

Grandview-Woodland Area Council  
c/o Britannia Community Centre  
1661 Napier Street  
Vancouver  
BC V5L 4X4

Brent Toderian  
Director of Planning  
VanCity Building  
#406-515 West 10th Avenue  
Vancouver  
BC V5Z 4A8

Monday 9 November 2009

Dear Mr. Toderian:

Re: 2250 Commercial Drive

Grandview-Woodland Area Council (GWAC), the main community association of Grandview Woodland, is writing to express its concern about the application to rezone 2250 Commercial Drive (at East 7th Avenue) from C-2C (Commercial) District to CD-1 (Comprehensive Development) District.

The applicant proposes to convert the existing 3-storey retail and office building, which has the Van East Cinema and CCEC Credit Union among its tenants, into a 5-storey mixed-use building consisting of a commercial ground floor with four residential floors above, containing approximately 66 condominium apartments.

The absolute height allowed under C-2C zoning is 35 feet; the C-2C District Schedule allows 45 feet at the discretion of the Director of Planning; the proposal is for a building height of 63 feet. C-2C zoning allows four storeys; the applicant is asking for five.

### **GWAC's main recommendations**

According to Ankenman Marchand et al (2009, p. 3), "By demolishing the building, we could achieve the same uses and density within the existing zoning."

The applicant has claimed that their proposed building design for the site — the one requiring relaxation on the allowable height and number of storeys in C-2C zoning — can be accomplished while keeping the building's existing concrete and steel structure.

GWAC's Directors encourage the applicant to apply that same thinking about minimizing demolition work to the production of a new design that achieves the same uses and density *within* the C-2C zoning, ideally without drastically changing the appearance scale of the building (especially its appearance scale facing Commercial Drive and East 7th Avenue).

Even with a building that achieves the same uses and density within the C-2C zoning, GWAC has concerns about affordability, traffic issues, and loss of amenities with such a building.

We would draw your attention, in particular, to problems with the traffic study used as part of the application.

The Directors of GWAC would therefore urge the City to recommend against allowing the proposed rezoning.

GWAC presents reasons below why the proposed rezoning should not be granted. We have divided the reasons into three parts: (1) What C-2C Zoning Allows, (2) Community Benefits, and (3) Community Drawbacks.

## **(1) What C-2C Zoning Allows**

### **1. The applicant is requesting a huge increase in additional height**

The C-2C zoning schedule allows an outright height of 10.6 metres (34.78 feet). It allows 13.8 metres (45.28 feet) at the discretion of the Director of Planning. The applicant is asking for 19.19 metres (62.96 feet). That is a huge increase in additional height over what is allowed within C-2C zoning.

### **2. The applicant is requesting an additional (fifth) storey as well as additional height**

According to Ankenman Marchand et al (2009, p. 3), “the project conforms in every respect to the existing C2-C [sic] zone and it’s [sic] associated Design Guidelines, with the exception of height.” We have a concern that this information was in a handout given out to members of the public at a 20 October 2009 neighbourhood workshop, intending to inform them about the project, yet it seems that the project also doesn’t conform with respect to number of storeys.

To demonstrate this, look at Section 4.3.2 of the C-2C District Schedule. That section states:

The Director of Planning or the Development Permit Board, as the case may be, may permit an increase in the maximum height of a building to a height *not exceeding* 13.8 m and *4 storeys* with respect to any development. (Italics ours)

Note that the section specifies that a height increase should be limited to four storeys.

The Director of Planning recommends in a second document that buildings in C-2C and C-2C1 zones should be no more than four storeys. Toderian (2009, p. 3) states:

[T]he proposed amendment will allow consideration of increases in conditional height to a maximum of 13.7 m (45 ft.) to achieve more appropriate commercial ceiling heights. *It is also recommended that development within the C-2C and C-2C1 zones be limited to four storeys which is consistent with the building form that is commonly developed in the zone.* (Italics ours)

To summarize, the applicant seems to have not made clear to the public that a second relaxation is being sought (five storeys instead of four) — a relaxation that the City does not permit in its C-2C District Schedule and its Director of Planning recommends against in a second document about the same schedule.

## **(2) Community Benefits**

### **3. The applicant claims “The project is highly sustainable in every aspect” but is extensively redeveloping a 30-year-old concrete building environmentally sustainable?**

The applicant has claimed that “The project is highly sustainable in every aspect” (Ankenman Marchand et al (2009, p. 26). GWAC’s Directors note that the existing form of the building is only thirty years old (built in 1979) and question whether redeveloping a 30-year-old concrete building is environmentally sustainable. Isn’t such a redevelopment too short for the typical life span of such a building?

### **4. The applicant claims environmental and sustainable benefits for the proposed new building design, but not for a design that conforms to the zoning**

According to Ankenman Marchand et al (2009, p. 3), “For sustainability, environmental and economic reasons, we are seeking a two-storey height relaxation.” Regarding the environmental and sustainable reasons, we understand that the proposed building design will keep the concrete and steel frame of the existing building, and that the only planned demolition work is to set back the façade on the lane side.

GWAC’s Directors appreciate the concern of the applicant for the environmental and sustainable aspects of the proposal. However, the Directors would ask why the applicant cannot produce a design for the building that

achieves “the same uses and density within the existing zoning” (Ankenman Marchand et al., 2009, p. 3) while also minimizing the demolition work and rebuilding that would need to be done.

## **5. The applicant claims safety concerns with the existing building design but provides no evidence in support of those claims**

According to Ankenman Marchand et al (2009, p. 4), “The façade of the [existing] retail [at grade] is set back approx. 6’ with a continuous colonnade that makes the retail spaces dark, hidden, illegible and unsafe.” It is not clear what “illegible” means in this context. Also, can the applicant supply evidence to support the contention that the retail spaces are indeed “unsafe” as a result of the existing building design? (No evidence appears to be supplied by the applicant.)

This issue of safety is important because it is one of the justifications that the applicant is making for redesigning the building.

We would add that even if the applicant can demonstrate with evidence that safety is a concern, then why doesn’t the applicant fill in the colonnade, making it interior space with better lighting and access to the street? It is not necessary to propose a completely redesigned building to solve this issue, if it is indeed an issue.

## **6. The applicant claims the proposed building will generate less traffic but there are a number of problems with the trip generation figures in their traffic study**

A study commissioned by Ward Consulting Group for the applicant states that “The proposed use will generate 15% to 40% less traffic than the existing use. As a result it will have less traffic impact on the neighbourhood” (Ward Consulting Group, 2009, p. 18).

We question these figures. The report computes trip generation for the existing building using Institute of Transportation Engineers (ITE) categories for “Shopping Centre” (code 820), “General Office Building” (code 710), “High-Turnover (Sit-Down) Restaurant” (code 932), and “Movie Theatre without Matinee” (code 443) (see Ward Consulting Group, 2009, p. 8) and applies these to the 98 trips to the building in AM peak hours, as summarized in Table 7 on page 9. Table 7 compares trip generation for the existing building with trip generation anticipated for the proposed building.

We would like to draw attention to some problems with Table 7, starting with trip generation for the existing building. We believe the breakdown of numbers between “Office,” “Restaurant”, “Theatre” and “Retail” probably does not reflect the true breakdown within the building. We contend that a far higher proportion of the trips are generated by the Office use within the building. The main user of office space in the building is the Grandview Woodlands Mental Health Office of Vancouver Coastal Health (VCH).

The problem is that the traffic study was conducted in June, but VCH is due to move out of the building shortly, into new premises on East Broadway. We contend that VCH generates an above-average number of trips for an office user because of its professional staff and clients coming and going from the building. So even if a new main user of the office space is found, trip generation by the existing building will likely be going down, whether the building is redeveloped or not.

We also doubt that 24 of the 98 current generated trips are due to the Restaurant category, because the users of the restaurants on-site are likely walk-ins.

With regard to trip generation for the proposed building, we note that trip generation from “Residential” in Table 7 is based on 58 units. However, the City of Vancouver’s web page about the rezoning application (<http://vancouver.ca/commsvcs/planning/rezoning/applications/2250commercial/index.htm>) states that the development will contain 66 condominium apartments, which is almost 14% more.

Also, other types of trip generation for the proposed building seem to be missing. Page 7 of the Ward Consulting Group report states that “The proposed development includes mixed usage of residential, commercial, restaurant and bank” with the bank to be 7,500 square feet — larger than the existing bank on-site. However, when you look at trips that “Retail” is expected to generate in the new building (in Table 7 on page 9), the size of retail is listed as 7,500 square feet. But that’s the expected size of the new bank alone. So what about trips generated by commercial use (other than the bank) in the new building?

So the effect of the points we are making is that (1) trip generation due to the existing building is *too high* because it is likely to fall shortly — possibly in quite a major way — when VCH moves out, whereas (2) estimated trip

generation due to the proposed building is *too low* because it has been calculated using 58 residential units (not 66) and does not seem to include trip generation due to commercial use (other than the proposed bank).

### **7. The installation of traffic humps on East 6th and East 7th Avenues bears little relation to the proposed development**

Pages 16-17 of the Ward Consulting Group traffic report discusses the possibility of traffic calming on East 6th and East 7th Avenues. Moreover, we understand that the applicant has offered to pay for the installation of speed humps on East 6th or East 7th Avenue. It is nice of the applicant to offer to cover these costs, but this offer should not be regarded as in any way related to whether the proposed building design at 2250 Commercial is considered acceptable or not. If speed humps are needed, it is because of vehicles cutting through between Commercial Drive and Victoria Drive, along East 6th and East 7th Avenues. This is an existing problem, bearing little relation to the proposed development.

Also, if there are indeed problems with vehicles cutting through along East 6th and East 7th Avenues, then speed humps should be installed through the City's Speed Hump Program.

### **(3) Community Drawbacks**

### **8. The applicant claims the proposed building will generate less traffic, notes the excellent access to transit, yet plans to supply parking that exceeds City bylaw parking requirements**

The Ward Consulting Group study states on page 18:

For the proposed uses, a total parking supply of 97 spaces is proposed which exceeds the current City's Bylaw parking requirements (i.e. 84 stalls minimum). In addition, due to the good access to transit and other services, internal trips and shared parking spaces, the overall parking demand on the site might be further reduced.

GWAC's question is: If the applicant is concerned with sustainability and environmental issues (as seen in their attention to minimizing demolition work on-site), then why is the applicant planning to supply parking that exceeds City bylaw parking requirements? Surely, if it is claimed that the proposed building will generate less traffic and that there is excellent access to transit, then the applicant should be supplying just the minimum number of parking spaces required by the City?

Note also that GWAC's Directors welcome the projected reduction in traffic (if accurate), but that the reduction can be accomplished if the applicant "achieve[s] the same uses and density within the existing zoning" (Ankenman Marchand et al, 2009, p. 3), which the applicant has said is perfectly possible (Ibid.).

### **9. Questions about the affordability of commercial and residential space in the proposed development**

GWAC is concerned about the displacement of existing businesses if 2250 Commercial Drive is redeveloped, and is concerned that cost of renting commercial retail space in the proposed new building will be considerably more than in the existing one.

GWAC is also concerned about the affordability of the new condominiums in the proposed new building.

### **10. Concern about the loss of community amenities**

While acknowledging the proximity of the Rio Theatre at 1660 Broadway East, GWAC is nevertheless concerned about the loss of the 476-seat Van East Cinema as a community amenity.

GWAC is also concerned about the loss of office space in the proposed new building.

### **11. The proposed building design does not fit with the neighbourhood**

The height of the proposed building does not fit with the height of buildings in the local streetscape, plain and simple. The appearance of the proposed building, with its proposed five storeys and penthouses and general exterior design, does not fit with the aesthetics of the local streetscape.

The applicant might make a counter-argument that the existing building itself is unlike other buildings in the immediate area in terms of height, number of storeys, and appearance. That is true, but the current building has been there in its present form for thirty years (since 1979) as part of the Commercial Drive streetscape, and hence its height and appearance are long-established in the neighbourhood and familiar to people in Grandview-Woodland.

## 12. Concern about the precedent that would be set if this spot rezoning was allowed

This is probably self-explanatory. Within Grandview-Woodland, over half of Commercial Drive from Grandview Highway to Venables Street is zoned C-2C, and the rest is zoned with the similar C-2C1, as is some of East Hastings Street. If a massive increase in height and an increase in the number of storeys is allowed for 2250 Commercial, then what is to stop another developer requesting the same for another site that has C-2C or C-2C1 zoning within Grandview-Woodland?

To conclude: Because of the preceding, the Directors of GWAC would again urge City staff to:

- (1) Recommend against allowing the proposed rezoning of 2250 Commercial Drive, and
- (2) Encourage the applicant to produce a new design that:
  - a) achieves the same uses and density within the existing C-2C Schedule (which the applicant says is perfectly possible),
  - b) minimizes demolition work by preserving as much of the building's concrete and steel frame as possible, and
  - c) minimizes rebuilding work by, ideally, avoiding drastically changing the appearance of the building (especially its appearance facing Commercial Drive and East 7th Avenue).

As noted previously, even with a building that achieves the same uses and density within the C-2C zoning, GWAC has concerns about affordability, traffic issues, and loss of amenities with such a building.

Sincerely,

Dan Fass on behalf of

The Directors of Grandview-Woodland Area Council (GWAC)

(Max Addington, Selena Couture, Annwen Davies, Tom Durrie, Dan Fass, Bing Jensen, Brenda "Poesy" Koch, Susinn McFarlen, Craig Ollenberger, Richard Penneway, Petronella Vander Valk)

GWAC website: [www.vcn.bc.ca/gwac](http://www.vcn.bc.ca/gwac)

GWAC web page about 2250 Commercial Drive: [www.vcn.bc.ca/gwac/2250Commercial/index.html](http://www.vcn.bc.ca/gwac/2250Commercial/index.html)

## References

Ankenman Marchand et al (2009). 2250 Commercial Drive ... adaptation & re-use. Twenty-six page Powerpoint presentation at Neighbourhood Workshop held at 2250 Commercial Drive on 20 October 2009. Powerpoint presentation produced by Ankenman Marchand Architects and Image Development Inc. (The first four pages of the presentation were made available to workshop participants as a handout.)

City of Vancouver (2009). C-2C District Schedule. September 2009. Vancouver, BC: City of Vancouver. <http://vancouver.ca/commsvcs/BYLAWS/zoning/c-2c.pdf>

City of Vancouver (2009). C-2C1 District Schedule. September 2009. Vancouver, BC: City of Vancouver.  
<http://vancouver.ca/commsvcs/BYLAWS/zoning/c-2c1.pdf>

City of Vancouver (2009). Rezoning Application – 2250 Commercial Drive. Vancouver, BC: Rezoning Centre, City of Vancouver. <http://vancouver.ca/commsvcs/planning/rezoning/applications/2250commercial/index.htm>

Toderian, Brent (2009). Amendments to the C-2C and C-2C1 District Schedules and Guidelines. Report from the Director of Planning to Vancouver City Council. Report Date: 1 June 2009. RTS No.: 07969. VanRIMS No.: 08-2000-20. Presented at General Council Meeting on 16 June 2009. Vancouver, BC.  
<http://vancouver.ca/ctyclerk/cclerk/20090721/documents/phea1.PDF>.

Ward Consulting Group (2009). Traffic and Parking Assessment for Proposed Mixed Use Development 2250 Commercial Drive Vancouver. July 2009. Produced by Ward Consulting Group for Image Development Inc.  
<http://vancouver.ca/commsvcs/planning/rezoning/applications/2250commercial/documents/trafficstudy.pdf>

Cc: Ian Cooper, Senior Rezoning Planner, Rezoning Centre, City Hall

Cc: Mayor and Council