

Dear Mayor and Council

At this August 4 2022 COTW meeting, there are three development proposals which appear to under-serve people with disabilities.

Council:

- please direct or request staff to **include accessible parking in the data tables**, once the amended Schedule C is effective, identifying resident accessible, visitor accessible and one would hope at some future date, car-share accessible dimension
- please ask **how the one accessible unit will be allocated** (of 210 proposed units over the 3 proposals)– what is the market mechanism for ensuring that such units go to people who need them (I do not believe one exists)
- Please make **approval of any on-site car-share contingent on it being based in a stall of accessible dimension**, so that it may benefit all residents
- Please ask questions about whether transit credits benefit residents who cannot take traditional buses.

F.1 Rezoning Application No. 00793 and Associated Development Permit with Variances Application No. 00182 for 1030 Fort Street

Due to its zoning, there no parking is required so there will be no accessible parking. The implications are that many people with disabilities cannot live there, by design. This is not noted in the Accessibility Impacts Section, but it is a significant *impact*.

The report says, “a. Transportation Demand Management (TDM) programs to offset the proposed parking shortfall including the following

- i. car share memberships and usage credits for all residential units
- ii. three BC Transit eco passes for a minimum three-year term for the commercial retail unit
- iii. the provision of 48 long-term secure bicycle stalls (exceeding the minimum requirements in the Zoning Regulation Bylaw by 12) of which six are oversized for cargo bicycles “

I have been making the point for years that Transportation Demand Measures may work for able bodied people, but not people with disabilities.

- i. Car share does not work if locations are not close enough and if the on-site base stall is not wide enough to allow full door opening for transfer from wheelchair, use of a walker, or employment of a ramp.
- ii. BC Transit passes work for regular buses but I don’t think they work for HandyDART, with its substandard service level.
- iii. The bike parking MAY be suitable for wider, longer adapted bikes, but we don’t know whether the door to the storage room is accessible or the access aisles allow space for transloading.

F.2 Rezoning Application and Official Community Plan Amendment No. 00766 and Development Permit with Variances Application No. 00175 for 1693-1699 Fort Street

1. the building to be secured as rental in perpetuity
2. the provision of a **one-bedroom accessible unit**

3. one studio, one one-bedroom and two two-bedroom units secured as affordable for a minimum of ten years and allocated to median income households (or lower) as defined in the Victoria Housing Strategy.

While any accessible dwelling unit is positive, the report does not tell us whether the accessible unit is also affordable or explain why it is one bedroom. Staff do not track and report on accessible and adaptable units in proposals or built. **What mechanism is in place to match people who need an accessible unit with the rare one like that that may be built? If it's not social housing, there is no wait list or registry.**

"2 b. Secure the purchase of one fully electric car share vehicle, one electric vehicle charging station and one on-site parking stall for the car share vehicle all to the satisfaction and specifications of the car share organization, and public access to the parking stall, car share memberships for each of the dwelling units including a \$100 car share credit for each unit. "...

"2 f. Secure the provision of one accessible on-site parking stall. "

The car share value is a benefit that accrues to only those who can take advantage of it, and if the on-site stall is not based in an accessible-size unit, it is of no value to those who cannot use it because it is not accessible. That feels discriminatory.

There is no mention of mobility scooter parking/charging in this or any land use application today.

Having on accessible parking stall for one accessible suite means there will be no accessible visitor parking. The significant variance request will put parking demand higher than supply and when parking is scarce, non-compliant use of accessible parking increases.

F.3 Development Permit Application No. 00609 for 2659 Douglas Street

"Accessibility [sic – should be *Accessibility Impact Statement*]

No accessibility improvements are proposed beyond what is required through the *British Columbia Building Code*. The proposed courtyard and the pathways surrounding the proposed buildings are designed to be accessible. "

The Building Code does not require any accessible parking and the City doesn't yet, so even though the Data Table does not report it, it is unlikely that any accessible parking is provided despite the building housing 146 units.

Again, TDM will not benefit some people with disabilities.

Does the Sustainability program "subsidized transit program for residents" apply for residents who cannot take advantage of the regular transit system only, or can it be applied to HandyDART?

This is a typical parking section of a Data Table

Required

Proposed

Parking – minimum		
Residential	53	53
Commercial	25	25
Visitor	10	10

Sincerely, Robin Bayley

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