anyone looking at the plans. Not only misleading, it deceives and tricks anyone looking at the plans to not appreciate or fully understand the site and

neighbourhood. Perhaps the city has guidelines that say buildings not included in any development are supposed to be “whited out”. If so, that should be changed so as not to deceive a viewer of the truth.

We are adamantly against this proposed development for the following reasons:

- The revised plans have a building that is still way too large and dense for the lot size and for the neighbourhood. James Bay is already the densest community in Victoria (according to Statscan). The plans goes against the Official Community Plan and the James Bay Neighbourhood Plan.
- The proposed building does not adhere to the heritage conservation feel of our community. It in no way has an appearance that “enhance existing heritage/character with regards to scale, form, quality and materials”, as in the James Bay Neighbourhood Plan. This building is an **eyesore and a monstrosity** that does nothing to enhance our beautiful neighbourhood. The design is modern, boxy and lacking any historical character.
- The address of the building may be 50 Douglas Street but it infringes on the Battery Street Conservation Area 1. This historic designation has a purpose: “To conserve and enhance the heritage value...of low scale residential areas”. Enhancements must have a high quality of architecture that “responds to its historic setting” (Official Plan Appendix A, Section 4). Again, this redevelopment in no way enhances the heritage nature of this area. The massive size and modern design of the proposed building does not belong here and disrespects the history and heritage so loved by this community.
- Conservation guidelines mention the importance of matching existing densities and providing a transition to lower density uses. A new building of the proposed 8 stories next to low buildings in the heritage conservation area would not have a sensitive transition.
- The proposed building is detrimental to tourism. As a heritage community on Battery Street, we play a large role in fostering tourism in Victoria. We feel like we are ambassadors to the past about our home. The horse carriages with tourists drive by our home and point out the beauty of our home and neighbourhood. Cruise ship passengers meander by, often stopping to talk to us about our home while we are gardening. Tourists and residents alike stop and take pictures and ask questions about the history all the time. We are a beacon at the top of Battery Street for tourists and residents alike, and a true historical landmark. Having this giant, modern looking building towering over us completely takes away from the heritage character of our neighbourhood.
- There is a strong likelihood that this development will put us out of business, at least during the demolition and construction phase. We have a lovely, 124 year old, heritage designated house which has been providing forms of guest accommodations since the mid 1900s. Guests choose to stay at Ashcroft House for the heritage style, the history, the architecture of our building and also for those features in our neighbourhood. It will truly be a shame if this development puts us out of business and for Ashcroft House to be no more.

We fully understand there is a need for senior housing in Victoria but this is not the development to help with that. Amica is a business whose goal is to make money and they do so by providing high end housing for seniors who can afford expensive accommodations. Even in the current Amica building, they are charging \$10,000/month for a run down 400 square foot suite as told to me by a woman whose mother lives there. That is not affordable seniors housing.

This proposed building does not belong in this neighbourhood because it goes against the Official Community Plan, the James Bay Neighbourhood Plan, and the Battery Street Heritage Conservation Area guidelines. Also, it is not a viable option to provide affordable seniors housing.

Thank you for taking the time to read our letter. We hope you support our community in stopping this redevelopment. Please feel free to contact us if you want to discuss anything.

Kind regards,

Shannon and Jonas Stahr

Ashcroft House Bed & Breakfast



Dear Mayor Alto and Council Members,

We are writing to express our continued strong opposition to the massive re-development proposed by Amica Seniors Living for 50 Douglas Street.

We wrote to the last Council to register our objections to this seriously flawed development proposal (earlier correspondence below). We are now faced with a new Council and a revised development plan that by all accounts is even more questionable, in that neighbours' concerns have not been adequately addressed and the building is even larger than before.

We recognize that you will receive many detailed negative commentaries on this enlarged "campus" situated in a particularly sensitive area of James Bay. We will leave the point-by-point critique to others more technically qualified. We simply wish to ask you to reflect on the impact which a project of this size will have on the neighbourhood as a whole.

We have lived in James Bay for more than forty years. When we first moved here we were warned (by other Victorians, entirely without cause) about how tough a place it was, and we have watched its steady transformation from a sturdy working class enclave to a more ethnically and socially diverse mix of people, all of whom are happy to call James Bay home. James Bay has always had a clear sense of itself, as earlier collective efforts to short-circuit inappropriate developments have amply shown. The neighbourhood has nevertheless been willing to absorb a range of institutions and a variety of housing options. As a result, James Bay has become the most densely populated part of Victoria while retaining a vital, inclusive neighbourhood environment.

In our view the Amica development would significantly tilt the balance in the neighbourhood away from traditional housing types, especially because of the other projects currently underway, notably the very large construction at the corner of Government and Menzies Streets. Perhaps most importantly, the collective will of James Bayers, as expressed in the Official Community Plan, would be ignored. For an incoming Council to start its mandate with such an obvious contravention of the spirit of a neighbourhood would be a shame and an ominous sign for the future of Victoria's strong, engaged neighbourhoods.

Thank you for this opportunity to pass along our views, and best wishes for your next four years.

Lynda Cronin & Peter Heap

614 Niagara Street
Victoria, BC V8V 1H9

From: Public Hearings
To: [REDACTED]
Subject: RE: 50 Douglas development

From: Edward Pechter [REDACTED]
Sent: November 13, 2022 9:30 AM
To: Dave Thompson (Councillor) <dave.thompson@victoria.ca>
Subject: 50 Douglas development

Dear Councillor Thompson

Congratulations on your election and all good wishes for success in your new position.

We are following up on the letter sent last January to the previous Mayor and Council, expressing concern about the revised proposal for 50 Douglas around the corner from where we live. That proposal, by continuing to request substantial variances from the height, density, and setbacks established in the land-use documents, had consequences for the neighborhood no less devastating than the original proposal.

We have now seen the further-revised proposal submitted to the City on October 3, requesting even more extensive variances from the land-use guidelines. As suggested in the City staff's response to the revised proposal, this development, if approved, will irremediably degrade the neighborhood's residential and heritage characteristics—precisely what the guidelines are designed to protect.

We appreciate that your responsibilities extend beyond the interests of particular neighborhoods and write now about the impact of this development on Victoria as a whole, specifically on the critical problem of affordable housing.

The developers propose to tear down a functionally sound and neighborhood-friendly building at Amica, replacing it with a vast and towering complex of high-priced penthouse suites and elder-care facilities. The 102 moderately-priced units currently available at Amica will be permanently eliminated from the City's already inadequate supply. Our affordable housing problem will become significantly worse.

This development is bad for the neighborhood and it's bad for the City. It violates the City's own land-use guidelines and it ignores the suggestions of the City's own planning staff. We respectfully urge you to turn the proposal down.

Thank you for your consideration.

Signed by the 22 residents of Saint Andrews Street identified below:

Mitch Anthony 109 Saint Andrews
Renée van Campen 142 Saint Andrews
Margaret Danylchuk 126 Saint Andrews
André Fontaine 128 Saint Andrews
Karen Froebe 130 Saint Andrews
Marjorie Garson 114 Saint Andrews
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Paul Richards 114 Saint Andrews

Catherine Ryan 121 Saint Andrews
Bruce Sanguin 144 Saint Andrews
James Stevens 136 Saint Andrews
Helga Strauss 136 Saint Andrews
Joan Tuttle 120 Saint Andrews

Dear Rob Bateman and new Mayor and City Councillors,

With the new year we felt it was timely to remind you all again of our ongoing concern with the proposal by Amica\Milliken to demolish and rebuild at 675 685 Niagara St and 674 676 678 Battery St. We are re sending our original letter as our sentiment and viewpoint is completely unchanged.

Sincerely,

Jeanette Stacey & Peter McGuire.
102, 660 Battery Street,
Victoria V8V 1E5

Sent from my iPad

Begin forwarded message:

From: P M [REDACTED]
Date: October 30, 2022 at 9:34:07 AM PDT
To: rbateman@victoria.ca
Cc: mayorandcouncil@victoria.ca
Subject: Amica\Milliken\DHKa's Revised Proposal 675 685 Niagara St 674 676 678 Battery St

We write to you with regard to the above with great concern due to the fact that despite their 10th February 2022 application being refused by city council staff citing non compliance with land use policies relevant to property as set out in the Official Community Plan (OCP), James Bay Community Plan(JBCP),Niagara St DPA-16 and Battery St Heritage Conservation Area(HCA1), Amica/Milliken's 3rd October 2022 revised proposal is nearly identical to their original 10th February 2022 application in scale.

An application to build a seniors complex on this scale in our James Bay neighbourhood would be to the detriment of the area and it's existing neighbours. It would also set a precedent for future large build applications which would threaten to change the very nature and charm of James Bay.

We urge you to refuse the re application dated 3rd October 2022 and to request that Amika/Milliken respect the above mentioned pre set regulations before re negotiating their proposed rebuild plans for the site.

Sincerely,

Jeanette Stacey & Peter McGuire.

102, 660 Battery St,
Victoria, V8V 1E5.

From: P H [REDACTED]
Sent: January 28, 2023 11:56 AM
To: Rob Bateman <rbateman@victoria.ca>
Subject: Request to deny the Amica/Milliken proposal on Douglas Street

January 28, 2023

This letter is to discourage the Amica/Milliken proposal to expand their property on 50 Douglas Street.

They applied in 2021 to expand and were refused based on versions that were not considered supportable in scale or appearance. Now they have re-applied with an even larger building proposal. They don't seem to have grasped the concept of why they were refused earlier.

Last week they put up a sign advertising spaces available in the current building. Why are they asking for a huge enlargement if they can not fill the spaces they have now?

A little sidenote not often considered - We live in an area of the world with many days of cloudy, rainy skies. Building structures which create more shade is not a beneficial to the health of the surrounding residents. We need that Vitamin D. . .

Please remember that bigger is not always better.

Thank you.

Patricia Hollister
Battery Street resident

From: Charlotte Dorion [REDACTED] >
Sent: Thursday, May 18, 2023 11:50 PM
To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>
Subject: objection to Amica proposal at 50 Douglas st

Project Type:
Pre-Application (CALUC)
Folder Number:
CLC00369
Application Date:
Dec 22, 2021
Addresses:
50 DOUGLAS ST
City Contact:
developmentservices@victoria.ca

To whom it may concern,

I am writing to express my alarm and disappointment that the city is continuing to consider a building of this size at this location. A six story building at 50 Douglas st will block many residents' view of the sea and will totally dominate this area of the city.

I would like to petition the council to reduce the height of this building further, so that it does not detract from the natural beauty of James Bay and dominate all views from Beacon Hill Park and towards the sea and mountains for so many.

Thank you for taking my objections into account
Charlotte Dorion

Dear Mayor and Council,

We are compelled to write to you once again with regard to the latest revised plans for the proposed new seniors care facility at 50 Douglas Street.

Despite the city's planning department's suggestion that the building should be 3 to 4 storeys in height, we note that the latest plans show a six storey building with each storey being taller than average. This makes the overall building height unacceptable for a heritage neighbourhood such as ours here in James Bay. We realize that it is somewhat lower than the original planned height which was colossal, but feel it needs to be further reduced.

We also note that the planner's question to Amica re affordable accommodation for seniors within their proposed new building was not responded to in any legible way. Could this mean that it is to be a building run for profit to accommodate only those who are fortunate enough to have deep pockets?

Thank you for giving our letter your consideration.

Sincerely,

Jeanette Stacey and Peter McGuire
50 Battery Street,
Victoria V8V 1 E5

Dear Mayor & Council,

Re: Amica Douglas House proposed changes at : 674,676,678, Battery St, 50 Douglas St, 675, 685, Niagara St Victoria.

Further to our previous correspondence in connection with the ongoing planning application by James Milliken for Amica Douglas House, we now write in response to the most recent revised plans received by the City of Victoria on January 8th 2024 which are currently being reviewed by city staff.

Whilst the plans have reduced in scope from the huge scale building which was first proposed, we note that despite city staff's past recommendation that the building should be four storey's it is still a six storey proposal and appears too high for a heritage designated area. We also note that all other Amica buildings in and around Victoria are five storey's and lower so we wonder why this particular application continues to be for six?.

As you are all aware James Bay is a well loved charming and historic area much appreciated by the people who live in it as well as the many visitor's it receives every year. We hope that the area will be allowed to retain it's attractive nature with the City of Victoria's sympathetic planning approval process.

Sincerely,

Jeanette Stacey and Peter McGuire

102,660 Battery Street,
Victoria V8V 1E5

From: Development Services email inquiries
Subject: RE: DEMAND LOWER STOREY/BUILDING HEIGHTS ON OVERLY TALL SIX STOREY PROPOSAL: REZ00810 (9 April 2024 Revision)

Dear Development Services,

I am attaching my updated letter similar to the "DON'T COMPROMISE" I emailed you in March. I felt another letter was necessary given that the Applicant has submitted a third revision this year, i.e., the 21-page proposal dated 9 April 2024. You have my permission to use my 12 April 2024 letter to replace any earlier letter I have sent you about the Amica/Milliken/dHKa Redevelopment Proposal in James Bay.

What's new in my 12 April 2024 letter? The title, certain page numbers to accord with the most recent revision's pagination, a sentence or two (e.g., one ending concern 2; another ending the "To conclude" paragraph. You'll also notice that there are 10 concerns instead of the original 8: concern 2 is now separated from concern 1 for more emphasis on the inexplicable storey heights; and concern 4 is entirely new. In "General Points" at the end, points 2 and 3 are essentially new as well. Finally, the letter now sports two signatures.

Finally, I also have two questions, if you have time to answer:

(1) Is there a defined storey height? The Amica/Milliken/dHKa six-storey building height proposal is currently 23.1 m/76 ft. That is several meters taller than two six-storey apartment buildings nearby: 17.44-17.75 (600 Dallas: proposed) and ca. 19 m (450 Dallas: approved). What accounts for the 4-5 m difference? (See my comment 2 in the attached letter.)

(2) Is the City considering iconic views (including along Dallas Rd) as an important consideration in (re)development proposals? Walking back to James Bay from town yesterday, I noticed that Capital Park in no way interferes with our view, from Government St, of the Legislature. But Orchard House on Michigan St in James Bay blocks a surprising amount of the glorious sky/mountain/sea view from Douglas St. (I've added a new comment 4 in my new letter to address my concern about the Amica/Milliken/dHKa redevelopment proposal.)

That's all for now. Thank you for your time, consideration, and concern for community input.

Yours sincerely,
Dr. Adele J. Haft
202-660 Battery St, Victoria, BC V8V 1E5

DEMAND LOWER STOREY/BUILDING HEIGHTS ON OVERLY TALL SIX STOREY PROPOSAL:

REZ00810 (9 April 2024 Revision)

Amica/Milliken/dHKA's 7 March 2024 Revised Proposal for 675 and 685 Niagara St, 50 Douglas St, and 674, 676, 678 Battery St (site of Amica Douglas House: ADH) in James Bay

"The City is considering a Rezoning application to allow for an assisted living building with increased density. Concurrent with DP000614 and HAP00251."

(Rezoning Application REZ00810: victoria.ca/devtracker, as of 12 April 2024)

The 9 April 2024 Douglas House Senior Care Expansion plan is the seventh revision of the 11 Feb 2022 redevelopment proposal. Previous submissions featured a 7-storey building (27.1 m/89 ft, 27 May & 20 June 2022) only a meter lower than the original 8-storey proposal (28.47 m/93 ft, 11 Feb 2022; 31m/102 ft, 3 Oct 2022). Then on 16 May 2023, the Applicant submitted a 6-storey building on which the 8 January, 7 March, and 9 April 2024 revisions are based: all four revisions eliminate one of two underground parkade levels and the Independent Living penthouse level that seemed so inappropriate atop an Assisted Living and Memory Care building. Housing units in earlier proposals have been replaced with concrete terraces to "provide a transition to the lower neighbours" (16 May 2023 List of Revisions: Design Comments). What looks like a flat roof sports 3 mechanical units, 2 elevator mechanical units, and a solar panel area in the southeast (Roof Plan, p.9). The Building Code & Zoning Summary (p.3: BC&ZS) lists the building height as 23.1 m/76 ft — just 0.6 m/2 ft less than the 16 May 2023 building height of 23.7 m/77.8 ft (roofs excluded). Since neither the Section Plans (8 Jan 2024, pp.11-12) nor the subsequent Roof Plans specify the elevation of the roof's mechanical units, ***what appears on the drawings to be an additional 2+ m/6.5 ft for roof units brings the building's minimum height to 25.1 m/82 ft—only 2-3 m shorter than the earlier proposed 7- to 8-storey buildings.***

Six very tall storeys is still not a compromise despite continued attempts to align itself better with our City's plans and bylaws and James Bay's famous heritage area visited by millions each year. Here's why:

1. Proximity to Beacon Hill: *As revised, the building still interrupts Beacon Hill's famous views of the Sooke Hills for residents and visitors alike.* Beacon Hill is a heritage-designated location as well as an indigenous historical site and tourist landmark. Standards and Guidelines for the Conservation of Historic Places in Canada are required to be considered. Yet the building's roof height remains at 47.3 m geo/155 ft (BC&ZS and Section Plans, pp.11-12). *That means the building will rise 8.3 m/27 ft above Beacon Hill's crest of 38.914 m geo/128 ft* (beaconhillparkhistory.org/contents/chapter13.htm).

2. Storey Heights: *The 8.3 m difference is more than the height of two proposed levels in the 9 April proposal. Moreover, floor heights have expanded from 3.3 m/11 ft in the 11 Feb 2022 proposal to a minimum of 3.6 m/12 ft on the 7 March and 9 April 2024 revisions.* Operational Notes attest "No Treatment, no moving residents in bed" (i.e., no hoists: BC&ZS). Is the extravagant height of each storey meant to mitigate the claustrophobic feel of small units?

3. Building Height: Even at 23.1 m/76 ft, the proposed 6-storey is *twice as tall as the highest of the two existing 4-storey buildings that the Applicant seeks to demolish (12 m/40 ft: 11 Feb 2022 plan, p.2).* The James Bay Neighbourhood Plan states that future development should be limited to 3-4 storeys outside of the village center (Map 2). The property is currently zoned as urban residential (R3-2), allowing for low and mid-rise buildings up to 6 storeys in strategic locations. It is located on a secondary arterial, but the OCP does not identify it as a strategic location (p.38). Furthermore, the proposed redevelopment is adjacent to the low built forms in the Battery Street HCA-1, a heritage destination area celebrated for its history, horse-drawn carriages, and old-world Victoria charm. Levels 5 & 6 now accord with the Heritage

Comment recommendation that “upper storey(s) [be] set back by at least 2.5 m,” particularly along the west and on the southeast by the Heritage House. *Yet the Applicant continues to ignore the Heritage Comment recommendation to “consider 3 to 4 storeys in total”* (Revisions Lists: see also OCP, HCA 1: Traditional Residential, p.263). Note: *Victoria’s other Amica properties are 5-storeys (Jubilee) or less (Somerset, Gorge). Five-storey Amica Jubilee House is in a busy commercial area near a hospital, whereas Amica Douglas House lies on James Bay’s periphery with only two commercial amenities near future Assisted Living (AL) and Memory Care (MC) residents: the Beacon Drive In & For Good Measure.*

4. Viewscapes: Lower Douglas St, from Avalon Road to Mile Zero and the sea, currently offers us all a rejuvenating view of tree-lined Beacon Hill Park (east) opposite stone walls and manicured lawns & gardens fronting generously setback apartment buildings (west). Four-storey Amica Douglas House is barely noticeable. *Set as it is on the highest point of land on Lower Douglas St., the proposed excessively tall “flagship” building will tower over the Park’s trees, block viewscapes west to the Sooke Hills from the top of Beacon Hill, and compete with Mile Zero and the sky and sea for attention.*

5. Density: *The proposed FAR is 2:45, double the Floor Area Ratio density of the current building (1.2:1). The current amended 2019 zoning and land-use guidelines restrict 6+ storey buildings to a FAR of 1.6:1 for buildings with enclosed parking.* A FAR of 2:1 might be considered in strategic locations; but, as noted above, this is not a strategic location.

6. Footprint and Site Coverage: *These are nearly double what has been permissible.* According to the recently removed Zoning Bylaw 3.3 pdf, if a 6+-storey building with enclosed parking were approved, the footprint would be restricted to 30% of the lot coverage with 60% of the lot being open site space (victoria.ca/assets/Departments/Planning~Development/Development~Services/Zoning/Bylaws/3.3.pdf). ***Yet the 9 April 2024 revision proposes a 6-storey building that will cover 53% of the lot, the largest so far proposed, with only 41% left for open space*** (drive spaces excluded). The 16 May 2023 footprints were larger than those in previous revisions. The 9 April 2024 New Building Footprint (2,474 sm) and Total Structural Footprint (2,559.2 sm) may be 15 sm smaller than its 2023 model (2,489.1 sm & 2,574.4 sm: see both BC&ZSs), but they are also around 300 sm larger than the 3 Oct 2022 footprints.

As a result, the proposed outdoor space on this small property (4,913.9 sm) will allow only a few of the AL and MC residents — not to mention their families and caregivers — to enjoy the sun at any given time. Currently, the predominantly Independent Living (IL) residents of Amica Douglas House don’t rely on the landscaped property for their outdoor experience. By contrast, MC residents require far more security than IL or AL residents. So it’s a huge drawback to propose that the property will have so little outdoor space: my father’s continuum of care residence, for instance, had an enclosed garden reserved for MC residents only.

The three 2024 revisions may contain one ray of hope. They propose to “move” MC residents from Levels 2 and 3 on the 16 May 2023 plan to Levels 5 and 6. Level 6 already displayed roof decks on both the West and SE corners in addition to the south deck also found on Levels 2-4. Level 6 now has a north deck, and Level 5 similarly features four roof decks that provide access to sun and warmth while also offering light at the ends of residential corridors. (By comparison, the AL Levels [2-4] now sport 16 unit balconies per floor, but only two communal decks [north & south] and corridors still dead-end into residential doors and stairways. New Level 2-4 balconies cut into the “generous” 8.6 m south setbacks listed on p.6.)

7. Shrinking Units and Common Areas: ADH is holding open houses and new residents are moving in. Amica's welcome package invites residents to choose among studios, 1-bedrooms, 1-bedrooms + den, 2-bedrooms, and penthouses. Earlier redevelopment revisions also offered an assortment of unit sizes and shapes. But the three 2024 revisions propose only cookie-cutter studios and one-bedrooms beyond the three unique Heritage House suites (225-565 sf): The 141 studios (420 sf) and 27 one-bedrooms (550 sf) are small for one person, let alone for couples, several of whom currently reside at ADH. That my father could have rented a two-bedroom unit contributed to his affection for ADH. Particularly troubling is the new Level 1 Plan (p.5): It shows 9 AL/MC units (7 studios, 2 one-bedrooms) in the building's SE corner where the 23 May 2023 proposal placed a Theatre, Game/Pub room, Styling Station, Fitness and Treatment Centre, and Boutique Washrooms for Men and Women. These amenities, now significantly smaller and near a similarly reduced Bistro, Craft Kitchen and Fireside Lounge, are confined to the NE part of the Main Level. The small Library, a haven in my father's community, has disappeared entirely.

8. Impact on Current Residents: *The 2023-2024 revisions offer 168 new units* (plus 3 suites in the renovated Heritage House). Since almost every unit is labeled "AL/MC," including the nine on Level 1, we're forced to trust the figures in the BC&ZS. There'll be 102 new AL units on Levels 2-4 (81 studios, 21 one-bedrooms) to "replace" the current 102 IL and AL units. And 57 proposed MC units on Levels 5 & 6 (53 studios, 4 one-bedrooms). *How can 57 new Memory Care beds justify demolishing Amica Douglas House (ADH) and forcing its current 102 IL and AL rental residents — our neighbours and friends — to sever ties with their neighborhood and networks and/or to move elsewhere — potentially at greater expense — or accept an undesirable alternative?* Yet the Applicant's 3 October 2022 Letter to Mayor & Council (p.3) not only admits that the number of IL residences has declined since 2019, but also claims that "the 1966 Douglas House...is at the end of its useless [sic] life with small elevators, low ceiling heights and no central air conditioning" (p.1). Is that sufficient reason to demolish the cozy, welcoming home of community-oriented residents? After all, Amica Jubilee House — with its emphasis on Memory Care and Assisted Living — opened in December 2023 and its approved sister building is slated to accommodate senior renters (*Times Colonist* 16 Sept 2023). Of course, *Amica Jubilee is not a block from Beacon Hill Park or from the Salish Sea*. When my father visited Victoria's IL and AL residences, he fell in love with ADH. Only death prevented him from living there...and he too would be facing displacement.

9. Impact on Future Residents: Smaller, even more high-priced senior-living units than ADH offers today will prevent residents currently living in larger suites from returning to similar sized units and, equally important, prevent many IL singles and couples from moving to this proposed retirement community while they're vital enough to contribute. Furthermore, units rented by residents with physical and/or cognitive challenges are more likely to vacate more quickly, with the result that higher prices can be offered more quickly to new residents when they move in. *No affordable units are being proposed.*

10. Impact on Proposed MC Residents: The proposed MC levels are hardly the homey best-practice "houses" consisting of kitchen, living room and dining room surrounded by 10-15 resident suites. Instead, the 27-30 suites are separated into two corridors by a central area for dining, lounging, and participating in activities (the spa having been removed to the east corridor). *Despite the amenities, this setup is over twice the size of the "village-like setting" currently being advocated as best-practices for MC housing*, and resident suites encroach on what had been part of a large common space in the 10 Feb 2022 application. *This upscale warehouse is not state-of-the-art today, let alone in 30 to 50 years. Compare this proposal's design to that of the 306-bed, 3-storey, long-term care home to be built on 2 hectares/5 acres in Colwood by 2027* (*Times Colonist* 17 March 2023).

To conclude: The original proposal and its revisions for the redevelopment of Amica Douglas House have been packed with an **extraordinary number of extraordinary variances**. The 2024 revisions may seem to be a step in the right direction, **but the property still remains too small for the Applicant's ambitions**. Furthermore, because the proposed 6-storey building is to stand on the height of land at the corner of Douglas and Battery, it will still dwarf Beacon Hill and the neighbourhood's surrounding heritage buildings, looming over adjoining properties and streets. **Unless the Applicant reduces the storey and building heights substantially, I urge you** — for the reasons above and more (General Points, below) — **to OPPOSE THIS PROPOSAL**.

Recognizing how busy you are, I thank you again for your time, attention, and expertise.

General Points:

1. StatsCan (2021) revealed that James Bay was the densest community in Victoria, with a density of 6.6 compared to City of Victoria's 4.4. (Omitting the Legislature and Ogden Point, JB's density reached 10.0). Furthermore, **James Bay is already rich in home-care providers, senior living residences, and residential care facilities**—from Amica Douglas House, Amica Somerset House, Tapestry at Victoria Harbour, Nova Pacific's The Camelot, Glenshiel Housing Society (IL, low-medium income), and nearby Rose Manor (IL) to Trillium's Douglas Care Community (Long Term Care [LTC], beside ADH), AgeCare James Bay (LTC, publicly funded), Retirement Concept's Beacon Hill Villa (IL,AL,MC, funded by Island Health), Garth Homer Services' Heron House at 507 Government (subsidized AL), Capital Regional Housing's Parry Place (subsidized AL), Broadmead Care's Beckley Farm Lodge (publicly subsidized LTC), and nearby Sunrise of Victoria (LTC) and Mount St. Mary Hospital (publicly subsidized LTC).

2. The proposed high-turnover memory and assisted care facility offers no subsidized or affordable units and will almost certainly require irregular and repeated ambulance and emergency transport of residents. Yet **the Applicant gives no justification why such a large facility should be placed in a quiet residential neighbourhood far from the City's distant hospitals**. Furthermore, if approved, the Applicant estimates that their redevelopment proposal will not be complete until 2028, requiring the neighbourhood's mostly retired residents to endure — in their homes and apartments — years of noise (and possibly dynamiting), congestion, tree removal, and disruptions that could threaten their health and undermine the structural integrity of the predominantly heritage community surrounding it.

3. What evidence has Amica/Milliken/dHKA supplied to prove that any new construction must be as large and disruptive as what they propose here? *Despite their apparent concession of reducing their proposed structure from a nominal 8 to a nominal 6 storeys*, the excessive heights of the storeys and overall height of the proposal prove their "alterations" to be a rhetorical bait and switch. The Applicant offered a one million dollar "donation" to the city's local amenities and housing funds for its five-storey Amica Jubilee House and seven-storey senior rental building. If, as is likely, another million dollars is offered for the rebuild of Amica Douglas House to "offset" their overriding of city building restrictions, such a donation would be paltry compared to the negative impact the redevelopment will certainly have on the very communities and neighbourhood for which the Applicant professes concern.

Sincerely yours,

Dr. Adele J. Haft and Jordan Zinovich, 202-660 Battery Street, Victoria, BC

Hello Rob and the Development Services Department,

I have three points that I would like to raise regarding the most recent revisions, submitted on March 7, 2024 by the developers for the rezoning and development proposal for Amica Douglas House property.

#1-Page one is inconsistent with the development proposed in the rest of the document. The image is misleading and simply different than what they are showing the other pages. The location of the driveway along Niagara is in a different place, and the trees along the property line are different, for example. I would suggest that they resubmit the document with consistent imaging and measurement information.

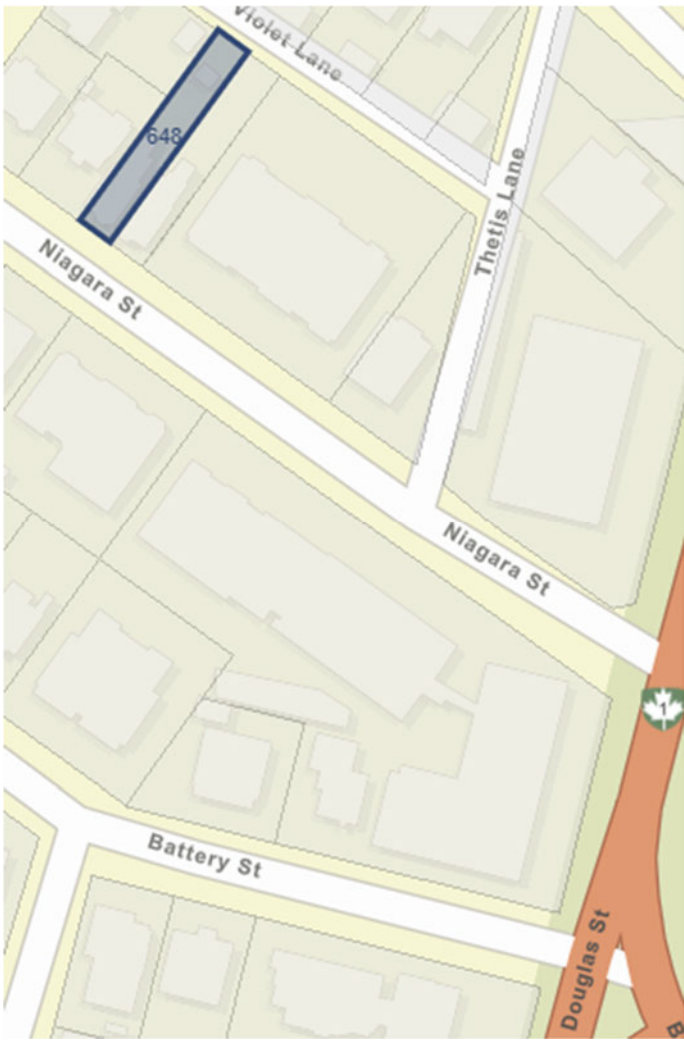
#2-The side of the property facing Niagara Street is quite vertical. I would strongly urge whoever can influence the developers to make more of a step-back in the design along Niagara Street, so that from the street view, it does not feel like there is such a tall building beside you. A deeper step back from the fourth to the fifth floors would ease the transition to the neighbourhood and reduce the overwhelming feel of such a large building. Better yet, only going up five stories would be much more supportable.

#3-The shadow study has been removed. My house will be shaded until noon every day through the winter if any building that is one storey higher than the current one is permitted to be built here. I know this because the sun beams into our house in the winter just over the height of the current Amica Douglas House buildings. It is as if the city council and developers at the time were considerate of the shadow impact of the neighbouring properties. I would ask that the shadow study be required to continue to be included in each revision, so that this impact is not lost in consideration of this development proposal.

Please let me know what you think of these suggestions and how they may be conveyed to the developers. Can these be included in the letter that city staff will send to developers following your technical review of the current revisions?

Thank you,
Dean Rysstad
648 Niagara St

(I own a registered heritage house that is due north of the Amica Douglas House property.)



Dear Mayor Helps and City Council Members,

We are owners of Ashcroft House Bed & Breakfast (a heritage designated home) at 670 Battery Street, located right behind and beside the proposed Milliken/Amica development at 50 Douglas Street.

Should this development be allowed to go ahead, we have very serious concerns about our ability to stay in business. Our house has been a guest house and/or bed and breakfast for over 50 years and this development poses a serious threat to our future.

Demolition and Construction

Our house was built in 1898. We are concerned what the physical effects on our property and house will be with the demolition and ongoing construction. What will all the ground shaking do to our house? Should it be Milliken's responsibility to look into this and provide assurances that there will be no physical repercussions to our building? Milliken should be financially responsible to us for any effects on our home and we would want a legal agreement in place stating this. How else can we be assured that this beautiful heritage designated home doesn't become unsafe for living and worthless?

History

Our home still retains the beauty and charm it had back when it was built. We will be celebrating its 125th birthday next year. Built by Edward Taylour, the house was his home that he shared with family and friends, including George Jennings Burnett. He was a very well-known composer in Victoria in the early 1900s. UVIC still has a bursary in his name for music students. This building has an interesting history and we are sharing it with our guests.

Ashcroft House (formerly Battery Street Guest House and initially, Sydney House) has been a bed & breakfast for decades, and previous to that it hosted many people beyond its owner residents, like us. We host guests from all around the world. We provide warm hospitality, a feeling of the history and community of James Bay, and a peaceful and calm experience. They get to stay in a beautiful heritage house, and see pictures and stories around our home about the people who originally lived here.

Tourism

The demolishing of the buildings surrounding our home will almost certainly destroy our business. We will be unable to provide the peaceful, calm rejuvenating experiences that our guests love during the demolition and construction. We would have to advise potential guests of the construction in advance of them making reservations. We will lose bookings and ultimately not be able to stay in business during demolition and construction.

Gone will be the appeal of our beautiful home and amazing neighbourhood for potential guests and repeat guests.

As a heritage community on Battery Street, we play a large role in fostering tourism in Victoria. We feel like we are ambassadors to the past about our home. The horse carriages with tourists drive by our home and point out the beauty of our home and neighbourhood. Cruise ship passengers meander by, often stopping to talk to us about our home while we are gardening. Tourists and residents alike stop and take pictures and ask questions about the history all the time. We are a beacon at the top of Battery Street for tourists and residents alike, and a true historical landmark.

Milliken/Amica

This development is 100% about catering to wealthy people. Amica is a luxury provider of senior accommodation. Average people are just not staying there at a starting monthly rate of about \$6000/month. Will Milliken/Amica step up and offer assurances that there would be no physical impact on our building? Will they provide financial support to a small business immediately beside them, who will be unable to stay in business due to their actions?

It will be truly shameful if they put us out of business and for Ashcroft House to be no more.

By approving this development, you cater to the wealthy at the expense of history, tourists and average people like us. Ashcroft House and our business deserve to be protected instead of crushed.

Thank you for taking the time to read this. We sincerely hope you appreciate our position.

Shannon and Jonas Stahr

Owners of Ashcroft House Bed & Breakfast