



November 29, 2019

Honourable Shane Simpson
Minister of Social Development and Poverty Reductions
Framework for Accessibility Legislation
PO Box 9058 Stn Prov Govt
Victoria, BC V8W 9E2

Dear Honourable Shane Simpson:

Re: Consultation on Framework for Accessibility Legislation

Thank you for the opportunity to provide input to the Province of British Columbia in consideration of new accessibility legislation.

The City of Victoria is encouraged by the leadership of the Province to make British Columbia a better place to live, work and visit for all people with disabilities. New legislation can support greater independence of people with disabilities, contribute to new opportunities for meaningful employment, and enable full participation in our communities.

The City is nearing completion of our own Accessibility Framework to systematically remove and prevent barriers in our community. The Framework and associated Council Policy is intended to integrate accessibility considerations and planning across all city infrastructure, operations and services. Through the involvement of people with lived experiences, including the City of Victoria Accessibility Working Group, the Victoria Disability Resource Centre and SPARC BC, the City has identified a number of ways that our programs, infrastructure and services can prevent and remove barriers in our community. In support of these objectives, the City will be launching a new Accessibility Program in 2020 to provide support for planning, action, training and capacity building to deliver year-on-year accessibility improvements.

The City's approach to accessibility planning and considerations aligns with the Provincial Framework to empower persons with disabilities and the broader community to work together to identify, remove, and prevent barriers. We have summarized our key commitments and focus areas of our draft Framework below.

Statement of Commitment

- The City of Victoria is committed to identifying, preventing and removing barriers across its services, programs and infrastructure, in order to benefit the community in a way that respects the dignity and independence of people with disabilities.
- The City of Victoria values the contributions from all citizens and believes that diversity strengthens the community. The City recognizes the essential knowledge and perspectives of people with lived experience and

commits to making sure those voices are part of community planning and decisions.

- The City of Victoria will ensure that staff and Council are aware of their roles in influencing accessibility for people with disabilities and accept their responsibility to support positive city community attitudes.

The City's Accessibility Framework is broken down into three key focus areas that closely align with the business and structure of City work and planning.

1. **Built Environment:** Promoting accessibility as a collective good and a key component in urban policy, design, planning and development. This focus area includes the systematic reduction of physical barriers across transportation and mobility, facilities and public spaces.
2. **Government and Services:** Removing barriers and increasing participation in local government programs, services, information and public decision making. This also includes utilizing our authority to regulate and enforce municipal bylaws to support people with disabilities.
3. **Capacity and Collaboration:** Develop increased corporate capacity to deliver professional services in a more accessible manner. Develop partnerships and advocate to other levels of government and community stakeholders for change. Collaborate with key community partners and set a strong example for community accessibility attitudes and awareness.

Input to the Framework for Accessibility 2019:

The City is grateful that the Province is taking this important leadership role to develop new laws, standards, and policies to better support people with disabilities to live with dignity and to meaningfully participate in their communities. The City recognizes that British Columbians have a higher prevalence of disabilities than the rest of Canada (Canadian Survey on Disabilities, 2017). In response to the legislation development engagement process, City staff have provided some comments for consideration:

Advocacy on behalf of People with Disabilities:

The City encourages the Province to take a lead role in advocating for people with disabilities. This can be accomplished by supporting public sector agencies and municipalities to integrate accessibility into all planning, undertaking public education and awareness campaigns, and involving people with lived experiences in the decision making process. More formal forms of advocacy could also be considered. For example, in Alberta there is an Office of the Advocate for Persons with Disabilities. This office represents the rights, interests and well-being of people with disabilities in the Province. By building relationships with the community, the Advocate learns about and brings key issues and concerns to the government with recommendations.

Data Collection at Provincial and Local Scale:

Currently, the only available data related to accessibility and disabilities within our community is the 2017 Canadian Survey of Disabilities. The Province and its municipalities would benefit from up to date, accurate, localized statistics to help make more informed policy and investment decisions. Leadership from the

Province to require and enable enhanced data collection and dissemination in advance of the next Federal Census is encouraged.

Development of new Standards & Review of Regulations:

The City is supportive of the five areas that the Province has identified in its Framework including *service delivery, employment, built environment, information and communication, and transportation*. There is an opportunity for the Province to continue to show accessibility leadership through its “ownership” and setting of standards and regulations within British Columbia, thereby avoiding inconsistency between municipalities and confusion for end users.

The Province should consider reviewing and updating existing legislation or regulations. Some examples we have heard from our recent consultation efforts include:

- Employment – Training programs, employment grants and other social innovation models to support meaningful employment opportunities at all levels of government and in the private sector are welcomed are welcomed.
- Accessible and Adaptable Housing – Access to affordable and accessible housing options were a key theme identified by Victorians during our consultation process. Providing funding and support for design and construction of affordable and accessible housing. Adaptive housing uses an approach where buildings can be modified later at minimal cost in order to meet the changing needs of occupants if and when their abilities change.
- Building Code – Continuing to advance accessibility standards as a part of BC Building Code updates and consideration of any retrofit code.
- Public Transit & Transportation Options – Improving accessibility of conventional transportation networks (eg: public transit / ferries). Our residents struggle to find dependable, accessible transportation options. There is widespread community support for making substantial investments in conventional and custom public transit to support mobility options for people with disabilities. The Province could also do more to support the expansion of accessible vehicle fleets that are operating and serving communities in the form of ride-hailing or taxis.

Development of Tools and Resources for Municipalities:

Victoria is one of the first municipalities in British Columbia to develop a comprehensive Accessibility Framework and Policy. We are excited to begin implementation with a goal to continuously improve our approach to reducing barriers and preventing new barriers in the capital city. Staff welcome resources such as design specifications, communications and engagement guidelines, and evaluation criteria to help develop and implement new approaches to service delivery that is more inclusive and supportive for people with disabilities.

Funding:

New grant programs to support municipalities retrofitting the built environment, parks and public buildings would enable local governments to achieve their accessibility objectives sooner. Many communities are making investments to

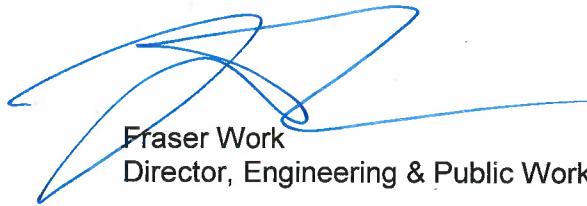
retrofit buildings, crosswalks, parks, pathways and the built environment to improve safety and reduce barriers to accessibility. Due to the City's limited resources and competing priorities, addressing accessibility barriers requires applying prioritization tools to ensure projects are fairly assessed to serve the needs of residents.

Summary:

The City of Victoria applauds the Province of British Columbia's leadership and looks forward to the development of legislation that will improve accessibility for all British Columbians. Providing municipalities with time to prepare and comply with new legislation and offering comprehensive programs to help local governments identify, implement and track accessibility investments are important foundations to support the success of this initiative.

Should you have any further questions, please contact Sarah Webb, Manager Transportation Planning & Development at 250-361-0482.

Best regards,



Fraser Work
Director, Engineering & Public Works