



December 1, 2016

Office of the Chief Medical Health Officer
Island Health Fort Royal Medical Centre
430- 1900 Richmond Avenue
Victoria, BC V8R 4R2

RE: Proposed Supervised Consumption Service at 2920 Bridge Street

Dear Dr. Stanwick,

I am writing on behalf of the Burnside Gorge Community Association (BGCA) in regards to the Supervised Consumption Services site proposed for 2920 Bridge Street.

While we applaud both the City and Island Health for responding to the current drug-related health crisis and moving forward with a harm reduction model, we consider the level of community consultation that has taken place in regards to this site woefully inadequate.

Island Health's own criteria for service location states that *"a reasonable community feedback process has to be undertaken before any exemption application can be made to Health Canada. This will provide members of the public and other community stakeholders with an opportunity to ask questions and have concerns addressed."* The BGCA does not believe that a two-week time frame between the media release on November 15th and the closing of a general survey on December 2nd constitutes *"a reasonable community feedback process."* We urge Island Health and City of Victoria to make no further decisions on this site until direct, full and honourable engagement with our community has taken place.

We also note that Island Health's Service Location Criteria requires *"an ability to integrate SCS with other complementary health or social services."* The Honourable Mayor Lisa Helps has echoed this stating that any proposed SCS would be *"alongside other health services ... and not a stand-alone location."* To date there has been no information presented to the community as to what, how, or by whom, complementary services would be delivered at this location.

We urge Island Health and the City of Victoria to take a much more holistic approach to the 2920 Bridge St site. Part of the planning needs to look at the impacts on the surrounding community, residential and commercial alike. The Burnside Gorge community is already experiencing the cumulative impacts of multiple facilities housing high risk populations, facilities that are arguably under-resourced and under-supported. The BGCA has been an active partner in Good Neighbour Agreements and groups which are intended to proactively respond to community impacts. Unfortunately we have found that this is not often the case and these agreements are ineffective at mitigating issues retroactively. We would like to see direct accountability to community built into facility leases from the outset in addition to formal agreements with community partners.



Evidence suggests that the areas immediately around supervised consumption sites will be negatively impacted. As stated above, we are struggling with a concentration of services/facilities that are under-resourced and over-crowded. The societal benefits of an SCS, which we support in principle, should not be disproportionately borne by the Burnside Gorge community. The survey on the Island Health website that describes possible "mitigations" for community concerns demonstrates an entirely insufficient set of tools to manage the negative impacts of an SCS. Mitigating and offsetting measures for the community need a complete re-evaluation.

As always in dealing with a crisis situation, a perceived lack of time for consultation results in facilities being put in place without proper planning of ongoing services required or attention paid to effective management of the ongoing effects to the surrounding neighbourhood. Burnside Gorge has experienced this time and time again. We contend that the only way Island Health and the City of Victoria can achieve acceptance of an SCS in Burnside Gorge is to first have a real, informed dialogue with us about the proposal and a strong commitment to doing whatever it takes to make this site successful in terms of both service delivery and community benefit.

Until all the parties involved can demonstrate a willingness and ability to address the serious neighbourhood challenges that currently exist and can provide evidence that a SCS site can be operated with minimal disruption to nearby businesses and residents, the BGCA cannot support this proposal for 2920 Bridge Street.

In closing, we would like to reiterate the need and benefit of our community's active and meaningful participation in the development of a project that will have an incredible impact on this neighbourhood and to have a voice in solutions for all our citizens. To that end the BGCA requests a meeting with VIHA and Victoria Mayor and Council at the earliest possible date pending Health Canada approval and well in advance of next steps regarding implementation of supervised consumption services in Burnside Gorge

Sincerely,

Avery Stetski
President

cc: City of Victoria Mayor & Council