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To: City of Victoria BC,
City of Victoria Accessibility Committee, ATTN: Linda Bartram

From: The National Coalition of People who use Guide and Service Dogs in Canada

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We would like to thank the City of Victoria Accessibility Committee for listening to the responses we received from a wide range of people with regards to the proposed information signs. We as the National Coalition of People who use Guide and Service Dogs in Canada are willing to help the City in answering any questions, or to assist in any way we can.

This survey is in response to a request to get comments about the signage the City of Victoria is proposing. As we understand it, the signs are being placed throughout the bike lanes and skateboarding areas to create awareness of the safety concerns to pedestrians with disabilities, with emphasis on pedestrians with low vision, or who are blind. This information is directed towards cyclists and skate boarders.

The following are the opinions and concerns of the people who responded. The majority are people who stated they were Blind, Deaf-Blind, and low Vision. The next largest group of respondents were pedestrians from all walks of life with stated disabilities, including seniors, parents with children and/or children in strollers, bicyclists, skate boarders and 8 vehicle drivers. Please note many people who stated they had disabilities were also parents, grandparents and parents of children with disabilities. Many of the responses are repetitive and we chose to put them in to ensure the voices from all people were recorded. We did not separate people into categories as we believe all are equal, and their points of view valid. 97 people responded. The following is a snap shot of those responses.

- 1) 100% of the people interviewed agreed the design of having pedestrian's walking through bike lanes was a design mistake on the cities part and is endangering everyone.
- 2) The "floating" islands to reach the bus stops and signal crossings are confusing, dangerous and put pedestrians, vehicle drivers and cyclists at risk.
- 3) People have serious concerns the City is not listening to its citizens, and is spending tens of millions of dollars despite this. However, the city is now forcing pedestrians to walk into bike lanes. According to Victoria bicycle advocate Corey Burger, policy and infrastructure chair of the Greater Victoria Cycling Coalition who said "Mixing bikes and people walking is, in general – not a very good idea." from an article in the Jan. 29, 2019 - Victoria News.
- 4) In Vancouver there are no bike lanes on public transit routes. People have asked why the City of Victoria did not think of that as one alternative to the dangerous situation they have now created?
- 5) No matter who uses the bus routes or tries to cross a street using a signal, pedestrians are all required to pass through bike lanes to get to bus stops and to find signal buttons.
- 6) Cyclists shared their concerns that the bike lanes are very narrow and they are in more danger from cars than ever before in some areas of the City.
- 7) Cyclists were very concerned they were being blamed for the ill-informed decisions made in the design phase of the bike lanes. It was also stated that much more consultation should have taken place with all the parties involved to develop truly meaningful infrastructure that was safe, efficient and logical.

Some respondents reported even being blamed for the City cutting down so many trees in order to make room for bike lanes.

- 8) Cyclists also expressed concern that the needs of pedestrian safety, as well as their own, was never fully taken into account, and do not like feeling at odds with pedestrians, particularly those who have disabilities. Many of the cyclists have a stated disability and also have family members who are impacted by the way the city has designed and implemented its bike lanes.
- 9) Vehicle drivers described the current street and bike lanes as narrow, so much so that cyclists are at times being forced into the traffic lanes. Another by-product of the narrow bike and traffic lanes is the lack of safe and direct access to pedestrian pathways when exiting parked vehicles. The current design allows insufficient clear space to safely get in or out of parked cars, particularly for those who require more clear space than ambulatory citizens, such as those who use wheeled mobility devices or strollers, those with low or no vision, or adults who are larger in stature.
- 10) Cyclists also shared their concerns that the City now wants to them to be responsible for pedestrian safety by stopping and letting the pedestrian know when it is safe to cross the bike lane to get to an island traffic signal, bus stop or exit a bus safely. This is a flawed solution to a serious problem that places too much faith in the vigilance of bike lane users to ensure the safety of pedestrians.
- 11) Regardless of the pedestrian, with or without a seen disability, Universal Design principles are clear about any solutions to integrate busses, traffic, cyclists and pedestrians, must work for all. Pedestrian safety, and the safety of the bike riders and vehicle drivers in this case is being sacrificed.
- 12) In one Times Colonist article on June 16, 2019, a cyclist with two children on the back of her bike carrying groceries weighed in at over 250lbs. How does a rider with that much weight and momentum stop in time to avoid a pedestrian or a pedestrian using an aid like Guide Dog in a bike lane? The opportunity for incident is exacerbated by the addition of the children and their needs which impact attention spans of parents at the best of times.
- 13) Vehicle drivers are very concerned with all the considerations they need to be aware of, including:
 - not hitting bike riders in narrow lanes,
 - dealing with busses pulling out,
 - knowing when it is safe to cross the bike lanes, particularly if they are a first-time user of Victoria's streets. (This is particularly applicable for a city that sees almost 4 million tourists per year)
 - trying to find safe parking,
 - pedestrians disembarking busses who may turn into traffic and not the bike lane to reach the sidewalk.
- 14) Vehicle drivers expressed their concerns that in some areas of the city, they have to park in what was once the middle of the street, manoeuvre a wheelchair or passenger into traffic then go around the car into a bike lane to get to the sidewalk. They wondered how that was considered safe by the city and how a driver with an aid like a wheelchair could safely leave their car and get in their chair without being struck down in traffic.
- 15) It was reported there are places in the city, like the crossing to the bus stop near Quadra and Pandora, where there is a telephone pole that blocks the clear path of travel and obstructs clear line of sight. See photo at the end of this report. Cyclists and vehicle drivers cannot clearly see a pedestrian coming through a bike lane to reach the bus stop until it is too late.
- 16) At that same crossing, there are no tactile/scribed lines on at least the bus stop island side.
- 17) In the cities haste to put down access tactile tiles at intersections, some of the tiles are not positioned to provide context as to the crossings directionality which is a serious safety hazard. One person asked, "Is this the Cities attempt to proclaim they are accessible to pedestrians who are blind and have low vision?"

- 18) The crossing through bike lanes getting on and off busses as well as finding the street crossing buttons was noted to be particularly difficult near a busy Provincial Government Office downtown. The services provided at that office requires large numbers of pedestrians, (including pedestrians with disabilities and their aids) to access it on a daily basis. Several respondents felt they are “playing chicken” with their lives every time they go there to receive services because of the unsafe design of the street crossings, and getting on and off the busses.
- 19) Another of the great concerns expressed was the lack of appropriate tactile interfaces on the sidewalk to bring a person to the crossing.
- 20) The haphazard alignment of some of the tactile placements at some of the crossings and the lack of tactile indicators at most crossings are of concern as well. Furthermore, there are no tactile indicators of any kind in the crossings that will allow people to correctly find the other side of the crossing.
- 21) Many people felt there was no understanding of how a pedestrian with low vision or who is blind must navigate in a city. This has left some feeling that there is a deep insensitivity and unawareness on the part of the city about the risks to a person’s life that some of the infrastructure design choices have created.
- 22) All respondents agreed it is not if, but when, someone will get seriously hurt or killed as a result of the way the city has designed the streets.
- 23) Many asked who is responsible if a cyclist or skateboarder hits and harms a pedestrian and/or their aid, like a Guide Dog or Service Dog? Or strikes down a child?
- 24) People were under the impression the city was relooking at its design and are wondering why there is recently built yet another floating island with a traffic signal at the corner of Government and Humboldt where wharf street ends and Humboldt begins. Again, the pedestrian must maneuver through a bike lane to get to the beeping traffic button to activate the signal to cross. Pedestrians with low vision and who are blind are particularly at risk.
- 25) While going over the information on the signs, cyclists repeatedly wondered why, because of unsafe bike lane design, are they now responsible for pedestrian safety? Is the City not responsible for their safety?

The Signage

- 26) The current draft of the signage the City has proposed does very little to remedy the existing unsafe situation. The disclaimer people wanted most around their comments about the signage is that City should understand the fundamental problem is the City is putting pedestrians, cyclists and vehicle drivers in jeopardy as a result of unsafe design. These unsafe conditions will not be mitigated by this signage or create a reliable expectation that cyclists and skateboarders will be responsible to govern certain aspects of traffic control. Especially for, according to this sign, pedestrians with disabilities.
- 27) There appears to be no Universally Designed thinking to ensure safety and inclusion of all.
- 28) Cyclists and vehicle drivers especially were upset they were now responsible to ensure pedestrians were safe to cross roadways and to ensure the safety of pedestrians who use aids, such as walkers, wheelchairs, Guide Dogs and Service Dogs. They felt the city was transferring the responsibility onto them.
- 29) The signage, while attempting to ensure the safety of a Guide Dog or Service dog and their user, in practice will not. A skateboarder is unlikely to stop or see the person and dog, as many are looking down and are sharing the same pathway/space, making it impossible to avoid a pedestrian or safely stop.
- 30) Regardless of what is on the sign, it is impossible for the City to promote good behaviour. The City will not be able to ensure compliance of safe behaviours to protect pedestrians, cyclists, vehicle operators and for those pedestrians who use an aid like a Guide or Service Dog unless there are strong penalties, enforcement, and adaptations and improvements on current designs.

- 31) Will the same expectation on cyclists and skateboarders apply to all pedestrians regardless if they have a disability or not? Should not all be treated with respect and ample clear space ensured? The signs do not reflect this.
- 32) All the people surveyed feel the signage, while trying to bring awareness and responsibility to cyclists and skate boarders, will not be read by most people, or ensure the safety of the person and their aid.

Specifics about the signage reviewed. First there is a visual image of the sign then a description of everything on it below.



The sign is spaced into sections and says the following:

Top-section one: Light blue background with white figures riding black outlines of bicycle wheels and of a skateboard.

There are over 1.5 million Canadians that are visually impaired or blind.

As you ride or roll in the city be on the lookout for persons with a disability.

This has outlined characters using a bicycle and a skate board and the City of Victoria Logo.

Section Two: Black background with white lettering and the headings in light blue and figures in white
WATCH - look for people using long white and red canes and service dogs

There is an outlined character of a person being pulled downward holding a harness on a dog

Section: Three

YIELD - as you approach an intersection or a midblock crossing, be prepared to stop for all pedestrians.

Never bike around a person with a service dog, as it can startle a service animal.

There is an outline of one person hunched over using a white cane with red on the bottom.

Comments on the sign

- 1) The low vision and blind community were not given any notice or were involved in development of this signage or any materials that may be developed.

- 2) The sign was not described into accessible text when the city put it publicly out on its social media page, which missed the intended parties it was geared to support.
- 3) This draft signage attempts to address a broad range of issues, but in reality, confuses the issues. Pedestrians and their Guide Dogs, pedestrians and their Service Dogs, pedestrians with low vision, pedestrians who are blind, pedestrians using white canes, pedestrians with disabilities. Pedestrians are being implicated as a separate group from those with disabilities as it is laid out with confusing terminology.
- 4) The term to use is low vision, **not** visually impaired.
- 5) The signage colors are not visually easy to read. Yellow on a black background may be a better option. However, people see contrast differently and there are no perfect sets of colors.
- 6) The signage is not accessible, and as a result the people it is meant to support are unable to access the information.
- 7) The sign uses two terms. Service dog and service animals. This is confusing because there are no service animals under the Canadian Human rights law. It must be consistent and use the word dogs.
- 8) The sign advises readers to watch out for a person with a disability. Many disabilities are unseen. All pedestrians should be respected and watched out for.
- 9) The sign starts with statistics about Canadians who are low vision or blind but then says to watch out for persons with disabilities. In Canada, we know 1 in 4 people self-declare they have a disability. That means 25% of our population has stated they have a disability, so at least 25% of the pedestrians in Victoria may have a disability that is seen or unseen.
- 10) How does a cyclist or skate boarder determine if a person has a disability? By mixing up disability and the low vision and blind, it makes no sense. It then talks about all pedestrians as if people with disabilities are not pedestrians. This essentially separates us into a secondary class of people.
- 11) Is the signage to educate the public who ride skateboards and bicycles about pedestrians with low vision and who are blind? About pedestrians who use white canes? About pedestrians who use Guide Dogs? About pedestrians who use Service Dogs? About pedestrians who have a disability? About all pedestrians inclusive of people with disabilities? It was not written in inclusive language or is clear who the intended people are.
- 12) The signage should address the Universal Design principles that all pedestrians have the right of way in a bike lane, even if they somehow end up in a bike lane outside of the specified crossings.
- 13) There is no effective "way-finding" on the sidewalks of Victoria to find the crossings for pedestrians with low vision and those who are blind, deaf-blind as well as unseen disabilities. As a result, it is quite reasonable to think pedestrians for many reasons would sometimes end up in a bike lane, and not at an actual crossing. This has not been addressed and must be. No matter where in a bike lane there is a pedestrian, they must be yielded to.
- 14) If the City wants to do a series of signs and informational brochures that address specific areas of aids used by pedestrians, then be specific about that. A Guide Dog, A service dog, mobility aids like wheelchairs, crutches, canes, walkers, strollers etc.
- 15) The image of the person using a white cane on the signage shows them hunched over rather than upright with the cane out front. Having the cane user upright with the cane directly out front is important, as skateboarders and cyclists need to understand the lengths of the canes, as they can be as much as 5-6 feet in front of a person.
- 16) The drawing of the person hunched over using a guide dog shows a harness which most service dogs do not have. However, someone skate boarding or riding a bicycle would not be able to differentiate between a pet, a service dog or a guide dog at a quick glance. They should have respect for the dog, period, and not put it in danger or have it react defensively.

- 17) It should be clear that any pedestrian **must** have the right of way, and then be supported by specific informational signage regarding people with dogs. This would include not approaching suddenly or quickly up on a person, ride around them or stay quiet so the low vision or deaf user does not know they are there. That is true for a number of elders and people with children who stated they get startled when skateboarders or cyclists wiz by them and touch them or do not announce they are near them.
- 18) There were several respondents who are deaf and drive bicycles that stated they would not be able to communicate verbally with a pedestrian as to whether or not it was safe to cross through a bike path or disembark a bus. They could use a hand gestures, however, a low vision or blind pedestrian may not be able to understand that. They pointed out that again by not using Universal Design principles and good design, the City has instead reversed the problem by bringing pedestrians into a bike path now that they have taken the bikes off the sidewalks.
- 19) People who use bikes and skateboards felt they should not be solely responsible for the safety of all pedestrians with or without a disability when trying to cross through a bike path. They felt they cannot take on the sole responsibility and absolve the city for bad design.
- 20) Several pedestrians who are deaf stated that when using a Service Dog, they would not necessarily be able to know when someone was speaking to them to advise them when it was safe to cross the street. Three of the people interviewed who identified as deaf/blind felt they were in real danger when using their service dog's due to insufficient way-finding. They were unsure whether they could find a crossing to safely cross through a bike path, only to then negotiate a floating island to locate the bus stop or a beeping signal crossing. They stated their dogs were not trained to be watching for cyclists and to cross streets against traffic patterns which are confusing.
- 21) There are no beacons or vibration technology set up, nor were there easy to follow tactile strips along the sidewalks leading to the curbs to alert and inform them.
- 22) Skateboarders and cyclists should watch out for everyone regardless if they have a disability or not. We are all pedestrians, Little kids, elders, people with strollers. Pedestrians use all types of aids, strollers, shopping baskets, Guide dogs, Service dogs, wheelchairs, canes, white canes, walkers. How they are used must be understood and respected. Understanding the demographic of people with disabilities is key to designing for all, which is the duty and obligation of government.
- 23) The signage should reflect universal design principles around pedestrians and have specific targeted information about different types of aids pedestrian with disabilities use to have an understanding about, in all their descriptors on the signs. That may mean a series of signs.
- 24) The information about not cycling around a dog as they may startle is a very good point. However, there is an additional and equally important missing point specifically about Guide Dogs. Guide Dogs are trained to instantly and quickly pull away from an oncoming threat such as a car, bike or skateboarder. By coming up fast and in the path of travel of the dog and handler, the dog will pull the handler out of that perceived danger. That is not the behaviour of a startled guide dog, that is a high degree of safety training. Every Guide Dog is trained that way, and it's the most important point about how a Guide Dog will react when faced with the perceived danger of being struck. This creates the possibility of the skateboarder and/or cyclist creating an even more dangerous situation without that information.
- 25) Service Dogs on the other hand may or may not be trained that way and in fact could startle and react.
- 26) Under the BC Animal Cruelty Act, it is against the law to interfere in any way with a Guide or Service Dog. It must be stressed that **any** perceived endangerment is illegal.
- 27) All pedestrians should be protected from cyclists and skateboarders coming too close and too fast.
- 28) The fundamental issue is that anyone stepping into and through a bike lane to catch public transit or to find a traffic signal is potentially in harm's way.

- 29) It is the actual design of the streets that is at issue and no poster or brochure or expectation that cyclists and skateboarders are now responsible for the safety of others will change that.
- 30) 100% of the respondents reported that there needs to be much more meaningful consultation and inclusion at the decision-making tables when the City of Victoria is doing its planning. 1000 people a day are turning 65 in Canada and many live in Victoria and have now greater difficulty crossing streets and using public transit safely. An interesting fact is that the most reported issue for people over the age of 48 is macular degeneration, so planning using Universal Design is imperative for cities. The City says they consulted. Was it informed consultation? Did the City listen? The testimony laid out in this document would suggest not.
- 31) There are many reasons people with disabilities are protected under the Charter of Rights and Freedoms in our Constitution. It is because they are excluded and discriminated against frequently. The re-design of the streets of Victoria is leading to more people unable to safely use public transportation, and as a result it is creating more social isolation, particularly for people with disabilities.
- 32) The one most important issue the respondents overwhelmingly stated was this. Pedestrians with disabilities are far more reliant on public transport, using City sidewalks and crossing streets than all the groups. This appears to not be taken into account by the City and as a result has ignored the safety and basic mobility needs of the most vulnerable population in the City.
- 33) Finally, it was reported by the city that between May 2018 and March 2019, the Fort Street bike lane averaged 577 trips per day, and Pandora's daily average of 1,108 trips per day since opening. The city has not discussed with pedestrians how many have felt unsafe or had an issue or incident when attempting to cross streets or use transit. How is the City going to know the impact on pedestrians when it is not being studied? How will the City ensure every cyclist is well trained and understands the issues of the current street design and its impacts on pedestrians, including pedestrians with disabilities?

End of comments from Survey. Next is a photograph and description of near Pandora and Quadra crossing to floating island bus shelter.

National Coalition of People who use Guide and Service Dogs in Canada

Photo near Pandora and Quadra showing telephone pole that blocks view of cyclist to cross safely through a bike lane to reach a floating island with a bus stop and shelter. There are no tactile indicators on the island. This means that a pedestrian with low vision or one that is blind could walk straight into traffic.

