



Christ Church Cathedral School

912 Vancouver Street
Victoria, British Columbia
V8V 3V7

Telephone [REDACTED]
Facsimile [REDACTED]

July 13, 2017

Dear Mayor Helps and all City Councillors,

The purpose of this letter is to bring to your attention the lack of municipal and provincial guidelines to direct the acquisition, development, and siting of supported housing facilities. As you know, the opening of Mount Edward Court at 1002 Vancouver Street immediately next to Christ Church Cathedral School has caused a lot of difficulty for the neighbours and the school. I was very surprised to learn there are no by-laws or even guidelines for siting such a facility. There are by-laws for the placement of marijuana retail stores and pubs that assure none will be placed within 200 metres of a school. There are by-laws restricting how close marijuana stores can be to each other. There are even by-laws to prohibit bicycle vendors from operating within 30 metres of a grade school. But there are no by-laws or even any loose guidelines in Victoria concerning the proximity of supported housing to a school.

The City of Victoria has worked closely with the provincial government to support the development of affordable housing and supported housing. As a result, several new supported housing facilities have opened in Victoria in recent years to serve an obvious need – that of housing those with barriers to employment including mental health and addiction issues. However, it would appear that development has occurred on an opportunistic basis and not according to well-considered criteria that assesses the receiving neighbourhood community for an appropriate fit, at least this was certainly the case for Mount Edward Court. Victoria is the seat of the provincial legislature and it makes good sense and appears to be a good investment of public funds that the Capital City's mayor and councillors use their strong relationship with the provincial government to help the province develop guidelines and sample by-laws that would serve not only Victoria but all of BC.

These guidelines could address the following:

- distance to elementary schools, daycares, playgrounds or anywhere vulnerable populations are concentrated
- the size of the supported housing facility (ideally 30 – 50 residents)¹
- the concentration of supported housing facilities in a neighbourhood
- proximity to public transportation and health services

¹ Lenk, Anna. *Research Highlight: Options for seniors or chronically ill shelter users*. Ottawa: CMHC, 2004. Print. Socio-economic Ser. 03-019; (can also be found here: <https://www03.cmhc-schl.gc.ca/catalog/productDetail.cfm?cat=32&itm=35&lang=en&sid=oRRgmdekEXkxgNzTsi8V6mmxbryQjRjSkHNg40Vbv50KJlmaWBftXJtbQriotsu&fr=1496099941207>)

For the past year and a half I have been taken away from my primary role as a School Principal, which is the education of our students. Instead, out of necessity I have had to focus on the complexities of supported housing including: the legal and political world of provincial-municipal relations, political influencers, police reports, needle sweeps, increased security, child psychology papers, assuring parents that their children will be safe on my watch and the drafting of covenants, which may or may not hold water. I am certain that Mayor Helps and many City Councillors have also spent a lot of time on these issues. If there were common sense guidelines and by-laws in place then every school principal across the province now and into the future could remain focused on providing the educational leadership that society has asked from them. For this to happen, our city leaders and decision makers in the provincial government must collaborate to design an overall framework of guidelines and sample by-laws. Wouldn't this be a good use of everyone's time and energy?

This is my appeal to the elected leaders of the City of Victoria: focus on governance by developing guidelines and by-laws that will serve as a roadmap to current and future supported housing initiatives and ensure the well-being of all members of the community.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'Stuart Hall', written in a cursive style.

Stuart Hall
Head of School
Christ Church Cathedral School

cc: Lianne Taylor, Director of Planning
Chris Coates, City Clerk

Mayor Lisa Helps and Victoria City Council
City of Victoria
City Hall 1 Centennial Square
Victoria, BC V8W 1P6

July 25, 2017

RE: Mount Edward Court Re-Zoning Public Hearing

Dear Mayor Helps and Council,

I am writing you as a parent of two children that attend Christ Church Cathedral School, as a Board member of Christ Church Cathedral and as a concerned citizen of greater Victoria.

It is critical to that if there is to be a re-zoning of the Mount Edward Court facility that the school and the surrounding neighbors have a clear legal document that will ensure and enforce the compliance with the restrictions on the types of residents that are to be housed at the facility.

Hard drug use is to not be tolerated especially with a school directly across the street... Period.

I wish this letter to be included as part of the July 27th, 2017 public hearing for Mount Edward Court.

Thank you,

A handwritten signature in black ink, appearing to read "Jeff Bishop". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Jeff Bishop
4959 Thunderbird Place
Victoria, BC
V8Y 2A2
Cell [REDACTED]

Lacey Maxwell

From: Laurie Brucker [REDACTED]
Sent: July 26, 2017 8:15 PM
To: Lisa Helps (Mayor); Marianne Alto (Councillor); Chris Coleman (Councillor); Ben Isitt (Councillor); Jeremy Loveday (Councillor); Margaret Lucas (Councillor); Pam Madoff (Councillor); Charlayne Thornton-Joe (Councillor); Geoff Young (Councillor)
Subject: Mount Edwards Court

Dear Mayor and Councillors,

I am writing regarding the use of Mount Edwards Court. I am a parent of two young girls who attend Christ Church Cathedral School.

I understand there is a rezoning application for Mount Edwards Court coming in front of Council soon. As you review that application, I would like to encourage you to consider alternate uses for the Mount Edwards Court Building, rather than continuing to support, and support expansion of, its use as housing for people who have had a hard time remaining housed. The current use of the building for this purpose is inappropriate next to an elementary school. A much more appropriate use would be to consider housing for seniors, families or single parents, who may also be vulnerable populations.

Considering expansion of the current building occupancy to nearly 80 units of supported housing with the current or similar population, does not align with best practices in the industry. It invites the litany of problems that have been seen at the 844 Johnson Street facility in town, which has heavily impacted surrounding neighbours and the general downtown environment.

I hope that you will consider these factors when reviewing the application.

Regards,
Laurie Brucker

Lacey Maxwell

From: P.E. Holmes [REDACTED]
Sent: July 26, 2017 10:50 PM
To: Lisa Helps (Mayor)
Cc: [REDACTED]
Subject: Mount Edwards Court rezoning proposal

26 July 2017

Mayor Lisa Helps

City Hall

Victoria, BC

Re. Mount Edwards Court rezoning proposal

Dear Mayor Helps,

It is naïve to imagine that the use of Mount Edwards Court as a supported housing facility will not bring with it increased use and trade of drugs and alcohol, as well as incidents of violence and disruption, to the immediate area. Such activities make it wholly inappropriate as a next-door neighbour to an elementary school, which should be protected from close proximity to any facility where these activities can be expected.

The city needs supportive housing, but equally does it need housing for low-income families and the elderly, both of which uses would be not only vastly more appropriate but would provide positive community-building opportunities among their constituents.

As a Victoria voter and taxpayer, as a parent of a child attending Christ Church Cathedral School, and as the daughter of elderly parents I appeal to you not to support the current Mount Edwards Court rezoning proposal.

With best regards,

P.E. Holmes

1747 Lillian Road

Victoria, BC

V8S 1L2

Cc: Victoria city councillors

Lacey Maxwell

From: M Rainsberry [REDACTED]
Sent: July 27, 2017 9:16 AM
To: Victoria Mayor and Council
Cc: natasha
Subject: Mt. Edward Court

To Mayor and Council members,

I do not support the rezoning at 1002 Vancouver St. I am not in support of the use or expansion of residents at Mt. Edward Court.

My children are enrolled at Christ Church School, and I am concerned with how a rezoning will affect both the school and neighbourhood.

Thanks,
M Rainsberry

Lacey Maxwell

From: Natasha [REDACTED]
Sent: July 27, 2017 9:05 AM
To: Victoria Mayor and Council
Subject: Mt Edward Court

Dear Mayor and Council,

This letter is to urge you not continue or expand the use at Mt Edward Court for accommodations for those citizens who have problems remaining housed.

Please consider the senior citizens, or families / single parents who are in need of low income housing who would be good neighbours and residents.

Our children attend Christ Church Cathedral school, and we are always on high alert going to and from school.

We are also business owners in the area, and we have been adversely affected by the condition of the neighbourhood over the last few years.

In closing please consider these concerns:

Supported housing facility for seniors is between 30 and 50 residents. Cool Aid and BC Housing are proposing to put 79 units of supported housing at Mount Edward Court (currently 38 residents there). The decision to double that population does not align with best practices as researched by CMHC and as is demonstrated at another Cool Aid facility.

Cool Aid has said they will screen the residents moving into Mount Edward Court. The School and neighbouring residents/ businesses need the accountability provided by regular data reports of those screening results, i.e., we need the assurance of knowing the general profile of the residents allowed to move in next door.

Thank you,
Natasha Rainsberry

July 28, 2017

201-912 Southgate
Victoria V8V 2Y2
[REDACTED]

Victoria Mayor and Council:

Mount Edwards on Vancouver Street in Victoria. I walk past this building often as I live in Southgate between Quadra & Vancouver streets. I haven't followed this issue since the closure of the "tent city" and the opening of the 1st floor of Mount Edwards to marginalized folk, I would have thought the building was vacant. I never see a resident, hear a resident or see drug paraphernalia. The only indication the Mount Edwards is housing people is the Security person standing in front of the building.

I support this residence now and the proposed increase in residents. We need to house everyone in this wealthy province including those who have fallen on hard time and need help.

I don't know when the neighbours who complain about the Mount Edwards residents hear or see disturbing behaviour, because I never do even in the evening walking home from events at the Royal Theatre.

Sincerely,

Lynn Martin

From: France Cormier [REDACTED]
Sent: August 7, 2017 11:07 AM
To: Victoria Mayor and Council
Subject: Mt Edwards: A reminder of who can access supportive housing

The information below contradicts the promises made by Cool-Aid for Mt Edwards. At CALUC, I asked Ms. Stinson if they were going to use the CASH process to pick Mt Edwards residents. She said yes. Here is how CASH defines who can and cannot access supportive housing:

Greater Victoria Centralized Access to Supported Housing (CASH)

The Centralized Access to Supported Housing (CASH) program is a cross-organizational hub for collecting applications and referrals to mental health and addictions supported housing in the Greater Victoria area.

Supported housing integrates tenancy with on-site support services and is intended for people:

- Who are managing multiple barriers including mental health and/or addiction issues;
- Who, due to these issues, are experiencing homelessness or are at risk of homelessness;
- Whose support needs cannot be managed with community supports.

CASH strives to streamline access to supported housing with a fair and equitable process for all people accessing supported housing in the Greater Victoria area.

CASH is unfortunately not a good fit for individuals whose primary needs are:

- Affordable housing

- Assisted Living
- Tertiary care
- Emergency housing
- Abstinence based housing
- Transitional housing for clients released from prison
- Housing for minors or families (clients with children)
- Seniors housing

<http://victoriasupportedhousing.ca/>

How does that reconcile with the "promises" made for Mt Edwards. It does not. The whole proposal is based on lies. How can we expect a fair hearing, when the proposal is filled with lies, so that even the mayor does not understand it?

I also have a very recent email from the BC Housing CEO who clearly states that drugs will be allowed at Mt Edwards, just not intravenous drugs.

Can you please ask these questions before going to public hearing?

Thank you,
France Cormier.



Christ Church Cathedral Educational Society

912 Vancouver Street
Victoria, British Columbia
V8V 3V7

Telephone [REDACTED]
Facsimile [REDACTED]

July 24, 2017

Re: Rezoning Application No. 00588 for 1002 Vancouver Street.
Committee of the Whole, Thursday July 27, 2017 at 9:00 am
Agenda Item #3a.

MAYOR'S OFFICE

JUL 25 2017

VICTORIA, B.C.

The Mayor & Members of City Council:

On behalf of the Board of Directors of Christ Church Cathedral School, an immediate neighbour to the proposed facility, I am writing to provide Council with the School's perspective and to ask Council not to approve this rezoning application in its present form.

First, I must point out that the proximity of 1002 Vancouver Street and Christ Church Cathedral School is approximately 20 metres across a quiet cul de sac road (Rockland Ave.).

This juxtapositioning of two vulnerable populations means that extraordinary care is required to ensure the safety and well-being of both. We are concerned that all of the cautions necessary have not been adequately addressed in this application.

There is no other supported housing in the Province of BC (or anywhere else in Canada) that compares in terms of proximity. Examples quoted from Vancouver all have considerably greater distance between them. The often-quoted local situation, also included in the application, (My Place and Central School) is different in many significant ways:

- My Place housed 40 people, compared to the 78 + 15 spaces applied for at 1002 Vancouver Street;
- My Place was only ever intended as a temporary shelter, 1002 Vancouver is a permanent housing facility and;
- My Place was at a considerable distance from Central School (a three-lane road as a part of the distance between the facilities).

Even the compositions of the schools is different – Central School caters for students in middle grades, Christ Church Cathedral houses students from Kindergarten to Grade 8.

Second, there appear to be no City guidelines or policies regarding the placing of facilities for those in need of support in neighbourhoods and especially as they relate to schools. While policy (by-laws) exist regarding the placement of many businesses, including the sales of liquor and marijuana needing to be at least 200 metres from a school, no such policy exists with regard to the proximity of social facilities housing large numbers of people (many with unpredictable behaviours and high probabilities of harmful addictions) next to elementary schools.

Third, research regarding the success of supported-housing facilities is overwhelmingly in favour of ensuring that:

- facilities address their residents' needs by providing homes and necessary support services that meet their needs and,
- facilities fit within the neighbourhood, so that the residents are absorbed into the neighbourhood and not regarded with suspicion or anxiety by others.

The link below refers you to a CMHC report from 2007 that provides guidelines. Following this model and making sure that housing provided in Victoria is of an exemplary standard, and not subject to accusations of "warehousing" or similar pejoratives, we believe that the number of residents at 1002 Vancouver Street should be limited to not more than 50 people.

http://publications.gc.ca/collections/collection_2011/schl-cmhc/nh18-1-2/NH18-1-2-184-2007-eng.pdf

Christ Church Cathedral School had been in steady growth mode for more than 25 years, providing a nationally recognized quality education for up to 200 children per year and employing up to 34 professional staff. It has been adversely affected by decisions of BC Housing and Cool Aid over the past eighteen months. From a financial perspective, we have faced an income decline of between 15% and 20% as parents withdrew their children because of the precipitous opening of Mount Edwards Court.

We have spent many hours in consultation with BC Housing and Cool Aid and while there has been some recognition of the vulnerability of the School there has been a lack of any mechanism to ensure that impacts to the school are seriously addressed now and into the future. The proposed legal agreement between the City and BC Housing does not adequately ensure that impacts to the School are seriously addressed. We are looking for a written covenant governing numbers of residents, behaviours and processes to be used in making any changes in use.

We would be pleased to meet with Council to discuss the difficulties this proposal presents and to assist in looking for solutions for both the school and BC Housing.

Sincerely



Malcolm Read Ph.D.

President, Christ Church Cathedral Educational Society.

Lacey Maxwell

From: James Yahoo! Email [REDACTED]
Sent: August 14, 2017 5:01 PM
To: Lisa Helps (Mayor); Ben Isitt (Councillor)
Cc: Victoria Mayor and Council
Subject: Rezoning Mount Edwards Court, 1002 Vancouver St Victoria. Potential conflict of interest, Mayor Lisa Helps, Councillor Ben Isitt

Hello Mayor Helps And Councillor Isitt,

I recently sent the letters below to the City Clerk and City Manager posing the question of whether either of you should be voting on the subject rezoning application given your reported close ties to the Applicant. Receiving no response, I have chosen to ask Mayor and Council the same questions.

I appreciate that in the case of Mayor Helps, the BC Housing funding connection to the GV Coalition to End Homelessness has been clarified, but it still leaves a situation where the Mayor is voting on a project funded by BC Housing, with Cool Aid as Applicant, while partnering with them on developing projects that BC Housing can fund and Cool Aid can operate. Meanwhile, in addition to voting, the Mayor seems to have become their de facto spokesperson in the media.

The specific details are in the emails below. My question is simple, "Are either of you in a non-pecuniary conflict situation when voting on this rezoning application?" If not, could you please explain why not? I can assert that in business, given the situations as I understand them below, I would recuse myself. I am very bothered by the perception of very close ties to the Applicant.

Thank you for your consideration,
James Campbell

Letter 1

Subject: Rezoning Mount Edwards Court, 1002 Vancouver St Victoria.. Potential conflict of interest, Mayor Lisa Helps

Hello Chris,

I sent a copy of this email to Jason Johnson previously, but now I think you might be the right person so I am sending a copy to you. I understand you may be able to advise me on an issue that I am not sure exactly how to classify. City Council in Victoria is presently considering a rezoning application for the building at Mount Edwards Court, [1002 Vancouver Street in Victoria](#). What I am having trouble understanding is why the Mayor does not recuse herself from the discussion and voting on this issue. The application for rezoning was made by Cool Aid Society on behalf of themselves and BC Housing.

In addition to her role as Mayor, Lisa Helps is also the Co-Chair of the Greater Victoria Coalition to End Homelessness. The Coalition is made up of Service Providers and Business Partners. One of the Service Providers is Cool Aid, one of the funding Business Partners is BC Housing. According to The Bylaws of the Coalition, the Mayor is appointed by the Board of the Coalition, which I assume means she was not formally appointed by the City Council. This would seem to allow for a non-pecuniary conflict to exist.

In addition, the fact that the Mayor is also Chair of the Coalition's Priority One Task Force with a time-limited mandate to find housing options for the chronically homeless (hard-to-house) as outlined below from the Coalition press release should be grounds for her recusal from voting on the rezoning proposal for Mount Edwards Court facility. I am assuming that anyone mandated by BC Housing and Cool Aid through the Coalition to rapidly identify housing options for the same clients that the Mount Edwards Court rezoning proposal concerns, is conflicted. Recent media comments by the Mayor favourably comparing the proposed usage of Mount Edwards by Cool Aid housing hard-to-house, age 50+ alcoholics and recovering addicts, to the previous usage as a senior's complex for mainly 80+ elderly and infirm, are clearly and demonstrably ridiculous. Such comments support my concern that the Mayor is pursuing an agenda that could well demonstrate a conflict of interest requiring recusal from voting on the rezoning. I would appreciate the favour of your reply, and discussion with the Mayor if deemed appropriate.

Thank you,
James Campbell

Excerpt from the Greater Victoria Coalition to End Homelessness press release

For Immediate Release April 19, 2016

Greater Victoria Coalition to End Homelessness Strikes Priority One Task Force to Help People Experiencing Chronic Homelessness

The Coalition Board of Directors recognizes the need to work collaboratively to address the needs of this population.. The Board recently struck the Priority One Task Force with a time-limited mandate to identify needs and work in partnership to find housing options for this subset of people experiencing chronic homelessness. These are people who may be living with particularly high levels of support service need.

Lisa Helps

Victoria Mayor, Coalition Co-Chair, Priority One Task Force Chair



From the Bylaws of the Greater Victoria Coalition to End Homelessness

1. 6.2 The Board of Directors will **appoint** the Mayor of Victoria as a Co-Chair and one of the elected directors, preferably a director elected to represent the community at large, to be the other Co-Chair.

Letter 2

Subject: Rezoning Mount Edwards Court, 1002 Vancouver St Victoria. Potential conflict of interest, Councillor Ben Isitt

Dear Mr. Coates,

I find myself copying you again on the same issue. I am again concerned about a potential non-pecuniary conflict of interest in the referenced matter.

The referenced development proposal is from Victoria Cool Aid Society, a non-profit housing operator in Victoria. The rezoning is to allow for development of a housing complex for the hard-to-house at the noted location. The following is an excerpt from the profile of Councillor Ben Isitt on the City of Victoria website. "He combines professional and volunteer expertise with hands-on experience working with Victoria's street community as a Housing Support Worker with the Victoria Cool Aid Society."

Why would a person touted as working with the Applicant not recuse himself from discussion on this issue. It is not entirely clear if this is a strictly volunteer position, but even so the connection is too close. I suspect that a reasonable person would conclude that Mr. Isitt's decision-making could be influenced or affected by the connection, such that a private interest could conflict with the Councillor's public duties. Again, I would appreciate a reply and any discussion with Mr Isitt that is deemed appropriate.

Regards,

James Campbell



Sent from my iPad

Sent from my iPad

Sent from my iPad

Aug. 14, 2017

Dear Mayor Helps and Council

I am writing in regards to the rezoning application No. 00525 and Development Permit with Variances Application No. 00035 for 1201 Fort St. and 1050 Pentrelew Place and Associated Official Community Plan Amendment (Rockland).

My husband and I recently moved to Central Park Place, a four condo complex across the street from the multi-unit buildings project proposed by Abstract Development. We are opposed to this project as it has been presented.

Density in the downtown core is something we all believe in and can aspire to, but these are units will be high end, not solving the need for low income, or even “average income” housing.

The main issues of concern:

- **Green space** is rapidly disappearing here while condo development flourishes. This is the first Fort St. location on the edge of downtown with old growth trees, bushes and grasses, a much needed respite from the frenetic energy of Fort St. This property has many old growth trees that should be preserved, not only for their beauty, but for their much needed shade and air purifying gifts.
(Is there any possibility of the city buying or trading this piece of land for a few acres in the suburbs, perhaps somewhere outside of heritage residential neighbourhoods, where Abstract’s “vision” would fit in better?)
- **Traffic** on Fort St. is already too busy and too **noisy** and adding over a hundred people to this location, most with vehicles, is just increasing the problem (What is going to happen to Fort St. traffic after the Cook St. Bike Expansion? Will all the Cook St. vehicle traffic be funneled up Fort St.?)
- The **massing, the height, and the architectural expression** leave much to be desired. All other townhouses, single family homes and condos in this neighbourhood are a maximum of 4 stories and any development should stay within those limits. What about an ecological perspective? I’ve seen nothing in the plans. Solar? Gardens? Green building materials?
- The **art gallery** on Moss St. is going to be renovating and **will need more parking-** would this park like 7 acres not be better utilized as an extra parking space perhaps combined with some low density housing, pathways, benches, community gardens, etc. ?
- **A few “low-income” units** will not benefit those needing housing now. It is a gesture on the part of Abstract, but it’s **not enough.**

I realize that a high end condo/townhouse development will pay more taxes to the city than a green or park like space. Sadly, our neighbourhood will miss this tiny bit of wildness, this irreplaceable and beautiful piece of land. After cutting all the old growth down, digging and excavating and blasting the land, this little piece of paradise will end up filled concrete, with steel and with glass. Forever.

Sandra Shore

Lacey Maxwell

From: JAMES CAMPBELL [REDACTED]
Sent: August 19, 2017 7:10 PM
To: Leanne Taylor; Jonathan Tinney; Victoria Mayor and Council
Subject: Mount Edwards Court Rezoning, Permit No. 00195, 1002 Vancouver Street

Leanne Taylor
Senior Planner
Development Services Division
City of Victoria

Jonathan Tinney
Director
Sustainable Planning and Community
Development Department
City of Victoria

Aug 19, 2017

Re: Rezoning Application No. 00588 for 1002 Vancouver Street

Hello Leanne and Jonathon,

I would like to make a few comments about the recommendation you made with regard to the aforementioned rezoning application. I was particularly interested in the section "Other Considerations". It was obvious to me that this section was written by someone who has spent much time with a Cool Aid Representative or a Cityspaces Consultant. It is curious that all arguments in this section support your recommendation that approval is the right land use decision here. Certainly the use of Mt. Edwards is **consistent** with a Housing First approach, in that it could fulfill some objectives of Housing First, **if properly managed**. But, you really are not in a position to comment on whether this facility will actually encourage social integration or minimize stigma unless you have credentials I am unaware of. I would like to highlight some of the other issues I have with your recommendation.

1. Your review of the two Canada Mortgage and Housing (CMHC) studies is curiously selective. The broader CMHC study you referred to (Housing Options for Elderly or Chronically Ill Shelter Users, June 2004) was quite clear in the following two paragraphs.

"Generally, the downtown area is preferred, **provided the facility is not in a drug area or where residents are likely to be subject to predators**. Downtown areas are familiar to residents and close to services such as day care centres, government-funded cafeterias and medical facilities. Alternatively, some informants suggested that **a location in the outskirts of a city or in the country would be more appropriate, as it is away from predators.**"

"Accommodation should be **fully accessible** and could include private and semi-private rooms, or a lockable room with **a two-piece bath and small kitchenette**. There should be communal rooms for dining and social events, case rooms where home nurses can do their work and bathrooms where

workers can help residents with bathing. **The scale should be small, with 30 to 50 units per project at the most.**

How is it that you selectively missed the 30 – 50 units recommendation, the accessibility, and the location away from drugs and predators? With Johnson Street and Our Place and Sandy Merriman in close proximity, it is difficult to suggest that this location is away from drugs and predators. Your synopsis of this article was blatantly directive and a disservice to the decision-makers on Council. This is not the way research should be used. The city needs evidence-based decisions, not decision-based evidence. Your recommendation should not be based on selective parsing of research articles.

2. Why are you commenting on how successfully the building will be run in the future and how wonderful everything will be? How can you know all these things? Seriously, who wrote this? It is like an advertisement for Cool Aid! Why is it here? Did you interview residents of Cool Aid facilities? Did you interview Victoria residents living next to any Cool Aid facility?

3. What is illicit substance use? I turned to Google to find this, “**Illicit drugs** include **illegal drugs** (such as cannabis, opiates, and certain types of stimulants), **pharmaceutical drugs** (such as pain-killers and tranquillizers) when used for non-medical purposes, and **other substances used inappropriately** (such as inhalants).” Is that Cool Aid’s definition? If it is not permitted on the premises, it will likely take place in the nearby residential area. Are you okay with that?

4. And proximity to the Christ Church Cathedral School. How did you choose your analogue scenarios near schools? I note once again that by “staff note” you likely mean “Cool Aid or Cityspaces pointed out”, since at least two of these cases are neatly summarized by Cool Aid as part of their campaign to overcome opposition by Christ Church Cathedral School. I am curious about why you restricted yourself to public school examples and examples from outside of Victoria. Perhaps you could have used the example of the Greater Victoria Christian School at the Baptist Church on Pandora. Closed due to “urban issues” when a needle exchange and the Open Door brought them to the doorstep. Oddly, the Head of School tried to do what the Mayor keeps asking Christ Church Cathedral School to do, embrace the challenge of introducing students to these urban issues. He was gone in two months and the school closed. Not every parent wants their child to learn those lessons in elementary school. Fortunately, some of the students were able to move to St. Andrews. Again, “urban issues” encroached when Our Place opened and enrollment dropped. The school tried to paint it in the best light possible, but declining enrollment killed it off just as surely. Studies do not report on operators of homeless facilities near schools that have closed. Operators do not mention it. No one says anything because we are always responding to a housing crisis, but the schools close just the same. Or what about the Centennial Day Care near Rock Bay Landing forced to move to avoid “urban issues”. So, what are these “urban issues”? I contend that you would have to be willfully blind to not see the issues around Johnson Street, Our Place and Rock Bay Landing. Now place them 18m from an elementary school.

Perhaps your analysis is window dressing, not relevant to the zoning application as it touches on potential future behaviours of the occupants. But I think it is safe to say that similar behaviours will be exhibited around the school. But if we cannot talk about behaviours, we can talk about results. Loitering, discarded needles, petty theft, increased incident reports. Even the Greater Victoria Coalition to End Homelessness, “Nimby to Neighbour” publication admits the famous Denver study that was done in 2002 demonstrated that supportive housing residences over 53 units reported increases in violent and total crime in close proximity to the facility. Homeless advocates use this study to prove that crime does not increase around these facilities ignoring the observed 30% increase in incidents within 500 feet of the facility. More wishful thinking at play.

At Central Middle School, a **temporary shelter** was established. There is a vast difference between a middle school and an elementary school. In B.C., parents have the ability to move their children to other schools outside their catchment area if there is space. We will never know what might have happened. I do know that capacity at Florence Nightingale Elementary somewhat removed from the Biltmore, operated by RainCity Housing Society is now running at 64%, one of the lowest percentages in Eastside Vancouver even with population growth. Why? Did you even ask before touting the success of this project? The Biltmore is really only 43 hard-to-house; the remainder was previously housed and low income “at risk”. Additionally, there are two major condominium developments housing 100’s of people in the 147 m between the facility and the Florence Nightingale Elementary School. Also, busy roadways flank the area. Not really comparable.

I have to admit that I laughed at your use of Nicholson Towers as a comparison to Mount Edwards. This is marketed as affordable living, not supportive recovery. Very different things! Very bad example! A simple online search would have told you that. But I am certain someone assured you this was a reasonable comparable. If you can assure that the following description is accurate to describe those entering Mount Edwards, you might find more support. But it is not! This is merely low-income affordable 55+ housing. No addiction or mental illness.

“Located in Vancouver’s West End, Nicholson Tower is a 20 story high rise that is home to approximately 240 low to moderate income households. The Bloom Group is committed to maintaining Nicholson Tower as affordable housing for seniors age 55 and older. Residents must be able to live independently and be committed to the community aspects of the facility, which includes shared amenity spaces.”

And Mole Hill Community Housing Complex is just not anything like what is proposed. A simple trip to their website clearly demonstrates that. Read below for a description of their clients in affordable housing. These are not the hard-to-house addiction recovery patients, and only 8 with mental health issues.

“There are 170 units on the Hill. There are both **market and subsidy suites** available, ranging in suite sizes from bachelor to 3 bedrooms. 10 units are dedicated to the wait list of the MacLaren Housing Society, which provides homes for persons living with AIDS. The St. Paul’s Heart Home, which provides housing for **heart transplant patients** and their families while recuperating from surgery, is directly across from St. Paul’s Hospital. Watson House, with a transition home run by the Coast Mental Health Foundation, provides rooms and **support for 8 people learning to reintegrate with the community while managing mental health issues.**”

And yet the Mayor was pleased that you included these incredibly misleading comparisons. Good to know that the Lord Robert Annex School will likely survive having typical affordable housing nearby.

I believe this decision should be made weighing the most likely outcome of the action on the existing neighbourhood. You have done a great disservice to those opposed to this proposal by supplying comparables that are far from comparable, from ignoring the evidence from Victoria from private schools that closed, and by comparing a **temporary** shelter-public school story to this permanent proposal. Ask yourself why BC Housing has created an armed camp at Christ Church Cathedral School if they believed there would be no impact.

One statement that glaringly stands out from your conclusion is, “The Applicant has demonstrated how the proposal will minimize impacts on the neighbourhood.” This is just not true! I repeat that one has to be willfully blind to not see the impact of similar facilities in Victoria on the

neighbourhood. We are also watching in dismay as each new facility is used as rationale for the next in the area. On the one hand because services are introduced and hence now close by, and on the other hand because area buildings suddenly become targets for new housing and services. This is apparent in Burnside-Gorge to anyone who will investigate. As to items that mitigate neighbourhood concerns, these are all directed at making the inside of the facility livable, they have nothing to do with outside. The operator has publicly stated that they take no responsibility for what happens once the client leaves the facility. This might work in an industrial area, or in the heart of downtown, but in a quiet residential area, not so much. And once the school is gone, our area is changed forever. And of course, Cool Aid will immediately start talking to the Diocese about using the empty school facility as it has a kitchen and showers and conversion to accommodation could take place.

Direct Victoria examples suggest that the elementary school and the proposed housing cannot coexist in such close proximity. Allowing it is tantamount to a social experiment with potentially serious consequences. Any approval of this proposal will go against the wishes of the community in this regard. Further, Cool Aid, instead of engaging the community and seeking to partner with a community council, and other best practices evident in the literature, has instead chosen to be dismissive and disingenuous in the treatment of neighbourhood representatives. Cool Aid acts as if there will be no impact on the neighbourhood when they know that is not the case. Further, you have supported this agenda by being willfully blind to the obvious Victoria examples of the outcome of these facilities. But the neighbours are not so easily dismissed. It is we who will live with the legacy of this decision. Even the call for public consultation is a dodge of responsibility by Council. What possible input could the general public housed far away have to this specific situation other than "it is a good cause, thank goodness it is not in my backyard!" But that hardly touches on the issues that have been brought forward by those living the issue. We have had a trial run, and it has not been good.

Inclusion of the "Other Considerations" section opposes Councillor Alto's concern about using Land Use to discriminate against certain people as has happened in the past. However, as your inclusion of this section indicates, it is perfectly legitimate to consider the impacts of a proposed facility use on the surrounding community.

Regarding the legal agreement,

1. You mention the Vulnerability Assessment Tool (VAT) and comment only those with a low-to-moderate support requirement will be admitted, as if tied to the VAT score. A quick read of the VAT (Canadian Version) yields the following,

"While an assessment score offers a view of an individual's relative overall set of needs, **it does not define the level or type of support an individual needs**. Additional research may reveal whether assessment scores can be used to determine the best type of housing for an individual, but until that happens, the amount of support, supervision, medical care, etc., that any given individual needs will have to be determined separately from the vulnerability assessment process.

Because this type of research has not yet been conducted, avoid using assessment scores for purposes other than determining relative overall need. An individual with a higher score is deemed to be more vulnerable to continued instability, but that does not necessarily mean they require a more intensive level of services or supervision than someone with a lower score. Assessment scores alone should not be used to determine that an individual's needs are beyond the scope of a particular service or housing program." (Vulnerability Assessment Tool Canadian Version)

Quickly rewritten, this is saying, "An individual with a lower score is deemed to be less vulnerable to continued instability, but that does not necessarily mean they require a less intensive level of services **or supervision** than someone with a higher score." And yet low-to-moderate VAT score in this case

seems to be used to infer that the client group will be in low need of supervision and services. This is just not so.

2. Illicit substance use will not be permitted on the premises. So, where is it going to take place? On Rockland near the schoolyard, in my backyard? Again, examples from Our Place tell us that the drug use is in proximity to the facility.

The legal framework needs to be much stronger before any approval. In particular, these facilities seem to get used as temporary shelters all the time in response to the next crisis. This is an entirely inappropriate use for this facility. There should be restrictions. Further, there should be requirements to avoid this area ending up like Our Place with people sprawled all over Rockland and the Pioneer Park area. Cool Aid will not care about this, only the neighbourhood cares. And we really, really do. If our playground at the Court House, so full of children now, dies off because of needles like the one I had to get Y staff to remove there last week, it will be because too many homeless and addicted services are being crowded in this area. It will make us all very sad indeed that we cannot have a school and a playground downtown.

From the Executive Summary,

1. You mention that the proposal is consistent with the Cathedral Hill Precinct Plan, yet the section, A Future Vision of Cathedral Hill includes the following. "These features attest to the quiet, restful character of the eastern and southern reaches of the precinct. And, "people frequent the Courthouse green and Pioneer Square during lunch." Or "In the evening, residents use these green spaces as an informal meeting spot." These features of the neighbourhood that the plan wants to promote are not consistent with people sprawling about as near Our Place. What controls are actually going to be placed on Cool Aid and clients to ensure that the Precinct Plan is respected?

From Affordable Housing Impacts,

Where are the studies showing 93 units are recommended, not just a social experiment? Where are the studies that show that this number of people can be adequately serviced and supported by Cool Aid? Why are the results from other buildings in proximity to this location like Our Place and Johnson Street not discussed or debated in this section? Why are we willfully blind to actual Victoria examples?

Thank You,

James Campbell
Mount Edwards Neighbour

c.c. Mayor and Council

Pamela Martin

From: Enrique Blanc Cisneros [REDACTED]
Sent: Wednesday, October 04, 2017 12:40 PM
To: Public Hearings
Subject: Lot 1, VC, Plan 35568

Hi, we live in the 1020 burdett apartment, we disapprove entirely of this plan.

First of all, neighborhood is calm, neighbors can park their bikes and they remain safe. That will see a change, I have no doubt as proven with other locations of the city with supportive housing units.

Car parking is difficult as it is. I park on rockland because there's not enough space on burdett most of the time, reduce those spots by 50% and I no longer am sure where can I park my car. You should only keep 5 spots. why are government workers more important than tax payers? with 5 spots the city should have enough for emergency vehicles and on-site manager.

We are getting absolutely no benefits at all from the city providing support units, our rent is expensive as is at around \$1,400 for our apartment. Price for the location and relatively calm and safety.

Most cities opt for supportive housing a little bit farther away from Downtown, why is victoria different? why do they have to be so close to Downtown. there's plenty of space in oak bay, saanich, saanichton, esquimalt, gordon head. Why Cook st village?

Who's getting the benefit here? owner of the building?

We voted for liza phelps, but have regretted our decision almost immediately, and this is another reason why. it makes no sense.

We will try to be at the hearing, but might be away for work. Which is really in-convenient that there is only 1 hearing for something that can potentially change the lives of a couple hundred people.

So out of this deal you guys must be getting something, right? but the rest of us, who will have to put up with confused, possibly dangerous, difficult members of society, next to our street, the late night sirens, cops ambulance, fights, random shouting. What do WE get in return?

Thank you, I hope this letter wasn't too informal.

I will try to be there, and I am hoping there's an opportunity for a second one.

Also thanks for sending the letter.

Pamela Martin

From: sharon levene [REDACTED]
Sent: Friday, October 06, 2017 9:28 AM
To: Public Hearings
Subject: 1002 Vancouver Street

RE: R 84 Mount Edwards Court

Please do not share my email address

I am against the rezoning of this property. I live across the street and I feel it is inappropriate to have this many supportive housing units so close to the school. Personally I have not had any issues to date with the current residents or witnessed any inappropriate behaviour but I do think that increasing the number of residents increases the risk to the children at the school and the neighbourhood.

Thank you,
Rockland Ave Resident