

Accessible Parking Engagement Summary

January 2021

Introduction

The City of Victoria is taking deliberate steps to make itself a more inclusive community. As part of these efforts new policies, strategies, and programs are being developed to help nurture a connected and cohesive community that promotes well-being, belonging, resiliency, and vibrancy.

Consistent with directions in the Accessibility Framework, the City is developing Accessible Parking Development Regulations that identify the required accessible parking associated with private land development and city-supplied parking (on-street, parkades, and surface lots).

Draft design guidelines have been developed by the City with the support of a consultant team. The work of the project team included background research, review of best practices, and conversations with representatives of the accessibility community and the development industry.

Stakeholder engagement to inform the draft design guidelines has been focused on consulting with agency partners, the development community and accessibility advocates. Through interviews, focus group discussions and written feedback, the consultants have developed draft guidelines with a goal to balance the needs of all stakeholders.

Engagement Approach

Phase 1:

In summer 2020, the City conducted the first round of targeted stakeholder engagement through one-on-one interviews with people with lived experiences, accessibility agency partners and private land developers. The main objective of the interviews was to gain insights and perspectives of the current state of accessible parking, and to understand the needs and obstacles of the people using and/or building accessible parking.

The consultants conducted 1-hour interviews with 11 representatives from the community, as detailed below:

- Seniors Task Force (2 members)
- SPARC BC (2 attendees)
- Rick Hansen Foundation (1 attendee)
- Action Committee for People with Disabilities (1 attendee)
- BC Aboriginal Network on Disability Society (1 attendee)
- Urban Development Institute (1 attendee)
- Chard Developments (1 attendee)
- Interviews with 2 advocates

The following questions were asked in the interviews:

1. What has been the general experience of users from your group in accessing parking in the City of Victoria?
2. What are your primary concerns regarding current accessible parking in Victoria?
3. Do you feel that there is sufficient accessible parking and that it is appropriately located for the needs of people with disabilities?
4. Are there notable examples of accessible parking in the City for either positive or negative reasons?
5. How would you be affected by an alternative approach to accessible parking, for example, providing different types of parking stalls for people with limited mobility vs. people using ramp-equipped vehicles?
6. Are there other creative approaches that you are aware of that might work better than the current type of accessible parking in Victoria?
7. Are there any best practices or recommendations you would like to mention to the City of Victoria to consider regarding accessible parking

Phase 2:

Following the first phase of public engagement, the consultants and staff went through multiple iterations of draft guidelines. In December 2020, a finalized draft recommendation report was developed. The consultants and staff prepared a report-back opportunity to discuss the recommendations with the stakeholders from Phase 1. Two virtual focus groups were organized for mid-December.

Workshop #1 – Public Accessible Parking

Workshop #1 was focused on the proposed accessible parking design guidelines for city-owned facilities (on-street, parkades, and surface lots). This 2- hour workshop brought together accessibility agency partners and advocates to comment on the proposed guidelines. A facilitated discussion took place following a brief presentation to gain understanding of the participants opinions and perspectives of the proposed recommendations.

Attendance: 5 participants

Workshop #2 - Private Accessible Parking

Workshop #2 was focused on the proposed regulatory requirements for private accessible parking. This 1.5 hour workshop brought together accessibility agency partners and representatives from the development community. Following a brief presentation, a discussion on the proposed regulatory requirements took place. It was important for both parties to hear eachothers perspectives on subjects such as supply rates and stall design.

Attendance: 5 participants

Stakeholders invited to attend the workshops included:

- Seniors Task Force members
- Victoria Disability Resource Centre
- Rick Hansen Foundation
- Action Committee for People with Disabilities
- BC Aboriginal Network on Disability Society
- SPARC BC
- Seniors Serving Seniors
- Urban Development Institute and its members
- Chard Developments
- Fort Street Properties
- Individual advocates / people with lived experiences (3)

The City offered an additional opportunity to provide feedback from those unable to attend the focus groups. 3 participants provided additional feedback.

What We Heard: Key Findings

Design

- Pleased to see incorporation of blue paint markings
- Consider installing more diagonal parking stalls to meet diverse needs
- Concern for vulnerability of people that travel to intersection to access curb ramp
- Need to consider that wider column space for underground parking spaces will impact development costs and therefore housing affordability
- Current signage of accessible parking is unclear/confusing

Supply & Inventory

- For private residential parking, 3 accessible stalls have been the most common amount requested
- Current supply of accessible parking is unreliable
- There are often barriers that are near an accessible parking spot – mailboxes, posts, bike racks, garbage cans.
- When accessible stall is lost temporarily due to construction, it should be replaced with another accessible stall.
- Providing more spaces at specific locations, such as recreation sites.

Education and Enforcement

- Will need to create public understanding of what the crosshatch design and use
- Need for more enforcement and increased fines to ensure compliance
- Ongoing maintenance updates on the City's website to relay information of accessible parking – especially an updated map of current stalls

Other

- Accessibility of parking meters – coin operated, the height of the machines, glare from the screen
- Locations in parkades have dark lighting and there is a concern for safety
- EV parking and accessible parking – consider co-locating them together
- Recommendation for new parking card – in addition to placard – charge nominal fee – to park anywhere in the city for up to 3 hours

Rob Gordon

From: Personal information
Sent: January 8, 2021 10:35 AM
To: Alannah Rodgers
Subject: Vancouver briefing note on accessible parking & other sources of information

This document makes some of the arguments I have made and points to “extensive study”. Perhaps they have a rigorous demand study that the City of Victoria could access. It also addresses the spacing issue in underground parking you mentioned to me when I joined you and Christine Paisley after the private sector consultation in mid-December.

<https://council.vancouver.ca/010726/pe6.htm>

This document outlines a process that is more site-specific than formula driven. <https://www.cityofkingston.ca/documents/10180/32687714/Parking%20Study.pdf>

If Council is asked to approve the proposal that cites only the two building types that require more accessible parking, then perhaps it can be combined with an approach that allows staff or Council to require more in a particular application, where circumstances warrant.

One thing I didn't mention is that there appears to be a zone in the City in which no parking is required. There was a building on Wharf Street considered within the last year that had no requirement for on-site parking. I think there is something wrong with a standard that is based on a percentage of regular stalls when some buildings require no parking. The argument in the case cited was that residents could use alternative modes of transportation or find parking on the private market, but no one looked at whether assumptions about access to transit, cycling, car-shares applied to people with disabilities or whether accessible routes existed between the proposed building and the perhaps private parking that was not identified.

Therefore, I recommend that there be one accessible parking spot required even when no regular parking is required (perhaps subject to a threshold of units if need be). I don't know what the area is or the document that sets out the rules that allow no on-site parking. Planning staff will know.

We talked about lighting and maintenance. In the Ottawa Design Standards, Page 241 onward has some guidance. The document also has signage examples.

https://documents.ottawa.ca/sites/documents/files/documents/accessibility_design_standards_en.pdf

That's probably it for a while. I can't become an expert on this, but I have tried to bring my public policy analysis expertise to bear, provide your project with history of the issue (and thus and understanding of community expectations) and raise some issues that need to go into a parking lot for later attention. This, in addition to commenting on the proposals.

Personal information

Rob Gordon

From: Personal information
Sent: January 7, 2021 9:49 PM
To: Alannah Rodgers
Cc: accessibleparkingbc@gmail.com
Subject: Accessible Parking in Victoria BC

Hello,

I'm writing to share this post from the Accessible Parking BC Facebook page. I feel it summarizes well an accessibility discrepancy around the reduction in parking spaces around Victoria.

I appreciate we need to work on climate change, but penalizing disabled people such as myself in the process by eliminating parking, and thus making Victoria LESS accessible for many of its citizens, makes me wonder if it's a worthwhile, long-term approach.

There seems to be an assumption from Mayor Helps that nearly everyone can and should ride bikes. To me, this is a bold, ableist assumption.

There are those of us who live independently and can usually drive ourselves and there are parents with disabled children who need accessible parking, because sometimes between where we park and our destination isn't accessible.

There are caregivers, and Community Support/Health Workers, Nurses, and Mental Health workers and many others who need parking to support and/or care for disabled people or ill patients. Some need to take their patients/clients to appointments or out as a group. Bussing/biking between clients isn't always feasible.

Then there's housing considerations, which are discussed below.

Reducing parking makes me feel like only abled people need to be considered. Driving is a privilege but for people like me it's accessibility to Victoria.

Please read the post below, and let me know how you plan to address the reduction in parking. In many ways, when one removes the barriers and make spaces accessible, one is removing that which creates disability. When spaces are accessible, they are accessible for everyone.

This is the Facebook post, shared with permission from Accessible Parking BC's page:

Further to recent posts about the current City of Victoria policy exercise regarding accessible parking requirements, can City Council be counted on to approach the matter in an unbiased way, especially given that the interests of people with disabilities may conflict with housing objectives? We know from experience that the City has no transparent or established process for dealing with such conflicts. The proposal out for consultation now already leans in favour of developers and recommends an unsubstantiated low accessible parking supply standard.

Victoria News, "October 2017, Parking requirements may be relaxed for Victoria developers"

"Although this is a bylaw about parking, Helps said her goal is to improve the housing market.

"Building parking is really expensive," she said. "The more parking we require, the more expensive rental units and condos [are] ... even affordable rental units. When we require a non-profit housing developer to put in a certain number of parking spots based on 1981 statistics, that increases the rent in the affordable housing units.

“The less parking spaces we mandate, the less cars there are and the less greenhouse gases are emitted.”

The Mayor has stated this attitude time and time again, even wishing publicly for no minimum parking requirements.

Putting aside the grammar, let's look at the assumptions behind this. One is that if no parking is supplied, people will use transit. Well maybe some people have a choice, but others don't. Transit may not fulfil the needs of people with disabilities. Another is that if parking is not supplied with the residential building, those who won't use transit can buy parking on the private market. PWD [People With Disabilities] may not be able to. There may be no accessible path between the dwelling and the parking, and transportation demand studies I've seen presented to Council to support parking variances (to lower the already low requirements) never look at this or the circumstances of people with disabilities who may want to live in the building. I've seen an application going to Council for a multi-unit residential building with no parking whatsoever and for some reason to do with its location in the historic core, that was legal.

For some people, parking is what determines whether they can live in a certain building. Council has never been informed about how PWD get around, how many drive, how many must be driven in a private vehicle and why and for what purpose. Council does not know about the need for caregivers to have accessible parking. They don't know when the demand is greatest. They don't know where PWD who use wheelchairs or other mobility devices must go or want to go but cannot.

There are proposals for the supply of accessible parking floated now and no factual report to accompany them that creates a common understanding of the challenges, discusses drivers of demand or takes consultants or decision makers into the world of people who need accessible parking. Let's hope that by the time this works its way to COTW and Council, there's a report that boosts understanding of both sides in this David and Goliath human rights struggle.

When the website is working again, I'll look at the staff report that prompted this article.

<https://www.vicnews.com/news/parking-requirements-may-be-relaxed-for-victoria-developers/>

Thank you for your time,

Personal
information

Sent from my Galaxy

Rob Gordon

From: Personal information
Sent: January 7, 2021 2:44 PM
To: Alannah Rodgers
Subject: FW: Off Street Accessible Parking

Dear Alannah

I found the following note that indicates some previous analysis, reporting and undertakings made by City staff on the issue of accessible parking. As you can see, consultation with the development community stalled the previous attempt at making changes to Schedule C, although the AWG was told that it related to quality of data collection, carried out under a research design developed without consultation or understanding of how accessible parking is used. Very little information in favour of increasing accessible parking requirements has ever been provided to Council, and this is a Council that is hostile to parking in general. This is the background I had wanted to fill you in on previously but could not find. It was against these recommendations and Council direction that I was assessing the recently distributed proposals. See forwarded notes below. They contain extracts from a previous staff report.

Also:

AWG's December 2017 minutes say "City staff are seeking feedback to determine whether requirements set out in the BC Building Code are sufficient or if additional requirements should be set out in the Zoning Regulation Bylaw." That original question remains unanswered by the current policy exercise. It seems to have gone straight to what might be acceptable to the development community without first establishing actual demand. See the minutes at <https://www.victoria.ca/assets/City~Hall/Committees/Other~Committees/AWG%20Minutes%20Dec%204%202017.pdf> Sadly, links to discussion documents are broken. I sure hope that Jim Handy is part of the current exercise or has at least been consulted and the file from that last round of work obtained and reviewed.

I don't see much evidence in the proposals that input provided by the AWG in December 2017 was seriously considered. [https://www.victoria.ca/assets/City~Hall/Committees/Other~Committees/AWG%20Off%20Street%20Parking%20Regulation%20Consultation%20Report%20final%20\(002\).pdf](https://www.victoria.ca/assets/City~Hall/Committees/Other~Committees/AWG%20Off%20Street%20Parking%20Regulation%20Consultation%20Report%20final%20(002).pdf)

There is also the later AWG report
<https://www.victoria.ca/assets/City~Hall/Committees/VDRC%20Parking%20Recomendations.pdf>

I also attached my document referenced in the December 2017 AWG minutes, as it may not have been in the operational file.

I think this provides you with the information necessary for a fulsome Background section for a future staff report and an understanding of where advocates such as me are coming from.

Personal information

From: Personal information
Date: Monday, February 18, 2019 at 9:39 AM
To: Personal information
Subject: Re: Off Street Accessible Parking

Personal information

Perhaps you could also provide the following.

I would also add that **Council** gave Staff the following direction in July 2018 re. reporting back with a scope of work for accessible parking that **Staff have not fulfilled**. Staff only reported back on the lump sum for a combined study, as per AWG recommendation. They were obliged to report separately on the Schedule C work, given previous specific Council direction. In addition to reporting on the potential cost savings by combining the work of City-provided and Schedule C accessible parking work, they should have provided a breakdown by sector. Only then would Council have been provided with sufficient information to make an informed decision about 2019 accessible parking work AND the information it had directed staff to provide in advance of the financial plan's presentation.

I can't see how Staff would not report with the scope of work in the original Financial Plan and why, after advising it be undertaken previously, would backtrack when the need is now more profound and urgent.

Further, recently, Director Work seemed to indicate that the \$100,000 figure included bicycle parking and EV parking, which is not accessibility related, but I'm not 100% certain on this. He certainly mentioned those in the recent Special COTW discussions.

Previous Council direction to staff (responding to a recommendation from staff)

July 12, 2018 at Council

Report:

Review of Off-Street Parking Regulations (Schedule C of Zoning Regulation Bylaw 80-159) and Delegation of Minor Parking Variances

at <https://pub-victoria.escribemeetings.com/filestream.ashx?DocumentId=19120>

Minutes indicate the following was approved:

Moved By Councillor Alto

Seconded By Councillor Isitt

That Council direct staff to report back to Council with a scope of work, anticipated timelines and estimated costs associated with a review of barrier-free parking needs in the City of Victoria. This review shall provide recommendations for potential regulations and guidelines that could be adopted by the City.

CARRIED UNANIMOUSLY

This should therefore, have been costed and part of the original Financial Plan presented to Council this Fall. Unless it was done earlier, but I cannot find it, nor do I recall it.

From the Staff report [**Note - the objections of the complicated regime now no longer operate, given that the Province has vacated this regulatory area. They now can rely only on cost arguments.**]

"

1. *"Staff considered including regulations relating to barrier free parking in the Zoning Regulation Bylaw. Correspondence with members of the City's Accessibility Working Group suggested that the current requirement, outlined in the BC Building Code, is not providing enough barrier free parking stalls. It was suggested that the City consider increasing the supply to help those with mobility constraints. Staff also heard some opposition to this approach from the development industry. The concerns primarily related to the fact that, as this is regulated through the BC Building Code, the inclusion of potentially contradictory regulations in the Zoning Regulation Bylaw could result in considerable confusion for applicants. Issues with the allocation of such barrier free stalls in strata developments were also raised."*

Staff carried out further consultation with the development industry to determine whether the issues raised could be satisfactorily resolved and to what degree additional barrier-free parking stalls could be provided. The feedback received was largely a reiteration of previous concerns; however, the point was also made that, in the residential context, any additional stalls would come at a significant cost per stall and, as these stalls cannot be sold, the cost would be passed on to the buyer and, therefore, would impact affordability. Staff heard a strong preference that barrier-free parking should continue to be regulated through the SC *Building Code* and the City would be creating a complex regulatory scheme by adding more stringent requirements in the *Zoning Regulation Bylaw*.

Staff also engaged with the Accessibility Working Group and the Disability Resource Centre on this issue, as directed by Council. In addition to the summary notes taken by staff at the December 21, 2017 meeting,

written comments were also received from the Accessibility Working Group (both documents are included in Attachment B).

Key themes included:

- in terms of stall supply, the *BC Building Code* requirements for barrier-free parking are too low, especially in Victoria
- stall dimensions, as specified under the Code, are insufficient and do not provide enough space to accommodate vehicles with wheelchair ramps
- other design considerations should be addressed either through regulations or guidelines, and could address issues such as grades for barrier-free parking, location of curb cuts and space for mobility scooters.

Based on the feedback received and staff research to date, it is evident that the development industry has concerns relating to the inclusion of barrier-free parking requirements in the *Zoning Regulation Bylaw* that are more stringent than those set out in the *BC Building Code*. The provision of such stalls does carry a financial cost which is passed on to the purchaser and affects housing affordability. On the other hand, there appears to be sufficient evidence that the Code does not provide for enough barrier-free parking stalls in the City of Victoria. For example, based on information provided by the Disability Resource Centre, there are currently approximately 16,500 disability parking permits in circulation in metro Victoria (includes the City of Victoria, the District of Oak Bay, the District of Saanich, and the Township of Esquimalt); when comparing this figure to an approximate population of 235,000, approximately 7% of the total population has a disability parking permit. In comparison, for most types of development, the *BC Building Code* does not typically require any barrier-free parking stalls for parking areas of up to 50 stalls. Where more than 50 stalls are provided, barrier-free parking stalls are provide at a ratio of 1 stall for every 100 parking stalls. The requirements in the Code do not attain the 7% which appears to be the need based on the percentage of the population which have a disability parking permit.

In light of the above, staff recommend that Council consider proceeding with one of the following options:

Option 1 (recommended):

Direct staff to report back to Council with a scope of work, anticipated timelines and estimated costs associated with a review of barrier-free parking needs assessment in the City of Victoria. This assessment shall provide recommendations for potential regulations and guidelines that could be adopted by the City.

Option 2:

Continue to refer to the *BC Building Code* for barrier-free parking requirements in the City of Victoria. Staff are recommending that Council consider proceeding with Option 1, **given the evidence that the *BC Building Code* requirements do not address the demand for barrier-free parking in the City of Victoria. It is anticipated that such work would be carried out by a specialist, professional consultant, or organization. It would involve working closely with the development industry and persons with accessibility needs, and any final recommendations would include recommendations for potential regulations and guidelines to ensure that barrier-free parking is provided in a manner that meets the needs of our citizens but does not adversely impact key Council objectives, such as housing affordability.** Should Council proceed with this option, staff anticipate reporting back with a scope of work, anticipated timelines and associated costs, in Q4 2018, concurrently with a project brief for Design Guidelines for Bicycle Parking (see below)

From: Personal information

To: "

Cc: "

Sent: Thursday, February 14, 2019 2:44:41 PM

Subject: Off Street Accessible Parking

In December 2017 AWG did a consultation (report attached) with the consultants who were at that time, assisting the City to update its off-street parking regulations. The minimum standards in the BC Building Code were in effect at that time. AWG stated that these standards were not sufficient to meet the growing need for accessible parking in Victoria. If Victoria was to adopt higher standards in its regulations, these would override the inadequate standards in the code. **The consultants indicated that in light of AWG's feedback, more research would need to be done requiring further funding.** AWG is not clear if this was ever sought but to our knowledge no further work on off-street Accessible parking regulations has been done.

Then in November 2018 came the announcement about the changes to the BC Building Code; as of December 10 2018, the BC Building Code no longer contained minimal standards for off-street parking. AWG raised this imminent development at its December 3 meeting and as a consequence, Council passed the following motion:

That Council

1. Direct staff to maintain the previous provincial standards, on an interim basis, while staff develop new, stronger accessible parking standards.
2. Request the Mayor write to the Premier of British Columbia objecting to this new policy and its negative impacts on standards of accessibility.

As part of the financial plan, staff then asked Council for a \$100,000 to hire a consultant to complete this work plus a study of accessible City owned parking. AWG had recommended this on-street parking study as a result of work done by the Victoria Disability Resource Centre Parking Committee and a very comprehensive report of one of its members. Yesterday, Council turned down this request and instead directed staff to report back on accessible parking and cost implications as part of the Accessibility Framework implementation. They also spoke of making efforts to get the province to reinstate accessible parking standards into the building code.

Today I received information about a provincial bulletin regarding this issue which can be found at

https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/construction-industry/building-codes-and-standards/bulletins/b18-09_accessible_parking_requirements_bulletin.pdf

It states that **"Communities without specific bylaw provisions will be unable to enforce minimum standards for accessible parking after December 10, 2018."**

I do not know if staff have seen this bulletin but they did not reference it during the discussions. Please let them know that we now have no standards and are at risk of developers taking advantage of this gap until the City develops regulations which now will not happen until 2021, at the earliest, as a part of the AF implementation now predicted to be in 2020. So we will be without standards for possibly two plus years, and during a building boom.

Rob Gordon

From: Personal information
Sent: January 6, 2021 4:24 PM
To: Alannah Rodgers
Subject: Re: Follow Up - City of Vitoria Accessible Parking Stakeholder Engagement

Good afternoon Alanah:

I'm not sure there is much reason to follow up with staff on these recommendations as my comments seem to have had minimal impact, if any. It is frustrating that the City and developers who have paid staff to deal with these issues as part of their regular work along with a paid consultant are unwilling to listen to people who have been doing specific work on the issue for the last number of years. I have a full time paid position outside of the disability community as well as full time caregiver duties and am regularly expected to meet short timelines if I wish to respond to the city. This in itself is a barrier to meaningful inclusion.

The report contains inaccurate and incomplete information and analysis at this time I feel it best that I address it directly with Council and the Ministry of Transportation and Infrastructure as staff and the consultants seem unwilling to listen.

If you wish to discuss this further I can make time available in the next few days.

Personal information

On Wed, Jan 6, 2021 at 12:44 PM Alannah Rodgers <arodgers@victoria.ca> wrote:

Good afternoon and Happy New Year!

On Monday December 14th and Tuesday December 15th, the City of Victoria held focus groups to hear feedback on the draft recommendations for Accessible Parking in the City.

For those that attended the focus groups and submitted feedback, thank you kindly for your time, expertise and perspectives to inform this project. I have attached for your information a summary of background research and public engagement thus far. Also attached are the slide deck presentations and reference materials.

Should you wish to provide written comment on the draft recommendations, please submit your feedback to arodgers@victoria by January 18th, 2021. If you would like the opportunity to discuss over the phone, please indicate your availability and I will set up a time to discuss.

Feedback received will inform the final draft recommendations that will be presented to Council in mid-February. At that time, staff will be seeking further direction from Council to develop final guidelines, standards and bylaw amendments which will be accompanied by further and broader engagement through a public hearing process.

Please do not hesitate to reach out if you have any further questions or comments on the process or if you require the reference materials in a different format.

Thank you for your continued feedback and commitment in supporting the City's efforts to become more inclusive.

Kind Regards,

Alannah Rodgers

Active Transportation Project Coordinator

Engineering & Public Works

City of Victoria

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Personal information

Rob Gordon

From: Personal information
Sent: December 28, 2020 3:51 PM
To: Alannah Rodgers
Subject: My feedback

Dear Allanah

I have sent this feedback to you only. Please forward as you see fit. Formatting in the document seems to be making it impossible for me to work with the document on one of my older devices and I'm looking at two screens. I may have misplaced some comments in the wrong sector section, but most are applicable to both. I simply have to stop at some point, despite each reading giving rise to more questions.

Despite my attempts to edit and consolidate, it is only getting longer and for that I apologize. I did not get word of the summer consultation in time to provide input. Many of my comments, particularly at the end are about what this leaves undone in the parking ecosystem.

Despite the scope limitations of this project, I believe it could include Parks and street parking, as well as non-standard self-propelled vehicles (e.g., modified bikes) and accessibility device parking in Schedule C.

Although I provide detailed questions and feedback, my primary message is that **I see no evidence that the proposed supply rates will meet demand.** And not dealing with street parking is an inexplicable and huge gap of scope.

There are few facts and little discussion of demand. I've attempted to provide some missing background but don't think I found the recommendation staff put forward with the last Schedule C amendment undertaken in 2017 but not approved until 2018 (that Council accepted) about the need to go back to accessible parking and conduct a rigorous study on which to make fact-based decisions. If one was undertaken, it is not provided here. Decision makers will need it and it would have been easier to comment had rationale and facts been provided. I also wonder if previous work was fully taken advantage of, and that includes reports behind the 2011 changes to Beacon Hill Park roads, which contains much accessible parking information.

The whole exercise could be vastly improved if all parties were to share an understanding of the facts and comparative analysis.

Personal information

Rob Gordon

From: Accessible Parking <accessibleparkingbc@gmail.com>
Sent: December 13, 2020 6:03 PM
To: Robin Gagne
Cc: Alannah Rodgers; Laura Tennant; Stan Levenhorst; Dan Casey; ttejassvi@sparc.bc.ca; ed@sssbc.org; christine@actioncommittee.ca; **Personal information**
Subject: Re: Workshop #2 – Proposed Private Accessible Parking Regulations
Attachments: 20200814 Beacon Hill Park Accessible Parking Final.pdf

I have provided several comments here as I may not be able to make the meeting on Monday or Tuesday:

Terminology:

The report refers to the "New International Symbol of Accessibility." This is incorrect. The International Symbol of Accessibility is an ISO 7001 world standards symbol. What the City has provided in this document is the "dynamic symbol of access" or "DSA." This symbol is often favoured by advocates and activists because it is intended to display an active, engaged image with focus on the person with disability. It is not yet recognised in BC legislation and cannot be used for *regulatory* elements. The symbol was designed as part of the "Accessibility Icon Project" and was reviewed by the International Organisation for Standards in 2015, at which time they rejected it, as did the US Federal Highways Administration. Referring to it in any way relating it to the International Symbol of Access is incorrect. Using it for *regulatory* elements of the accessible parking space (traffic control devices or "signage") is also inconsistent with provincial legislation.

Signage

Accessible parking *signage* is considered a regulatory "traffic control device" under the Motor Vehicle Act Regulations. The signage as proposed with the dynamic symbol of access is not consistent with the Motor Vehicle Act Regulations Division 23 Schedule 2 in symbology or colour. Section 124 of the *Motor Vehicle Act* outlines powers of a municipality. It reads in part:

(1) the council of a municipality may, by bylaw not inconsistent with or derogatory to this part [Part 3], provide for the following:

(a) the placing or erection of traffic control devices to give effect to this Act or a bylaw adopted under this section;

(c) the regulation, control or prohibition of the stopping, standing or parking of vehicles in the municipality;

(d) in accordance with any regulation made under section 209 (2) (h), for parking for persons with disabilities, on highways that are not arterial highways, including providing for a system of permits for those parking zones;

The Motor Vehicle Act Regulations Division 23.03 states: "All traffic signs corresponding to those depicted in Schedule 2 of this Division, if erected after June 30, 1978, shall conform with respect to shape, colour, minimum dimensions, symbols, wording and reflectorization to the standard traffic signs shown and described in Schedule 2."

Unless the City has approval from the Ministry of Transportation and Infrastructure, changing the Motor Vehicle Act Regulations Division 26 Schedule 2 signage would be inconsistent with and derogatory to the requirements of the provincial legislation, and therefore in contravention of Section 124 of the Act. It must be remembered that any place to which the public is invited or has access for the purpose of parking or servicing vehicles meets the definition of "highway" under the BC Motor Vehicle Act, and traffic control devices must therefore be consistent with provincial legislation. The DSA *can* be used for pavement markings or wayfinding signage as these are not recognised as traffic control devices under BC legislation and therefore not regulated.

Van Accessible Parking Space Signage

Parking spaces designed for use by people with adapted vehicles must also have a "van accessible" tab. This is not restrictive but informative to encourage people who do not need the additional width for a side access ramp to leave these spaces unless no other accessible spaces are available. This is particularly important as the City

has chosen to use the 1/6 USADA standard instead of the more current 1/2 Access for Ontarians with Disabilities Act (AODA) standard for van vs standard car accessible parking spaces. The blue and white “van accessible” tab is consistent with other CRD municipalities including Central and North Saanich as well as the City of Richmond. As the tab is in addition to the regulatory sign, it is not inconsistent with the regulations. **Municipal bylaws must support and enhance existing provincial legislation. What we "like" or "want" is not always an option. Until the province amends the Motor Vehicle Act Regulations and adopts the dynamic symbol of access, use of incorrect signage can cause issues with enforcement under provincial legislation therefore creating a barrier to access and lead to human rights complaints levied against the City.**

Wayfinding Signage

The wayfinding signage as proposed is unclear. As a driver and caregiver, I would read this signage as pointing to an accessible path, not necessarily accessible parking. The use of the letter "P" with the ISA/DSA would provide clarity in the signs' meaning. The use of the “P” to indicate “parking” is also consistent with both ISO 7001 and the *Manual of Traffic Control Devices for Canada*.

Number of Accessible Parking Spaces

The City's proposal is for 1 accessible parking space for every 50 parking spaces in public parking lots that contain 50 or more parking spaces in total. The context is unclear if this means all public parking (e.g. including on-street parking) or only in parkades. On its face, this appears to be grossly inadequate when placed next to recognised accessibility standards. This approach is even more concerning given the repeated comments made by the Mayor to limit or eliminate infrastructure that supports the use of personal vehicles, including parking. The position stated by the mayor makes the use of percentage or ratios to determine accessible parking requirements inappropriate. The City's leadership has failed to acknowledge, at least publicly, that for many in the community the lack of properly designed accessible parking is an accessibility barrier and not just a “nice to have.” This was clearly demonstrated with the City's response to the road closures at Beacon Hill Park. Staff reported to Council that 11 accessible parking spaces were available in the park. This was not the case, and the “new” spaces added were in signage only, save one. The remainder were, and remain, unsuitable for anyone who cannot use a standard car parking space. (see letter attached)

Public parking is a public facility and is in part to provide access and accessibility when other options are not available. Accessible parking is an *accommodation* to ensure that people with disabilities have access to services and facilities normally available to the public as required in Section 8 of the BC Human Rights Code. It is unconscionable that the City would propose such a low number of accessible parking spaces. Every lot should have at least one accessible dimensioned parking space (signed as accessible or not), and public lots of 10 or more must have at least one designated accessible parking space. Extremely large parking facilities such as municipal parkades may be able to reduce the overall percentage due to the sheer number of overall spaces. This approach is consistent with existing accessibility standards including the USADA. See link below.

<https://www.access-board.gov/ada/guides/chapter-5-parking/>

Dimensions

I support the minimum dimensions proposed as they are consistent with both USADA and AODA standards.

Private Parking Standards

I have not had an opportunity to dig into the “private” parking standards, but I imagine I will have the same concerns apply. While the proposal is "double that of the BC Building Code" this is nothing to boast about. The standard has not changed since 1965 when it was first introduced into the National Building Code as part of "Supplement 7: Building Standards for the Handicapped." At the time, there was significant stigma surrounding people with disabilities and most were not active and engaged members of the community. Many were warehoused in institutions, forgotten or ignored by their families and the community at large. Today's environment is very different and to not recognise the contribution that people with disabilities and seniors make to the community (or could make if the community was accessible) is wrong. The standard proposed by the City is again not consistent with recognised accessibility standards and in my opinion significantly inadequate for the demographic in the City of Victoria or the CRD.

I would be pleased to discuss these concerns further. I am available December 19th through January 8th if this time frame works for you. I have significant concerns that the proposals are less than adequate and not consistent with both the Accessibility Framework and the Council Accessibility Policy.

I look forward to your reply,

Kind regards
Dave Willows

David Willows
Lead Advocate
Accessible Parking BC
www.facebook.com/AccessibleParkingBC

Personal information

On Thu, Dec 10, 2020 at 4:32 PM Robin Gagne <rgagne@urbansystems.ca> wrote:

Hello – Thank you for your interest in the City of Victoria’s workshop #2 on their proposed private accessible parking regulations. Please review the attached summary document beforehand. If you have any questions or concerns about the workshop feel free to reach Robin on his cellphone (250.661.6880) or by email (rgagne@urbansystems.ca)

Details:

As mentioned, workshop #2 will be focused on the recommended new requirements for inclusion in the City’s development regulations and would be establish requirements for accessible parking in all new land development. Where previously BC Building Code specified requirement, the City is now responsible through regulation to ensure all new land development includes appropriate accessible parking supply, parking space dimensions and layout, signage / markings, and access provisions (i.e., ramps, access).

The workshop session will include a overview presentation from City staff and the consulting team on the preliminary recommendations for private accessible parking regulations, followed by a facilitated discussion among the group to help inform and gauge the level of support for the final recommendations.

Workshop #2 will be 2-hours long and conducted on Zoom

- Accessible Parking Design Guide – **December 15th, 1:30pm to 3:30pm (2hrs)**

Join Zoom Meeting

<https://urbansystems-ca.zoom.us/j/9081465570>

Confidential passwords and userids

Rob Gordon

From: Personal information
Sent: July 1, 2020 4:17 AM
To: Stan Leyenhorst; Alannah Rodgers; David Willows
Subject: Re: Stakeholder input - Victoria Accessible Parking Requirements and Design Guidelines

Follow Up Flag: Flag for follow up
Flag Status: Completed

Hello Stan, Alannah and David,

I'm sending my recommendations and not recommended drawings. I have also detailed explanations too.

This is from July 2019. **Plan 1.A** - Is my highly recommended plan that includes all types of accessible vehicles for parking lots. This plan serves all people.

I have attached the drawings in word and pdf format for convenience.

Let me know your thoughts?

Regards,

Personal information

Sent: Friday, June 26, 2020 at 2:40 PM
From: "Stan Leyenhorst" <stan@uadi.ca>
To: Personal information
Subject: Stakeholder input - Victoria Accessible Parking Requirements and Design Guidelines

Hello Personal information

I'm sending you this email as one of the consultants engaged by the City of Victoria to assist them in developing their Accessible Parking Requirements and Design Guidelines.

Alannah Rodgers, Active Transportation Project Coordinator for the City of Victoria, reached out to you recently regarding our research and indicated to us that you had indicated interest in participating.

I'm sending this note to schedule a virtual interview by Go-to-Meeting video call in the week of July 6-10th. (EXCEPT July 7, 11-noon and July 9, AM – 2 PM, July 10th) We would love to hear your views on the current state of designated accessible parking in the City of Victoria and get your views on some potential ways of improving it. We'd like to offer you your choice of whether or not you'd like to talk with us alone, or have Alannah join the call on behalf of the City as well. We can schedule an hour for the call, although the length of time we need will mostly depend on the nature of the feedback that you'd like to share.

If you're willing to help us with your feedback, can you please provide me with three one-hour options in the week July 6-10th and let me know if you'd like Alannah to join us?

I've included the interview questions for your convenience.

On behalf of the City of Victoria,

Thanks,

Stan Leyenhorst



604-897-0643

stan@uadi.ca

www.uadi.ca



August 14, 2020

Mr. Navdeep Sidhu
Assistant Director, Parks and Recreation
City of Victoria
1 Centennial Square
Victoria, BC V8W 1P6

Subject: Temporary Parking for People with Disabilities in Beacon Hill Park during COVID-19 Road Closures

Dear Mr. Sidhu:

I am writing to voice concerns with the City of Victoria's approach to parking for people with disabilities in Beacon Hill Park (referred to as "disabled zones" in the Motor Vehicle Act Regulations). As part of the COVID-19 response, the City closed several roads and parking areas within the park. This has left large portions of the park inaccessible to seniors and people with mobility disabilities. In short, the city has created new barriers. The scope of this letter covers only immediate accessible parking issues related to the park and does not address the more widespread accessibility issues created by the temporary road closures or longer-term recommendations.

In response to access concerns, the City reportedly added 6 "temporary" disabled parking zones around the park periphery – 3 on Douglas Street at Circle Drive and 3 more on Nursery Road. This approach is not only inadequate but was executed in a poorly considered manner.

1. Parking signage has been inadequate and culturally insensitive towards People with Disabilities.

City staff used repurposed "No Stopping Special Event" signs with a piece of paper added at various times reading "Handicap Parking Only" or showing just a black and white international symbol of access (wheelchair glyph). This paper weathered quickly and within a few days the signs would only show "No Stopping Special Event" (see Figure 1).

Using "special event" signage was extremely poor judgement. People with disabilities using the park is not a "special event," and it perpetuates the stigma

of people with disabilities as having “special needs.” The needs of people with disabilities are not special – they are the same as everyone else. At times supports or accommodations are required when facilities and services are not designed to provide universal access. It is a failure of designers, not the person with a disability.

Further, the use of the word “handicap” is also considered by many in the people with disabilities community to be offensive due to its historical context. The most universally recognised option is to use standard Motor Vehicle Act Regulations signage that consist of symbols and no words.

As a guest at the July 28, 2020 AWG meeting, I identified to City staff (including yourself), councillors and the AWG that not only had the signs been inadequate, but they were now absent and that these parking spaces had reverted to “general parking.” You made a commitment that the issue would be addressed the following day, however 2 weeks later there is still no signage for these spaces, and therefore no temporary accessible parking for the park.

2. Accessible parking is not located to meet access requirements to the facilities it serves.

A critical component of park access is the ability to use washrooms and other facilities. The closure of Arbutus Way and Bridge Way also closed access to the single accessible parking space that was within 200m of the park’s only accessible washroom. This is a new barrier in the park with respect to parking location as one criterion for obtaining an accessible parking permit is the applicant “has a mobility disability that poses a risk to their health by walking 100 meters.¹” There is also no accessible parking located near the playground on Cook Street, a place where family members of all ages and abilities would be likely to attend.

3. Temporary Accessible Parking is not designed to be *accessible*.

To accommodate access requirements for people with disabilities, parking allocated as disabled zones must be designed properly. A standard car parking space does not provide sufficient space for people with mobility devices. Of the 3 spaces on Douglas Street, only 1 provided additional space for access. I was unable to locate the other 3 temporary accessible parking spaces on Nursery

¹ Victoria Disability Resource Centre: Application for Parking Permit

Road you referred to at the AWG meeting.

4. Alternative Parking Locations identified by Council do not provide Accessible Parking.

Several designated accessible parking spaces have been removed along Dallas Road adjacent to Beacon Hill Park. The City maintains that this area of responsibility rests with the CRD and therefore is currently unable to erect signage. However, in dealing with accessibility and human rights law, one looks at impact. People without disabilities have been free to park along Dallas Road for several months, even continually through construction, but people who require accessible parking have not. The Dallas Road waterfront was cited by councillors as an alternative parking location to Beacon Hill, but without accessible parking, it is not in reality, an alternative. I have copied the CRD on this letter to bring this issue to their attention. Note that currently the only accessible parking space on Dallas Road is at South Turner and not in Beacon Hill Park (it is in Holland Point Park). It is located 0.5 km from the Beacon Hill Park boundary.

5. Information on accessibility changes must be included public information.

The map showing road closures in Beacon Hill Park shows barriers to access but does not provide the public with information on any alternative accommodations for access that the City has made. At the July 28, 2020 AWG meeting you state that there were 11 accessible parking spaces available within Beacon Hill Park. Being unable to find any reference to the location of these parking spaces on the City's website, I requested information on the location of these from you by email on Thursday July 30, 2020, however that information has not been forthcoming. As of August 11th, 2020, I am still only able to locate the two spaces near the petting farm entrance. Apart from the spaces that were lost with the closure of Arbutus Way and Bridge Way, I am unable to locate any additional accessible parking within Beacon Hill Park.

Victoria City Council has made several assertions that provide policy direction on accessibility including publishing the draft "Council Accessibility Policy Statements" (August 6, 2020 Committee of the Whole meeting) which reads in part:

Purpose:

"...To ensure people with disabilities are treated with respect and have equitable access and opportunity to participate and contribute to City policies, engagement activities,

programs and services, communications and technology, employee services and infrastructure.”

Statements

“The City of Victoria is committed to building an inclusive society with accessible services and programs that contribute to community life in a way that respects the dignity and independence of people with disabilities...

...The City is committed to providing an accessible environment in which people with disabilities can access the City's services, and facilities, including all buildings, public spaces, information and communications, in a manner that meets their individual needs.”

With these statements in mind I offer the following.

Recommendations:

The following is a non-exhaustive list of recommendations for immediate action. A longer-term plan for parking and access must be developed by the City in an authentic collaborative community engagement process that focuses on the rights of people and groups with protections under human rights law.

1. **Signage:** The City must recognise and respect people with disabilities by utilising correct signage consistent with provincial/national standards. The City therefore must obtain a supply of temporary, weather resistant Motor Vehicle Act Regulations Division 23 Schedule II “Disabled Parking” signs (also in the document I sent you on 30 July, 2020). These signs must be installed in a manner that makes them more difficult to remove, or alternatively, the City must monitor more frequently and replace signs as necessary to ensure access.
2. **Increase Accessible Parking Within Park Boundaries:** Additional accessible parking must be located within the park boundaries near to facilities. There are several locations that already lend themselves to this. One example is utilising the crosswalk on Circle Drive at Dear Lake as an already existing access aisle for the two adjacent parking stalls. 3 or more parking stalls in the Nursery Road parking lot should also be combined to provide proper width accessible parking spaces to serve the playground area.
3. As per item 2, any new or relocated accessible parking spaces must meet width, slope, surface, marking/signage, and *accessible path of travel* requirements. I

would be happy to provide additional information on this item if requested.

4. By copy of this letter I have am advising the CRD the role the City of Victoria expects that body to undertake in maintaining accessible parking in Beacon Hill Park precinct as this may not have been articulated to them previously. The result is what matters to the community, not which government body is responsible for it.
5. Update the Beacon Hill Park map online to include the location and number of accessible parking spaces. Poor or absent information is also a barrier to access that can be easily addressed in a timely manner.

I am bringing this issue to your attention and expressing the expectation that the situation will be corrected quickly with weatherproof signage consistent with the requirements of Division 23, Schedule 2 of the Motor Vehicle Act regulations (Figure 2). These events reflect extremely poorly on the City's renewed attempt to gain the trust and reconcile with people with disabilities through the publication of the City's Accessibility Framework and Council Accessibility Policy Statements.

I look forward to this situation being corrected in a timely manner. If you have any questions, please do not hesitate to contact me at Personal information

Sincerely



David Willows
Lead Advocate

CC: L. Bartram, AWG Chair
T. Soulliere, Director, Parks, Recreation and Facilities
J. Loveday, Councillor
S. Potts, Councillor
A. Rodgers, City of Victoria Engagement
R. Lapham, CRD Chief Administration Officer



Figure 1: Temporary “Disabled Zone” parking signs on Douglas Street at Circle Drive.

Special Event signage repurposed as “Handicapped Parking” signs, but the parking restriction has worn off. That said, a person with a disability using a public park should never be advertised as a “special event.”



Figure 2: Motor Vehicle Act Regulations Division 23 Schedule 2 Sign. The sign must be at least 60cm x 30.

Motor Vehicle Act Regulations, BC Reg26/58



Map from City of Victoria news release April 9, 2020 “Physical Distancing at Beacon Hill Park and Dallas Road” showing park closures with a statement about additional accessible parking. As of August 11, 2020, none of this accessible parking was identifiable.

The park ranges in width from approximately 400m to 750m and is approximately 1000m from Superior St to Dallas Road. With only peripheral parking, much of the interior area is inaccessible for many seniors and people with mobility disabilities.

<https://www.victoria.ca/EN/meta/news/news-archives/2020-news/physical-distancing-at-beacon-hill-park-and-dallas-road.html>



Updated Beacon Hill Park Map retrieved from the City of Victoria Website. No mention of accessible parking.

Opening of some parking within the park has marginally improved accessibility, however access to a number of key park facilities and elements are still beyond the physical capabilities of many seniors and people with disabilities to access due to their distance from designated accessible parking.

This map must be updated to show at least where the designated accessible parking is located.

<https://www.victoria.ca/EN/main/residents/parks/beacon-hill.html>

Proposed Accessible Parking Plan

by Personal information

July 10th, 2019

Personal information

Table of Contents

Page 1: **Plan 1.A - Is my recommended plan that includes all types of accessible vehicles. This plan serves all people.**

Page 2: **Plan 1.A is my Recommended Plan and Write up.**

Page 3: **Plan 1.B-1 - Is NOT recommended.** This plan does not account for all accessible vehicles types.

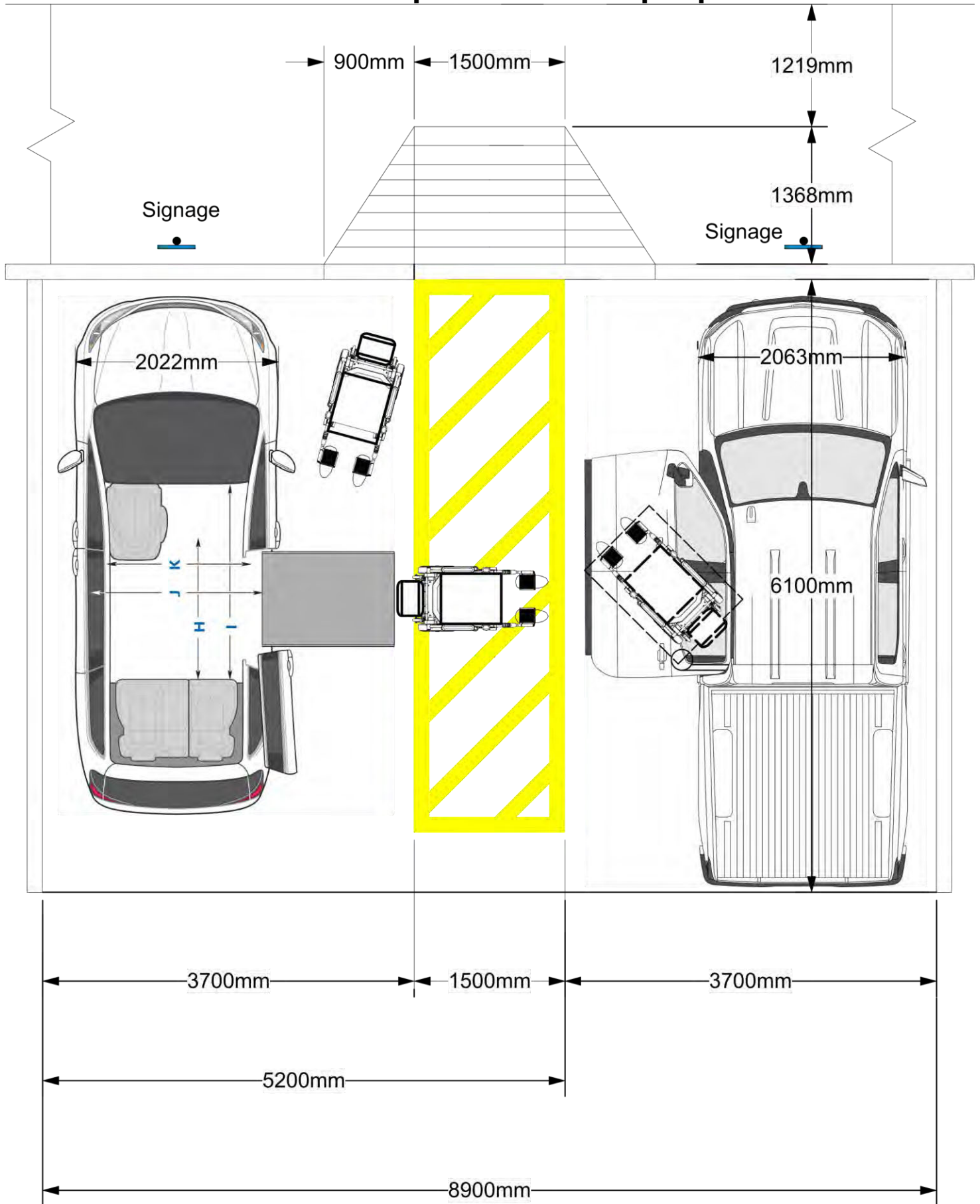
Page 4: **Plans 1.B-1 through 1.B-3 are NOT Recommended Write up.**

Page 5: **Plan 1.B-2 - Is NOT recommended.** This plan does not account for all accessible vehicles types.

Page 6: **Plan 1.B-3 - Is NOT recommended.** This plan does not account for all accessible vehicles types.

Page 7: **Links and Photographs.**

Plan 1.A - Is my recommended plan that includes all types of accessible vehicles. This plan serves all people.



Plan 1.A is my Recommended Plan and Write up:

This plan accommodates all vehicles including: Right side loading Vans, Left side loading Trucks, SUVs and Cars. I just met a guy here in Victoria at PISE who has a left side loading Truck. He told me that many accessible parking stalls are too small and the stalls that are big enough he must back into. Do you like backing up your large vehicle into a stall. Current parking stall widths are not wide enough for Right side loading Vans either. Often, I must park in the back of the parking lot. And when you are less than 4ft tall navigating a parking lot is quite dangerous.

Accessible parking stalls need to be bigger, which is an unfortunate fact. Municipalities want a retrofit plan; a plan that can be easily changed back. A plan that would NOT require the scraping and repainting of extra parking lines. They want to shove people into a hole that is not quite big enough and are not safe.

It's odd that North Saanich wants a retrofitted plan that saves money, when the new plan does not serve all people? There is a good chance people will complain and North Saanich will need to fix/update it a second time. They do plan on reviewing the current new approved plan in 2 years' time.

Should we not just build it right the first time?

Drawing 1.A: This drawing shows how much room is actually needed to serve all people with varying vehicle types in a safe manner.

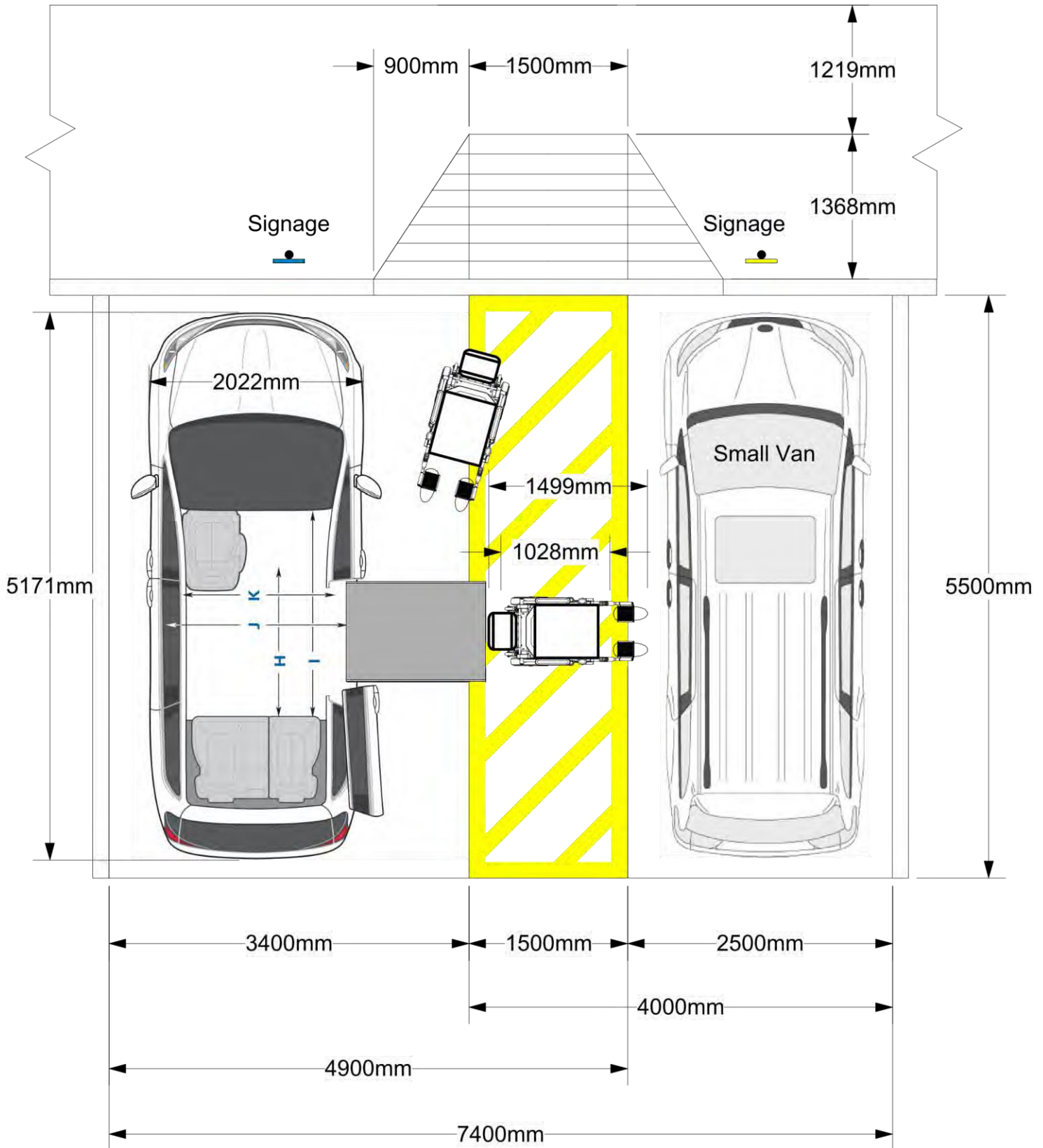
Pros:

- All accessible vehicles will fit. Including side loading Vans, Trucks and SUVs.
- Parking is safe.
- No need to back in.
- Accounts for bad park jobs.
- Allows for right side and left side loading vehicles to park side by side with both ramps out.
- A safe place to park a wheelchair while caregiver loads van.

Cons:

- Costs more and requires scraping and painting of extra parking lines. pg.2

Plan 1.B-1 - Is NOT recommended. This plan does not account for all accessible vehicles types.



Plans 1.B-1 through 1.B-3 are NOT Recommended: The current approved plans are not safe and do not serve all vehicle types. The plan does not have sidewalk dimensions? Often the side walks are not wide enough and many parking stalls do not have the wheel stoppers.

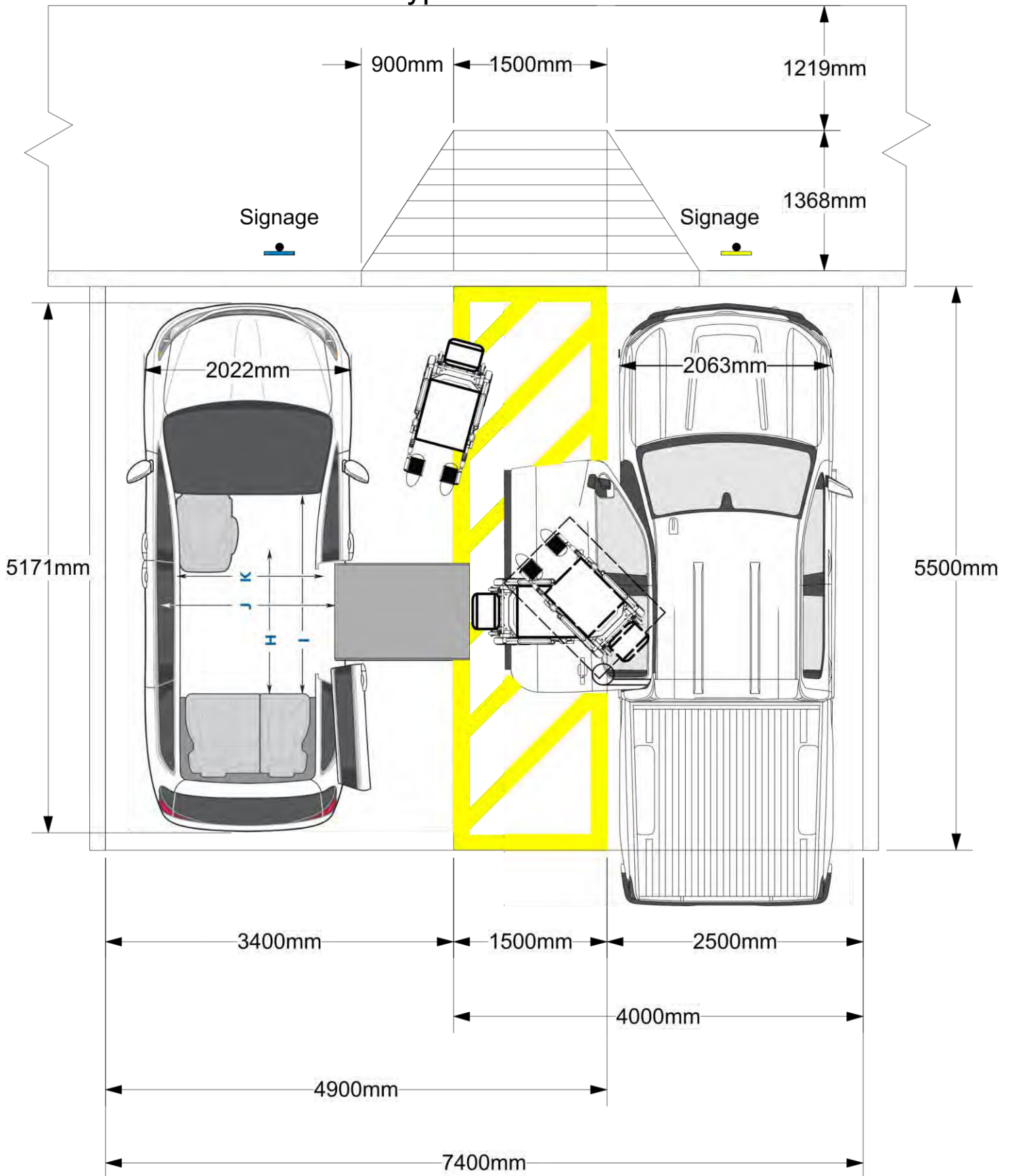
Pros:

- Cheaper and only two parking stalls require scraping and painting.

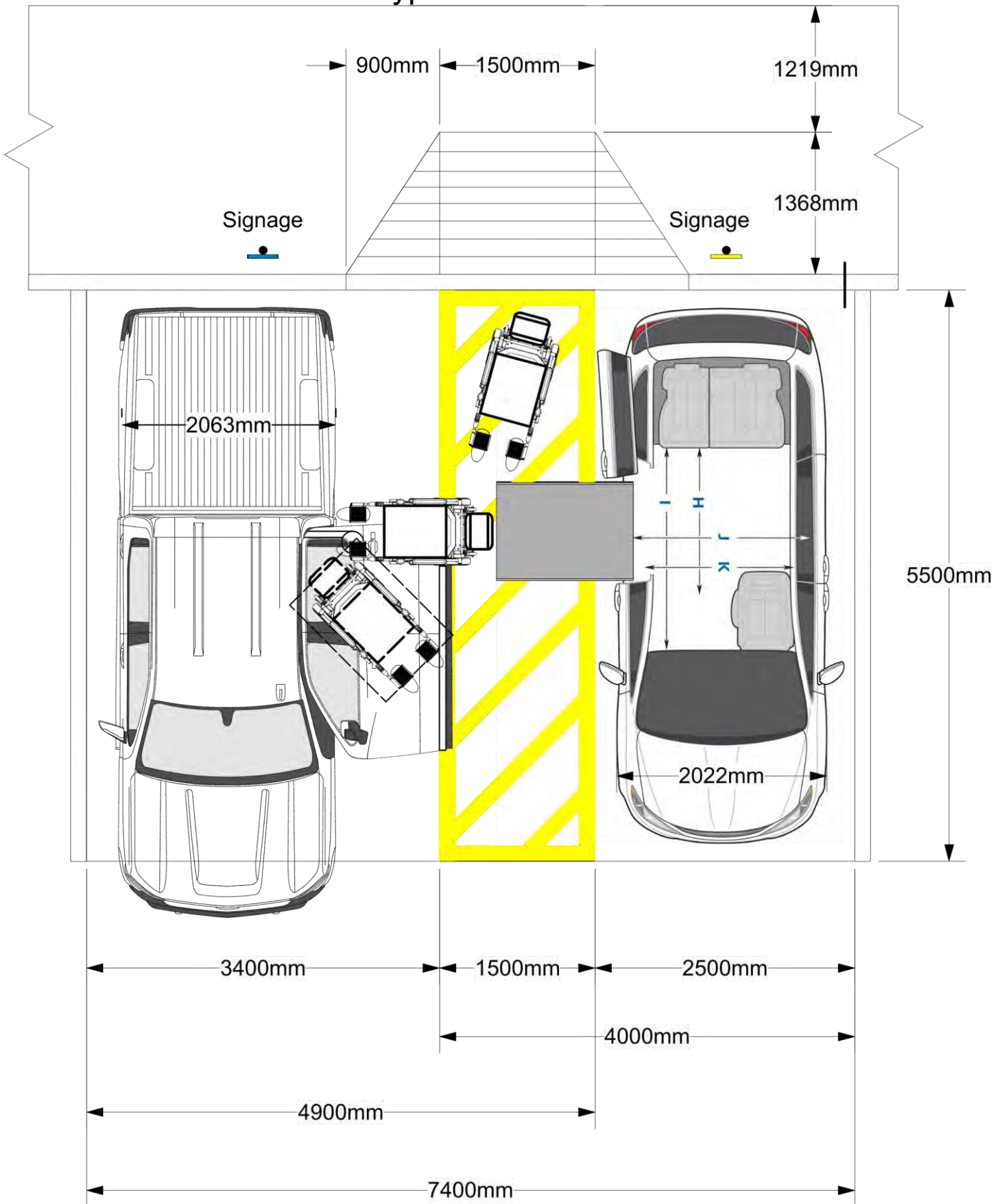
Cons:

- Does not accommodate for all vehicle types.
- You now need more signage for small and large accessible vehicles.
- Proposed signage size is not big enough for color blind people.
- large left handed vehicles must back into stalls, If the left parking stall is taken by a big truck that is backed in, a side loading van must back into the right side parking stall.
- My van ramp has almost been run over twice now. Because my ramp impedes into the stall beside me. People are not looking for a ramp while parking. Having more space between vehicles will help prevent this.
- Some people in manual wheelchairs can be less than 3ft tall.
- People that can not operate their manual or power chair need a safe/close place to be placed while the caregiver packs groceries, bags, purchased items into the van.
- Having only a few inches between your toes and the next vehicle is a bad idea.
 - o People with cerebral palsy have and uncontrollable reflex response; if someone honks or make a loud noise they will jump which can cause them to uncontrollably drive their chair into the side of a parked car.
 - o People with neuromuscular disabilities like me are very weak and if I run over a small rock while disembarking this can cause my arm or hand to move forward. My hand falls onto the joystick and I can not stop until a caregiver takes my hand off the joystick.
- No mention of sidewalk dimensions? Many side walks that run along buildings are not wide enough to accommodate a properly built ramp. Some are too steep and pose a tipping risk. If stalls have no parking stops big trucks bumpers over hang the side walks. And It is a waste of money to build these ramp cut outs to know where. Yes, these ramps do exist.

Plan 1.B-2 - Is NOT recommended. This plan does not account for all accessible vehicles types.



Plan 1.B-3 - Is NOT recommended. This plan does not account for all accessible vehicles types.



Links and Photographs

<https://www.braunability.com/us/en/mobility-products/wheelchair-accessible-vehicles.html>

<https://www.atconversions.com/atc-truck-conversions/>

<https://www.atconversions.com/atc-suv-conversions/>

<http://www.blvd.com/wheelchair-van-conversions/atc-conversions>

<https://www.freedommotors.com/wheelchair-accessible-conversions/chevrolet-and-gmc-wheelchair-trucks>



File Reference	AP-002 Signage
Date	2020-03-05
Bylaw Signage Recommendations	

2.0 Required Signage

The required signage for all accessible parking spaces in British Columbia is the sign identified in the *Motor Vehicle Act Regulations Division 23, Schedule 2 "Disabled Parking"* (See Figure 1)



Why is this sign required?

1. Standardisation of signage

In developing or updating an accessibility element in a bylaw, a *standard* is being produced. Standards must be consistent with other regulatory elements and for the most part prescriptive. Consistent signage and markings reduce ambiguity for drivers, users of accessible parking, and people and businesses that must comply with the signage requirement in the bylaw and provincial statute. In every case, the use of text should be avoided in deference to standard symbols as in the MVA Regulations sign. The word "Handicapped" should not be used as it is considered by many in the disability community to be offensive.

2. Most parking lots that require accessible parking are places where the public has access or is invited and therefore are considered "highways" under the *Motor Vehicle Act* (MVA)

MVA Definitions

"Highway includes:

(c) every private place or passageway to which the public, for the purpose of the parking or servicing of vehicles, has access or is invited, "

3. As a *highway*, there are several other sections of both the *Act* and *Regulations* that are applicable and lead to the requirement to use of the Motor Vehicle Act Regulations signage:

MVA 124 Municipal Powers

(1) The council of a municipality may, by bylaw not inconsistent with or derogatory to this Part [Part 3], provide for the following:

(d) in accordance with any regulation made under section 209 (2) (h), for parking zones for persons with disabilities, on highways that are not arterial highways, including providing for a system of permits for those parking zones;



File Reference	AP-002 Signage
Date	2020-03-05
Bylaw Signage Recommendations	

MVA Part 3 209 Regulations respecting highways:

(2) The Lieutenant Governor in Council, on the recommendation of the minister responsible for the administration of the Transportation Act, may make regulations providing for

(g) the designing, manufacture and location of traffic control devices and determining the instructions given by them;

(h) parking zones for persons with disabilities, including providing for a system of permits for those parking zones.

MVA (Regulations) Division 23 Traffic Control Devices

"regulatory" means a type of traffic sign which advises a motorist or pedestrian that certain action is required of him; disregard of such a sign constitutes an offence;

Schedule 2 signs authorized

23.03 All traffic signs corresponding to those depicted in Schedule 2 of this Division, if erected after June 30, 1978, shall conform with respect to shape, colour, minimum dimensions, symbols, wording and reflectorization to the standard traffic signs shown and described in Schedule 2.

Traffic sign meanings

23.05 All traffic signs depicted in Schedules 1 and 2 shall have the titles and meanings accompanying each sign illustration or group of illustrations. The words "regulatory" and "warning" following the title of a sign or group of signs in a schedule designates the sign type.

Sign dimensions

23.07 Sign dimensions, as shown in Schedules 1 and 2, are the minimum dimensions that may be used. If a larger sign is used, it shall have the same proportionate shape as its minimum. For diamond shaped and triangular shaped signs, the dimensions are for the sign sides, not the diameters. Dimensions specified for any other sign shape are for the horizontal diameter followed by the vertical diameter.

- 4. As parking lots to which the public has access are considered “highways” under the MVA, MVA signage assists property owners, bylaw officers and other officials in enforcement :

MVA 201 Sign as evidence

The existence of a sign permitted by this Act and purporting to regulate the use of the highway in any manner is evidence the sign was duly erected and maintained by the proper authority under this Act and in accordance with this Act and the regulations.



File Reference	AP-002 Signage
Date	2020-03-05
Bylaw Signage Recommendations	

MVA (Regulations) Division 23 Schedule 2

Proper Motor Vehicle Act signage is *required* under the current regulations to support enforcement of the misuse of designated accessible parking. Providing or permitting any other standard could be considered inconsistent with or derogatory to the Act and Regulations and therefore in contravention of Section 124 of the Motor Vehicle Act.

Disabled Parking (Regulatory)

Only vehicles transporting or driven by a person with disabilities may park in parking spaces which display this sign.

Colour: White background throughout, red top circle and centre slash, black centre "P", green bottom circle, black centre symbol, black arrows and black border. White, red and green reflectorized. (See Figure 1)

MVA (Regulations) Division 38 — Parking Permits for Persons with Disabilities

Interpretation

38.01 In this Division: "disabled zone" means a parking zone identified by the disabled parking sign as set out in Schedule 2 of Division 23 of these regulations;

Offence

38.08 A person commits an offence who:

- (d) stops, leaves standing or parks in a disabled zone a vehicle that does not display*
(i) a permit issued under this Division, or
(ii) a permit of similar nature issued by another jurisdiction,

The fine for parking in a disabled zone in contravention of Division 38 of the Regulations is \$109 and is found in the *Violation Ticket Administration and Fines Regulation* under the *Offence Act*.

5. In provinces that have accessibility legislation or stand-alone regulations around accessible parking, the provincial Motor Vehicle Act (or equivalent) signage is referenced. (eg, Ontario's *Integrated Accessibility Standards Regulations Sec 80.37*,)
6. The MVA signage is consistent with both the *Manual of Uniform Traffic Control Devices for Canada* (MUTCD) and the BC Ministry of Transportation and Infrastructure's *Manual of Standard Traffic Signs and Pavement Markings*. The MUTCD standard is referenced in the *Newfoundland Building Access Regulations Sec. 15 (1) (a)*,

File Reference	AP-002 Signage
Date	2020-03-05
Bylaw Signage Recommendations	

7. The MVA sign is consistent with the National *CAN/CSA B651 Accessibility for the Built Environment* standard. The Implementation Guide states, “*The sign should be one that is officially recognised by the local jurisdiction or be the sign from the Manual of Uniform Traffic Control Devices for Canada.*” The CSA signage reference is found in the *New Brunswick Barrier-Free Design Building Code Regulation* in sentence 3.8.2.2.4.a and the *Treasury Board Accessibility Standard for Real Property*.
8. The signage is what new drivers are trained to identify in ICBC’s training materials, including the new driver manual *Learn to Drive Smart*, Chapter 3.
9. Motor Vehicle Act signage for accessible parking is already specified in municipal bylaws in Barriere, Central Saanich, Coquitlam, Duncan, North Saanich, North Vancouver (City), North Vancouver (District), Richmond, Saanich and Sooke plus all unincorporated areas of BC.

Van Accessible Supplemental Signage

Accessible parking spaces that meet the specifications for Van Accessible parking should have an additional “tab” sign added below the required Motor Vehicle Act Regulations sign. Figure 2.



Figure 2: Recommended Blue and White “Van Accessible” tab

Blue and white colouring is consistent with the *Manual of Uniform Traffic Control Devices of Canada* standard for *informational* signage. This sign is intended to inform and remind users that, as courtesy, accessible parking spaces with larger dimensions should be left for people with ramp adapted vehicles, but it may be used by anyone authorised under Division 38 or the BC Motor Vehicle Act Regulations.

File Reference	AP-002 Signage
Date	2020-03-05
Bylaw Signage Recommendations	

Lack of standards leads to some of the following issues:



From any distance this space in Duncan is not recognisable for what it is. This results in a higher incidence of misuse of accessible parking. Studies have indicated that clearly identified spaces reduce unintentional *and intentional* misuse of accessible parking



(left) This example from View Royal (no accessible parking bylaw) does not provide a clear message. Is this an accessible parking space or does it show an accessible route?



Left to their own devices, property owners tend to use signs that have low visual impact or are “branded” with their own images.

Regulatory signage should be consistent, unambiguous, and command respect.

From **Personal information** Member, Accessibility Working Group. The thoughts, opinions and questions are hers alone.

My main concerns for Dec 18 call

- 1. Visitor parking demand for low income and rentals**
- 2. Accessible parking demand in resident and visitor areas in certain types or residential developments where PWD likely to live**
- 3. Bike storage configurations and access (ramps on stairs)**
- 4. Planting**
- 5. Wheelchair access in and out of lots and safe crossing of driveways within lots**

Further research:

- understand the holders of accessible parking permits better – where they live, if they drive themselves, profile of disability (mobility devices)**
- visitor parking demand study in specific accommodation types (paper 4 indicates that while they spoke to reps of affordable housing, they didn't speak to residential care people.)**
-

The Off-Street Parking Regulation Project

The key proposed changes to Schedule C are summarized as follows:

- updated vehicle and bicycle parking stall requirements based on data collection and analysis
- a more user friendly format
- fewer parking stalls required for smaller dwelling units
- fewer parking stalls required for rental and (non-market) affordable dwelling units
- front yard parking allowed for single family dwellings and duplexes [Will it be accessible?]
- new parking stall requirements based on geographic area [new residential in Urban villages has more like downtown requirements, whereas, demand is greater due to commercial]
- ^[SEP]new regulations for the design and functionality of bicycle parking ^[SEP][will it be accessible? Ramps from downstairs long term parking, over-sized]

Objectives of the review of parking include:

A key component of this project was the review and update of minimum parking requirements for private property which has been completed through data collection

(ICBC vehicle ownership and on-site parking demand counts), research, and analysis related to parking demand and best practices. Other project objectives included:

- reducing the frequency of parking variance applications thereby streamlining the overall development application review process
- supporting development and investment with updated regulations and design standards for vehicle and bicycle parking that are better aligned with current practices and trends
- supporting affordable housing and healthier communities
- establishing a user-friendly format.

The project website says, “A review of off-street parking is being conducted to align the regulations with actual demand, current trends and community objectives.”

Observation & question - None of the stated objectives of the policy relate to making housing and businesses accessible or Strategic Objective 7, Social Inclusion. The stated objectives are to streamline development and remove or reduce parking requirements as an impediment to lower cost housing. Could the policy be expanded to include this objective?

The **Accessibility Impact Statement** for the new parking regulation is:

Barrier free parking is currently regulated through the BC Building Code (where it is referred to as "parking for persons with disabilities") and is discussed later in this report.

The staff recommendation includes language to direct staff to create Design Guidelines relating to Electric Vehicles (EVs) and it is intended that the scope of this work would also address opportunities for accommodating parking and charging of mobility scooters.

[Where is this and why has it been brought forward without it? Makes it seem like an after-thought]

Where are provisions for electric vehicles and mobility scooter charging in the draft bylaw?

If they are to come later, what standards exist? What is the consultation plan?

Shouldn't this be expanded to include any unusual vehicles and conveyances likely to be used by people with mobility related disabilities?

The presentation says:

- This project does not include a review of public parking such as on-street parking, public parkades or parking lots. [What covers a private parking lot like those run by Robbins?]

Does that mean that the project is not looking at privately owned parking lots which

might be provided for the public use in commercial developments? Or does the use “public” mean publicly-provided? [So this would apply in something like a new Bay Centre?]

Is Barrier Free/Accessible Parking the new name for what was called Handicapped parking, or is there an additional element included? [Will people understand what it means? “Accessible” is used so many ways now]

Accessibility related concerns

The main concern is that reduced parking requirements will result in fewer available specialized spaces for people with disabilities. [

There is ample evidence in the form of academic studies showing that as the parking supply decreases, so do infringements on handicapped parking spots. When parking availability decreases, this tendency can be counteracted with better signage, surveillance and enforcement, as outlined in the studies. [

Can the project look at ways to address this in Design Guidelines?]How will this known unintended consequence of increased unauthorized use of accessible parking spaces when supply is short of demand be mitigated?

The visitor parking requirement is the same for most building uses (with only condominiums having a higher ratio within the residential category). Anecdotal evidence suggests that where vehicle ownership is lower, there may be a need for more visitor parking, especially for facilities where service providers and family are likely to be visiting, such as residential care and low income housing.

Has any thought been given to varying visitor parking requirements depending on the type of housing?

Is there any research looking at the need for visitor parking spots in affordable housing or housing for special populations such as seniors and people with disabilities who might be expected to have lower rates of vehicle ownership but higher need for deliveries **driver services** and **in-home** service providers who would use visitor parking? Does it support the low level of visitor parking?

Affordability objectives propose that developers can provide more cost-effective housing if the high cost of parking spaces is not paid by those who do not need it. They point to success in reducing housing cost along with parking requirements when there is a robust private long term parking market. Has any consideration been made to whether Victoria has sufficient private sector long-term rental parking, in the right

places, to address the need for residents of new developments to lease parking on the open market when required?

Does the decreased parking requirement in the downtown and historic core relate to the availability of public transport and stem from an assumption that everyone can take public transport or partake in car-share or other shared transportation management schemes? Is the project aware that public transit is not accessible to everyone?

Please explain Figure 1, on page 3, which shows Core Area and Village Centres, so that blind members can have the information.

What is the hashed area where the legend says See Zoning Bylaw 2017?

Please explain the different use types where asterisked. See questions imbedded in the list below, in text boxes like this one.

WE CAN SKIP THESE QUESTIONS IN THIS CALL

These are the categories used for prescription of parking requirements.

Residential

Single Family Dwelling

Two Family Dwelling

*Semi-attached Dwelling

*Attached Dwelling

Secondary Suite

Garden Suite

Assisted Living Facility

Condominium

Apartment – defined as (dwelling unit secured as rental in perpetuity through a legal agreement). Does this form of agreement exist now? Is it enforceable?

Affordable (defined as Affordable (affordable dwelling units secured in perpetuity through a legal agreement)

All other multiple dwellings – what are some examples? Group Home? Housing Co-op?

Commercial (parking requirements based on floor space)

Restaurant

*Office

Medical Office

Personal Services

(includes hairdressers, dry cleaners, repair of personal goods, travel agents and other similar uses) .

Financial Service

*Restaurant

Is there any consideration to what type of restaurant? Are the requirements the same for take-out as sit-down?

Drinking Establishment

(a building or area including a nightclub, bar or pub that is licensed through the Liquor Control and Licensing Act for the sale and consumption of Liquor on the premises and where entertainment may be provided in the form of recorded music, live performances or a dance floor)

*Retail [Are there any differences in parking needs of retail by sub-categories?]

*Grocery Store [Does this category differentiate between types or just size?]

*Transient Accommodation [Is this just hotels/Motels or will it include grandfathered STRs?]

Institutional

Hospital

*Elementary / Middle School

Is there a category for High School?

University / College

(as defined under British Columbia legislation, and regulated as such under said legislation)

How are private post-secondary institutions that do not meet the provincial legislation for university or college classified? For instance, language schools, technical colleges, hairdressing schools, etc.

*Arts and Culture

(includes museums, art galleries, theatres and other similar uses, but does not include cinemas)

Is a private art gallery Retail or Arts and Culture?

*Place of Worship

What happens when places of worship have large halls that serve as Assemblies? Assembly

(includes convention facilities, cinemas, training facilities and other similar uses)

*Health and Fitness

(commercial recreational facilities, gymnasiums and other similar uses)

Will parking requirements apply to public facilities like the new Crystal Pool and does the bylaw differentiate between types of facilities, recognizing that hockey takes more equipment than swimming and may increase the need to drive?

Care Facility

(day use facilities, and includes preschool, day care, residential care facilities and similar uses)

*Transitional Housing and Emergency Shelters

(a staffed facility, open year round, that provides temporary accommodation for persons who are homeless or at risk of homelessness, and may include food and support services)

Can this parking be supplied without affecting the covert nature of emergency women's shelters that seek to blend in to neighbourhoods? Is need based just on size and not beds?

Industrial

Industrial

Warehouse

General questions:

Can the presenters highlight what is changing – e.g., from X to Y, in which categories and areas?

Please explain the rationales behind the different requirements.

“If a use is not specifically listed in Table 1 or Table 2 of this Schedule, the number of parking spaces required shall be calculated on the basis of a use or class of use that is most similar to the actual use, based on parking demand characteristics. “

Are (for example) Personal Services businesses usually grouped together or are they more likely to be part of multiple-use clusters: E.g. Fairfield Plaza?

How will the City avoid abuse of the “similar use” clause? “ WHO DECIDES?

What is the average number of units for new developments in Village Centres and how many visitor parking spots might be required? Would the new regulation mean that it has to be 6 units or more before any off-street visitor parking is required? Or is there a minimum requirement?

What is the rationale for having similar reduced parking requirements for village centres as the core, when those villages have businesses occupying street parking, and residents living above stores and on the same blocks as retail and services are less likely than people living in residential neighbourhoods to find on street parking?

Regarding calculation of floor area for restaurants, how will sidewalk space and seasonal outdoor space be treated? Pg. 2, item 5:

What will the parking requirements be for a unit that has a fixed term rental agreement with the City when, presumably that term is concluded occupancy would change from rental to ownership? Does the regulation say, that the higher calculation will be used?

Will that mean that while new rental accommodation will not be affordable, because the owner must recoup the cost of the parking?

Regarding schematics

The herringbone patterned angled parking in particular has narrow travel paths so if a back ramp is deployed, it might obstruct through traffic.

Will all parking lot configurations support vans with back ramps or side ramps?

Page 8. The owner or occupier of any land or any building or other structure, for each use present on the land or in the building or other structure, must provide off-street bicycle parking spaces in accordance with Table 2.

Are there standards or requirements for short term bicycle parking, to make sure it will last, can be navigated around with a wheelchair **MOBILITY SCOOTER, ETC?

Many people cross planted areas on foot to exit parking lots in the direction most convenient to their destination.

Has any thought been given to ensuring that there are convenient pathways through the 1 meter planted buffer to the street so that people with mobility equipment might also have convenient exits?

It can be difficult for able bodied people to cross access aisles in larger parking lots, with no marked pedestrian crossings.

Are there any requirements for these, and how has the safety of people in wheelchairs, who may be lower and less visible than upright adults been taken into consideration? If not addressed by Provincial standards, can the City include it in design standards?

The bylaw links parking requirements to units, not their size. I COULD BE WRONG HERE

How does the bylaw take into account the number of bedrooms in a dwelling unit and can that be used as a proxy for an indication of families, vs. single people? Is it true that

families with children, who might be assumed to occupy 3 or more bedrooms, own cars to a greater extent than single people?

Is it fair to assume that the floor area calculation area will result in fewer parking spots for rental and affordable housing, given that these are likely to be denser on average than condominiums (e.g., more units in the same floor space)? Presumably, condos will have more common property, public space and shared amenities, larger rooms and hallways, and a lower proportion of gross floor space will be used by walls.

A vehicle parking space must not be closer than 1.0m to a street.

What is the purpose of this requirement on page 10? Is it to allow a sidewalk beside the parking lot, and is this the same width as a sidewalk?

It is surprising to see landscaping requirements in parking regulations. The AWG has identified allergenic plants and trees as a barrier to accessibility for people with allergies, asthma and related conditions and Council has asked Staff to look into this.

Are there going to be any guidelines or rules around what can or cannot be planted? Could the bylaw state that the landscaping must comply with City policies that are in place at the time of development approval, so that it leaves the door open for future regulation?

What are the most commonly used plants that withstand the soil trampling that must occur within these areas? (I can look these up on the OPALS scale to determine their impact on people with allergies, asthma and related conditions.)

2.3 Vehicular Parking Landscaping and Screening

On page 17, the soft landscaping is only described in relation to item 4, and not the earlier sections that also mention soft landscaping.

Is this intentional and why?

3.1 Bicycle Parking Specifications page 18

As bicycle use is adopted by more users, including adults with children and people with disabilities or special transportation needs, a greater variety of non-standard bicycles

will be bought and require storage. If the cycle network is really to be for “every age and ability”, the City needs to plan for their off-use period storage. Bikes used by people with disabilities include wheelchair bikes, tandems, side by side tandems, walking aid bike, Electric mobility scooter bike, etc. Some of these may be difficult to fit through standard doorways, use standard bike rack spacing and racks for locking, or stair ramps.

Has thought been given to implementing a *maximum* distance from an entrance for long term bike parking? This becomes more important if these standards are later used for mobility device parking.

How will a ramp on stairs to long term storage accommodate mobility impaired users of bicycle type devices?

Will a stair ramp accommodate non-standard bicycle types such as tandems and those with carts, even if used by people without mobility impairments?

Will the requirements for aisle width between long term storage racks ensure that wheelchairs and mobility scooters can pass if there is a bike parked that is longer than average, perhaps a recumbent bike, tandem, or with a trailer or front cart as are commonly used by families with children?

Will the configuration of long term bike storage facilitate the transfer of a person from a wheelchair to a recumbent bike?

Will the various dimensions and configuration accommodate longer, wider and oversized bikes as described above, especially recumbent trikes, adaptive bikes and trikes and other forms likely to be used by people with disabilities?

Are bike racks going to be suitable for locking all types of specialized bikes?

Some pages showing the variety of bikes available for people with disabilities:

<https://www.especialneeds.com/shop/mobility/special-needs-tricycles-bicycles.html>

<http://www.friendshipcircle.org/blog/2012/02/21/20-bikes-trikes-and-tandems-for-children-with-special-needs/>

<https://bike-on.com>

<https://www.cyclinguk.org/article/cycling-guide/guide-to-adapted-cycles>

<https://www.vanraam.com/en-gb/advice-inspiration/news/bike-for-disabled-people>

New since provided, based on Working Paper 3

http://www.victoria.ca/assets/Departments/Planning~Development/Community~Planning/Documents/Victoria%20Schedule%20C%20Parking%20Review%20Working%20Paper%20no3_FINAL_Sept23-16.pdf

Vehicle ownership rates were developed for representative existing multi-residential sites in the City. Vehicle ownership data is obtained from the Insurance Corporation of British Columbia (ICBC) for each identified site through their *Vehicle Ownership Information Request* program. All information is from September 2013 to March 2016. The number of units for each study site is established through Canada Post's *Find a listings*.

Vehicle ownership does not account for visitor parking demand, which is considered through observations and research (see *Section 3.4*)

1. **Condominium:** Subject to strata title ownership, may or may not allow for rental;
2. **Apartment:** Owned by a single property owner or agency and rented to tenants at market rates; and
3. **Affordable Housing:** Housing sold or rented below market rates, or where land

2.2.1. Vehicle Ownership, Overall

Vehicle ownership information was obtained for 126 multi-residential sites consisting of a total of 6,475 units. The average overall vehicle ownership rate was found to be 0.63 vehicles per unit. The average vehicle ownership rate was 0.65 vehicles per unit if filtered to exclude "affordable" housing sites. [That difference does not seem to support the much lower rate for affordable.]

[What percentage of multi-family units does 126 represent?]

[how was the sample determined and was the profile representative – e.g., different sized buildings with different numbers of units? Aren't many affordable housing units mixed in with market?]

What are some examples of Affordable Housing developments?

Housing Type	Study Sites	Owned Vehicles
Condominium	69	0.74 0.94 0.23 - 1.15
Apartment	34	0.49 0.69 0.20 - 0.78
Affordable	23	0.50 0.80 0.10 - 0.91
Overall	126	0.63 0.87 0.10 - 1.15

This shows that condo vehicle ownership is 1.5 that of other categories. Is that reflected in reg? Isn't it double?

Location	Condominium + Apartment		Condominium Only		Apartment Only	
	Avg. (per unit)	(per unit)	Avg. (per unit)	(per unit)	Avg. (per unit)	(per unit)
Downtown Area (1)	0.57	0.86	0.67	0.87	0.33	0.42
Village / Centre (2)	0.74	1.03	0.83	1.05	0.51	0.68
Remainder (3)	0.68	0.87	0.78	0.9	0.54	0.70

The average vehicle ownership rate among Downtown Area sites was found to be 0.57 vehicles per unit, approximately 25% to 30% lower than rates among sites in the Village / Centre or Remainder areas. See Table 2. The difference between Downtown Area and non-Downtown Area sites was greater among Apartments (approximately 40%). Vehicle ownership rates among sites in the Village / Centre area were marginally higher than those in the Remainder areas for condominium, but not apartments.

[What other factors might explain the differences? Is the downtown housing stock older and possibly less expensive or geared to younger people, for instance?]

Established research suggests that sites close to transit exhibit reduced parking demand. See *Section 5.1.4*.

[Do they know the differential rates of transit use by people with disabilities vs. other populations?] For PWDs, they may need specialized transport such as Handidart or ramp-equipped private vans.

A survey was also distributed to understand commercial parking demand among Downtown Area and Village / Centre sites. See *Section 4.0*.

Multi-Residential Visitor

Observations of visitor parking were completed at 16 multi-residential sites that are believed to accommodate visitor vehicles on-site (rather than on-street or elsewhere) and provide a full account of visitor parking demand. Observations were completed over three time periods representing peak periods for visitor parking, as follows:

1. 9:00pm on Wednesday, March 09 2016
2. 8:30pm on Friday, March 11 2016
3. 8:30pm on Saturday, April 11 2016

[Only one time period was observed. The assumption seems to be that visitors are actual visitors such as friends, vs. service providers and tradepeople. The time observed is when seniors are asleep, and family is not visiting. Same with any care facilities. These are not likely to be the busy visiting times, especially for professional care-givers. Further, personal observation puts work hours as a peak time for visitor parking for condos, when tradespeople come by and bridge clubs meet, etc..]

From Parking Paper #4

Consultation included two housing groups, but no one from the disability community

From June to August 2016, the consulting team spoke with the following:

- • 5 municipalities in the CRD
- • 5 developers representing two organizations
- • 1 private developer
- • 5 individuals representing affordable housing organizations
- • 1 individual representing a property management company
- • 2 staff representing BC Transit
- • 2 private citizens
- • 1 individual representing strata owners
- • 1 individual representing a carsharing organization

2.2. Focus Group on Affordable Housing and Parking Supply Rates

Date: Monday July 25, 2016

Location: City Hall, 1 Centennial Square **Time:** 10am-12pm

Focus group participants represented the following organizations:

- • Capital Regional District
- • M'akola Development Services
- • Greater Victoria Housing Society
- • Pacifica Housing Advisory Association
- • City of Victoria Staff
- • van Hemert & Company (consulting team)
- • Watt Consulting Group (consulting team)

[What is the focus of these groups? See below. Who didn't they speak to in the field? Did they speak to anyone running independent/assisted living or long term care facilities? Are there other facilities in Victoria that house people with disabilities?]

Pacifica Housing provides over 1000 units of quality rental housing in Victoria, Duncan and Nanaimo including some designated for people with disabilities. Their properties are listed in 3 categories (subsidized, supported, reduced market) here <https://pacificahousing.ca/properties/>

Greater Victoria Housing Society is a non-profit charitable organization dedicated to providing affordable rental housing for low- to moderate-income families, seniors, working singles, and adults with disabilities who live independently.

[didn't look like Victoria City properties are for people with disabilities – they focus on families and seniors with one for singles too.]

Started for housing for people of First Nations, then Mis'kow'ao Development Society (MDS) was incorporated March 18th, 1988 as a non-profit society, we specialize in project development, and property management services for market and non-market developments. Mis'kow'ao has provided development and project management services for over 30 affordable housing projects for aboriginal and non-aboriginal clients. [not sure they have Victoria City projects.]

- A “blanket rate” for affordable housing sites may not be appropriate given the full spectrum (and diversity) of affordable housing needs. There is value in having a parking supply rate for affordable sites that differ by unit size, recognizing that the parking demand needs of those living in smaller units may be completely different from those living in larger units.
- • A different parking supply rate is needed for supportive housing recognizing their different parking demand needs.
- Visitor parking in affordable housing sites needs to be addressed as there is typically a shortage. Schedule C currently sets the requirement whereby 10% of the total parking spaces must be provided as visitor parking spaces. However, through research and discussion with the focus group, there is value in amending the requirements to an “additional” number of visitor parking spaces required (e.g., 0.5 spaces per unit plus an additional 0.1 visitor parking stalls). Focus group participants explained how this change could alleviate some of the parking shortages as it could result in more available visitor parking spaces.
- The parking needs of affordable housing tenants must be considered over the long-term. It is hard to predict how parking needs will change in the future but Schedule C should consider incentivizing other forms of transportation such as transit and carsharing to improve options for tenants. If a low parking supply rate is set for affordable housing sites, and tenants lack options other than driving, then parking demand will inevitably increase.

[You can not get all residents of affordable housing onto transit and other options. They may be there for physical or mental disabilities.]

1. **Summing Up:** Parking demand for affordable housing sites is dynamic; demand can differ depending on the type of housing (e.g., supportive housing) and unit type. As such, the Schedule C minimum parking supply rates need to reflect these differences.

[How does the draft bylaw address this? Visitor parking looks pretty static, and there aren't additional considerations other than housing/institution type, with great variety within categories.]

Table of Contents

Introductory comments	2
Need to present findings and background	2
What will change & unanswered questions	2
Exhibit 1, Parkopedia public information on Accessible Parking	4
Missing Background	4
PRIVATE PARKING REGULATIONS	6
1. ACCESSIBLE PARKING SUPPLY	6
TABLE 1.RECOMMENDED ACCESSIBLE PARKING SUPPLY REQUIREMENTS	6
Table 2 – Recommended Accessible Parking Requirements for Specific Land Uses	10
VAN ACCESSIBLE PARKING	12
TABLE 3. RECOMMENDED ACCESSIBLE + VAN ACCESSIBLE PARKING SUPPLY	12
Location	13
Circulation and Access and Location	13
2. ACCESSIBLE PARKING DESIGN + LAYOUT	14
FIGURE 1. ACCESSIBLE PARKING DESIGN REQUIREMENTS, PERPENDICULAR AND DIAGONAL SPACES	14
FIGURE 2. ACCESSIBLE PARKING DESIGN REQUIREMENTS, PARALLEL SPACES	14
FIGURE 3. RECOMMENDED ACCESSIBLE PARKING IDENTIFICATION SIGNS + DIMENSIONS	15
Exhibit 3 - More effective Accessible Parking Signage, with enforcement messaging	16
Exhibit 2 - Examples of poor signage to be avoided through the Guidelines – Clover Point	17
Pavement Marking	17
General Comments	18
GOING FORWARD and other considerations – Private Parking	24
PUBLIC PARKING	25
Supply	27
Timing	31
Figure 7	33
Exhibit 5 – common buffer zone incursions, indicating not sufficient width	34
Figure 8, etc.	35
Need Location Notes	35
Limited Mobility Parking	35
What legal status will limited mobility parking have?	36
Feedback	38
Next Steps	40
Parking lot of issues not addressed by this project	40

Introductory comments

Need to present findings and background

This is a partial response to the Strategic Plan 2019 action, “**Adopt accessible parking standards for on-street and off-street parking**”, now reported as “*Continuing in 2020*”. How did it get so narrowed in scope and is Council aware? The standard is now planned for 2021 and will not include street parking. That reduction in scope warrants a direct Council decision, or at the very least highlighting and explanation in the staff report that accompanies a decision request.

For many people in this community, parking equals access and mobility. That access has been poor and is eroding as parking disappears. A relationship between privately and publicly provided parking has always existed. In single family home neighbourhoods, one or two cars may be parked on the property and the remainder use the street. Street parking is not accessible, on the whole, as residential streets are narrow. As people move to the downtown core, overflow street parking becomes less viable. Not everyone can take advantage of the transportation options that are often touted for parking variances.

The two proposals contain conclusions without providing background factual basis on which to make decisions. Comparators are not provided. “Best Practices” are not defined. The numbers and organizations are not cited, especially within BC and locally. The papers would benefit from a table of neighbouring and “best practice” jurisdictions and their requirements laid out for comparative purposes. The relatively low 2% needs to be justified.

What will change & unanswered questions

Why was the terms of reference set so narrowly and not amenable to feedback? “2. Establish new accessible parking design specifications for city-supplied stalls (on-street, surface lots and parkades) and establish target supply ratios for city-owned surface lots and parkades. “¹This excludes on-street parking. Why? The deficiencies of standard and supply have been known for some time, and seem to have been accepted by Council, who indicated a need to address it. They did not provide direction.

According to the Update, the July 2020 consultation did not include the Victoria Disability Resource Centre, and December 2020 consultation was also very limited in its inclusion of major local organizations. The VDRC is the organization that administers the accessible parking program and were in a position to supply vital facts, as well as the perspective of the people it serves. Will Council be informed of this shortcoming and these gaps in providing voice to those affected by decisions? Or better yet, will the oversights be rectified, and the playing field leveled?

What will happen regarding this, the third priority? “Prioritize a retrofit and expansion strategy that will result in measurable improvements to the existing supply of public accessible stalls as well as increased quantity of public accessible stalls overall across the municipality.”

¹ City document: Accessibility Working Group Meeting, Project Update - November 2, 2020, Accessible Parking Requirements, Design Standards and Specifications, Summary of project objectives:

Who approved this terms of reference? It was certainly not described in the Accessibility Framework and associated documents, or subject to direct Council direction in a way in which public input could be entertained and other important projects are. At the last Schedule C amendment, Council approved project plans at various stages of planning and the project. The Short Term Action Plan described this 2020 project as “Develop municipal accessible parking requirements and design standards (CSA Standard B651 or equivalent) for parking in new developments and for City-owned parking” and did not suggest the scope limitation (failure to include street parking) that staff appear to have imposed. Further, a second parking related action implies that street parking would already have been started “Continue to evaluate the locations, pricing and regulations associated with accessible parking stalls as a part of city-wide curb management planning” in 2022. Will the City consider hydrants/taxi zones for drop off for PWD? Are any suitable (with nearby ramps)?

The proposals do not really indicate what will change – that is, compare current to future. It is very difficult to obtain accurate information on accessible parking availability now. The City does not provide information on accessible parkade parking. The following is a screen shot of Parkopedia, filtered for “disabled” parking spaces. It should include private parking as well. One has to scroll down the right side list, but gets no additional information on accessible parking except an icon indicating the presence of “disabled parking”, but no information on specific location or the number of spots, when opening the selected lot location.

Accessible parking exists in an ecosystem, the design guidelines and Development Bylaw AP requirements are only one small part. Pricing, enforceability and enforcement, public and business attitudes, shrinking parking base, curb management, accessibility of heritage buildings, housing accessibility are other factors, grandfathered older housing stock/parking. This is being dealt with in a vacuum.

What rules will apply to federal and provincial buildings? For instance, the courthouse? Parking denied is justice denied. The City jail? What sized lot is it?

What will happen to applications in progress? What will the transition provisions be?

These proposals are presented already with graphic design (and therefore difficult to copy text from, to allow for easy commenting). They look pretty final.

These proposals are being introduced at a time when the City has no in-house accessibility advisory function. Consultation is being undertaken at a time of year that make it difficult for disability groups to comment. They have much extra workload due to COVID relief program changes from other levels of government. Is there really an opportunity to influence the final proposals? Has the City taken into account the low capacity of organizations to mount a meaningful counter argument to the proposals which it appears that the development industry lobbyist have already influenced? Why are their arguments and figures not being shared?

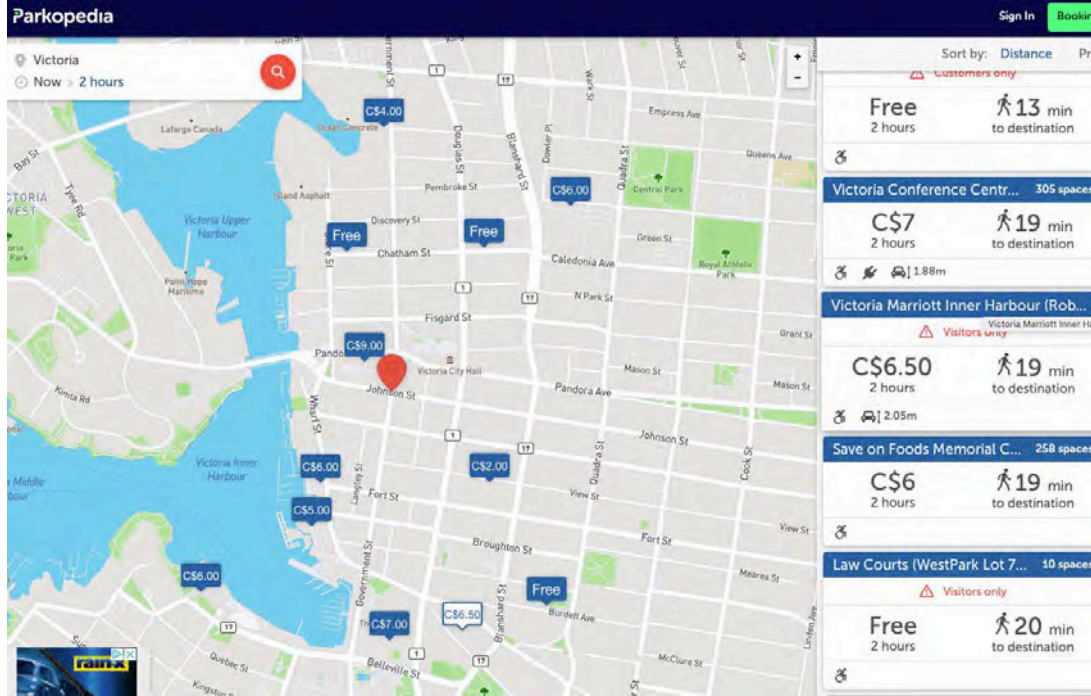
Where is the demand study and facts about the number of current permits?

Where is information on the entire accessible parking supply in the downtown, including both sectors? The following is a screen scrape from Parkopedia, filtered for accessible parking. The right hand column is not complete.

Was the expert consultant report from the last round of road closures in Beacon Hill Park be considered? It resulted in a traffic demand study and had explicit recommendations for accessible parking in the park (as well as location principles) that the City has already paid for, were developed with meaningful public input and provide applicable recommendations. This report was shared with Sarah Webb and a request made for the more detailed studies behind it, but they were not provided. They should be in the possession of staff.

Can you explain the rationale for differences in public and private supply requirements?

Exhibit 1, Parkopedia public information on Accessible Parking



Missing Background

When the exercise of looking into making accessible parking (AP) changes was undertaken in 2017, people with disabilities were consulted very late in the process and pointed out flaws in the research design, which was based on assumptions of the same usage patterns for AP as regular parking. The research was to have provided the evidence and justification for changes, and AP was left out of the 2018 amendments to Schedule C because the consultants could not provide that evidence due to faulty research design. Therefore, when staff presented recommendations for changes to regular parking only, they also recommended at that time that a project be undertaken to properly research demand for AP. Figures were obtained on the percentage of accessible parking permits by adult population – not even limited to driving population and that supported the 7% figure.

The recommended project was not escalated when the Province provided advance notice of its firm intention to vacate the AP policy field in 2018, and the City wasted time pursuing an option that the Province had made clear from the outset would not happen. Since the 2018 Schedule C amendments the City has seen a building boom during which many large projects have been undertaken under the non-binding norms of the “old” Provincial Building Code AP requirements which have not been in effect since December 2018 and under the CoV reduced general parking requirements from the early 2018

Bylaw amendment. It is important to understand that the specifications for dimensions of AP stalls and signage were not changed, the supply ratios remained the same but the base number of stalls decreased.

The Accessibility Framework is supposed to be about making the City of Victoria “a more inclusive community.” For many people with disabilities, parking = freedom, and their only transportation option is private vehicle. When shops, services and housing do not include sufficient accessible parking, they does not serve people with disabilities, but instead exclude them. The freedom or segregation of people with disabilities is what is at stake.

There are risks in departing from established norms and accepted standards. These are not explored. Council often provides direction to coordinate regionally. Delays in dealing with parking were to allow time to work with neighbouring jurisdictions on uniformity of approach. Did that happen? What have they done and how do their standards compare to what is being proposed?

The scope of this exercise is less than the last time Development Bylaw amendments were considered. For instance, accessible bicycle parking is not included. There were barriers in the last round, including the possibility of having to walk bikes up ramps beside stairs, insufficient clearance or accommodation of non-standard bicycle type vehicles that may be used by people with disabilities. **When will accessible bicycle parking be dealt with?**

What is the prevalence of people using wheelchairs in Victoria? What percentage drive?

Is there a standard side for van access side ramps?

What are the assumptions and tradeoffs behind the recommendations? What is the level of access being aimed for? 80% attempts to park successful?

Can demand issues be corrected in part by better real-time information on AP stalls the way they do in Europe? You know those displays that say X stalls available at the entrance to parkades? Could they also state AP stalls? And could this tie into a mobile app?

Where is the lighting standard? If it wont’ be dealt with in this project, will it be dealt with elsewhere and is it on a master issues list? Has it been rejected and if so, why?

From: Kelly-Anne Malcomson <kmalcomson@victoria.ca>

Sent: November 5, 2020 3:48 PM

To: Thomas Soulliere; Derrick Newman; Navdeep Sidhu; Mandi Sandhu; Sarah Webb

Subject: notes from AWG, Nov 2

Attached are the draft notes I took at Monday’s AWG meeting. Summary of Actions:

- Sarah will check to see how lighting will be considered (with accessible parking design standards), and report back.

PRIVATE PARKING REGULATIONS

Re: Document: ACCESSIBLE PARKING DEVELOPMENT REGULATIONS 2021 - SUMMARY OF PROPOSED RECOMMENDATIONS

There are no page numbers on the document, and I cannot do a markup, so I will reference it by headings and in order.

What is the “council accessibility policy”? Are you approving to the document Council approved October 8 2020, the *Accessibility and Inclusion Policy* document that contains aspirational statements and procedures?

Where is the research paper with facts? What are neighbouring municipalities doing, when did they implement their new standards, what are factors creating demand, and how does our community compare to others on those factors – e.g., Parking Permit numbers/percentages of population? The housing crisis is worthy of mention, along with a description of how that is affecting what may be economically disadvantaged people with disabilities.

Would appreciate a summary of what was heard. Advocates have to respond to arguments they haven’t seen and after what appears to be compromises already made? There is a brief reference to balancing points of view in this document but those have not been shared. Is trying to exercise human rights to mobility and equal access a point of view?

Will the end product be “*Accessible Parking Development Regulations*” as stated in the paper or amendment to the Development Bylaw for accessible parking? The term may be accurate if not capitalized and italicized.

1. ACCESSIBLE PARKING SUPPLY

Minimum Supply, General Land Uses

TABLE 1.RECOMMENDED ACCESSIBLE PARKING SUPPLY REQUIREMENTS

[Table augmented in red]

Total Parking Supply Required	Accessible Parking Supply Required
0 - 10	0
11-50	1
5-100	2
101-150	3
151-200	4. (One additional accessible parking space for each additional 50 total parking spaces required)
201-250	5
251-300	6. (point at which an additional van-accessible stall required)

Questions/Comments on Supply

Favourable: I believe that accessible parking is required at a lower threshold than previously.

Negative:

The suggested supply is not sufficient.

This table continues the approach of tying the required AP supply to overall parking supply. Were alternatives considered?

If previous overall parking requirement for a building of certain size and types was 100 stalls (under the Development Bylaw) and the old Building Code required 1 accessible parking stall per hundred, this would end up with 1 accessible stall. However, the City changed the base. Say that the overall parking requirements for the same type of building is now 50 and the City proposes a change to 2%, the end result is still only one parking stall. The role of changes to the base cannot be overlooked without distorting the impression of level of improvement. Now, the base may not have been halved, but it could continue to change and the Mayor is on record as wanting no minimums, and variances are generally granted.

What is the rationale for allowing new buildings without any accessible parking, especially since regular parking requirements have been reduced recently and are already very low? This proposal does not create the situation, but there are geographic areas in the City where no regular parking is required. Able bodied people have options that PWD don't.

Does the City have more accurate figures than it included in the Accessibility Framework (which was a national average, applied to Victoria's population, so may not be at all representative of local conditions)? Even then, what is the best, most applicable information available or in the City's possession for mobility impairment prevalence? Are there any scholarly papers?

How many private but publicly available accessible parking stalls are there now (e.g., in pay lots not associated with a particular business)? Parkopedia provides some idea of location but not number. Is it accurate and complete or are there other lots that have accessible spots? And if so, how accessible are they, given that the old code didn't really guarantee accessible dimensions?

Table 1 does not explain where the base requirements come from and how they have changed recently (in the 2018 amendment). Context and background is required. How large must a business premises be before 11-50 stalls is required? How large for 251-400 spaces and how many public lots in Victoria have that sort of number? What are some of the number of stalls in different categories of businesses parking lots? Downtown – Saveon Foods, Fairfield – Thrifty Foods, etc. How does the formula above compare to what is currently there in number (and later explain the difference in quality).

Parks – how will the City measure the base number for parks? Is each park considered one entity such that parking could be provided very far away from the amenities people want to visit? Or, might a park be divided into parts? For instance, would total parking within Beacon Hill Park be the base, for application of a yet-to-be-established supply rate for public accessible parking? Would it include the parking provided off roads that are now closed and may remain closed permanently, given Council's November decision that did not put an end or review date on remaining road closures? If so, there would be no accessible washroom access for PWD. Some neighbourhood parks with

Given that there is no change to requirements of older businesses and residences, this puts greater demand on new buildings. For example, an older business with a parking lot of less than 100 might only have one AP stall, and that stall may not even be suited for a person who needs to transfer to a wheelchair, due to the inappropriate previous dimensions. Effectively, the old businesses may not have any truly accessible parking. So when a new business opens, it becomes the only alternative for a person with disability to be independent, and demand will be greater there. Decision makers must be disabused of their misconceptions about existing AP to truly understand the need. This is the kind of evidence base needed.

An implication of a supply formula based on number of regular stalls is that it is difficult for people with disabilities to support small local businesses and such businesses may be unreceptive to future Building Code and design requirements to become more accessible, or fail to improve access with ramps, automatic doors or other measures. It is a chicken and egg issue.

The effect of this recommendation for supply is to relegate people with disabilities to live in larger multi-unit residential structures and new buildings they may not be able to afford. Together this limits housing choice and may restrict options to social housing where accessible suites are offered. There is a fundamental question – do people with disabilities deserve choice of type of dwelling unit?

Not providing accessible parking can have the equivalent effect as a sign in the window saying “People with disabilities not served”. Discrimination through design should not be legal when discrimination through actions is not.

There needs to be another approach than tying supply to other required parking. Maybe there is a hybrid approach, such as a hard minimum (that is higher than proposed, possibly with no threshold).

When a business has little or no parking, people without disabilities have more options than those with. They can try to find street parking further away. Thus, it is the PWD who should be accommodated.

Imagine adding “can I park?” or “can my caregiver park to come up and get me for errands and appointments?” to the list of criteria in your housing search, in addition to location, amenities, affordability (and not having the same options for ride-shares or biking). Suddenly, “Can I park” becomes the major selection criteria.

How can we get developers to understand that accessible parking can be an amenity as they rent and sell to an aging population? There are no statistics to support the need in these papers. The Accessibility and Inclusion Policy has something about staff understanding their roles in promoting positive community attitudes toward PWD. This project has not yet done that.

Requiring accessible parking could lead to more voluntary provision of accessible (or more accessible) suites, which are not required by the Building Code. Developers might figure that if they have to provide AP, the people who use it might need other features. If they were rewarded under other City policies, that would help too. Consider tying extra accessible parking to potential variances.

The City’s Inclusionary Housing Policy isn’t. Accessibility has now been subsumed under the Inclusion banner, but the pre-dating IHP doesn’t support accessibility. “Inclusionary housing policies are one tool municipalities can use to encourage the creation of new affordable housing and mixed-income communities. Across Canada, inclusionary housing policies are used as a type of municipal policy or land

use regulation that asks developers to provide a portion of their new market housing projects at affordable rates in exchange for additional ‘bonus’ density permissions beyond established limits. These onsite affordable units are known as inclusionary housing.” While this policy may help low income PWD find housing, it does not in any way ensure a supply of accessible housing, and parking is a big part of accessibility. Developers don’t get “points” for including accessible units or features, and they largely are not required by either the Building Code or City Design Guidelines.

There is no requirement to consult with an accessibility group on development proposals. The whole area of Planning was conspicuously missing from the Accessibility Framework. The AWG was never consulted and the new Accessibility and Inclusion Policy likewise does not require consultation. Toronto refers certain types of developments to its committee.

<https://www.victoria.ca/assets/Departments/Planning~Development/Development~Services/Applications/Development%20Variance%20Permit%20Application.pdf>

So in addition to Bylaw changes, the City should change its policies to ensure that development proposals are run by accessibility experts. Staff are not yet expert, and with the training plan reported, this will not happen for several years.

Re. “The recommended supply requirement exceeds the past BC Building Code requirement by approximately double”. The percentage may be about double **but the base has changed**, making it less than double. This makes the quoted statement incorrect. And the base may change again. Certainly, the overall parking supply is shrinking if one includes street parking lost to other public domain uses such as bike lanes, street closures, crosswalk bulbs, cafes and miniparks. If one made a table of pre-2018 Development Bylaw parking numbers and post amendment numbers, the shrinkage of the base would be obvious. What percentage increase would the proposal amount to if using the pre2018 base numbers, for given sizes of buildings?

DO NOT TIE ACCESSIBLE PARKING NUMBERS ENTIRELY TO BASE PARKING REQUIREMENTS. THE ASSUMPTIONS USED TO SUPPORT THE FOREVER-SHRINKING PARKING SUPPLY DO NOT OPERATE FOR MANY PWD. THEIR NEED FOR PARKING REMAINS CONSTANT OR GROWS WITH AN INCREASINGLY DISABLED POPULATION, WHILE OTHERS MAY BE ABLE TO TAKE ADVANTAGE OF OTHER OPTIONS.

Should residential buildings that exclude PWD be built at all? Recently a development proposal for the Northern Junk building came before Council that required zero parking for residents. Proponents suggested that private market parking could be obtained by those who wanted it, without considering whether there was an accessible route to the private parking and whether that would be safe for vulnerable people in wheelchairs in that neighbourhood, given higher incidents of assault on people with disabilities.

SEGMENTED LOTS

Re. residential buildings – visitor/resident mix not addressed. What sections will the AP spots be? Need them in both. If more than one required, should have one of each type. How have you considered the interplay between parking Regs and the Strata Corporation Act? How does this proposal ensure that someone can live in the housing of their choice and obtain the accessible parking they need?

Similarly, for private parking – many lots serving plazas with multiple buildings have spaces reserved for particular businesses. What will the PWD do when the business they plan to visit does not have accessible parking?

Table 2 – Recommended Accessible Parking Requirements for Specific Land Uses

This section requires more explanation and seems very limited in type.

The categories are too few, consisting only of Assisted Living Facilities and Hospitals. What are the chances of new instances of such buildings being constructed within Victoria? Can this be applied retroactively? Are the base parking requirements for these types of buildings different from others and if so, how? One must always be aware of the magnitude and formula for general parking requirements to understand the denominator of stalls on which AP percentages are based. I believe it is true that Assisted Living buildings require fewer parking stalls than other residential, based on assumptions that may or may not be backed up with facts about need. Certainly, there is likely to be lower vehicle ownership, but there is also likely to be high staff demand and also high demand for accessible pickup and drop-off spaces.

Does the 6 to 1 ratio of van accessible apply to the higher amounts in these building type categories?

This should be a topic of consultation with specific questions to PWD and the VDRC – what destinations do PWD have difficulty finding suitable parking at? Please consider work done last time around and present comparative research.

I have no idea of the adequacy of the proposed supply or how it compares to best practice or neighbouring local governments or the prior Building Code requirements.

How is rounding to be done? Round up if the formula produces a fraction over .5? The following table is an attempt to understand how this formula might be applied.

stalls	AP stalls
15	2.25
30	4.5
50	7.5
100	15
130	19.5
150	22.5
200	30

For consideration for inclusion:

- Residential housing intended for seniors and even over 50,
- Medical buildings
- Physiotherapy clinics
- Certain types of retailers
- Independent Senior Living (not just “Assisted living”)
- Long term care facilities (unclear whether covered under Hospitals and whether any are built by the private sector)
- Affordable housing (the type most likely to be afforded by low income PWD)

- Any residential parking including accessible suites
- Museums
- Social services agencies (non-profit)

BACK TO GENERAL

What is meant by “desire for increased accessible parking provision expressed by local accessibility-focused organizations”? Does the City see accessible parking as a “desire” rather than a need? And aren’t there many more forces than local group demands? Why does the City consistently use language that minimizes formal recommendations and needed accommodations by characterizing them as “requests”, “desires” and “input”? Such practices do not demonstrate respect or give sufficient recognition to very real barriers. This is not accurate or respectful. As an able-bodied person, I might “desire” to be able to find parking directly in front of each business I visit. That is not the same as the need for accessible parking for someone who has had to produce medical documentation of a mobility limitation to get a permit.

Where and what are the concerns referred to in “concerns expressed by the development industry over actual utilization rates, particularly in multi-family residential developments”. What evidence do developers and the City have that existing spaces are underutilized? Please share such input with disability advocates. We have the right to know the “case against us”. Are people’s beliefs clouding their perception when they observe unutilized spaces? Do they see the empty accessible space but not the empty regular stall?

Are existing spaces that are not utilized suited to purpose and could that be the reason for lack of utilization? That is, what dimensions are the unused spaces (if they are, in fact, less used than regular spaces) and might they not be used because they do not meet needs – much like the new “accessible parking spaces” at Beacon Hill Park that are merely re-signed regular stalls? Are the buildings themselves inaccessible, and thus could not attract people with disabilities, or offer no accessible suites? Are entrances to the businesses inaccessible, so that they cannot serve PWD? That situation may change in future if and when Provincial or local standards for housing and building accessibility come in.

When citing “Current best practice”, to what is this report referring?

Re. “The recommended supply requirement is approximately inline with requirements in communities such as Richmond, Surrey, Kelowna and Central Saanich, all acknowledged as leaders with BC. “ It seems that the communities cited are very few, including those that this requirement exceeds? Where does this proposal stand more widely? What is the basis for asserting that the communities cited are actual leaders? “The recommended requirement exceeds those in comparable communities such as Saanich, Nanaimo, North Vancouver (City) and Coquitlam”.)

Re “The accessible parking supply requirements identified above should not be applied to land uses that generate demand for accessible parking that is generally above-and-beyond what is experienced with most land uses. These include Assisted Living Facilities (i.e., seniors housing, care facilities) and Hospital uses. “ **There are other types of facilities that generate more demand.** Those would include medical buildings that house doctor’s offices, clinics, X-ray facilities, etc. The Red Cross building on Fairfield Road

is an example. It's where people pick up crutches and wheelchair loaners. Rehab Facilities and physiotherapy offices, grocery stores (gotta eat), Public housing (because PWD are often low income as well), and any buildings that have accessible suites. The latter should have the regular amount PLUS ones directly associated with the accessible suites.

VAN ACCESSIBLE PARKING

Are "vans" the only types of vehicles that require the extra space? There are cars equipped with hydraulic wheelchair devices that remove a wheelchair from a trunk and bring it around the side. These regulations should be forward thinking.

What side do ramps usually come out of accessible vans? Will it be possible to back in in all instances, if the access aisle is on the wrong side? Need "Location considerations" that walk planners through this thinking. Need drawings that show van/car on different sides, to encourage alternation, if van ramps are on both sides.

Do we need an access aisle with cross-hatching at the back of van parking spaces, for rear loading vans? Are van accessible stalls long enough for rear-loading?

While it MAY be true that "This group requires a wider parking space to allow for maneuvering a mobility device in/out of a vehicle, but does not necessarily require close proximity to the building entrance.", the members of the group may have specific access requirements that are different than exist are included in other standards. For instance, these assistive devices may require larger turning ratios than wheelchairs, and may have special needs of curb cuts.

Will there be any definitions about who is entitled to use "van accessible spaces" and does it have to be that name? Will there be an enforcement mechanism?

TABLE 3. RECOMMENDED ACCESSIBLE + VAN ACCESSIBLE PARKING SUPPLY

This table needs another column to indicate the number of stalls. Leaving it out obscures the fact that there will seldom be a second van accessible spot. There are some types of facilities for which there should be a van accessible spot for a small number of regular stalls.

There are no page numbers in the document so it is difficult to cite passages. The table, **TABLE 3. RECOMMENDED ACCESSIBLE + VAN ACCESSIBLE PARKING SUPPLY** needs another column to indicate how many overall spaces would be required. For instance, there would have to be over 151 spaces for 4 accessible spaces to be required. It would be a HUGE LOT before an additional van space would be required, and chances are, the first will rarely be available for an accessible van. Table 3 maintains a fiction that van accessible spaces beyond the first will be built. How many lots in Victoria have the (is it 250) stall base?

A similar table in the Public parking document would be useful. The reader currently has to do this analysis themselves. But even this should have another column, so the reader can readily see how many spaces take on, for example to a fourth AP stall.

Location

“Accessible parking spaces are to be the parking space(s) located closest to an accessible ramp This requirement does not apply to van accessible spaces. “ What is here ensures that there will be an accessible path to buildings or amenities for van accessible spaces and that they are not stuck in the furthest regions and the least used areas of parking lots? Will users have to travel through traffic lanes between parking rows in very large lots (and they will be very large if they require a second van accessible spot)?

There should be Location Considerations for all types of AP, advising the uninitiated about features they should look for an avoid. This warrants a stand alone section or a subsection for each type. For instance, road width is a consideration as well as road surface and obstacles in the path to the nearest curb cut. Having to travel in the vehicle lanes should be avoided whenever possible. For instance, accessible parking along Dallas Road failed to take advantage of curb cuts within the parking zone. Instead, accessible stalls were located where the only access was by traveling in the roadway, in some cases at narrow parts of the road. Absence of drainage grills and sidewalk obstacles, and presence of extra wide sidewalks that will accommodate the curb ramp are some examples.

Keep some empty spaces beside regular stalls free of planters, motorcycle parking or bicycle parking, etc, to allow for opportunistic semi-accessible parking (for instance, allowing a passenger door to open more fully to allow for a walker).

Circulation and Access and Location

“An access aisle of a minimum of 2,000 mm wide is to be provided at the rear of all accessible parking spaces in a parallel configuration. “ But it isn’t marked as such.

- “Accessible parking spaces adjacent drive aisles and key circulation corridors should be level with a maximum cross-slope of 2% in any direction. “

Need to also state that **drainage grates should not be contained within these spaces**, as one is on Dallas Road toward the breakwater end. Canes could stick, walkers wheels could get stuck in the grills, and the difference in grade could cause trips. There could be drainage in underground garages or surface lots run by private or public operators.

I heard that developers raised considerations of pillar spacing in underground parking. Perhaps location considerations that best fit accessible parking in the likely pillar configurations dictated by the Building Code are in order.

Location considerations also need to take into effect refuse collection practices. Too often, we see private refuse removal companies using the conveniently places accessible parking stalls when they pull out bins waiting for collection. Simply prohibiting that does not stop the practice. Design considerations could. Similarly, loading and unloading is a common unauthorized use that these access provisions should address, if the AP is going to be available when needed by authorized users.

Need a figure for underground parking or other locations where the AP is not curbside, but perhaps abutting a wall. In underground parking, there might be two rows of parking with only a painted line

between them. How should these be configured? Might the access aisle have to continue through the adjacent row of parking if that row is closer to the accessible building or street access? Are people using mobility devices to be required to travel in the path of traffic to the nearest accessible building access, or should the access aisle continue to protect them to the elevator access? Is there a requirement for automatic doors throughout the path of access to the building interior?

Are there any instances when underground parking does not have level access to the building as in an elevator, but someone might have to go up a ramp? If so, that needs to be dealt with.

Electric charging stations are now commonly being installed at locations where accessible parking would more rightly go. That may be due to wiring. How are potential conflicts to be dealt with?

2. ACCESSIBLE PARKING DESIGN + LAYOUT

FIGURE 1. ACCESSIBLE PARKING DESIGN REQUIREMENTS, PERPENDICULAR AND DIAGONAL SPACES

Don't these spaces need to be longer, given that some vans are back loading? It must be possible to load and unload without stopping the flow of traffic. If not, this will reinforce negative stereotypes and perceptions of people with disabilities, and the pressure to move quickly and perhaps unsafely will not be respectful. The stall side markings should be extended, to indicate the exclusive use space.

Why are there no buffer zones on some driver sides? Shouldn't there be additional buffer zones on the outside of the two spaces, to accommodate disabled drivers in all spots? What are the assumptions behind that? Don't PWD drive? Will the passenger be obliged to enter the vehicle from only one side, on the side on which the buffer zone is located? Might there be reasons why there should be choice? Are side entry vans always with the ramp on the passenger side? **If there are not buffer zones so that each space accommodates each type of vehicle and both passenger and driver, then effectively, there is less parking available than on the plan. E.g. 51-100 = 2 but only one suits the needs of the people in a particular vehicle. VERY IMPORTANT POINT.**

The lime green lines may be confusing. The intent is to make them white, is it not?

This diagram continues the blue curb beyond the area to which it applies – right?

Should provide a diagram for multiple spaces in case, in rare circumstances, there actually are more than two accessible spots. Would there be any circumstances where this might occur? Or, what would be the ideal configuration for 2 AP and 1 van AP stall, or 3 AP, 4 AP and 1 Van AP? Are there circumstances where very little more space is required for another van AP stall that is not strictly required?

FIGURE 2. ACCESSIBLE PARKING DESIGN REQUIREMENTS, PARALLEL SPACES

Is this wide enough for a passenger and a driver to disembark? Both will need to disembark onto the roadway surface. Are there some streets (possibly one-way) where sufficient width could be obtained?

What colour is the stall box paint? Is the stall box mandatory?

Are the limitations of parallel AP such that they should really only be categorized as Limited Mobility or similar? It seems that the main requirement of truly accessible AP is increased stall width that allows for full opening of doors. Access to curbs is also important, but if the first requirement cannot be met, can it be AP.

FIGURE 3. RECOMMENDED ACCESSIBLE PARKING IDENTIFICATION SIGNS + DIMENSIONS

This signage is unfamiliar, given its use of the dynamic wheelchair user symbol. The accessible icon is not standard, to my knowledge. Who else uses it? The accessible icon is not standard, to my knowledge. Has it been tested for comprehension by PWD and general public? Is it enforceable, with this icon?

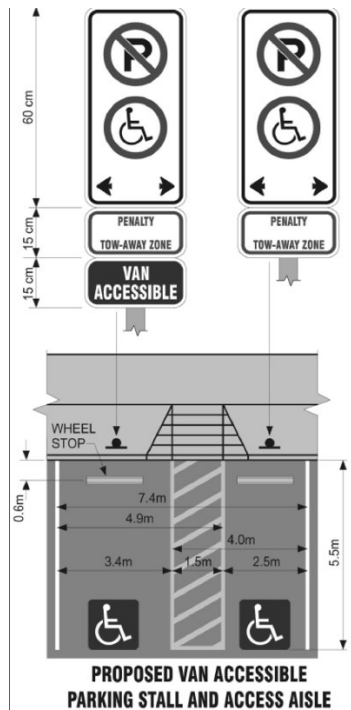
Need to conduct legislation search to ensure that police and Bylaw officers can enforce accessible parking permit requirements with non-MVA compliant signage.

How does the height of signage compare to public and general parking signage? Is any departure justified? How might it affect people with limited flexibility?

In most underground parking, stalls will be against a wall and curbs will not be visible. Other wall markings may be advisable. Two circumstances – pole and wall signage should be covered. How are they to be mounted to concrete walls, or is other forms of signage or markings allowed in this circumstance? How about a blue stripe at a certain level? Can signage be affixed with glues that do not allow them to be pried off any more easily than removed from a post?

This would be improved by enforcement messages and, particular to private parking, the phone number of the owner to whom infractions should be reported. Neither police nor Bylaw officers will enforce infractions on private parking unless it is the owner who will respond. This is a large gap in the regulatory regime that essentially makes AP restrictions on private property a fiction. The need to contact someone who can request enforcement is essential to the success of AP in the private sector. See Exhibit 3 below. It indicates penalties, but should have phone numbers too.

Exhibit 3 - More effective Accessible Parking Signage, with enforcement messaging



Why is blue background being recommended for the pavement marking? Although it is familiar, it seems to be more common to have white directly on the pavement. What are the perceived benefits of the blue background, and do they outweigh the additional installation cost and maintenance? Might a similar effect be gained by putting a blue wide bar at the entrance to a stall? That would be more easily spotted by PWD scouting for spots and parking enforcement.

Would it be possible to make signage requirements apply retroactively, even if developers are not required to change dimensions? This would be a relatively low-cost fit and could be made easier if the City were to buy in bulk and supply at cost to businesses within Victoria.

Would like to see a diagram that shows that the entire space including buffer zone is the restricted area. The public needs to be educated if the recently introduced AP at Dallas Road is an indication of their lack of understanding. Perhaps the City has to do this, to take leadership in education.

The sign below shows maintenance problems with outdoor signs and a practice that should be stopped – that of making the pole the holder of multiple message. Applies to public and private.

Exhibit 2 - Examples of poor signage to be avoided through the Guidelines – Clover Point



Above - Clover Point accessible parking sign requiring maintenance. Right – this should be prohibited, and that should be in the rules – no other signage on the same post except that referred to in the Guidelines.



Pavement Marking

What is the roll of the wheelchair icon in parking enforcement? If it is solely informational, than the departure from the norm may be acceptable.

Who uses this marking now? It would be helpful if the report provided more information on implications and reasons for the change.

Will the final standards have standards for fluorescence of the white paint? About the type of blue used? I think they would be useful.

Is there any reflective quality in the blue paint currently used? Is it high enough contrast?

May need to be more specific about how far the blue curb paint extends. For instance, people parking adjacent to accessible parking at Dallas Road do not seem to be aware that the buffer zone is included in the accessible parking space. Blue curb should cover the entire area of intended use, including buffer zones and associated curb cuts.

General Comments

This is very limited to technical aspects of the parking and does not integrate with other things such as accessible housing design, accessible routes (especially for City-provided parking which may not be associated with one destination), curb cuts, enforcement, pricing, etc. In private lots, will pay kiosks be accessible? I have had to help people in wheelchairs pay at medical building parking.

Lighting is not specified. Parkade, underground parking and surface lot lighting is an accessibility issue. Lighting around accessible parking may have to exceed illumination levels in other parts, and should be neurological-condition-friendly. While the City may be able to add this to Design Standards, the Building Code may govern it for private. Needs to be looked into.

Generally, this ignores how the base has already gone down. **It is not a doubling of accessible AP parking supply if the rate is applied to a lower base, and the base was lowered in 2017/18, and variances handed out like candy without consideration of the effects on PWD – e.g., the Northern Junk building with zero parking and no accessible route to private market parking considered.**

How have these numbers been arrived at? Where is the demand study whose inadequacy held back the Schedule C amendments last time in 2017? Those changes were touted as fact-based, and there were problems with the facts. Where are the facts this time? Demographics, Victoria's AP rate compared to others...

Will AWG and other organization previous recommendations be mentioned in the staff report? For reference, **November 2017 AWG minutes** [extensive quotes follow]:

1. a) AWG review and feedback regarding the draft off-street parking regulations – staff will come to December meeting. Jim Handy will send out accessible background materials to AWG prior to the December meeting. This will be the first item on agenda then AWG will do a written report to go back to Council.

December 2017 AWG Minutes

2. Consultation:

Off-Street Parking Regulation – Barrier Free / Accessible Parking Jim Handy, Senior Planner - Development Services, Sustainable Planning & Community Development - Presentation:

- The City of Victoria is undertaking a comprehensive review of off-street parking regulations (Schedule C of the Zoning Regulation Bylaw) **for vehicles and bicycles**
- The regulations have not had a significant update since 1981
- The regulations will establish appropriate parking requirements for development on private property
- This project does not include a review of public parking such as on-street parking, public parkades or parking lots.

Accessible Parking

- The provision of accessible parking is currently regulated through the BC Building Code [***Of course, this was later removed, so that there was no regulation in Victoria***]
- The City's Zoning Regulation Bylaw can set out more stringent requirements than those set out in the BC Building Code

City staff are seeking feedback to determine whether requirements set out in the BC Building Code are sufficient or if additional requirements should be set out in the Zoning Regulation Bylaw.

BC Building Code Requirements

The BC Building Code requirements can be summarized as follows:

- applies to all types of development: residential, commercial, industrial, institutional
- where more than 50 parking stalls are provided, parking stalls for persons with disabilities shall be provided in the ratio of 1 for every 100, or part thereof
- 1 stall is required per 40 rooms in **hotels**
- For **stadiums, theatres, cinemas** (and similar uses):
 - - Less than 500 seats = 3 stalls
 - - 501 – 1000 seats = 6 stalls
 - - More than 1000 seats = 6 stalls plus 2 stalls for each additional 1000 seats

Stalls must:

- be at least 3.7 metres wide
- be close and accessible to a building entrance
- be clearly identified as being solely for the use of persons with disabilities.

Further guidance is outlined in the Building Access Handbook 2014.

Find background on the City's parking project and the draft regulations at:

<http://www.victoria.ca/EN/main/residents/planning-development/off-street-parking-review.html> [*Link No longer valid*]

The floor was then opened for feedback from the AWG:

- Unanimous agreement from AWG that **BC Building Code rates for disabled parking are too low especially for Victoria in consideration that 12-14% of the population has some form of disability**, Victoria has a higher proportion of seniors

- The space at the end of a parking row often contains a landscaped area, suggestion that these areas should be kept paved and flat to allow for wheelchair ramps to extend out
- Concerns about the ability of the draft bylaw to accommodate non-standard bicycles and vehicles.
- Concerns about low visitor parking requirements for residential types where people with disabilities may be disproportionately found. Low vehicle ownership may lead to higher need for visitor parking.
- Best practice research recommends that approximately 5% of stalls (1/20) should be for disabled parking
- Several concerns raised with respect to the minimum stall width (3.7m) as this does not provide sufficient room to accommodate vehicles with wheel chair ramps. Ideally **there should be a requirement for an additional buffer space on both sides of the stall**
- Developers need to provide some resident accessible spaces, and **not put all accessible parking spots in visitor parking areas**
- A possible approach for determining the right number would be to look at the total number of disabled parking permits issued in Victoria in comparison to the number of registered vehicles or licensed drivers
- Identified that most new developments typically only provide the minimum amount of disabled parking that is required through the Building Code

- Consider design guidelines that address curb cuts and unobstructed access between disabled parking stalls and curb cuts
- Suggest exploring other universal barrier free design guidelines for reference
- Parking amenities such as EV charging should be designed for access and use by people with disabilities
- Consider design guidelines for mobility scooters as well
- Although the minimum requirements for motor vehicle parking may differ between condos, apartments and affordable housing, there should be a consistent requirement for disabled parking in all forms of development, especially multi family.
- Christine Paisley commented some accessible parking spaces have no cover or overhang, therefore a person in a wheelchair getting in and out of a car can get very wet from the rain, please consider covered accessible visitor parking if possible.

Robin had provided a document to the project in advance, through Brad, and Jim Handy offered to have a standalone meeting with Robin, email conversation or telephone conference. Robin would like comments from anyone interested on her paper and will share with the group.

ACTION: Robin will forward her paper “input and questions on parking regulations for Dec 4, 2017” to Chris Marks, Christine Paisley, Chris Dobbie. The committee will then send a written report (within the next month) with their recommendations to City staff.

Linda spoke regarding the need for a consistent number of accessible parking spaces. Staff reports noted that condos owners have higher rates of vehicle ownership than rental apartments and affordable housing. However, just because a person with a disability doesn’t own a car or doesn’t drive, that doesn’t mean they don’t have the need for an accessible parking space for their unit. People come to provide them with services and they need to park in accessible parking to pick up, not just visitor parking. These can be critical needs on a day to day basis, such as doctors’ appointments, etc where someone else is picking up to drive or other various events, homemakers, nurses need parking. Just because its low cost housing, doesn’t mean there isn’t a need for accessible parking.

If anyone has a follow-up comment or question, please contact Jim Handy, Senior Planner – Development Services, City of Victoria at 250.361.0523.

ACTION: Linda will send a written report with the AWG’s recommendations within the next month.

January 2018 AWG Minutes

2. Motion to accept the amended minutes of December 4, 2017 with the following change to “action” item:

Robin will forward her paper “input and questions on parking regulations for Dec 4, 2017” to Chris Marks, Christine Paisley, Chris Dobbie. ** Remove: The committee will then send a written report (within the next month) with their recommendations to City staff.**

Moved: Susan Gallagher Seconded: Chris Marks CARRIED

5. Business Arising:

a) Off Street Parking – AWG Consultation Report – Linda asked for confirmation that the AWG Consultation Report was shared with appropriate staff. Brad confirmed he shared it with Jim Handy and Robert Batallas with a note recommending that the entire report be posted as an attachment, along with the staff report, so that Council has all the information. This report can now be posted to the AWG webpage.

As directed at the last AWG meeting, Robin had a phone meeting with Jim Handy, Robert Batallas and Daniel Casey. They started off the call reporting that they felt that there were information deficits regarding the points the AWG raised, and the project would be seeking funds for the contractor to carry out more research.

AWG discussed the importance of projects consulting with AWG at early stages, so that its input can shape project research and activities. When the AWG is consulted early, it can provide input that might shape the project, but when the AWG is consulted later, it can only provide feedback on what has been done. At later stages, there is a greater onus on the AWG to justify changes to already-formed plans. The later the consultation, the more difficult it is for the project to fully address accessibility considerations.

Accessibility Working Group (AWG) Consultation Report [on accessible parking]

Re: City of Victoria Off Street Parking Regulations

Consultation: December 4, 2017 Report: December 21, 2017

Introduction:

Victoria is well known as having not only a high population of seniors but it also has a higher than average rate (twice as many) of students with disabilities. The mild weather is favourable to many of those with particular medical conditions. More persons with disabilities (PWD) are now living in the community and have their own private accessible transportation, often made possible by recent government funded employment programs. As Victoria residents live to an increasing age, they are more likely to experience a temporary or permanent disability which may require the use of a mobility device or adapted vehicle in order to maintain their independence. Contrary to the City's findings, PWD need for parking may be the same regardless of whether they own or rent their accommodation.

There are various reasons PWD may need parking, which may differ from the general population:

1. For PWD who own their own vehicles that they drive themselves. These may be users of wheelchairs who drive modified vehicles, or people with endurance and mobility challenges like seniors who still drive. The latter may approach a vehicle with a walker and not need as much extra space as people transferring from wheelchairs or using a vehicle ramp, but the former require accessible *resident's* parking stalls.

2. For people whose disability or economic situation means that they cannot drive or own a vehicle and who therefore rely disproportionately on in-house personal services and deliveries. This creates a need for *visitor* parking that need not be accessible, but is a very important consideration when determining

the amount of visitor parking for rental, affordable and assisted living residential types. Peak usage may be during the day but it may also entail visits to put residents to bed in the evening.

3. For PWD who require drivers to take them to medical appointments and various errands for everyday living. This creates a demand for accessible parking in both *visitor* and *resident* areas. Where drivers pick up people with disabilities, they may need to use wheelchair ramps and thus require extra space than is provided with a regular accessible parking stall. Further, drivers may need to park and accompany a PWD from their suite, meaning they need to park properly, and not just use a pick-up zone. If the service is required frequently, the need might best be accommodated by an accessible resident's parking spot associated with the suite, to ensure that if visitor accessible parking is occupied the PWD can still get out of their vehicle.

The BC Building Code regulates parking on private property. The AWG has been asked if the City should consider accessible parking requirements above and beyond the Building Code in the Zoning Regulation Bylaw and if so, for its recommendations. We would like to point out that the AWG could have been of more service to the City had the project consulted earlier, at a time when our concerns could have been incorporated into the research plan.

Recommendations:

Find below a description of what the current Code requirements are, our comments and recommendations.

1. Number of Accessible Parking Stalls Required

Building Code: Accessible parking stalls are only required where more than 50 parking stalls are dictated. For 50 – 100 stalls, the Code requires 1 accessible stall, and for every 100 stalls (or part of 100) over that, one additional accessible stall is required. This equates to between 0 - 2% accessible stalls.

Comments: Victoria's parking requirements should be based on Victoria's particular population mix, and thus, departures from minimum Provincial standards are warranted. Approximately 15,000 disabled parking permits are in use in Victoria at any given time. Disabled Parking Permits are assigned to individuals, based on documented medical need, and are assigned to the individual, not the vehicle. They can be used by anyone driving the PWD holding the permit, in any vehicle. Given a population (same geographic area) of 209,000, this equates to about 7% of the population requiring accessible parking. If compared to number of licensed personal vehicles instead of total population, this percentage would be even higher than 7%.

AWG Recommendations:

(a) That the City require a minimum of 7% of parking stalls be accessible.

The AWG also advises that the City Investigate Barrier-Free BC recommendations given that a B.C. persons with Disabilities Act will be legislated and Victoria's goal should be to meet or exceed what is legislated. Universal Design standards and those used by SPARC should also be investigated.

(b) Every residential development, including single family homes and low density developments, should have at least one accessible parking stall, consistent with Universal Design Standards. There should be no minimum threshold of total parking stalls, even for low density developments before an accessible stall is required. Even for single family dwellings, parking needs to meet Universal design standards, or PWD who require accessible parking are relegated to large multi-unit developments and would not have housing choice.

Explanation: Even though research has shown that a smaller proportion of residents living in rental accommodation own vehicles compared to those living in condominiums, and that this number is even lower in affordable rental buildings, for persons with disabilities, the need for an accessible parking stall may be independent of vehicle ownership. PWDs often require accessible parking to be picked up and dropped off to carry out daily activities

Persons on fixed and low incomes, which is the case for many persons with disabilities, are more likely to live in affordable rental units.

c) Maintain a consistent number of accessible parking stalls regardless of whether the development is a condo, or rental (including affordable) accommodation. The number of accessible parking stalls in an affordable rental building should be the same (possibly even more) than a condominium complex with the same number of units, and they should be located in both visitor and resident parking areas.

2. Width of Accessible Parking Stalls

Building Code: Accessible parking stalls are to be 3.7 metres wide

Comments: 3.7 metres may be wide enough for a person using a walker, but it is often not wide enough for a person using a wheelchair and rarely wide enough for those with a van with a side ramp. A vehicle door generally must be fully open to facilitate transfer from a wheelchair to a car seat. But where a side ramp is required, to accommodate a person in a wheelchair, there must not only be room for a side ramp, but also for the person using a wheelchair to approach the ramp and turn.

AWG Recommendations:

1. a) That the City **requires a buffer zone on either side of some (not all) accessible parking stalls** (marked with diagonal yellow lines) to accommodate vans with side ramps, to provide room to load and unload a wheelchair.
2. b) That the City requirements include two accessible parking stall designations: one for vans (whose specification include a buffer zone) and one that is 3.7 metres wide for those who do not require the extra width of the buffer zone. Where more than one accessible parking spot is required, both types should be furnished.

3. Possible Design Guidelines:

Project Staff mentioned that some requirements might be more suited for inclusion in Design Guidelines than a Bylaw.

AWG Recommendations for design guidelines:

- a) Replace curb and garden area beside end parking stall with level buffer zone.
- b) Install curb cut at head of buffer zone rather than at head of accessible parking stall.
- c) Require all parking amenities (such as charging stations) to be accessible.
- d) Accessible Parking guidelines should differ depending on the type of housing, according to known demand by PWD. For instance, scooter parking at senior's residences, and a high proportion of accessible visitor parking stalls at assisted living facilities.
- e) Accessible parking stalls should be required in each category of parking: visitor and resident.
- f) Require accessible parking stalls to be level.
- g) Bicycle parking should take into consideration the need for space to accommodate specialty bikes and/or trikes that may be used by PWD. Non-standard spaces need to be labeled as accessible only, and subject to similar rules as vehicle parking so that they aren't used for regular bicycles. (This may need to be written into the bylaw rather than guidelines).
- h) Bike racks should be highly visible (contrast with surroundings), especially at night, to avoid injury to people with visual impairments. (E.g if black, a florescent painted strip should be applied).

The AWG would like to express its appreciation of the City's proactive approach with regards to potential bylaw changes to the Zoning Regulations as they pertain to the provision of accessible parking. **The AWG would also like to extend an invitation to the City to come back to the AWG for a future consultation once more specific regulations are drafted.** *[Didn't happen – learned they weren't going forward when posted for COTW.]*

Submitted by: Linda Bartram, AWG chair

GOING FORWARD and other considerations – Private Parking

Grandfathered non-compliant parking. What will be done when renovations are made? Will they have to be brought up to new parking rules, the way plumbing has to be?

What will be done about existing multi-unit buildings? Would the City consider grants to housing providers or non-compliant businesses to upgrade parking? Would the City consider auditing and providing advice on retrofitting? It could give a grant to a non-profit.

Can it be made retroactive to new developments since 2018, when the Province vacated this policy area, having provided advance warning and the City did not prepare?

Public and Developer education needed on the need for and understanding the new standard – including buffer zones. Yes, spaces might remain empty for some time, but maybe there is only one wheelchair user in a building, and they have to leave sometimes.

The regulatory regime out of scope. Is there more to the project? My experience, reported to the City, is that it is very difficult to enforce restrictions on private property. Police will not act without a complaint for the owner. The owner can be difficult to reach and disinterested. Without improvements to enforcement, these spaces may become a fiction.

There are studies that show that non-compliance with accessible parking restrictions increases as parking supply in general decreases. Frustration causes people to rationalize behaviour they might not otherwise demonstrate. Victoria is on a long path of reducing parking requirements. It is irresponsible

not to consider what that means for PWD who rely on private AP. Thus, it is important to require contact information on private AP.

Planning department needs to see accessible parking as an amenity subject to negotiation (above the minimum). There will be features of some residential buildings that make it more and less likely that there will be high demand for accessible parking.

PUBLIC PARKING

Response to the document, DESIGN GUIDELINES FOR CITY SUPPLIED PUBLIC ACCESSIBLE PARKING SPACES

The supply proposal is limited, without stated justification or comparison.

I commented in July that on-street AP appeared to be missing from scope and was assured that it was in. It deals only with lots/parkades, even though the primary consideration is mobility impairment leading to a need for proximity, and street parking holds the most promise for distributed, proximate parking.

The front page includes a quote from the framework documents about responsibility to support positive community attitudes. What will this project do to support that? Needs a public info component, especially since engagement has been so narrow in scope and reach to disability organizations. There is a need to counteract with facts a perception that accessible parking is not needed and is preferential treatment, judgment of people with non-visible disabilities, and poor compliance.

“set an example for other communities in the region. “ Aren’t there municipalities in the region that exceed Victoria and have already made changes in advance of BC Building Code removal of AP? How can the reader assess whether the statement is justified without comparative information? The proposal is for fewer AP stalls than for the private sector (at least at a lower threshold). That does not seem like leadership.

“Supplement new development regulations that are proposed for “Schedule C” of the City’s Zoning Bylaw, *Off-Street Parking Regulations*. “ I think the use of “supplement” is wrong. These “complement.” If they supplemented, they would add information on private parking.

What will be the status of the new rules called “Design Guidelines”? How binding are there? Could a new public parking lot be built without meeting the supply set out in the eventually approved Guidelines? Is it common to have Design Guidelines for City infrastructure? I am aware of Design Guidelines applying to the private sector, as in Landscaping Design Guidelines. Everyone recognizes that whatever instrument was used for the new the standard is for curb cuts, it is not universally followed, and departures are not considered and warranted due to local conditions (although that may occasionally be the case).

Needs a Scope or Application section to set out when and where these Guidelines apply.

Does it apply to Parks-Department-supplied parking, which can be done without consultation with Engineering, and how would you count parking in parks? Proximity to washrooms should be a criteria in parks. Will the 2011 recommendations from the study on BHP with recommendations on AP be followed?

Needs more on location factors for street parking and what events trigger a review. For instance, construction – relocate – don't just close down.

Address parallel parking that requires crossing a bike lane. Or, add a design guideline that this is not a suitable location

Need to add avoidance of drainage grills in pavement such as appear in James Bay along Dallas Road.

The parkades closest to City Hall, including most importantly Centennial Square should exceed number requirements should any supply side numbers be created.

Missing communication piece on where accessible street parking spots are and which are open.

Missing something on freedom from sidewalk obstructions

What is the plan for bringing City provided parking up to the new standard? I see nothing in the 2021 budget

“In keeping with the accessibility commitment (right), the City has prepared design guidelines that describe design criteria for public provided accessible parking. Through the application of these guidelines, either when new public parking is built or as a part of retrofit efforts, the City can improve the quality of and access to accessible parking throughout the community. “ It could, but it could also never happen.

Council is taking away parking all the time, particularly conveniently located street parking. This has big implications for PWD who can take advantage of proximate regular parking. The role of street parking should be explained.

“Better reflect best practices”. Why don't they “implement best practice”? “better reflect” gives the reader no understanding of how close the proposal is to the undefined best practice.

“Guide the City as they work to improve public accessible parking resources in future. “ So, no plan and just guidance, not binding? How much accessible parking is there now, where is it and what is the goal?

If smaller lots are built in future, there could never be an accessible stall built again.

Please provide more information on the following “The work of the project team included background research, review of best practices, and conversations with representatives of the accessibility community and the development industry “ **PLEASE SHARE THE RESEARCH, WHICH ORGANIZATIONS THE TEAM SAW AS PROVIDING BEST PRACTICE, WHAT TYPES OF CONVERSATIONS WERE HAD WITH THE DEVELOPMENT INDUSTRY.**

What is meant by “Use of the new International Symbol of Access”? I think there is some confusion here

“A review of supply rates”? How was existing supply rate determined and what is it? Was the supply base modified as parking has been removed?

Trying to get my head around **How the City Will Use These New Guidelines**, particularly the statement “design guidelines are to be considered and by City staff in the design of all new accessible parking spaces”. When will there be new accessible spaces created? Won’t most work be retrofits? “For existing spaces on public land, the City will seek Council direction to review and prioritize retrofits to support a coordinated capital project.” Shouldn’t this be in the 2021 draft Financial Plan or are you thinking of spending 2021 in more analysis and maybe start retrofitting in 2022? That’s too long. Take a stab at an estimate.

How the City Will Use These New Guidelines?

For existing spaces on public land, the City will seek Council direction to review and prioritize retrofits to support a coordinated capital project.

This direction exists, from December 2018 and many staff undertakings about what the Framework would do. The Strategic Plan shows the policy changes as a 2019 action and expectations were set that 2020 would see implementation.

How will this exercise inform determination of priority for retrofits? What will be the process for members of the public to request new accessible spaces (equivalent to requests to retrofit pedestrian crossing controls)? There is nothing in the way of criteria for highest priority locations. This exercise should take the City closer to the project plan. Doesn’t the City know by now what the cost is to retrofit by moving lines?

Supply

What the proposal says

3.12 Where more than 50 parking spaces are provided, parking spaces for persons with disabilities should be provided at a minimum ratio of 2 for every 100 or part thereof.

- a. Van accessible parking spaces are to be provided in a ratio of 1:6 of total designated accessible parking spaces in parkades and parking lots.
- b. Where only one accessible space is provided, that space should be van accessible.

There is no intention of supplying AP for areas with less than 50 spots? The minimum threshold should be lower, and more in line with the private supply. With private parking supply rates decreased in the last Development Bylaw amendment and increased residential density downtown, more pressure is put on public parking. It is not leadership when the City does not follow the standard it imposes on others.

Readers need a table of the lots/parkades on City land by operator and location and number, with columns for nominal AP supply now, and under the proposal to understand the impact. I have no idea how many small lots there are and whether they are pay or free, privately operated or public. It could be that the majority of parking is in small lots that would have no AP requirements. This approach works against the interests of PWD who cannot travel far once leaving their vehicles. A distributed model is preferable.

Is there any dedicated employee parking – such as the Parks Yard at BHP? What requirements apply to them?

How determined for parks? Shouldn't every park and playground have an AP stall? What about Ross Bay Cemetery? Isn't it likely that older people would visit?

How many on-street stalls in the downtown core does the City have, on street and in lots/parkades? It would make a very interesting ratio to contrast the reported 28 accessible street spaces to that base. "There are 11,000 City-run and private parking spaces in downtown Victoria" (page 1, Parking – What You Need to Know, at

<https://www.victoria.ca/assets/Departments/Engineering~Public~Works/Documents/Parking%20Info%202020%20OCT%20DIGITAL.pdf> Is that current and accurate? Presumably this is only publicly available parking, and not privately assigned residential spaces or restricted employee parking, etc. Does the City intend to apply the supply percentage to the base of all the parking it supplies?

How many stalls required before a second van accessible spot is provided? How many City facilities qualify? Unlike for the Private accessible parking proposal, this document does not have a table that lays out requirements in increments to the point of requiring a second van-accessible stall.

For reference, the following was gleaned from the City website re. size of City-run parkades

- **Bastion Square Parkade** - 575 Yates Street (361 parking spaces) [6, including 2nd van]
- **Broughton Street Parkade** - 745 Broughton Street (below the Central Library, 544 parking spaces) [6, including 2nd van]
- **Centennial Square Parkade** - 645 Fisgard Street (188 parking spaces). [4]
- **Johnson Street Parkade** - 750 Johnson Street (232 parking spaces) [5]
- **View Street Parkade** - 743 View Street (531 parking spaces) [6, including 2nd van]

This analysis indicates that the new standard would dictate 27 Accessible parking stalls in downtown City parkades. How does that compare to the number of nominally accessible parkade AP spots currently? Add the approximately 20 nominally accessible street stalls (although the inaccurate website says there are 28), to total of ~47 accessible publicly-provided AP stalls in downtown.

There would be 5 van-accessible stalls for the van-first requirement, and 3 more parkades are large enough to require a second van-accessible stall. So that's 8 van spaces in all of downtown (since it's most likely that street parking is not van accessible). Is that sufficient? Is there any chance of putting van spaces on streets – maybe back-loading, if not side-loading?

The City website says:

Designated On-street Parking Spaces for People With Disabilities

The City has designated 28 metered on-street parking spaces downtown for use by people with a valid BC Disability Parking Permit on their vehicle. [Learn more.](#)

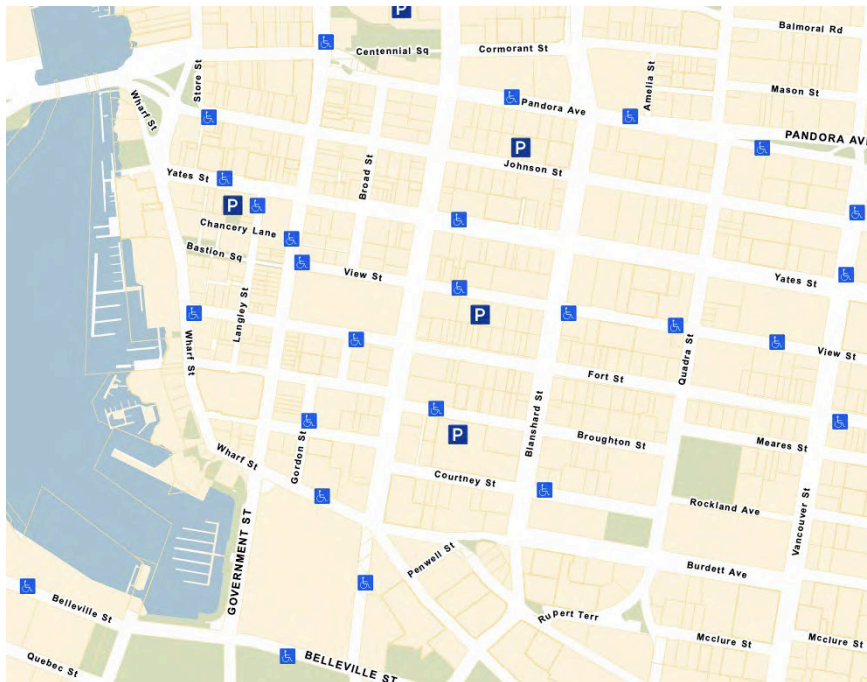
That link takes one to:

Accessible On-Street Parking Spaces Map

The locations of these on-street spaces were selected to provide maximum accessibility throughout the downtown core. A map showing the locations is [available here \[PDF - 372 KB\]](#).

Which takes one to the outdated map:

<https://www.victoria.ca/assets/Departments/Engineering~Public~Works/Images/AccessibleParkingSpaces.pdf>



There are some obvious holes on the map (even without knowing where these reported stalls are no longer operating), including around City Hall. Wouldn't it provide visible leadership if an AP stall serving City Hall were to be installed?

Enforcement

Would like to see phone numbers for enforcement. Should have Bylaw number on the pole or Police non-emergency number. An additional "To report infractions, call XXXXX" sign could be added to the pole, particularly in areas where compliance is known to be poor. Also, need to look at whole system of reporting infractions, including on private property. Ensure that Victoria apps are easy to use for reporting infractions. Even if outside enforcement hours, reporting would generate stats to identify stalls where compliance is poor, such as outside liquor stores, pharmacies and other quick turnover businesses where people may be seeking substances to which they are addicted.

1. GENERAL

1.4 All accessible parking spaces must be clearly marked on a vertical sign of least 300 mm wide x 600 mm high, and be mounted at the front of the space (see **Figure 2**).

I believe that any departure from accepted standards need very solid justification. Would putting the signs that high make them unenforceable? Need to address regulatory issues first and ensure no unintended consequences. There is a provincial standard for a reason. Is this height suitable for people in chairs **who may not be able to tilt their heads**? The standard signage height is predictable and there for a reason. If it has to be so high, then how can the City countenance the knee-high BHP “accessible parking”?

1.5 “A pavement marking should be installed that enhances the visibility of accessible parking spaces and discourages inappropriate use (see **Figure 3**):

“discourages” should be “Prevents any uncertainty” and there should be more to reinforce this principle, including requiring signage on each stall, rather than as at the Breakwater where bookend signage is used (I think), and signage inserted elsewhere that indicates Penalty – Tow-Away.

Why are these less specific than the private requirements?

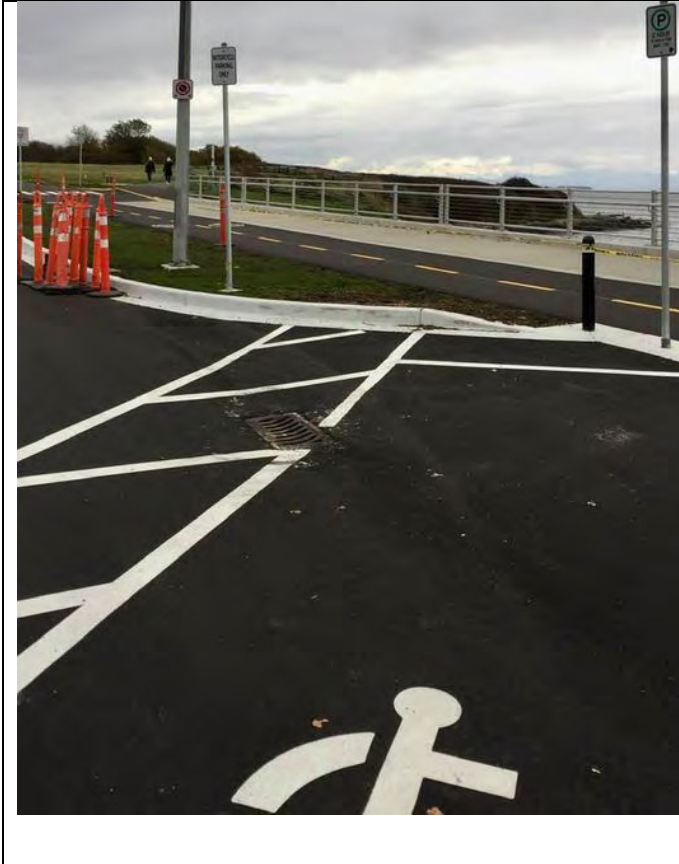
Guideline should address position of the wheelchair icon within the stall – centred but toward the rear?

1.6 The curb adjacent all accessible parking spaces is to be painted blue

Need to detail what area needs the curb to be blue. Diagrams should be accurately coloured, including the aisle, hashing, and stall box. The blue line should include buffer and/or part of the access aisle.

1.7 Directional signage should be used to identify areas where accessible parking spaces are located (see **Figure 4**).

What will the directional signage depict? Access ramp? If the sign is centred on the accessible stall, there shouldn't be a need for arrows to indicate the stall, right? If this design guideline is not clear about placement of signage, this creates confusion on the part of drivers, in need of AP and not.



Note the drainage grill crossing from the access aisle to the parking stall, right about where a driver would be disembarking a vehicle. This should be avoided. A “Location Considerations” section could contain such requirements.

Also note in this location, access to the sidewalk is directly onto the bike path and not through a marked crosswalk. That should also be prohibited or discouraged.

Note also that the buffer zone is marked in white, somewhat as if it is a crosswalk or access aisle, which it is not. It abuts a curb. How will buffer zones and access aisles be differentiated?

The buffer zone would be too narrow for a driver, if there were a parking spot adjacent.

Timing

There is a need to address timing of signage. It should accompany the pavement markings, and accessible parking should be installed when others have access to parking (unlike Dallas Rd). Accessible parking should not be an afterthought or delayed later than regular parking. If anything, its markings should be installed first. Others can participate in a free for all, but a disabled person runs the risk of returning to a vehicle and being boxed out.

1.8 “A curb ramp must not project into an accessible parking space, access aisle, or vehicle lane which is accommodating wheelchair transfers and vehicle ramps or lifts. “

Unclear. The curb ramp (same as curb cut?) will be within the AP zone. If the blue curb is part of the spot, necessarily, the curb cut will be within.

2. On-street Parking

“The following guidelines are to be applied to all new on-street accessible parking spaces. “

NEW? Isn't the idea to retrofit? There are only about 20 aren't there? If want to lead, then get rid of non-compliant “AP” street parking that isn't accessible. Or call it something else. Why doesn't the City commit to making all AP street parking compliant with new standards? It is the most visible to the community and could help promote positive attitudes. Street parking is

distributed and better suited to the needs of the residents who need it. The City has had a long time to think about it and has been telling Council for years that it is working on AP. 2022 is way too late.

Same comments about driver **needing accessible access and overall width as private regs.** How does a driver in a wheelchair disembark from a parallel stall and get safely to the curb cut?

Figure 5

Only 2 metres clear zone? Are you sure that this will not allow sidewalk obstructions to reduce ability to open doors and transload/disembark?

2.2 “Accessible parking spaces are to be located within 30 m of an accessible ramp leading to sidewalk level. “

30 metres seems excessive. It’s not just distance, but characteristics of the route that need stipulating – e.g., not into traffic lane. Why would you locate the AP where there is no good curb access?

What colour is the pavement marking for the exterior line? Will that line stick out further than adjacent parking stalls? And is the exterior stall line required or not? All drawings should accurately indicate colour, with grey-tone to show pavement and lighter grey to indicate sidewalk. The more realistic, the better.

“**2.4** Vertical signs identifying accessible parking spaces (shown in **Figure 2**) are to be mounted with the bottom of the sign at not less than 2.1 m in height. “ Is this appropriate for people who may not be able to move their heads well and using wheelchairs so lower than others?

I commented elsewhere that the City needs to justify and think through consequences for PWD and enforcement.

3. PARKADES / OFF-STREET LOTS

Need to mention posts and other potential obstructions, even those that might just make it more difficult to park the car because dexterity may be an issue. This would fit in a section on Location Considerations.

3.6 Directional signage should be located at the entrance(s) to parking structures to indicate on what levels and/or in what areas the accessible parking spaces are located.

Ensure that people understand that it is pointing the way to accessible Parking, not a wheelchair route or the stall that isn’t right there. More signage within, indicating where to turn. For instance, it can be hard to find your way around the parking in the conference centre, and spiral structures can be confusing as to level.

Figure 6

The curb ramp is shown within sidewalk space.

Will that restrict width of sidewalk? How often will this be realistic? What to do when not possible?

Sometimes, the stall might be against a wall, or facing another row of stalls, as in underground parking and surface lots. There should be drawings for these circumstances too, and there are signage implications.

“3.11 New parking payment machines or systems will:

1. Be accessible to wheelchair users and people with reduced dexterity and/or hand function
2. Be located close to parking spaces ...”

Need a section like this in the private parking Reg. I may have missed it, but theirs are likely to be less standard. Should they be good for people with visual and hearing impairments too? Yes.

Figure 7

Will the words Van and Car be shown on pavement and will vans be the only types of vehicles requiring the greater space? What if PWD drive or use large vehicles like pickups that aren't modified w. ramps? Aren't you really talking about vehicles with ramps, not "vans"?

What is the space to the right of the hashed access aisle but to the left of the right stall's demarcation line, in which a wheelchair symbol is shown? If it is part of the buffer zone, it should be cross-hashed.

Is the access aisle intended to be marked as, and have the legal protections as a crosswalk?

In some cases, there will be a need driver and passenger buffer zones on outside of zone, to address crowding and overparking. How should that be marked and is it legally part of the accessible parking stall so that if someone parks in it, they can be ticketed?

Are buffer zones wide enough? Doesn't seem to serve drivers.

The proposals figures only show access aisles, not outside buffer zones. Buffer zones are needed in some circumstances. Does the public understand their purpose and can lack of understanding be addressed with signage, at least at first?

Can people be fined for infringing on a buffer zone? The following photos are from Dallas Road. On any given day and inspection of buffer zones adjacent to accessible parking stalls will yield at least one example of the following parking – in part because the regular stalls are too narrow for the type of vehicle, and domino effect of overparking shifts multiple vehicles over the lines.

Can people with disabilities easily reverse in if a configuration does not provide the buffer zone or access aisle where needed, depending on whether the PWD is the driver or passenger, and which side they are seated?

If people with disabilities need to park within the access aisle or buffer zone due to incompatible configuration, are they at risk of being ticketed?

Exhibit 5 – common buffer zone incursions, indicating not sufficient width



What colour are lines supposed to be: yellow or white and what are the pros and cons? Is standardizing line colour of AP something the City could accomplish in 2021?

Which is most visible? White connotes a crosswalk, even if it isn't one, and may be seen as more sacrosanct. However, yellow curbs have a meaning and yellow lines may be more effective. Stalls are

commonly delineated by white. What do relevant standards do? Best practice? Would there be value in changing the convention for accessible parking, to highlight the difference from regular stalls? How does line paint colour affect cost? Have all these and other considerations been thought through?

Figure 8, etc.

Need more figures for different situations, such as multi-stall situations such as may be found on Dallas Road near the breakwater and in parks or lots requiring more than two. Banks of three may be common.

Need Location Notes

Guidelines missing guidance on how to find logical places to put the AP stalls.

Should buffer zones or access aisles differ, depending on the width or parking stalls in a given lot. Some private parking lots have very narrow stalls, increasing the likelihood that others will overpark.

When parking lots or parkades require multiple accessible parking stalls, are they to be located in a row or distributed? For instance, should they be in the same location near an elevator but on different floors? Do parkades have safe ground floor wheeled pedestrian access and egress?

Limited Mobility Parking

This warrants a separate section with more detail. The proposal says:

3.13 The provision of limited mobility parking spaces may be considered in larger parking facilities where a sufficient supply of accessible and van accessible spaces are provided and/or where areas adjacent an access or elevator have additional width.

1. Limited mobility spaces should be provided with additional width above the typical requirement for 2,600 mm, where possible
2. Limited mobility spaces should be near the elevator, accessible ramp and/or building entrance
3. Limited mobility spaces should be identified with a sign for Limited Mobility access (see **Figure 8**).

What is Limited Mobility Parking?

Limited mobility vehicles users include persons with heart or respiratory problems or those with aids such as canes and crutches, who benefit from a parking space close to the facility entrance, but do not require a side access aisle to enter the vehicle. Vehicles are not required to display a placard to occupy these spaces, instead relying on motorists to self-regulate.

Response:

What legal status will limited mobility parking have?

Be clear who these are for and their status. Have minimum standards. If no intent to tie to a permit, then they are not worthy of mention in Accessible Parking Design Guidelines. They simply become discretionary preferred group reserved parking like mothers with young children.

Is it going to be like the two spots near the petting zoo signed for “Senior or parent with infant only”? No extra dimensions and not capable of being enforced? Does the City have an inventory of all this non-standard parking signage and when will it address that?



Senior or Parent with Infant parking, Petting Zoo



Accessible loading sign, Arbutus Way (no accessible route but to a concrete slab or the road)

There is also non-standard accessible parking signage on a road currently closed in Beacon Hill Park, and the periphery “accessible parking”, hastily implemented on the periphery during May 2020 internal road closures continues to be sub-standard, (as well as stall dimensions), being effected by wooden stakes in the ground and standing about knee-high. The policy need to put Engineering in charge – not Parks.



The CSA does not intend it to be enforceable:

The name and description come from CSA B651 - Accessible Building Design for the Built Environment. Their intent is for people without placards/mobility device but who have a need to be near an entrance. The full document is available free at: <https://www.csagroup.org/wp-content/uploads/B651-18EN.pdf>

Table 7
Recommended number of designated parking spaces
 (See Clause 9.4.1.)

Number of designated parking spaces (see Clause 9.4.1)	Number of designated accessible parking spaces (see Clause 9.4)	Number of designated limited mobility parking spaces (see Clause 9.5)
2-50	1-3	2-6
51-100	2-4	4-8
101-200	4-8	8-16
201-300	5-10	10-20
301-500	6-12	12-24
Over 500	6-12 plus 1-3 for every 100 spaces over 500	12-24 plus 2-6 for every 100 spaces over 500

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Feedback

1. Limited Mobility Spaces must be IN ADDITION TO actually accessible stalls with proper dimensions.
2. I don't think the proposed name is right - the stalls are for people who need to be closer. "Proximity Accessible"? Re-think the name, including accessibility organizations such as local ones and Rick Hansen.
3. First, refine the idea of who these are for and for what purpose, and then re-think the name, including accessibility organizations such as local ones and Rick Hansen Foundation, and involve Engagement for branding AND messaging to the public on appropriate use.
4. Define dimensions of limited mobility stalls. Such stalls should be wide enough to be able to bring a walker up to the vehicle or be located in places where there is a natural characteristic to provide a little more space. There should be a minimum width.
5. Regulatory issues must be ironed out. If they are just for people with placards, the City needs to ensure that they are enforceable.
6. If they are going to be part of the design Guidelines, which is what the City will put the rules relating to public parking in, the number should be stipulated. Otherwise it is just a possibility that may never happen.
7. If someone can't walk far, are parkades the place for these? Shouldn't they be distributed near destinations?
8. Any counts of accessible parking stalls should not include these, or should count them separately. They are not truly "accessible". I foresee the risk that such places will be used to create the wrong impression about the supply of truly accessible parking numbers.
9. The City should not leave the current accessible-in-name-only stalls where they are, in the prime spots and put the truly accessible parking elsewhere, for cost reasons. The truly accessible parking should be the most well-located, then this class.
10. Some such stalls should be equipped with bike parking feature to accommodate non-standard accessibility self-powered vehicles which are not incorporated in the latest amendments to bicycle parking and which is a reduction in scope from what was promised when accessible parking was dropped from the 2018 Schedule C amendment. (But the attempt to address disabled cycling parking should not stop there.)

Figure 8.

LIMITED MOBILITY PARKING SIGN



Questions/Comments:

1. The instruction reads, “Limited Mobility & Caregivers Only”. Are caregivers of people with limited mobility (or any caregivers) allowed to use the space without the individual? It can be read that way.
2. Is this icon generally recognized? How was it selected?
3. Be clear about whether the exclusivity indicated by the sign is enforceable and whether eligibility limited to holders of accessible permits. This may mean it needs the MVA sign plus an extra sign (Like Van Accessible) but (Limited Mobility or Proximity Accessible).

What status will **Limited Mobility Parking** have? It is written as permissive and may not happen. Will it be the same as mothers with babies parking in malls? A courtesy with no enforcement?

3.13 The provision of limited mobility parking spaces may be considered in larger parking facilities where a sufficient supply of accessible and van accessible spaces are provided

The way it is written requires judgment and is no guarantee. “sufficient supply” should be re-written to say “design guideline supply has been met” or “in excess of design guideline supply”

If this new class of space is introduced, its supply should also be prescribed and the combined minimum truly accessible spaces plus proximity spaces combined should be more in line with actual demand - estimated at 7%.

Is there a role for judgment of Planning Staff in this area? Given the difficulty in determining in advance all the categories of uses and the demand for accessible spaces they are likely to create, can Planning Staff be delegated appropriateness within a range? And can developers be rewarded for providing accessible parking, when it comes to other concessions from the City? But first, Planning staff would have to become knowledgeable about the dependence PWD have on private vehicles. To date,

their parking demand studies and support of parking variances demonstrates ignorance of the barriers to use of alternative forms of transportation that PWD face.

Next Steps

February - April 2021:

- **Staff to develop a Retrofit Strategy for existing public accessible parking WILL THIS BE IN TIME FOR BUDGET 2021? OR IS AN ALLOCATION MADE?**
- Develop Zoning Bylaw amendments for private accessible parking
- Where is mobility device and non-standard self-propelled vehicle parking? That was also dropped from the last Development Bylaw and was supposed to be picked up again with Accessible Parking for motor vehicles.

Parking lot of issues not addressed by this project

This project failed to address overall supply of City-supplied accessible parking outside of large lots and parkades. Major gap in scope. Project should not go to Council for approval until this gap filled. At very least, the gap should be pointed out. The supply of small lot and street parking is missing. I hope that

Council will be given an accurate map of where the street AP is and the limitations associated with the spots – an updated “Willows report”.

No section on lighting. Minutes of an AWG meeting indicated this will be included

Public information on what’s available – keeping it accurate and current and adding numbers (rather than just Yes/No for AP available)

Incentives for retrofitting private accessible parking

The ever-shrinking base of parking in both sectors and its effect on PWD.

Ensuring that non-compliant parking is addressed when alterations are made, in the same way other things must be brought up to Code.

Parks – ensuring that each park has accessible parking and accessible route to amenities. Standards relate to curb access but not other public areas. (Private Parking requirements address routes, but no public supplied parking, which may be to destinations other than buildings).

Accessible Bike parking

Mobility scooter parking and charging

Time of day restrictions or lifting curb restriction to open up more AP spots when needed

Drop-off, pickup zones which if increased could assist with getting very immobile people close to where they need to be. Can PWD use commercial loading zones?

Need a provision for temporary AP for special events, especially those that are likely to attract higher than normal PWD, or special events that remove parking in general.

Maintenance – put expected lifespan and inspection and maintenance schedule into both sector's rules.

We see nothing about residential parking for PWD in residential neighbourhoods. In other jurisdictions, one can apply to have a stall converted, upon production of documentation.