



FAIRFIELD GONZALES
COMMUNITY ASSOCIATION
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June 13, 2022

Victoria Mayor and Council
1 Centennial Square
Victoria, BC V8W 1P6

Sent via email to mayorandcouncil@victoria.ca

Dear Mayor Lisa Helps and Council members,

RE: Bylaws for Accessible Parking Requirements: Zoning Bylaw Amendments
number 22-024 and 22-025

On behalf of the Fairfield Gonzales Community Association Board of Directors, I would like to express our appreciation to the City of Victoria for moving to introduce accessible parking requirements which were removed from the BC Building Code regulations in 2018.

We acknowledge that both the design and supply of accessible parking proposed in the draft amendments are a significant improvement for some housing forms and building locations and we look forward to them taking effect. In our pre-application work with rezoning applicants through the CALUC, we will bring the pending amendments to their attention. We note that Fairfield/Gonzales does not have or expect many commercial establishments that are large enough to require accessible parking under the draft Bylaw amendments.

However, we would like these amendments to be the best that they can be for the residents and visitors to Victoria and as such we have identified 10 gaps/areas of improvement that we would like you to consider.

1. Staff was charged with amending three bylaws in February 2021 (including Subdivision and Development Services Bylaw, and the Streets and Traffic Bylaw), but only one, the Zoning Bylaw, is being amended now. As such, the full picture is not presented, and it would be useful if, by the June 23 hearing, additional information could be provided to give a complete picture of what the next stage of amendments will cover and the policy decisions entailed, as well as when they will be introduced.
2. The draft amendments do not address the supply of accessible parking in zones where no residential parking is required, i.e., Old Town and several zones that have specific parking requirements that are separate from and less than Schedule C would require. This is a serious gap and represents a barrier to full participation in civic life because those who require accessible parking may not be able to use alternate transportation modes. Much of the housing



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- in our community, including single family homes, duplexes and garden suites, will not be affected by the amendments and will therefore not have a requirement for accessible parking.
3. The amendments do not enable people with disabilities to benefit from transportation demand measures that support parking variances that reduce overall parking supply. Even though this proposal will base accessible parking on the pre-variance general parking requirement, barriers to the use of car-share and bicycles persist. We fully appreciate new housing that features car-share options and bike storage. In fact, one such application for a multi-unit located on Cook Street applied to drastically reduce its parking requirements for cars, while continuing to feature car-share and bike parking options. However, we recommend that these draft amendments include a provision for any car-share located on the property being developed to be based on a stall that is of the same dimensions as an accessible stall. We also recommend a future exercise to review the bicycle parking rules in Schedule C, section 3.1, Bicycle Parking Specifications to consider mitigating barriers to allow room for adaptive bikes, transfer space, low-effort doors and long-term bike parking at grade.
 4. Similar to point 3, these amendments should address mobility scooter parking and charging, which has been an acknowledged need in previous staff reports. This is an important and valid transportation need. If it is not possible to include mobility scooter parking in these amendments, then we ask that the City address it in short order.
 5. There are some technical concerns about the accessible parking signage.
 - a. Since regular parking does not require signage, there are no general requirements for materials used and durability signage in the Zoning Bylaw.
 - b. To ensure clarity, the City should consider a prohibition against attaching other signage of general application to the accessible parking sign pole, as such additional signs may cause confusion and lead to unauthorized use of accessible stalls or grounds to contest a ticket.
 - c. The signage could be improved by supplying information on fines and how to report unauthorized use. Much off-street parking is out of sight and could create feelings of impunity for unauthorized users. Additional signage could help the current system of enforcement of off-street accessible parking. Regarding the design of the sign, we recommend that it be the same dimensions as Motor Vehicle Act signage and use a standard icon.
 6. The introduction of van accessible parking is welcome, and we observe many people using such stalls in Beacon Hill Park. However, the number of van accessible stalls will be lower than other CRD municipalities that have regulated van accessible parking, due to a minimum threshold for the first van accessible stall. Victoria is suggesting after six regular stalls, one van accessible, and after 25, the ratio is 25:1 or 4%. And while Sidney and Central Saanich has the same rate as Victoria, 4%, they require the 1st and 3rd accessible stall to be van accessible. Sooke requires all new accessible parking spaces to be van accessible.
 7. The policy, criteria and limits on delegation supporting the approval of variances relating to accessible stalls to staff should be disclosed to the public before the Bylaw amendments allowing the delegation are approved.



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8. Regarding Figure 2, all drawings except parallel parking depict the access aisle on the passenger side. The amendment should depict shared access aisles on both sides of the vehicle in accessible parking stalls. This can be accomplished in part by showing a shared access aisle configuration. Further, wording requiring varying the access aisle side where multiple accessible stalls are required should be added.
9. Regarding accessible parking rates in affordable housing units, we are concerned that the dwelling type most likely to house people with disabilities has the lowest rate of parking and thus, the lowest rate of accessible parking and accessible visitor parking. We recommend that due to the lowest regular parking base of this form of multi-unit developments, the rate of accessible resident and visitor parking be higher.
10. While we applaud the City's proposed supply rate for accessible spots at hospitals (5% vs BC Building Code's 1%) and assisted living facilities (15% vs the code's 1%), we recommend the City also review medical offices, which are identified in the medical office category in Schedule C, but currently require the same accessible parking rate as other commercial uses, as they warrant a higher supply due to the client/patient profile/demand.

We hope that the City will take measures to ensure that the draft Bylaw and upcoming hearing are communicated to residents who use accessible parking directly or through friends, family and caregivers, and that the information is provided in a readily understood form. Those with disabilities often use information sources other than mainstream media, which can be inaccessible to them.

The information is complex and not always presented in a format accessible to people with vision loss and different mental capabilities. Producing a detailed overview explaining what types and locations of buildings will be subject to the increased supply rates (and which will not) and providing detailed verbal descriptions of the drawings would be beneficial. Currently, one must read the amendments in conjunction with existing Schedule C to understand the changes. A suggestion could be to provide a marked-up version of Schedule C with changes indicated.

The FGCA will use its communication channels to publicize the public hearing and subject matter to our residents. We therefore suggest that accommodations are made for the large number of wheelchair users who may attend this and other public hearings, as there may not be sufficient accessible parking in the vicinity of City Hall.

We hope the City will follow through with a public awareness campaign after the amendments are effective, to explain the new designs and the importance of accessible parking to people with disabilities to the general public. In Fairfield Gonzales, we see unauthorized use of public, accessible waterfront stalls and therefore understand that public awareness and compliance needs to improve.

When these amendments are effective, they will become an important component of accessible housing, to enable our residents to age in place and to make our community accessible to everyone. We look forward to providing input on the accessible housing policy work the City has planned for later this year.



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Sincerely,

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On behalf of the Fairfield Gonzales Community Association Board of Directors
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CC

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