

Accessibility Working Group (AWG) Consultation Report

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:

- 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.
- 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.

Submitted by: Linda Bartram, AWG chair