



# 今日唐人街 *Chinatown Today*

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## **Letter of Opposition Towards 105 Keefer**

I am writing on behalf of Chinatown Today Society in opposition to Beedie's 105 Keefer development. As a youth-led non-profit organization in Vancouver's Chinatown, incorporated with the mission of sharing Chinatown's stories – past, present, and future, Chinatown Today is deeply committed to protecting vital sites of cultural heritage, community, story-sharing, and story-making in our community.

We are opposed to Beedie's 105 Keefer proposal because it does not serve the needs of Chinatown, instead posing a grave threat towards the neighbourhood and community. 105 Keefer not only threatens to worsen the crises of gentrification, affordability, and accessibility facing Chinatown, but



would also do serious damage to vital public spaces in the neighbourhood and erode Chinatown's sense of place. The Chinatown Memorial Square and the Dr. Sun Yat-Sen Park, two of the only truly public spaces in Chinatown, are especially threatened by this development.

Luxury condo developments have already done considerable damage to Chinatown, and 105 Keefer threatens to worsen the crises facing the community. We've seen from Chinatowns and other communities of colour across North America, like Portland Chinatown, Montreal Chinatown, Los Angeles Chinatown, and Seattle's Chinatown & International District, among others, that these kinds of luxury condo developments accelerate gentrification, the economic displacement of long-time residents and business, and cultural erasure. Even where, like 105 Keefer, these new developments go up on land used for parking lots or other low-density uses, they drive up rents in neighbouring buildings and intensify development pressure, driving gentrification and displacement beyond the individual object building. It's especially egregious that Beedie's proposal for 105 Keefer contains no affordable, culturally appropriate, or senior's housing despite the need for these being even greater than ever. Further, without safeguards to ensure that the retail ground floor will be occupied by businesses that are accessible to and can serve the needs of the Chinatown community, 105 Keefer appears to be following the examples set by luxury developments elsewhere in Chinatown (e.g., 189 Keefer, 188 Keefer, 183 East Georgia, 708 Main Street, 303 East Pender, etc.), which have brought in gentrifying businesses that attempt to actively erase Chinatown's identity and leave in their wake an empty and uninviting streetscape. The chilling effect of these developments has also been seen in other Chinatowns across North America; in Vancouver, despite promises of bringing "body heat" that would help revitalize Chinatown, we've seen that these luxury condos have had the opposite effect, intensifying the pressures on the community and bringing negative economic impacts. Carol Lee noted as much in 2017, when speaking on behalf of the Vancouver Chinatown Revitalization Committee:

"We found out the hard way that these new large buildings that were supposed to revitalize the community had an economic impact opposite of what [they were] supposed to do. They accelerated the way that gentrification has been sweeping across Chinatown and pushed out the very people [they] were supposed to help"

The imposition of Beedie's proposal on 105 Keefer would foreclose the possibility of any use for the site that could actually serve Chinatown's need in the foreseeable future. We've seen that despite high turnover and vacancy rates in these new luxury developments, they do not house accessible or culturally appropriate spaces or businesses that can serve the needs of the community.

In addition to these concerns, there are fundamental flaws in Beedie's proposed design for 105 Keefer. These design issues warrant rejection of the project by the Development Permit Board, when viewed in relation to the criteria set out in section 4.17 of the HA-1A District Schedule to the Zoning Bylaw. In particular, 105 Keefer would tower over the Chinatown Memorial Square and Chinatown Memorial Monument, doing irreversible damage to the sense of place and community vibrancy in Chinatown. The Chinatown Memorial Monument, by artist Arthur Shu-Ren Cheng, honours the Chinese-Canadian veterans and labourers that helped build our country and community, and fought

and died for our right to participate in Canadian society. Beedie's 105 Keefer development would absolutely dwarf the Monument, looming over the square that serves as a space for the community to come together, through dancing, singing, mahjong, games, festivals, ceremonies, memorial services, and other community events. The effect is compounded by the uniform roofline and lack of setbacks, contrary to the HA-1A design guidelines. A more in-depth summary of the project in relation to the criteria set out in section 4.17 of the HA-1A District Schedule to the Zoning Bylaw can be found in the attached Appendix.

Based on these concerns, and in solidarity with others in the community who have voiced their opposition to this project, we ask that the Development Permit Board reject Beedie's application just as they did in 2017.

Russell Chiong  
President, Chinatown Today Society

## Appendix: Criteria and Application to 105 Keefer

### Background & Factors the DPB Can Consider on May 29<sup>th</sup>

Per section 4.17 of the HA-1A District Schedule to the Zoning Bylaw as it was in 2017 (the “Schedule”), the Development Permit Board (DPB) must consider, among other factors, the intent of the Schedule, all applicable policies & guidelines adopted by City Council, and the effect of new visible exterior surfaces on the site and adjacent buildings, before accepting or rejecting an application.<sup>1</sup> Based on these factors, the DPB should reject the application.

It’s important to note that Mr. Jerry Dobrovlny, Chief Engineer for the City of Vancouver and member of the DPB during the 2017 decision, took these factors into account in his vote to reject Beedie’s application. Mr. Dobrovlny set out specific reasons why Beedie’s application was inconsistent with the intent of the Schedule, all applicable policies & guidelines adopted by City Council, and the negative impacts of the new visible exterior surfaces on the site and adjacent buildings.<sup>2</sup>

### The Intent of the Schedule, and All Applicable Policies & Guidelines Adopted by City Council

#### The Intent of the Schedule

The HA-1 and HA-1A Districts Schedule, in part, aims to ensure that new developments are compatible with the Chinatown context, and maintain the factors that make Chinatown an asset to the city.<sup>3</sup> Towards these purposes, and in order to achieve “an appropriate level of design sensitivity,” the design guidelines set out certain recommendations and requirements for developments.<sup>4</sup>

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<sup>1</sup> City of Vancouver, by-law No 3575, *Zoning and Development By-law* (2017), Schedule HA-1 and HA-1A, s 4.17, online: <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/b3a3ecbd4e4a0f8f6fd2891fd940526f08fef363/original/1684274973/f41bde0800fb1b18ae2dbdc0f41ef8b1\\_2017\\_HA-1A\\_district\\_schedule.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIOR7V](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/b3a3ecbd4e4a0f8f6fd2891fd940526f08fef363/original/1684274973/f41bde0800fb1b18ae2dbdc0f41ef8b1_2017_HA-1A_district_schedule.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIOR7V)>.

<sup>2</sup> City of Vancouver, Development Permit Board and Advisory Panel, *105 Keefer Street – DP-2017-00681 – ZONE HA-1A*, (Meeting Minutes), (6 November 2017), online (pdf): <[https://vancouver.ca/files/cov/minutes-dpb-20171106.pdf?\\_ga=2.96721817.729163293.1684282519-284115727.1683750957](https://vancouver.ca/files/cov/minutes-dpb-20171106.pdf?_ga=2.96721817.729163293.1684282519-284115727.1683750957)>.

<sup>3</sup> City of Vancouver, by-law No 3575, *Zoning and Development By-law* (2017), Schedule HA-1 and HA-1A, s 1, online (pdf): <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/b3a3ecbd4e4a0f8f6fd2891fd940526f08fef363/original/1684274973/f41bde0800fb1b18ae2dbdc0f41ef8b1\\_2017\\_HA-1A\\_district\\_schedule.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIOR7V](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/b3a3ecbd4e4a0f8f6fd2891fd940526f08fef363/original/1684274973/f41bde0800fb1b18ae2dbdc0f41ef8b1_2017_HA-1A_district_schedule.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIOR7V)>.

<sup>4</sup> City of Vancouver, by-law No 3575, *Zoning and Development By-law* (2017), Schedule HA-1 and HA-1A, s 1, online (pdf): <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/b3a3ecbd4e4a0f8f6fd2891fd940526f08fef363/original/1684274973/f41bde0800fb1b18ae2dbdc0f41ef8b1\\_2017\\_HA-1A\\_district\\_schedule.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIOR7V](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/b3a3ecbd4e4a0f8f6fd2891fd940526f08fef363/original/1684274973/f41bde0800fb1b18ae2dbdc0f41ef8b1_2017_HA-1A_district_schedule.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIOR7V)>; City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

## Applicable Policies & Guidelines

### The intent of the Design Guidelines

The express intent of the Design Guidelines for the HA-1A District (the “Design Guidelines”) is to encourage development “that is responsive to the community’s established cultural and historic identity” in order to “uphold the sense of place of Chinatown.”<sup>5</sup> Developments should be “a response to the contextual circumstances of any particular site.”<sup>6</sup> Towards this end, the Design Guidelines require that developers understand the context of Chinatown, review the Chinatown Statement of Significance (SOS) on the Canadian Register of Historic Places, and “demonstrate their understanding of the character and significance of the historic urban pattern and fabric.”<sup>7</sup> The SOS highlights the value of the Dr. Sun Yat-Sen Classical Chinese Garden, the importance of Chinatown as a place for socializing, ceremony, and cultural expression, and that part of Chinatown’s value comes from its survival through “urban renewal” that destroyed neighbourhoods for new construction.<sup>8</sup>

### Design Philosophy

The Design Guidelines also set out a framework of what should inform the design of new developments in Chinatown.<sup>9</sup> The aims of this design philosophy include enriching and protecting Chinatown’s sense of place, and “achieving liveability and neighbourliness.”<sup>10</sup> Further, developments should be informed by urbanism, in other words, “an understanding of the history, culture and architecture of the place.”<sup>11</sup> New buildings should “be informed by surrounding building façade proportions and compositions, patterns of fenestration and spatial organization” in order to reach a “respectful co-existence with the sensitive cultural-historic context.”<sup>12</sup> Developments should also help create “a vibrant and liveable environment.”<sup>13</sup>

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<sup>5</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>6</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>7</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>8</sup> “Vancouver Chinatown” (last visited 19 May 2023), online: *Canadian Register of Historic Places* <<https://www.historicplaces.ca/en/rep-reg/place-lieu.aspx?id=21260&pid=0>>.

<sup>9</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>10</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>11</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>12</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>13</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

## General Design Considerations

The Design Guidelines describe certain design elements and considerations that should guide developments in Chinatown. These include “the characteristic “sawtooth” streetscape profile with varied roof lines,” and the fact that “the Chinatown Memorial Square is the primary public open space” in Chinatown.<sup>14</sup> Guiding principles for design include the retention of the heritage values of the area as described in the SOS, and respect for the “scale and the character of the urban pattern” of Chinatown.<sup>15</sup> Views, especially public views, are a priority for new developments.<sup>16</sup>

## Building Scale and Form

The Design Guidelines specifically discourage “taller buildings, up to nine storeys, constructed on consolidated lots with uniform roof lines.”<sup>17</sup> The maximum allowable height for buildings is 27.4 m, or approximately 89 feet, with setbacks by approximately 3.0 m (10 feet) at heights above 21.3 m (just under 70 feet).<sup>18</sup> Where the upper portion of the building is for residential use, a 7.0 m (approximately 23 feet) rear setback is required.<sup>19</sup> Massing should be “street-oriented” with “a well-articulated principle façade and prominent saw-tooth profile.”<sup>20</sup> Buildings should respond to the context of the block and maintain the “fine grain streetwall pattern” and “saw-tooth” profile.<sup>21</sup> The overall massing and building height should be reduced through upper floor setbacks and other techniques for buildings taller than 21.3 m (just under 70 feet), or those that stray dramatically from the height of nearby buildings.<sup>22</sup> The street façades of new buildings should have distinct upper and lower sections, with measures taken to ensure that floors above 21.3 m are secondary to the primary façade below.<sup>23</sup>

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<sup>14</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 2.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>15</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 2.2, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>16</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 2.3, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>17</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 3.1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>18</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), ss 3.1.2, 3.3.2 online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>19</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 3.3.2, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>20</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 3.2.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>21</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 3.5.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>22</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 3.5.2, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>23</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), ss 4.2-4.3, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

While neon signs are allowed, they “should be compatible with adjacent buildings and the streetscape” and “mitigate potential impacts to residents.”<sup>24</sup>

### **Beedie’s Proposal for 105 Keefer is Inconsistent With the Intent of the Schedule, and All Applicable Policies & Guidelines Adopted by City Council**

As Mr. Dobrovolny noted in the 2017 DPB decision rejecting this design for 105 Keefer, significant changes would be required for this development to be made consistent with the Intent of the Schedule, and applicable policies and guidelines adopted by City Council.<sup>25</sup>

#### The Intent of the Schedule

105 Keefer lacks an appropriate level of design sensitivity, especially given its on the Chinatown Memorial Square, at the intersection of Keefer and Columbia Streets. Beyond serving as a gateway to Chinatown, this prominent location is the site of the Chinatown Memorial Monument, honouring Chinese-Canadian labourers and veterans who helped shape this country and who fought for our rights as Chinese-Canadians to vote. The Memorial Square is the primary public open space in Chinatown, serving as a home for recreation, ceremonies, memorial services, festivals, and other community events like mahjong, karaoke, community arts, and more. As an area of cultural celebration, located at one of the gateways to Chinatown, the Memorial Square is particularly important in defining Chinatown’s sense of place. The experience of Chinatowns in Montreal, Portland, Seattle, Los Angeles, and elsewhere have made it obvious that large-scale luxury developments like 105 Keefer have a chilling effect on the streetscape, doing damage to the social fabric and sense of place in the community. The risks are especially dire where such developments are imposed on sites that serve as gateways, or entryways to Chinatowns, as the progressive encroachment of gentrification serve to constrict the borders of these threatened neighbourhoods, furthering the progressive erasure of Chinatown communities and living heritage. This does damage to the very features of Chinatown that make it an asset to the city.

#### Applicable Policies & Guidelines

##### The intent of the Design Guidelines

The design of this building is neither adequate nor appropriate as a response to Chinatown’s established cultural and historic identity. Beedies’ proposed design fails to consider the identity of Chinatown beyond stereotypical views of Chinese culture that are tokenistic at best, from the arbitrary neon sign (completely inconsistent with the historical and current use of neon in Chinatown) and red elevator boxes to the chinoiserie-esque screens/railings on the balconies and the faceless Tai Chi practitioners rendered in the elevations, as well as the vague references to the “spirit of Chinatown”

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<sup>24</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 4.6, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>25</sup> City of Vancouver, Development Permit Board and Advisory Panel, *105 Keefer Street – DP-2017-00681 – ZONE HA-1A*, (Meeting Minutes), (6 November 2017), online (pdf): <[https://vancouver.ca/files/cov/minutes-dpb-20171106.pdf? ga=2.96721817.729163293.1684282519-284115727.1683750957](https://vancouver.ca/files/cov/minutes-dpb-20171106.pdf?ga=2.96721817.729163293.1684282519-284115727.1683750957)>.

without any further elaboration.<sup>26</sup> As 188 Keefer Street demonstrates, the use of the colour red and tokenistic nods to Chinese culture do little to remedy fundamental flaws in the design of the building.



Tokenistic nods to Chinese culture used in the elevations.<sup>27</sup>

Meanwhile, the large glass boxes, which include large portions of the main façades facing both the Chinatown Memorial Square and Columbia Street are wholly inconsistent with the current and historic urban pattern/fabric, more akin to a Yaletown condo than a response to Chinatown’s historic or present identity.

The lack of consideration towards the Monument demonstrates a failure to consider the contextual circumstances of this particular site, which have been outlined above. The alcove in the facade adjacent to the Chinatown Memorial Monument is not an appropriate response to the site, failing to take into account the sensitivity and cultural importance of the Monument.

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<sup>26</sup> Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), “Elevations”, online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>; City of Vancouver, “dpb-report-105 Keefer - Appendix e.pdf” (June 2017), online (pdf): <<https://vancouver.ca/files/cov/dpb-report-105%20Keefer%20-%20Appendix%20e.pdf>>.

<sup>27</sup> Picture credit: Screenshots (edited for clarity) of: Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), “Elevations”, online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>.





Note the lack of setbacks at the 21.3 meter (approximately 70 foot) height threshold (left) and lack of façade differentiation to make the floors above 21.3 meters secondary to the façade below.<sup>28</sup> The way this development dwarfs the monument is exacerbated by the overwhelming height of the development the massing oriented towards the square, and the lack of setbacks or other form of façade differentiation above the 21.3 m height threshold.

<sup>28</sup> Picture credit: Screenshot (edited for clarity) of: Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), “Elevations”, online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>.



The elevations for 105 Keefer depict the Chinatown Memorial Monument only in faint dotted lines, rendering it almost invisible, while depicting a non-existent 9-storey building next door in solid lines as if it did actually exist.<sup>29</sup>

The elevations also essentially erase the Chinatown Memorial Monument by rendering it only with a faint dotted outline.<sup>30</sup> These more subtle forms of erasure apparent in the design documents reflect the cultural erasure that this development threatens Chinatown with, jeopardizing the factors that embody Chinatown’s value (as described in the SOS) such as the community’s survival through attempted destruction and exploitation during “urban renewal.”<sup>31</sup>

<sup>29</sup> Picture credit: Screenshot (edited for clarity) of: Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), “Elevations”, online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>.

<sup>30</sup> Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), “Elevations”, online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>.

<sup>31</sup> “Vancouver Chinatown” (last visited 19 May 2023), online: *Canadian Register of Historic Places* <<https://www.historicplaces.ca/en/rep-reg/place-lieu.aspx?id=21260&pid=0>>.

## Design Philosophy

As outlined above, Beedie’s proposal for 105 Keefer would do serious damage to Chinatown’s sense of place.<sup>32</sup> Further, the use of prominent glass boxes on both the Columbia and Keefer Street façades give little consideration to the “surrounding building façade proportions and compositions, patterns of fenestration and spatial organization.”<sup>33</sup>



Large glass boxes and an unwelcoming facade on the Columbia Street frontage of 105 Keefer. This elevation also demonstrates the lack of setbacks facing the Chinatown Memorial Square.<sup>34</sup>

The massing of the building, lack of setbacks, and orientation towards the Chinatown Memorial Square (which acts as “primary public open space” in Chinatown), threaten the livability and vibrancy of the Chinatown urban environment.<sup>35</sup> 105 Keefer would loom over vital elements of the public realm that act as sites for the building of community, the sharing in culture and ceremony, and

<sup>32</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>33</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>34</sup> Picture credit: Screenshot of: Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), “Elevations”, online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>.

<sup>35</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), ss 1.1, 2.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

honouring those who have come before, such as the the Dr. Sun Yat-Sen Park, the Chinatown Memorial Square, and the Chinatown Memorial Monument. The relative uniform streetwall pattern that 105 Keefer would create mirrors other large luxury developments in Chinatown that have reduced the liveliness and vibrancy of the community. The proposed design of 105 Keefer would therefore suppress the use of public spaces fundamental to Chinatown, reducing livability and reflecting a lack of neighbourliness.<sup>36</sup>

As outlined above, the proposed design for 105 Keefer, which tokenises stereotypical perceptions of Chinese culture, demonstrates a lack of understanding of Chinatown's character or historic urban pattern and fabric. Instead of drawing on specific elements grounded in the specific context of Vancouver's Chinatown, Beedie's design draws on arbitrary aesthetic cues and various stereotypes, focusing on the development as an object building with little thought given to the broader impacts of the building or how it might appropriately respond to the historic and present urban fabric of Chinatown. This shallow aesthetic approach demonstrates a lack of consideration for urbanism, especially as it applies to the unique context of Chinatown.<sup>37</sup>

Beedie's proposal for 105 Keefer demonstrates a further failure to take into account urbanism in its lack of affordability and accessibility, or any safeguards against gentrification. Not only does the design pose a significant threat to the sense of place in Chinatown and show a lack of consideration for the building as existing in context and in relation with the existing neighbourhood and community, but the lack of these important measures also demonstrates a failure to consider the effects of the building on the surrounding community. The lack of affordable housing, accessible spaces and businesses, or other safeguards against gentrification, worsen the pressures on Chinatown, which is already in crisis; arguments that this building is replacing a vacant lot show a distinctly object building-focused perspective, which fails to take into account the urbanism of space and the effects of the building beyond the boundaries of the lot line.

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<sup>36</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>37</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

## General Design Considerations



The uniform rooflines facing the Chinatown Memorial Square (top) and Columbia Street (bottom).<sup>38</sup> The uniform roof line of Beedie’s proposed design for 105 Keefer fails to embody “the characteristic “sawtooth” streetscape profile with varied roof lines.” Further, the scale and massing of the building towering over the Chinatown Memorial Square show a lack of consideration for the “primary public open space” in Chinatown.<sup>39</sup>

Beedie’s proposal does not show an adequate consideration of the guiding principles identified in the Design Guidelines, such as the retention of the heritage values of the area as described in the SOS, and respect for the “scale and the character of the urban pattern” of Chinatown.<sup>40</sup> As Carol Lee (Co-founder and current Chair of the Vancouver Chinatown Foundation) noted at a public hearing on 105 Keefer in 2017 on behalf of the Vancouver Chinatown Revitalization Committee, “We found out the hard way that these new large buildings that were supposed to revitalize the community had an economic impact opposite of what [they were] supposed to do. They accelerated

<sup>38</sup> Picture credit: Screenshot of: Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), “Elevations”, online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>.

<sup>39</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 2.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>40</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 2.2, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

the way that gentrification has been sweeping across Chinatown and pushed out the very people [they] were supposed to help.”<sup>41</sup>

The creation of zones of exclusion and alienating design have a chilling effect that threatens Chinatown’s capacity to act as a place for socializing, ceremony, and cultural expression, in particular, in the Chinatown Memorial Square, which serves as the “primary public open space” for Chinatown.<sup>42</sup> This proposal of a large luxury condo building, out of scale with nearby buildings in Chinatown and the neighbouring Chinatown Memorial Square, despite the knowledge that this type of development jeopardizes the heritage values identified in the SOS demonstrate a lack of regard for the guiding principles.

This development would have particularly negative effects on views, especially public views, which are a priority identified in the Design Guidelines.<sup>43</sup> Views that are particularly impacted are those from the Dr. Sun Yat-Sen Park, the public park adjacent to the Dr. Sun Yat-Sen Classical Chinese Garden, and the Chinatown Memorial Square. It is important to note that diagrams and renderings Beedie submitted in their application use selectively chosen perspectives and viewpoints that downplay the impact on views from the garden, while ignoring the disproportionate impacts on free and publicly accessible spaces such as the Dr. Sun Yat-Sen Park and Chinatown Memorial Square.

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<sup>41</sup> Chinatown Today, “105 Keefer Public Hearing: Carol Lee” (7 June 2017) at 00h:04m:44s, online: *Youtube* <[https://www.youtube.com/watch?v=e\\_zRa-QTfBs](https://www.youtube.com/watch?v=e_zRa-QTfBs)>.

<sup>42</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 2.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>43</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 2.3, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

## Building Scale and Form



Uniform rooflines without setbacks facing the Keefer Street (top) and Columbia Street (bottom).<sup>44</sup> The scale of this development, at 9 storeys, across a large, consolidated lot with relatively uniform roof lines, is specifically discouraged by the Design Guidelines.<sup>45</sup> Further, Beedie’s design does not appear to conform with the setback requirements above 21.3 m or the rear setback requirements for residential upper floors.<sup>46</sup> The massing of the development fails to embody the prominent saw-tooth profile identified as important by the Design Guidelines.<sup>47</sup> Further, the building does not respond to the context of the block (as demonstrated by the impacts to the Chinatown Memorial Square, Chinatown Memorial Monument, and Dr. Sun Yat-Sen Park), lacks a distinctive “saw-tooth” profile, and the uniformity of the facades facing the Keefer and Columbia Streets fails to maintain the “fine grain

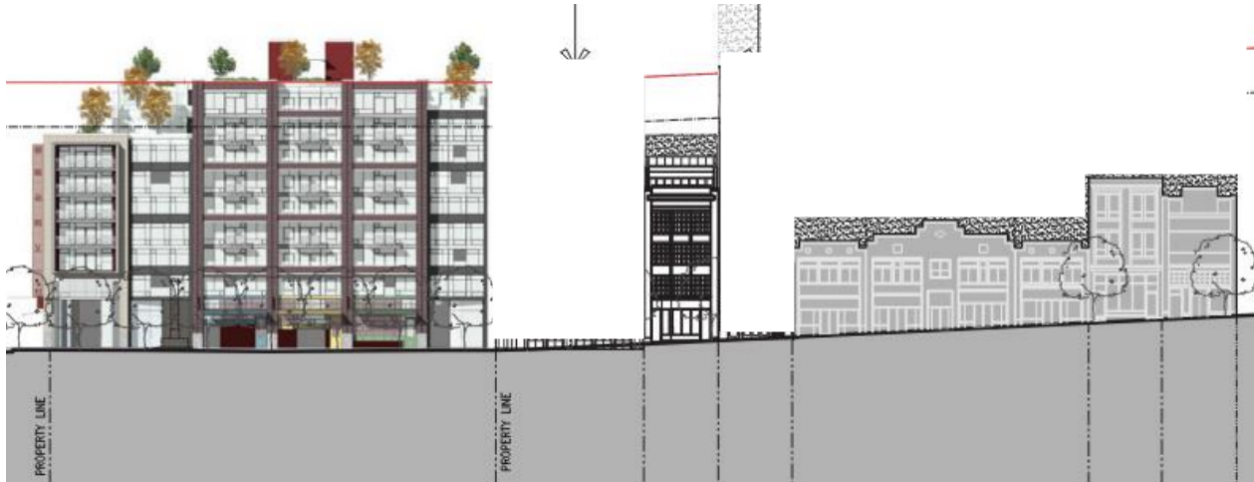
<sup>44</sup> Picture credit: Screenshot of: Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), “Elevations”, online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>.

<sup>45</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 3.1.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>46</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), ss 3.1.2, 3.3.2 online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>47</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 3.2.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

streetwall pattern” characteristic of Chinatown.<sup>48</sup> The overall massing and building height push the limits of the zoning; 105 Keefer is dramatically taller than nearby buildings, such as the Goldstone building, the Chinese Canadian Military Museum, and the buildings of the Dr. Sun Yat-Sen Park & Classical Chinese Garden.<sup>49</sup>



Street context elevations demonstrating the dramatic height difference between 105 Keefer and neighbouring buildings on Keefer Street, with non-existent buildings and “future possible development” height covered for clarity. Note that several 1, 2, and 3 storey buildings directly across the rear lane from 105 Keefer are not depicted in any application materials<sup>50</sup>

It’s especially important to note Beedie’s use of misleading renderings that downplay 205 Keefer’s dramatic departure from the height of surrounding buildings. In particular, the Development Application board on site at 105 Keefer depicts trees that are much taller than in reality (almost to the point of matching the height of the building), while the elevations conjure non-existent buildings similarly at the limits of the HA-1A zone, providing an irrelevant and misleading point of reference. The building lacks setbacks or other mitigating measures to ensure that floors above 21.3 m are secondary to the primary façade below.<sup>51</sup>

Finally, the sheer scale of the neon sign and placement would maximize its negative impacts. It is placed mere feet away from the Chinatown Memorial Monument and at the corner where the negative impacts of it shining into the Dr. Sun Yat-Sen Park and Chinatown Memorial Plaza would be

<sup>48</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 3.5.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>49</sup> It is possible that the building would actually exceed the height limits of the HA-1A zone, based on the base grade and height data provided in the Elevation and Site Plan documents.

City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 3.5.2, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>50</sup> Picture credit: Screenshot (edited for clarity) of: Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), “Elevations”, online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>.

<sup>51</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), ss 4.2-4.3, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.



maximized. The arbitrary nature of the text and lack of attachment to a specific tenant, business, or identifiable group is inconsistent with the existing typology of the streetscape as well as with the historic and current use of neon signs in Chinatown, while the proposed design is aesthetically uninteresting, rendering it incompatible with and grating against adjacent buildings and the surrounding streets.<sup>52</sup>

### **The Negative Effects of 105 Keefer on the Site & Adjacent Structures**

Beedie's proposed design for 105 Keefer would have severe negative effects on the site and adjacent structures, including the Chinatown Memorial Square, the Chinatown Memorial Monument, the Chinese Canadian Military Museum, the Dr. Sun Yat-Sen Classical Chinese Garden, and the Dr. Sun Yat-Sen Park.

As outlined above, the design lacks an adequate sawtooth profile for the roofline, as well as the required setbacks or any other architectural features for differentiating the façade. With the overwhelming massing of the design oriented towards the square, 105 Keefer would tower over the Chinatown Memorial Square and Chinatown Memorial Monument. The Chinatown Memorial Square, which serves as the "primary public open space" in Chinatown, is home to passive and active recreation, festivals, memorial services, and community events.<sup>53</sup> These often centre around the Chinatown Memorial Monument, which serves to honour Chinese-Canadian veterans and labourers. The sheer scale of 105 Keefer would dwarf the monument, exacerbated, not mitigated by the alcove in the façade used to inflate the claimed setback.<sup>54</sup>

Further, the proposed neon sign, at 5 storeys tall, mere feet away from the Chinatown Memorial Monument, maximizes the negative impacts on the site and adjacent structures.<sup>55</sup> As described above, the proposed sign is inconsistent with the historic or present use of neon in Chinatown, simply taking the aesthetic of neon without consideration for the unique context of Chinatown and the site more specifically. The scale and lackluster design of the sign would have the most severe impacts on vital public spaces in the Chinatown Memorial Square and the Dr. Sun Yat-Sen Park.

In addition, Beedie's proposed design includes large monolithic glass boxes as elements of the façade, which are out of scale with and an inappropriate response to the character of Chinatown.<sup>56</sup> The

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<sup>52</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 4.6, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>53</sup> City of Vancouver, Planning, Urban Design and Sustainability Department, *Chinatown HA-1A Design Policies* (2011), s 2.1, online (pdf): <<https://guidelines.vancouver.ca/guidelines-ha-1a-chinatown.pdf>>.

<sup>54</sup> City of Vancouver, "dpb-report-105 Keefer - Appendix e.pdf" (June 2017), online (pdf): <<https://vancouver.ca/files/cov/dpb-report-105%20Keefer%20-%20Appendix%20e.pdf>>.

<sup>55</sup> Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), "Elevations", online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>.

<sup>56</sup> Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), "Elevations", online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a\\_Elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/bfd0438546627f5427f836cadf45808c5d8e5b46/original/1681756107/a34af5e9d52fa2b70e42833b08b1525a_Elevations.pdf)>.

negative impacts of these glass boxes include the effects on views, and the erosion of the sense of place in Chinatown, both on the Columbia Street and Keefer Street (Chinatown Memorial Square) frontages.

These negative impacts that 105 Keefer would have demonstrate that it would not serve as an appropriate backdrop to the street, the Chinatown Memorial Square, or the Chinatown Memorial Monument without significant changes, such as those identified by Mr. Dobrovolny in 2017: deleting the glass boxes, reducing the middle bay heights to create a more distinguished “sawtooth” street profile, and reductions of floor area to reduce the massing oriented towards the square.<sup>57</sup>

### **Additional Factors: Misleading Application Materials**

Beedie’s application materials are rife with misleading figures and claims.

In particular, the application attempts to minimize the dramatic departure from the scale of the neighbourhood that 105 Keefer represents, and the impacts on adjacent buildings and sites. The application materials use selective viewpoints for view references, highlighting the lower impacts on the paid-entry Dr. Sun Yat-Sen Classical Chinese Garden while ignoring the impacts on the Dr. Sun Yat-Sen Park, the free-to-access public park section most affected by 105 Keefer.<sup>58</sup> Further, the Development Application board on site at 105 Keefer depicts trees that are much taller than in reality (almost to the point of matching the height of the building), while the elevations conjure non-existent buildings similarly at the limits of the HA-1A zone, providing an irrelevant and misleading point of reference.<sup>59</sup> This is particularly egregious in the context elevations, which replace vacant lots with 9+ storey buildings, fail to depict neighbouring 1-3 storey buildings, and give no consideration to the areas of the Dr. Sun Yat-Sen Park not directly behind the Chinese Canadian Military Museum.<sup>60</sup>

Further, the architects claim that the development would expand the pedestrian area by 26%.<sup>61</sup> This is false, not only because the site is already used by pedestrians, but also because this 26% figure would require that the removal of the service lane be counted. The removal of the service lane is at the

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<sup>57</sup> City of Vancouver, Development Permit Board and Advisory Panel, *105 Keefer Street – DP-2017-00681 – ZONE HA-1A*, (Meeting Minutes), (6 November 2017), online (pdf): <[https://vancouver.ca/files/cov/minutes-dpb-20171106.pdf?\\_ga=2.96721817.729163293.1684282519-284115727.1683750957](https://vancouver.ca/files/cov/minutes-dpb-20171106.pdf?_ga=2.96721817.729163293.1684282519-284115727.1683750957)>.

<sup>58</sup> City of Vancouver, “dpb-report-105 Keefer-appendix-d.pdf” (June 2017), online (pdf): <<https://vancouver.ca/files/cov/dpb-report-105%20Keefer-appendix-d.pdf>>.

<sup>59</sup> City of Vancouver, “dpb-report-105 Keefer-appendix-d.pdf” (June 2017), online (pdf): <<https://vancouver.ca/files/cov/dpb-report-105%20Keefer-appendix-d.pdf>>.

<sup>60</sup> City of Vancouver, “dpb-report-105 Keefer-appendix-d.pdf” (June 2017), online (pdf): <<https://vancouver.ca/files/cov/dpb-report-105%20Keefer-appendix-d.pdf>>; Merrick Architecture (Borowski Sakumoto Fligg McIntyre Ltd.), “Street Context Elevations”, online (pdf): *City of Vancouver* <[https://ehq-production-canada.s3.ca-central-1.amazonaws.com/d93c5d93a702f76dbb15043879772bc8aec009db/original/1681756155/37509b2b9b130fbda3247295cea91337\\_Str eet\\_context\\_elevations.pdf](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/d93c5d93a702f76dbb15043879772bc8aec009db/original/1681756155/37509b2b9b130fbda3247295cea91337_Str eet_context_elevations.pdf)>.

<sup>61</sup> City of Vancouver, “dpb-report-105 Keefer - Appendix e.pdf” (June 2017), online (pdf): <<https://vancouver.ca/files/cov/dpb-report-105%20Keefer%20-%20Appendix%20e.pdf>>.

discretion of the City and completely irrelevant to the application for 105 Keefer. In fact, the City has independently considered removing the lane, which is already used as a pedestrian area.<sup>62</sup>

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<sup>62</sup> City of Vancouver, “Chinatown Memorial Square Phase 2 Engagement Boards” (November 2021), online (pdf): <https://syc.vancouver.ca/projects/chinatown-memorial-square/phase-2-engagement-boards.pdf>.

