

Questions & concerns about the *Commercial Drive Business Society's (2012) Vision and Guidelines* document

Context and purpose of this critique

The Commercial Drive Business Society (CDBS) indicates that it represents “more than 500 business and property owners on the Drive”. It is funded by a levy on its members that amounts to close to \$500,000 a year. As with most Business Improvement Associations in Vancouver, its membership is made up of businesses who may or may not want to be members: they are members by default, simply by having businesses or commercial properties within the BIA area.

In 2012, the CDBS contracted Urban Forum Associates to produce the *Commercial Drive Business Society Vision and Guidelines* (CDBSV&G) document. One of the document’s purposes, according to p. 11, is to “ensure that the CDBS’s vision and priorities are effectively communicated to all key stakeholders and decision-makers, including the City of Vancouver, Translink and the surrounding community”. Because the document comes from a very influential organization and is intended to be a key input into the policy process (p. 17), several Citizens’ Assembly members agreed that it merits a close review.

What follows here is a draft critique of the Commercial Drive Business Society’s (2012) Vision and Guidelines document. This critique was prepared after discussion among several Citizens’ Assembly members, and it is meant to stimulate discussion in the CA. We feel broader discussion about the CDBS Vision document is necessary because very few people have seen it. Our discussions with several Commercial Drive business owners suggest that many of them (including some who participated in the CDBS survey and/or workshop) have not even seen it. We’ve been told publicly by the CDBS that the Vision document is viewable by appointment in the CDBS office, but we feel this is no substitute for making hard copies or electronic copies widely available to take away and review at one’s leisure. As of Feb. 12, 2015, the Commercial Drive Business Society has yet to honour its Dec. 1, 2014 promise to finally make its document available to the Assembly and the public on the web in a readily downloadable format.

There are many great ideas in this document for beautifying streets and improving the Drive’s pedestrian realm—like façade transparency, gradual densification, encouragement of public art, planning that addresses planned and future congestion around Broadway and Commercial, upper-floor retrofit of heritage buildings fronting the Drive, narrow store frontages, considerations of sunlight, and fine-grained building form. The purpose of this critique is not to summarize those great ideas but to raise a few questions and draw attention to details that might otherwise be missed. The intended audience for this critique is Citizens’ Assembly members who are currently weighing the positions of different groups on how to proceed with development on the Drive. Questions and concerns revolve primarily around:

1. Representativeness
2. Primacy of parking
3. Standardization and consistency
4. The Drive's identity

1. Representativeness

The CDBSV&G document is based on a process that included a member survey (the results of which are reported in the **CDBSV&G Appendix 1: Survey Summary**) and a workshop where attendees (listed in the **CDBSV&G Appendix 2: Workshop Attendees**) generated ideas for development on the Drive. The process of developing the CDBSV&G document also had ongoing input from the CDBS Visioning Committee, which is comprised primarily of CDBS board members.

To evaluate the generalizability of any survey, it's useful to look at methodology details, like the research instruments (i.e. the list of questions asked and the options/answers available to respondents), the size and characteristics of the population studied (in this case, CDBS members eligible to participate in this study), the sample size, and the sampling process. The CDBSV&G document doesn't include much detail on these points. For example,

- How many individuals were eligible to complete the survey?
- How is a respondent, for the purposes of this survey, defined? Is it an individual who represents one unique business or property, an individual who represents more than one unique business or property, or perhaps one or more unique businesses represented by more than one individual? Understanding how "respondent" is defined and how these numbers relate to each other (for example, a statement like "82 unique individuals who collectively represent a total of 40 businesses on 12 commercial properties in the Drive BIA") would be helpful to understand how representative the respondents are. It would also be helpful to know if any checks were in place to ensure that respondents to the survey were in fact BIA members, and to ensure that opinions of respondents (however these might be defined) are not counted more than once. Presumably this can happen if the definition of respondent is not clear, and one individual fills out a survey more than once to represent each of his or her different businesses or properties, or conversely, if a single business or property is being represented by more than one person.
- What follow-up methods, if any, were used to verify receipt of the invitation to participate in the survey by those eligible to do so? Evidence of robust follow-up would suggest that all CDBS members actually got their invitation to participate in the survey.
- How many survey questions were respondents required to complete in order for their surveys to have been counted among the total? How many returned surveys were considered to be complete?

Without information about the population and sample size, it is impossible to reliably calculate a confidence level or margin of error. Without these key measures, it is not advisable to generalize survey

results to a broader population, as in statements like: “Survey results suggest a majority of our members feel X.”

If we assume, based on statements in the CDBSV&G document, that there were at least 500 potential respondents (p. 12 indicates that the CDBS represents ‘more than 500’ business and property owners), that they all received the invitation to participate, and that 82 of these substantially completed the survey, *at most only 16.4% of the CDBS membership responded to the survey*. Entering these numbers into a margin of error calculator like [this one](#) places the margin of error for the survey results at 10% at the 95% confidence level. In other words, what a statement like “40% of CDBS survey respondents chose X” really means is “there’s a 95% likelihood that the *actual* percentage of the sampled population [the CDBS membership] who would choose X is *somewhere between 30% and 50%.*” Absent more information about sample size and how respondents are defined, CDBSV&G survey results should be seen as little more than a very rough (up to a 20-point range) estimate of CDBS opinion. Any extrapolations from this about what CDBS members actually feel (example p. 25: “A large majority of CDBS members feel that more public parking is needed in the area”) should be read very cautiously.

The CDBSV&G document does not offer any information about how many people participated in both the survey and the workshops, but p. 18 makes it clear that at least some people did. Canvassing CDBS opinion through both methods is entirely valid, of course, but this could also have the effect of amplifying opinions of individuals who did both. And if the conservative assumption were made that only two CDBS members did both the survey and the workshop (and subtract the unnamed guests from the list of workshop attendees/merchants in Appendix 2), this suggests a maximum total of 100 people were engaged in the survey and the workshop—*at most 20% of the organization’s membership*.

In some cases, the CDBS V&G document encourages conclusions that do not seem to reflect the reported data. For example, the preamble to the survey results in Appendix 1 states that where there are at least 40 respondents that share a general direction of opinion [e.g. important/very important], a “strong consensus” among respondents is suggested. But 40 out of 82 responses would suggest that only 48% of respondents shared that opinion. While significant, this would not suggest a “strong consensus” among respondents. At least 42 responses would be needed to suggest even a slim majority of respondents, and as discussed above, any extrapolations of survey results to the CDBS membership generally would be subject to a considerable margin of error.

The following questions center around the survey results, organized by the survey theme they relate to (see **Appendix 1 of the CDBS V&G document**).

Theme 1: Transportation and Pedestrian Movement

- Were survey respondents offered additional response options in Theme 1 besides “not important” and “very important”? Why would only some of the responses that don’t meet the “strong consensus” threshold of 40 get reported?
- The numbers of reported survey responses under this theme and throughout the survey consistently fall far short of 82. For example, in Appendix 1 under Theme 1, the number of respondents varies from 54 to 61. The preamble to the survey results suggests that there were more options, like

“important”. What were the opinions of the 21 to 31 respondents whose answers are not summarized here? Did they choose a neutral option, some other response, or simply not complete the survey? Reporting the *N* of respondents who answered a given survey question (or completed a survey) would have been helpful.

- The summary of the survey results for Theme 1 concludes that “Most survey respondents strongly oppose on-street bike lanes.” But “strong opposition” cannot be inferred from the information that 51 respondents (51/82=62% of respondents) indicated that “Increase bicycle access to the area by adding on-street bike lanes on the Drive even if this means a reduction in vehicle travel lanes or on-street parking” is “not important”. And, as noted above, the opinions of 31 survey respondents on this question are not reported here.
- The summary of the survey results for Theme 1 concludes that “Most survey respondents strongly support increasing on-street parking capacity.” And in the body of the report, p. 25, it says that “a large majority of CDBS members feel that more public parking is needed in the area.” But reported survey results that indicate that 40 respondents (that is, less than a majority of survey respondents) said it was very important to “Increase the capacity of on-street parking for automobiles.” Perhaps the unreported 25 responses to this question could shed light on how these “strongly support” and “large majority” conclusions were arrived at.

Theme 2: Your Clients/Customers’ Transportation Choices

- This is the only theme in the report for which the survey question isn’t reproduced. As presented under Theme 2, the stats don’t allow meaningful comparison between transportation modes. Disclosure of the original survey question, the options for responses, and the complete set of survey results would allow us to understand how all of the transportation modes relate to each other. For example, were respondents asked to break down mode shares of their customers such that they added up to 100%, or were they given a set of options, not necessarily mutually exclusive, to choose from for each mode (e.g. response options like: Vehicles: 0-25%, 26-50%, 51-75%, 76%-100%; Transit: 0-25%, 26-50%, 51-75%, 76%-100%)? What would the question and the complete responses reveal about how private vehicles rank in comparison to all other modes of transport (foot, transit, cycle, car share) to businesses on the Drive?

Theme 3: The Public Realm

- The summary of Theme 3 concludes: “a number of respondents wish to preserve and enhance the European / Italian heritage look.” How was this concluded, considering that none of the questions discussed under Theme 3 actually address the “European / Italian heritage look”? In any case, it would be great to know what “a number” (a phrase repeated throughout Appendix 1) actually means (a majority, or...?).
- Did the 17-21 respondents whose answers are not reported here choose a neutral option, or should it be assumed that no more than 65 people responded to any of these questions?

Theme 4: Existing Buildings & New Development

- The summary of this theme concludes that “a significant number of respondents think that new community amenities and *additional parking* should be provided as a condition of increasing residential density in private developments, or *through citywide property taxes* [emphasis added].” This linkage of additional parking to public funds is reinforced in the body of the report, as on p. 25 which states that “A large majority of CDBS members feel that more public parking is needed in the area, preferably on-street, and free or at minimal cost”. But none of the reported survey results suggest that a “large majority” of CDBS members want additional parking on-street parking capacity, much less explicitly link that provision to citywide property taxes.

Theme 5: The Drive’s Identity

- The CDBSV&G document makes multiple (at least five) references to a desired “Modern Urban Village” identity for the Drive—in relation to branding, architecture, art, street elements, and colours. But nowhere does it define or illustrate what “Modern Urban Village” actually means. Given that communicating the CDBS position to the surrounding community was one of the goals of the CDBSV&G document, it would have been helpful to include images that communicate an overall picture of what a “Modern Urban Village” is understood to look like.
- The second question under Theme 5 explores respondents’ opinions on “European / Heritage” as a possible branding theme to the Drive. The slash here suggests this refers to some melding of two themes (European and Heritage). But this term seems to be used interchangeably throughout the report as “European Heritage” and “Heritage European”, and even given priority emphasis on p. 49 when discussing the “European Heritage/Modern Urban Village” look. Are these themes interchangeable? Did respondents understand “European / Heritage” as “European Heritage”?
- There’s a statement under theme 5 that “a large number of respondents want panhandlers and street people to be addressed”, but no reference to any survey question that touches on this. How was this question asked, and how were the opinions of respondents distributed among possible responses? What (besides a mention on p. 38 of benches with arm rests meant to dissuade sleeping on them, and several references to water fountains) might addressing this actually mean? If this response came to an open-ended question that invited respondents to contribute other thoughts, were all of the responses included in the summary?

2. Primacy of parking

The CDBSV&G document has a strong focus on preventing loss of *any* on-street parking, even if that prevents construction of cycling infrastructure supportive of a wide range of cycling abilities (see reference to dedicated bike lanes on CDBS V&G p. 21) or sidewalk widening (see p. 27) to address what it acknowledges are “narrow and sometimes overcrowded” sidewalks. But there is no evidence in the reported survey results (Appendix 1) that this position reflects a majority of respondent opinion.

The CDBSV&G document doesn't just call for "no net loss of parking". It also proposes that the City *expand* on-street parking for business customers and shift the burden of providing that onto the public purse or local residents. This is also despite any evidence of a "strong consensus" on this in reported survey results.

The CDBSV&G document proposes the City expand parking by converting some local residents' parking to metered parking during business hours (p. 25), "acquiring nearby lots for off-street parking" to mitigate businesses' loss of any on-street parking (p. 22), significantly reducing or eliminating requirements of businesses to provide parking on their own properties (p. 26), and adding angled parking to sections of Commercial Drive (p. 25).

Leaving aside the question about whether the public should be expected to indefinitely subsidize car-centric business models with free or low-cost parking from the public realm when there are strong social, environmental and economic arguments that reducing auto-dependence is in the public interest, it's worth noting that business estimates of how their customers arrive don't always square with reality. Was any systematic research done on this question for this process to verify business owners' perceptions of how their customers arrive, or was this based simply on estimates? There is no call in the CDBS V&G document for research that would determine this or how to optimize use of the Drive's many current parking facilities, especially to ensure that is sufficiently available to people who need it most. These would include people with mobility issues that hinder or preclude walking, cycling, or taking transit, or those bringing or loading items that can't reasonably be transported by transit, bike, or to a car using a shopping aid like a small foldable wheeled cart.

The desire to preserve existing parking (and if possible, expand it) seems to connect to the CDBS's preferred option for a Commercial Drive bikeway, which is illustrated on p. 23. The concept illustrated here would banish bikes to the handful of discontinuous back alleys that run parallel to some sections of the Drive. The CDBSV&G document acknowledges that its proposed back-alley bikeway would be "a challenge". Presumably this is because it disappears in several places and is confusingly rerouted several times on alternate sides of the Drive, such that a cyclist traversing the length of the new CDBS Drive bikeway for only 14 blocks would have to cross the Drive four times, reversing direction each time. It's doubtful that relegating tourists, visitors from other neighbourhoods who come by bike and locals accessing Drive services by bike, to back alleys—replete with dumpsters and parking lots—would improve the Drive's image. Forcing cyclists to navigate close to a dozen uncontrolled intersections in as many blocks clearly violates evidence-based best practices in bikeway design.

The document also recommends these back alleys be developed for cycling somehow using a Green Space Fund that is "earmarked to create new public green space in the neighbourhood" (p. 22). It's not clear how vehicle-oriented service lanes shared with bikes constitute "new public green space", unless perhaps a good deal of pavement were removed and vehicles diverted from them. But nothing in the CDBSV&G document suggests the CDBS is advocating such a radical proposal.

The next-preferred option (illustrated on p. 24) is one in which – from the point of view of cycling hazards – little changes from the status quo. Painted lines would place bike lanes between a line of

parked vehicles and moving traffic. While this could work on wider sections of the Drive or on a wider and less busy street, on narrow, busy sections of the Drive this would leave cyclists accessing businesses and services as vulnerable to the hazards they are now: cars that drive into this space, parked cars' opening doors, cars crossing bike lanes to park, and buses crossing bike lanes in order to pick up passengers. As long as dangers like these remain present, a significant portion of the population will not consider cycling due to legitimate fear of hazards.

The document also emphasizes enhancing the Woodland and Lakewood bike routes instead of developing state-of-the-art, dedicated bike lanes on the Drive. Unfortunately, Woodland and Lakewood routes are visually removed, 1-3 long block lengths, and several storeys higher and lower than the Drive's services and businesses, making them impractical routes for cyclists accessing services on the Drive. It's possible that the (unfortunately, too common) assumption driving this recommendation is that cycling is either about kids cycling close to home or expert bicycle commuters getting from point A to B as efficiently as possible, when cycling is in fact (especially when supported by appropriate infrastructure) increasingly a means to do one's shopping, pick up the kids, get to the bank/library/doctor, connect with transit routes, and go out for the evening.

There are no real connections drawn in the CDBSV&G document between, on the one hand, the CDBS focus on the primacy of parking, the expansion of parking, and the assumption that the public should subsidize it; and on the other, research that demonstrates why people choose the transport modes they do, or the imperative of collectively reducing our collective dependence on high-emissions travel modes in light of climate change.

3. Standardization and consistency

This document advocates high-rises around the Commercial Drive/Broadway transit nodes (p. 43), 3-4 storey residential development immediately over retail on the Drive, with a step back to 6 floors for "most densification". This critique is not taking any particular position on these prescriptions, in recognition that densification needs to happen and there are different schools of thought on how to achieve it while attending to social and environmental values. But pointing this CDBS position out here may be useful to counter misperceptions that the CDBS is not in favour of considerable changes to the Drive.

More surprising is that the CDBS proposes eliminating the 7-foot building line setback north on Commercial Drive "so that new buildings will align with existing ones". The CDBSV&G document proposes that that "all ground floor commercial frontage should be built out to the property line" on the Drive north of 1st, to achieve a "more consistent spatial enclosure of the street" (p. 44).

Would this not serve to further narrow sidewalks, already characterized by the CDBS as "narrow and sometimes overcrowded" (but not eligible for widening if it costs any on-street parking)? Why is it important to eliminate the "saw-tooth" effect of differently set-back building fronts, which give the

Drive part of its character and provide additional spaces to step outside of the flow of pedestrian traffic for a conversation?

Improving “consistency” on the Drive is clearly a priority in the CDBSV&G document. In addition to “more consistent spatial enclosure of the street”, the CDBS document emphasizes the need for a “consistent palette” and a “consistent, integrated suite of elements... compatible in materials, finish and design” (p. 37); and well as consistency in tree species, size and tree spacing, banners, sidewalk design, street furniture, flowers/landscaping, lighting, directional signage, colour, and style—all to support a more consistent “Modern Urban Village” branding. The CDBSV&G also suggests supporting public art that reinforces a “more consistent form of branding” of the Drive: it should celebrate the Drive’s “Modern Urban Village/European Heritage character” (p. 40) and “reflect and comment on the Drive’s sense of place”.

The CDBSV&G document also emphasizes greater standardization, for example in building forms (e.g. “building facades should have a clearly delineated tripartite vertical arrangement, with a clear differentiation between the ground floor (base), upper floors, and roof”, p. 47); signage (“may be backlit, but should not exceed .5 m in height and 2.0 m in length”); and continuous weather protection along the entire width of building façades, “constructed of glass, metal, and other similar rigid materials” (p. 52).

It is obviously very challenging to come up with guidelines that preserve, promote, and enable the qualities of Commercial Drive that people treasure. The CDBSV&G’s emphasis on narrow (e.g. 33-foot), transparent, store-fronts; accessibility by several entrances; and a diversity of architectural details on storefronts is really laudable. But.... do narrow storefronts with diverse detailing make for diverse, independent ownership of smaller, unique, or locally owned businesses—or just the appearance of such? Would the Drive’s uniqueness and diversity of businesses (and perhaps even a sufficiently diverse local economy) also, or perhaps alternately, be served with zoning that prevents further assembly and subsequent redevelopment of immediately adjacent lots, and less of an emphasis on standardization and consistency?

4. *The Drive’s identity*

This section considers the question of who, if anyone, should steward a neighbourhood’s identity. The CDBSV&G document characterizes the current perception of the Drive as “Little Italy, hippy, diverse, Bohemian, ethnic diversity”. It anticipates an “improved” perception five years from now as “clean, safe, family-friendly, vibrant and unique, modern and urban.” Nobody would argue with the goals of any of these “improved” adjectives; the important historical and cultural influences of “Little Italy” on the Drive; or with the private sector’s proven efficiency at branding stuff, places, and experiences.

However, the “East Village” rebranding of the Hastings-Sunrise neighbourhood by the BIA there caused considerable consternation among residents who felt they had no part in that choice (see

<http://tinyurl.com/ngmwlfr>), and in the West End, where attempts by the local BIA (see <http://tinyurl.com/njgl4f4>) to rebrand were met with strong local resistance.

Questions that should be asked include: Do the CDBSV&G prescriptions for Modern Urban Village / European Heritage branding, transportation, public art, consistency, standardization, and “street people” put the treasured Bohemian, ethnically diverse character of the Drive at risk? Did the CDBS engage in any systematic consultation with residents and other organizations of the Drive (in addition to its members) on the questions of who, if anyone, owns the Drive’s “identity” and how it might be “branded”? How were branding themes chosen for consideration? Did the set of themes to choose from include any reference to First Nations history of this area and/or the Drive’s contemporary diversity, which includes First Nations, Latin American, Asian, Middle Eastern, Africans and more in addition to Europeans?

Notwithstanding the above comments, the CDBSV&G document has much of value. As a “key input” to public policy, the CDBSV&G document should be shared more widely and freely by the CDBS so that it can be read closely, discussed, and debated by all stakeholders, including its members and the surrounding community. Restricting access to the document to in-person appointments on CDBS premises doesn’t accomplish that.

Sharing the CDBSV&G document more widely would include, at minimum, making it available on the CDBS website immediately, in a commonly used format like .pdf and ideally with a copy of the survey, survey response options, and the anonymized data set to permit independent analysis of survey results. It would also include distribution of a generous number of hard copies to member businesses, for use by the businesses and their customers, as well as to local organizations that can be freely accessed by any resident, like the public library. After having made the document widely available for a period of time sufficient for people to digest it, the CDBS could also advertise and hold a public meeting where the CDBS and the consultant that produced it could be present to answer questions about the document.

CA Members: A (somewhat marked up!) copy of the CDBS V&G document was supplied to the CA by a non-CDBS member, scanned, and uploaded to the Citizens’ Assembly website. You can now download it from: <http://www.grandview-woodland.ca/download/cdbsvisionandguidelines-2012/>

Questions / comments about this critique can be directed to CA member Larissa A.