

October 1, 2007

Ms. Ulli Watkiss
City Clerk
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

Dear Ms. Watkiss:

At its meeting on Wednesday, September 19, 2007, the Commission considered the attached report entitled, "Province of Ontario's Draft Initial Proposed Transportation Accessibility Standard." Also attached is a copy of the final letter dated September 24, 2007 from Gary Webster, TTC Chief General Manager to Minister M. Meilleur, Minister of Community and Social Services.

The Commission adopted the Recommendation contained in the report, as listed below:

"It is recommended that the Commission:

1. Request the Minister of Community and Social Services defer finalising and approving the *Initial Proposed Transportation Accessibility Standard* until a common framework and set of definitions have been established for all of the accessibility standards currently under development, noting that:
 - the draft transportation standard is being brought forward in advance of the development of a number of broader accessibility standards that will be common for all sectors of the community;
 - this approach has created significant risks and uncertainties regarding the harmonisation of standards and, ultimately, the achievability of providing affordable accessible transit services that balance the needs of all transit riders;
 - the recommended delay in finalising the transportation standard will not have any effect on the TTC's plans to achieve full accessibility on the system in advance of the 2025 requirement established in the Accessibility for Ontarians with Disabilities Act, 2005 (AODA);
 - the TTC's current plans, as outlined in the annual accessibility reports to the Commission, and posted on the TTC website over the past four years, are anticipated to achieve the AODA goal by making bus services accessible by 2010, subway stations accessible by 2020 and light-rail systems accessible by 2024;
2. Endorse the staff position that the standard should be substantially revised, as outlined in this report and the attached submission to the Minister of Community and Social Services on the draft *Initial Proposed Transportation Accessibility Standard*, noting that:
 - the Province of Ontario is developing standards for implementing the AODA, both on a "common standards" basis to apply to all sectors in the province, and on a sector-

specific basis for activities such as transportation. The TTC will be required to meet both the common standards related to such things as customer service and the built environment, and sector-specific standards for transportation;

- TTC staff have participated in the Provincial standards development process but, as reported to the Commission in July 2006, continue to have significant concerns about the way in which the draft transportation standard has been developed, the lack of information and assessment of service implications, and the costs associated with implementing the proposed standard;
 - many aspects of the current draft transportation standard are very unclear with respect to requirements but, based on staff's initial best estimate of the implications of the transportation standard alone, it is estimated that the added cost to the TTC of the proposed standard will be in the order of \$60 million in one-time capital costs and an increase of \$1.5 million to \$2.5 million per year in ongoing operating costs;
 - the Province is expected to impose additional requirements through the creation of common standards, but the costs and operational implications of these and therefore, the full impact of Provincial standards, may not be known until 2009;
 - the Province has not committed to fund the accessibility improvements outlined in the TTC's ongoing Accessibility Plan or the various accessibility improvements which will be imposed on the TTC and the City of Toronto by the accessibility standards currently being developed;
 - TTC staff will continue to work with transit service providers, transit and municipal associations, and other organizations with an interest in public transportation during the standards development process; and
3. Forward this report to the City of Toronto, the Ontario Ministries of Community and Social Services, Transportation, and Public Infrastructure Renewal, the Ontario Human Rights Commission, and the Greater Toronto Transportation Authority.

The foregoing is forwarded to City of Toronto Council, through the Planning and Growth Committee for information.

Sincerely,

Vincent Rodo
General Secretary
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Attachment