BILD | BUILDING A GREATER GTA
Building Industry and Land Development Association

March 27, 2017

Mayor John Tory and members of City Council
100 Queen Street West
Toronto, ON
M5H 2N2

Dear Mayor John Tory and members of City Council,

RE: City Council, Agenda Item: PG: 18.5 Technical Amendments to By-law 569-2013

With more than 1,450 member-companies, BILD is the voice of the land development, home building and professional renovation industry in the Greater Toronto Area and Simcoe County. Our industry is essential to the City of Toronto's long-term economic strength and prosperity. In 2015 alone, the residential construction industry in Toronto generated over 74,000 on-site and off-site jobs in new home building, renovation and repair – one of the City's largest employers. These jobs paid $4.3 billion in wages and contributed $10.9 billion in investment value to the local economy.

On behalf of the members of the BILD Toronto Chapter we would like to express our concerns for the proposed technical amendments to by-law 569-2013. In these amendments, the City is increasing its dimensions for its accessible parking spaces. Most notably and problematic, the length of an accessible parking space is proposed to increase from 5.6m to 5.9m. Regular parking spaces would continue to be 5.6m in length. Furthermore, no transition was included for existing development projects. These changes are presented as technical amendments to align with the *Ontarians with Disabilities Act* and the *Accessibility for Ontarians Disabilities Act.* However, upon further review by our technical consultant-members, our industry believes that the City has taken greater liberties in its proposal than what is required from the Act *(see attached BA Group memo).*

BILD members were not consulted on these changes to the by-law in advance of this report being heard at the Committee level. A small BILD working group met with City staff following the Committee meeting on March 22nd. As expressed at our meeting, for existing development projects in the pipeline the effect of applying these new dimensions could trigger a flurry of new minor variance applications, where possible, or require a complete re-design of parking garages. For new applications, from a design perspective, we believe it is very problematic to apply different parking stall lengths, varying the lengths of the two types of parking stalls creates inefficient parking garage layouts.

These are unanticipated changes for our members and as such we believe it is reasonable for Council to:

- Include transition in order to maintain service delivery timelines for approvals and avoid re-working development plans that have undergone significant review.
- Direct for consistent parking stall lengths, by applying a 5.6m length for accessible and regular parking stalls. This change would be in conformity with the ODA standards.
- Employ the alternative calculation methodology, presented by BA Group *(see second attached BA Group memo).*

We thank you for the opportunity to make comments and should you have any questions or concerns, please feel free to contact the undersigned.

Sincerely,

Danielle Chin, MCIP, RPP
Senior Manager, Policy & Government Relations BILD

CC: Kerri Voumvakis, Director, Strategic Initiatives, Policy & Analysis, City of Toronto
Gary Switzer, BILD Toronto Chapter Chair
BILD Toronto Chapter members

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March 20, 2017

Kerri Voumvakis
Director, Strategic Initiatives, Policy & Analysis
City of Toronto Planning Division

RE: Proposed Amendments to By-law 569-2013, Section 200.15, Accessible Parking

Dear Ms. Voumvakis:

At its meeting on February 23, 2017, the City of Toronto Planning and Growth Management Committee recommended, amongst other things, that changes be made to *Section 200.15 "Regulations Applying to Accessible Parking Spaces"* of Zoning By-law 569-2013, regarding the length, width and number of accessible parking spaces to be provided as set out in the ***Report for Action*** from the City Planning Division to the Planning and Growth Management Committee, dated, January 23, 2017.

The ***Notice of Public Meeting*** document that was issued by the City Clerk's Office prior to the February 23, 2017 Planning and Growth Management Committee meeting stated that:

"The amendments to By-law 569-2013 also include changes to Section 200.15 to bring by-law 569-2013 in line with the provincial requirements for accessible parking in the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c.11 and amending Regulation 191/11."

The summary section of the January 23, 2017 **Report for Action** from the City Planning Division to the Planning and Growth Management Committee stated that:

"The report proposes amendments to Section 200.15 of Zoning By-law 569-2013 to implement changes to the accessible parking regulations to ensure the by-law regulations are consistent with the Provincial Accessibility for Ontarians with Disabilities Act and amending Regulation 191/11."

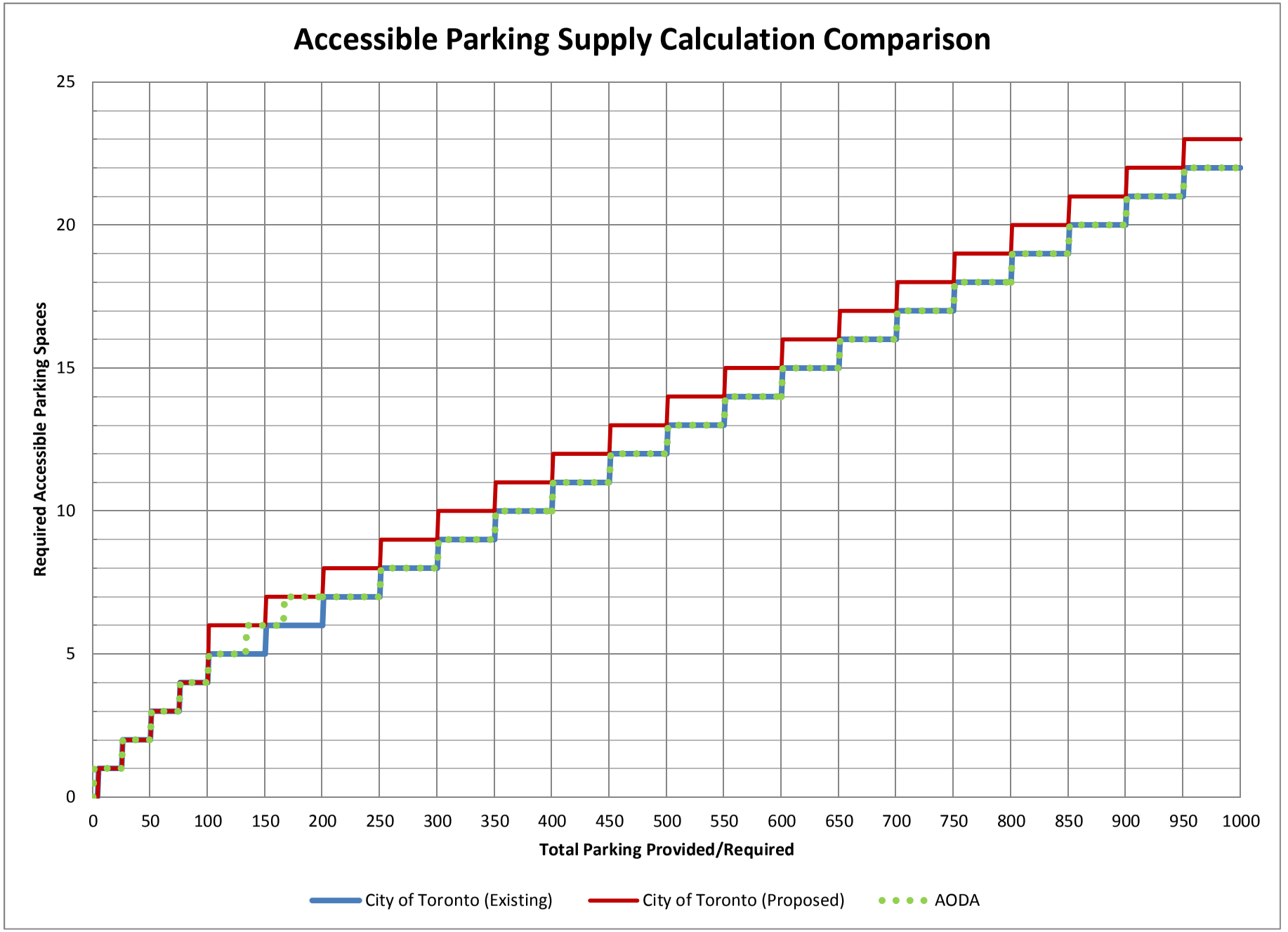
While we commend City staff for undertaking this initiative, unfortunately, the proposed modifications to accessible parking spaces does not bring By-law 569-2013 "***in line with***" nor make it "***consistent with***" the Provincial Regulations, as per the stated original purpose of the proposed modifications. In fact, the proposed modifications will result in the Zoning By-law accessible parking dimensions and provisions being just as inconsistent with the Provincial Regulations as they are currently.

Table 1 lists and compares key accessible parking space criteria for the current ZB 569-2013, the proposed ZB 569-2013 modifications and the Ontario Provincial regulations, enacted under the Accessibility for Ontarians with Disabilities Act (AODA).

Commentary on the individual issues follows, with examples illustrating areas of concern.

TABLE 1 ACCESSIBLE PARKING SPACE CRITERIA - COMPARISON

Criteria	City of Toronto ZB 569-2013		Ontario Provincial Reg. 191/11	ZB Modification Consistent with Provincial Reg. 191/11
	Current	**Proposed**		
Accessible Perpendicular Parking Space - Width	3.9m + No Access Aisle	3.4m + 1.5m Access Aisle	Type A (50% of Requirement) 3.4m + 1.5m Access Aisle Type B (50% of Requirement) 2.4m + 1.5m Access Aisle	No Requires all accessible parking spaces to be provided as if they were the Type A larger width.
Accessible Perpendicular Parking Space - Length	5.6m	5.9m	Not Specified (Permits the length of an accessible parking space to match the length of a municipality's standard parking space)	No Requires the length of an accessible space to be longer than a standard parking space.
Accessible Parallel Parking Space - Width	3.9m + No Access Aisle	2.6m + 1.5m Access Aisle	Type A (50% of Requirement) 3.4m + 1.5m Access Aisle Type B (50% of Requirement) 2.4m + 1.5m Access Aisle	No
Accessible Parallel Parking Space - Length	5.6m	7.1m	Not Specified (Permits the length of an accessible parking space to match the length of a municipality's standard parking space)	No Requires the length of an accessible space to be longer than a standard parking space.
Required Number of Accessible Parking Spaces	1 accessible space per 25 required parking spaces or part thereof for the first 100 required spaces **and** 1 accessible parking space per 50 required parking spaces or part thereof in excess of 100 required spaces	1 accessible space per 25 required parking spaces or part thereof for the first 100 parking spaces **and** 5 accessible spaces for the first 100 required parking spaces **plus** 1 accessible parking space per 50 parking spaces or part thereof in excess of 100 required parking spaces	4% of the total parking spaces (rounded up to the nearest whole number) shall be accessible parking spaces for to first 100 spaces provided. 1 accessible parking space **plus** an additional 3% of the total parking spaces (rounded up to the nearest whole number) shall be accessible parking spaces when between 101 and 200 total parking spaces are provided. 2 accessible parking spaces **plus** an additional 2% of the total parking spaces (rounded up to the nearest whole number) shall be accessible parking spaces when between 201 and 1,000 total parking spaces are provided 11 accessible parking space **plus** an additional 1% of the total parking spaces (rounded up to the nearest whole number) shall be accessible parking spaces when between more than 1,000 total parking spaces are provided.	No Differences between the existing City formula, the proposed formula, and the Ontario regulation's formula are illustrated on the attached chart.


Accessible Parking Supply Calculation Comparison
Required Accessible Parking Spaces
0
5
10
15
20
25
0
50
100
150
200
250
300
350
400
450
500
550
600
650
700
750
800
850
900
950
1000
Total Parking Provided/Required
City of Toronto (Existing)
City of Toronto (Proposed)
AODA

Accessible Parking Spaces – Width

Accessible parking spaces, under the AODA, fall into two 'types'. "Type A" spaces are 3.4m in width, designed to be "van accessible" and permit the side loading of accessible vehicles. "Type B" spaces are 2.4m in width and are designed for the use of those with mobility issues that require proximity to entrances/exits but do not require extra parking space width. Both "types" of spaces are required to be adjacent to an accessible aisle 1.5m that is wide. The AODA permits the required accessible parking supply to be split 50/50 between the two types of spaces (i.e., if 6 accessible spaces are required, 3 can be "Type A" and 3 "Type B").

The proposed changes to the by-law would require that all accessible parking spaces in the City of Toronto be sized as a "Type A" space. We are not aware of any technical studies which indicate that the 50/50 mix of "Type A" and "Type B" spaces required by the AODA is deficient. In fact, it has been our experience that most vehicles parked in accessible parking spaces do not require the additional width.

The impact to development of the proposed change is significant. The current width of 3 City of Toronto parking spaces (the typical number of spaces that fit within a typical structural grid in an above- or below-grade parking structure) is 7.8m plus the width of adjacent columns. Three typical spaces can be replaced with 2 AODA-compliant accessible parking spaces (3.4m "Type A" + 1.5m aisle + 2.4m "Type B" = 7.3m). Replacing 3 typical parking spaces with 2 proposal-compliant accessible parking spaces results in a required width of 8.3m. This exceeds the typical structural grid used in above-grade or below-grade parking facilities and may require structural changes near accessible spaces. Carrying this wider module through other parking levels may result in a more inefficient parking structure, higher building costs, and larger building footprints.

Accessible Parking Spaces – Length

The AODA specifies the width of accessible parking spaces, but does not specify the length. It is our understanding that this was specifically omitted from the Province's legislation such that the accessible parking space dimensions could be easily integrated into local zoning by-laws, which often have different parking space length and drive aisle width requirements. It also allows for parallel parking spaces to respond to the requirements of municipalities without additional regulation.

The proposed changes to Section 200.15 of By-law 569-2013 include changing the length requirement for a perpendicular accessible space to 5.9m from 5.6m (the typical length of a City of Toronto perpendicular stall), a difference of 0.3m. Parallel accessible stalls are required, under the proposed changes, to be 7.1m in length whereas typical City of Toronto parallel parking stalls are only 6.7m in length (a difference of 0.4m).

The additional length of a parking stall does not offer significant advantages to the loading and unloading of passengers from accessible vehicles. Rear loading vehicles would still need to utilize a significant portion of the drive aisle to load/unload passengers regardless of space length. Attached is an information sheet from an accessible vehicle retrofit provider. The ramp length for one of their installations is approximately 45" (or 1.14m). If this was fitted on the back of a 2012 Dodge Caravan (a 95th percentile design vehicle with a length of 5.15m typically used for this purpose) the total length for a rear loading vehicle with the ramp deployed would be 6.29m. Application of standard parking space design principles would require the provision of a 0.3m (1 foot) buffer in front of the vehicle which would result in a total parking space length of 6.59m. The provision of additional length within the stall would not provide relief to this condition, as a user loading into the vehicle would be positioned within the drive aisle for a perpendicular space. It should be noted that the additional length is inconsistent between the perpendicular and parallel parking spaces (+0.3m vs +0.4m).

There are, however, significant impacts to structured and surface parking facilities by lengthening perpendicular accessible spaces to 5.9m from 5.6m. An additional 0.3m would require that typical parking spaces opposite the accessible spaces (those on the other side of the drive aisle) would need to be moved to permit the 6.0m drive aisle required under the bylaw. This has three unintended impacts:

1) Drivers, travelling down the drive aisle, would see the 6.0m aisle "jog" to the side as they travelled, resulting in a less safe condition within the parking area or;

2) Parking spaces opposite the barrier free spaces may become shorter (5.3m in length) which would require regulatory relief. Without relief, all parking spaces within the impacted zone would be forced to shift (with parking spaces also shifting the entirety of the parking area) or resulting in the creation of unusable space within the parking area or;

3) If structural grids could not be adjusted to accommodate the shifts required by the longer spaces, some parking spaces might violate the City's "obstruction rule" within the By-law (200.5.1.10 (D)), resulting in the need to seek relief from the rule through a variance or Site Specific By-law.

Accessible Parking Spaces – Supply

As noted in the attached chart, the proposed rate of supply for accessible parking spaces differs from the Ontario regulations put in place by the AODA. Accessible parking is supplied at a rate dependent upon the proposed overall parking supply. The ratio proposed by the City seeks to simplify the calculations required by the Ontario regulations.

In setting the ratio for parking supplies of 100 spaces or greater at "5 plus 1 per 25 spaces or part thereof in excess of 100", the City requires one more parking space than the AODA for most larger parking areas.

Other Municipalities within the GTHA

It should be noted that other municipalities within the GTA have adopted the accessible parking requirements of the Provincial regulations in whole, including:

- City of Mississauga
  - Has adopted Type A and B parking stall widths
  - Parking stall length of 5.2m matches standard stall length of 5.2m
  - Has adopted accessible parking supply rates

- City of Brampton
  - Has adopted Type A and B parking stall widths
  - Parking stall length of 5.4m matches standard stall length of 5.4m
  - Has adopted accessible parking supply rates

- Town of Oakville
  - Has modified Type A (3.65m wide) and B (2.7m wide) parking stall widths
  - Parking stall length of 5.7m matches standard stall length of 5.7m
  - Has adopted accessible parking supply rates

- City of St. Catharines - Has adopted Type A parking stall widths
  - Parking stall length of 5.2m matches standard stall length of 5.2m
  - Has adopted accessible parking supply rates

We note that the length of the accessible parking spaces in the foregoing examples are less than the proposed City of Toronto accessible parking stall length. In fact, the lengths of accessible parking spaces in Mississauga, Brampton and St. Catharines, in particular, are quite a bit less than the proposed City of Toronto accessible parking stall length.

We also note that it has been our experience that no other municipality in the GTHA has an accessible parking space length that is different than the municipality's standard parking space length. These include:

- City of Vaughan
- Town of Richmond Hill
- City of Markham
- City of Pickering
- City of Hamilton

Examples

Appended to this report are a few examples of projects that BA Group is currently or has recently been working on. Many constrained sites will struggle to meet the requirements set out in the City's proposal. A summary table is included below:

TABLE 2 EXAMPLE PROJECTS & PROPOSAL CONFLICTS

Address	Conflict with Proposal	Status
1327 Queen Street East	Perpendicular stall length	Final site plan application submitted; pending staff comments.
2301-2315 Danforth Ave	Perpendicular stall length	Building designed, submitted for SPA.
897-899 Queen Street East	Perpendicular stall length	Building designed, submitted for SPA.

Based on the foregoing, the proposed modifications to the accessible parking space criteria are not in line with, nor are they consistent with, the Provincial regulations. In fact, there does not appear to be any technical basis or rationale for proposing changes to the City of Toronto accessible parking space which are different from those criteria in Provincial Regulation 191/11.

The currently proposed "non-harmonized" changes to accessible parking spaces will result in many unintended consequences, including;

- Inefficient parking configurations which will lead to more space being required for the same number of parking spaces and increased construction costs which will be passed through to parking owners and parking patrons;

- More difficulty in developing small and narrow sites;

- More difficulty in locating accessible parking spaces close to a barrier free entrance; i.e., wider spaces that do not fit within typical column grids pushes the accessible parking spaces further away; and,

- Multiple challenges through the Zoning By-law Amendment and Committee of Adjustment processes.

We are supportive of harmonizing the accessible parking space criteria in the City of Toronto Zoning By-law 569-2013 with the Provincial regulations. However, the criteria of Provincial Regulation 191/11 should be adopted, as is, such that Zoning By-law 569-2013 will truly be ”in-line with” and “consistent with” the Provincial regulations as intended.

We would appreciate your review of the foregoing and look forward to the opportunity to discuss our findings in more detail.

Sincerely,
BA Consulting Group Ltd.





Douglas J. Hall
Principal

Thomas F.C. Woodhall, P.Eng.
Associate

CC:
Danielle Chin, BILD Toronto
Paula Tenuta, BILD Toronto
Tony Yates, BA Consulting Group Ltd.
Brian Haley, City of Toronto
Klaus Lehmann, City of Toronto
Mario Angelucci, City of Toronto
Kerri Unger, City of Toronto
Ellen PEnner, City of Toronto
Leona Savoie, Hullmark Developments
Gary Switzer, MOD Developments

Attachments: Braunability Dodge Power Rear Entry info sheet; architectural plans for 1327 Queen St. East, 2301-2315 Danforth Ave., and 897-899 Queen St. East.

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Dodge Power Rear-Entry

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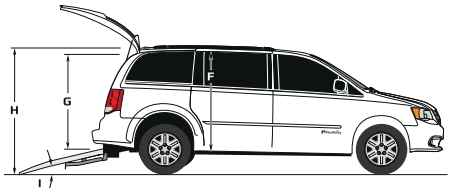



Dimensions

All dimensions are for reference only.

Lowered Floor Length - Long Option	A	87"
Lowered Floor Width	B	31"
Ramp Width (Usable Clear Opening)	C	30"
Ramp Length (Power)	D	45"
Distance Between 2nd Row OEM Flip & Fold Seats (Unfolded)	E	7"
Distance Between 2nd Row Aftermarket Bucket Seats	E	21"
2nd Row Wheelchair Location Interior Height	F	57"
Entrance Height	G	54"
Overall Height (Hatch Closed - with Roof Rails)	H	75.5"
Overall Height (Hatch Closed - without Roof Rails)	H	73"
Ramp Angle	I	11°

Due to manufacturing tolerances both with the OEM vehicle and the conversion components, all dimensions may vary slightly from those shown.

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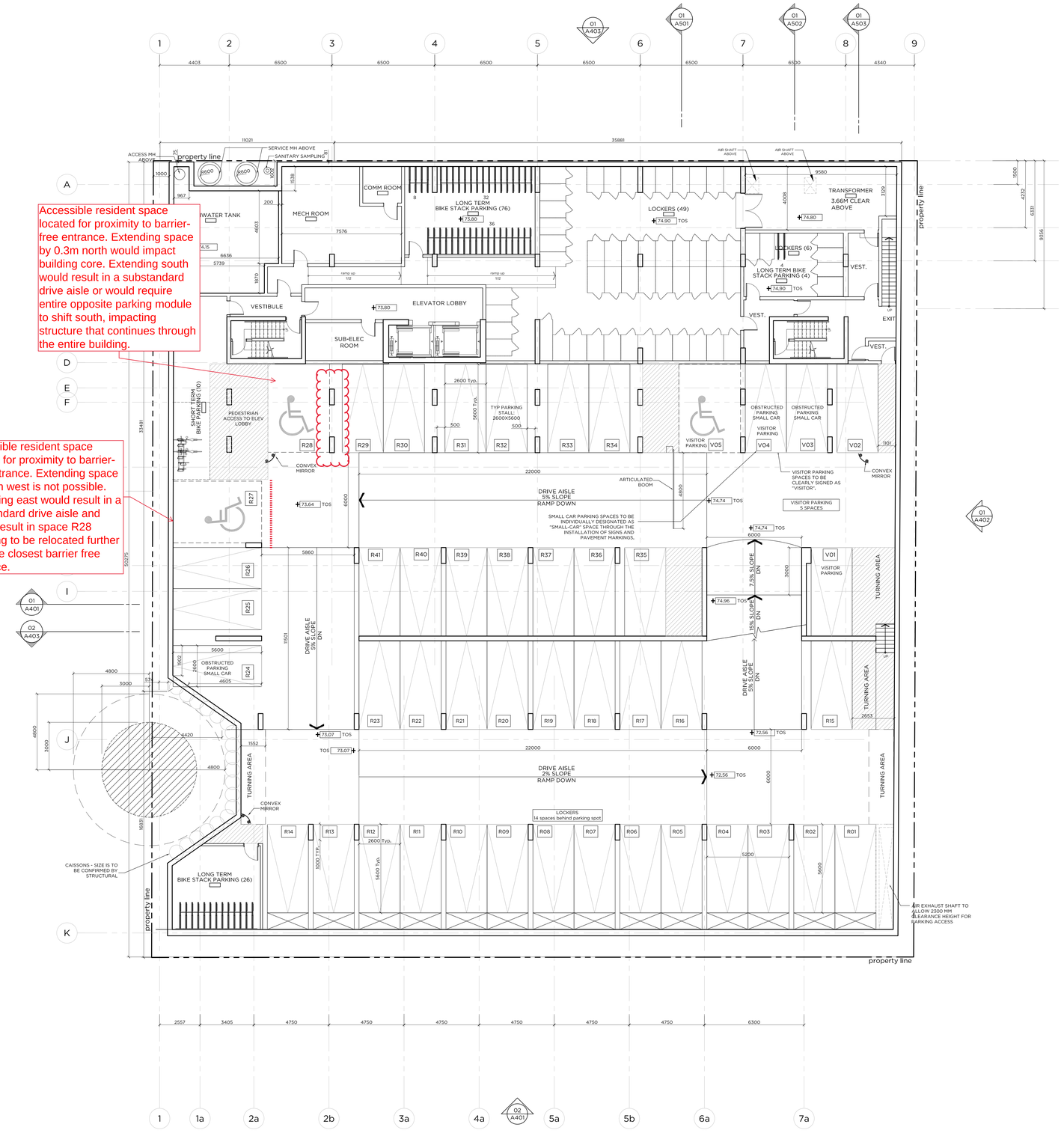
1327 Queen Street East



NOTE:
FOR SITE SERVICING & GRADING REFER TO DRAWINGS PREPARED BY COLE ENGINEERING

FOR LANDSCAPE & EXTERIOR LIGHTING REFER TO DRAWINGS PREPARED BY MBTW

REFER TO DRAWING A100 AND A201 FOR ADDITIONAL SITE NOTATIONS

TYPICAL PARKING SPACES ARE 2.6m X 5.6m. SPACES WITH ADJACENT OBSTRUCTIONS OF A DEPTH GREATER THAN 1m TO HAVE A TYPICAL ALLOWANCE OF 0.3m FROM PARKING SPACE.

ALL VISITOR PARKING SPACES TO BE CLEARLY SIGNED AT THE FRONT OF EACH SPACE AS "VISITOR"

ALL SMALL CAR PARKING SPACES TO BE CLEARLY SIGNED AT THE FRONT OF EACH PACE AS "SMALL CAR ONLY"

RESIDENTIAL
BIKE PARKING TYP.:

"SHARK UP" BY MADRAX.
- THREE, FIVE, SEVEN OR NINE HORIZONTAL SPACES PER UNIT



- VERTICAL DIMENSION FOR ALL AT LEAST 1.9M

RESIDENTIAL
BIKE PARKING TYP.:

STACK BIKE STORAGE BY MADRAX.
- 8 BIKE CAPACITY WITH ADD-ON CAPACITY, FREE STANDING



- VERTICAL DIMENSION FOR ALL AT LEAST 2.08M

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ISSUED RECORD

20140204	ISSUED FOR RZ
20150415	ISSUED FOR SPA
20151014	SPA RE-SUBMISSION
20151123	SPA RE-SUBMISSION
20151221	SPA RE-SUBMISSION
20160328	SPA RE-SUBMISSION
20160602	SPA RE-SUBMISSION
20160823	SPA RE-SUBMISSION

REVISION RECORD

20150415	Revisions to RZ

NORTH

405-317 ADELAIDE STREET WEST
TORONTO CANADA M5V 1P9
+1 416 599 9729
WWW.RAWDESIGN.CA

13020

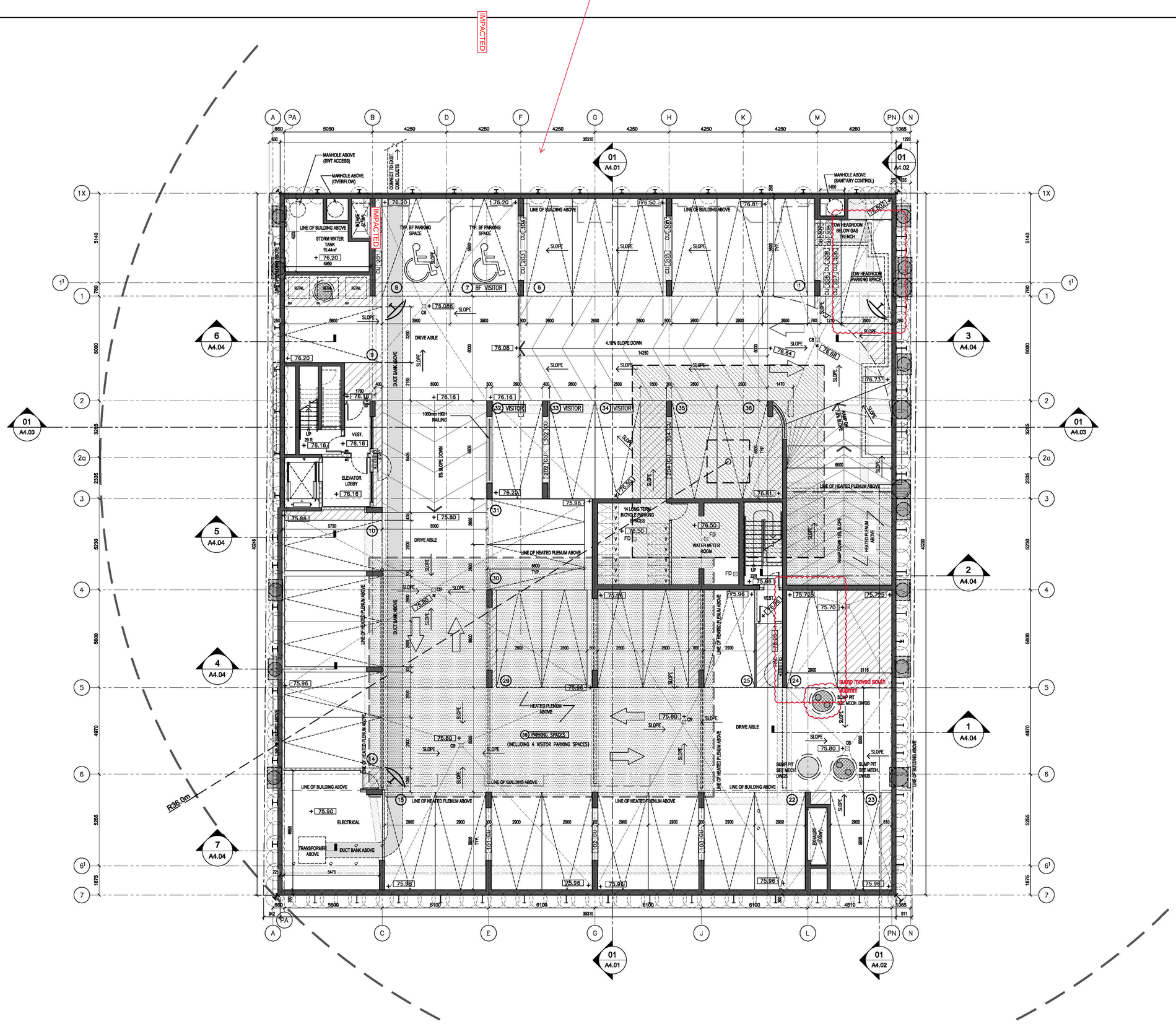
1327 Queen Street East

Rockport (Queen & Leslie) Inc.

P1 Parking Floor Plan

1:100

A101



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This drawing shall not be used for construction purposes unless countersigned by:

Signature

Giovanni A. Tassone

NOT ISSUED FOR CONSTRUCTION

Daniels
love where you live™

20 Queen Street West, Suite 3400
Toronto, ON M5H 3R3
Email: info@danielscorp.com

Revisions

Date	No.	Description
17/12/15	2	Re-Issued for SPA & ZBA
27/08/15	1	Issued for SPA & ZBA

Date Issued
Mar 2, 2016

Architect Inc.
GIOVANNI A. TASSONE
185 Bridgeland Ave., Suite 107
Toronto, Ontario M6A 1Y7
(416) 781-5020
(416) 783-3100 fax

Project
PROPOSED MIXED USE DEVELOPMENT

897 to 899 Queen Street
Toronto, Ontario

Project No. 15006
Scale 1:100
Drawn by AC
Reviewed by GAT
Title PARKING LEVEL P1
Drawing No.

A2.00

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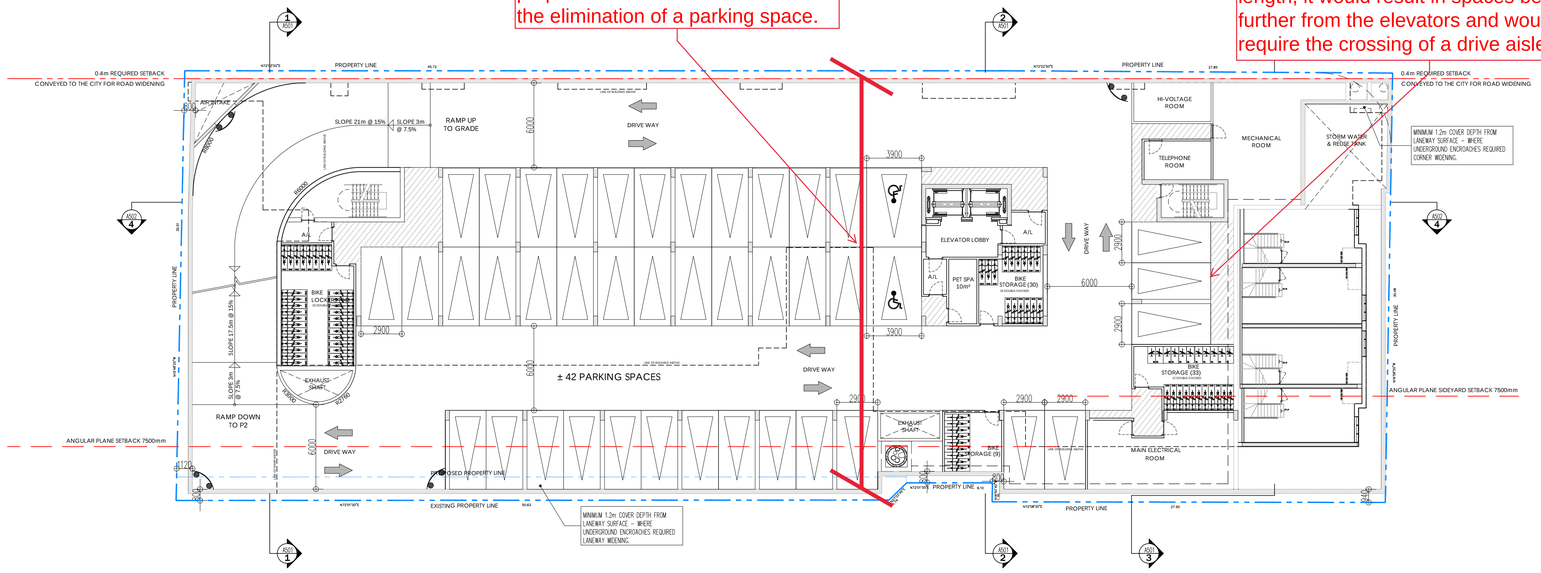
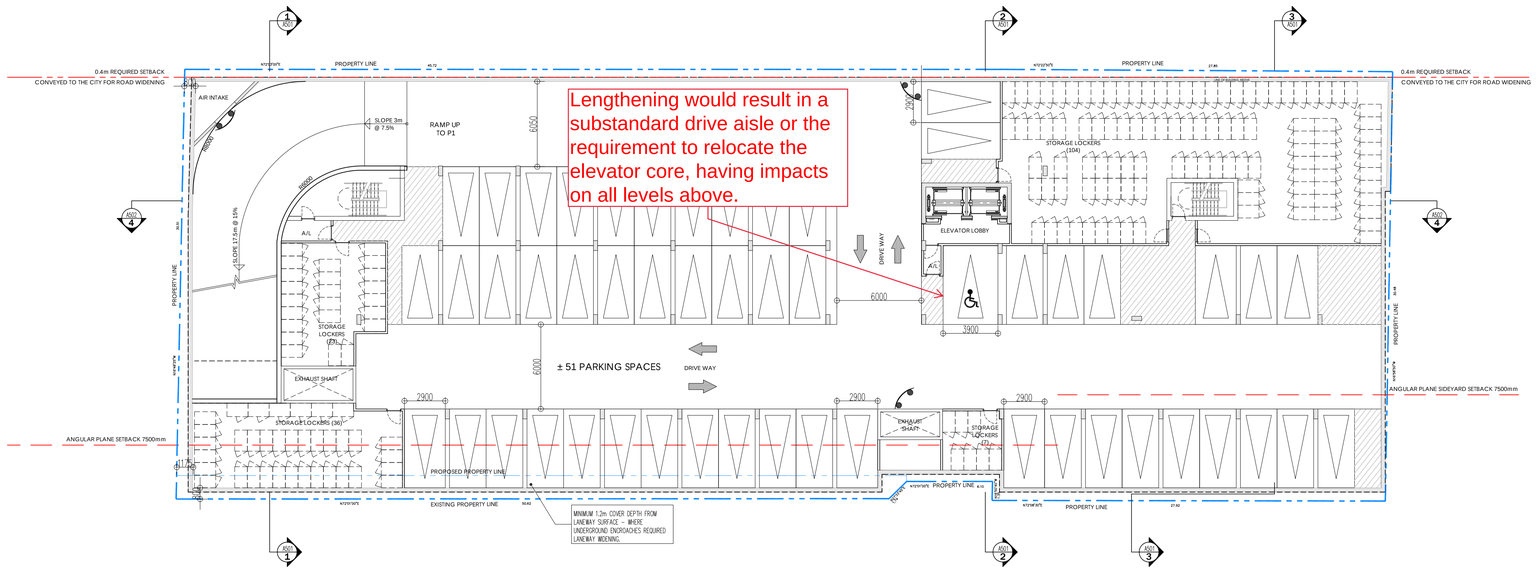
Fixed module dimension precludes extending both parking spaces; extending one while maintaining proper drive aisles would result in the elimination of a parking space.

Unable to relocate two "large" accessible spaces here due to structure; While the location accomodates the expanded length, it would result in spaces being further from the elevators and would require the crossing of a drive aisle.



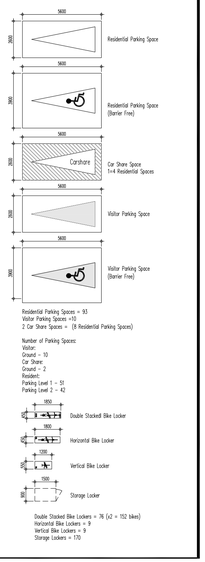
UNDERGROUND LEVEL 1

Lengthening would result in a substandard drive aisle or the requirement to relocate the elevator core, having impacts on all levels above.



UNDERGROUND LEVEL 2

PARKING LEGEND



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This drawing is not to be scaled. All architectural symbols indicated on this drawing are graphic representations only.

Conditions for electronic information transfer

Electronic information is supplied to the other associated firms to assist them in the execution of their work/review. The recipient firms must determine the completeness/appropriateness/relevance of the information in respect to their particular responsibility.

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1. Errors, omissions, incompleteness due to loss of information in whole or part when information is transferred.
2. Transmission of any virus or damage to the receiving electronic system when information is transferred.

01.	OCT.19.2015	issued for rezoning	EC
02.	APR.27.2016	issued for rezoning	EC
03.	JUNE.30.2016	issued for rezoning	EC
04.		issued for site plan appro	EC

FOR REVIEW

DRAFT

issued for revisions

GRAZIANI + CORAZZA ARCHITECTS INC.

1320 Showson Drive, Suite 100 Mississauga Ontario L4W 1N3
Phone. 905.795.2601 Fax.905.795.2844 www.gc-architects.com

PROPOSED MIXED USE DEVELOPMENT

2301-2315 DANFORTH AVE.

DANMOR DEVELOPMENTS LIMITED

TORONTO ONTARIO

Project Architect:	E.CORAZZA
Assistant Designer:	C.KOTVA
Drawn By:	C.KOTVA
Checked By:	D.BIASE
Plot Date:	Sep. 21, 2016
Job #	1282.15

UNDERGROUND PLANS LEVELS 1 & 2

1:200

A201

TITLEBLOCK SIZE: 610 x 900

March 24, 2017

Danielle Chin, MCIP, RPP
Senior Manager, Policy & Government Relations
BILD
20 Upjohn Road, Suite 100
Toronto, Ontario
M3B 2V9

RE: Accessible Parking Meeting Follow-Up

Dear Ms. Chin:

As a follow-up to our recent meeting with BILD and City Planning, Building and Legal staff regarding the City's proposed changes to the accessible parking requirements of ZB 569-2013, we offer the following additional information regarding the proposed accessible parking space supply. More specifically, we have developed an alternative methodology that permits the calculated number of accessible parking spaces to more closely match, but not be lower than, the AODA accessible parking requirements set out in Provincial Regulation 191/11.

In comparison to the AODA requirements of Provincial Regulation 191/11, the City's proposed methodology results in an extra accessible parking space for most of the total parking supplies of between 101 and 1,000 parking spaces. Please note that the City's methodology does not result in a an extra accessible parking space for total parking supplies of between 133 to150 spaces and between 167 to 200 spaces. However, what's more concerning is that it's become apparent that once the overall parking supply exceeds 1,000 parking spaces, the City's accessible parking requirement significantly exceeds the AODA requirements of Provincial Regulation 191/11. For example:

- City methodology exceeds AODA by 1 accessible space at 1,000 total spaces
- City methodology exceeds AODA by 12 accessible spaces at 2,000 total spaces
- City methodology exceeds AODA by 22 accessible spaces at 3,000 total spaces
- City methodology exceeds AODA by 32 accessible spaces at 4,000 total spaces
- City methodology exceeds AODA by 42 accessible spaces at 5,000 total spaces, etc.

A comparison of the City's proposed accessible parking supply requirements **verses** AODA, for a wide range of total parking supplies (99 spaces to 5,001 spaces) including key parking supply thresholds, is presented in **Table 1**.

TABLE 1 ACCESSIBLE PARKING REQUIREMENTS COMPARISON

Total Number of Parking Spaces	AODA/City Proposed Comparison				AODA/BA Proposed Comparison			Legend
	AODA	City Proposed	Net		AODA	BA	Net	
		1/25, Rounded Up				1/25, Rounded Up		Calculated Number of Accessible Parking Spaces Meets the AODA Requirement
99	4	4	0		4	4	0	
100	4	4	0		4	4	0	
		5 + 1/50, Rounded Up, In Excess 100 Total Spaces						
101	5	6	+2		5	5	0	
124	5	6	+1		5	5	0	
125	5	6	+1		5	5	0	
126	5	6	+1		5	6	+1	
133	5	6	+1		5	6	+1	
134	6	6	0		6	6	0	
149	6	6	0		6	6	0	
150	6	6	0		6	6	0	Calculated Number of Accessible Parking Spaces Exceeds the AODA Requirement by Less Than 5 Spaces
						3 + 1/50, Rounded Up		
151	6	7	+1		6	7	+1	
166	6	7	+1		6	7	+1	
167	7	7	0		7	7	0	
174	7	7	0		7	7	0	
175	7	7	0		7	7	0	
176	7	7	0		7	7	0	
199	7	7	0		7	7	0	
200	7	7	0		7	7	0	
						2 + 1/50, Rounded UP		
201	7	8	+1		7	7	0	
249	7	8	+1		7	7	0	
250	7	8	+1		7	7	0	
251	8	9	+1		8	8	0	
299	8	9	+1		8	8	0	
300	8	9	+1		8	8	0	
301	9	10	+1		9	9	0	Calculated Number of Accessible Parking Spaces Exceeds the AODA Requirement by Between 5 and 10 Spaces
999	22	23	+1		22	22	0	
1000	22	23	+1		22	22	0	
						11 + 1/100, Rounded Up		
1001	22	24	+2		22	22	0	
1499	26	33	+7		26	26	0	
1500	26	33	+7		26	26	0	
1501	27	34	+7		27	27	0	
1999	31	43	+12		31	31	0	
2000	31	43	+12		31	31	0	
2001	32	44	+12		32	31	0	
2999	41	63	+22		41	41	0	
3000	41	63	+22		41	41	0	
3001	42	64	+22		42	42	0	
3999	51	83	+32		51	51	0	
4000	51	83	+32		51	51	0	
4001	52	84	+32		52	52	0	
4999	61	103	+42		61	61	0	
5000	61	103	+42		61	61	0	
5001	62	104	+42		62	62	0	Calculated Number of Accessible Parking Spaces Exceeds the AODA Requirement by More Than 10 Spaces

While we understand that one of City staff's objectives is to try to simplify the methodology used in Provincial Regulation 191/11, the resulting number of required accessible parking spaces will have a significant impact for large developments, including: shopping centres, hospitals, office buildings, large residential/mixed-use projects, etc., and, respectfully, will not be consistent with Provincial Regulation 191/11.

With this in mind, we have prepared an alternate accessible parking supply methodology which includes two additional categories of parking supplies and addresses the City's objective to simplify the calculations; i.e., it does not rely on the use of percentages as does the AODA requirement nor does it rely on reducing the total parking supply by 100 spaces prior to using an equation as does the City's proposed methodology. In other words, the total parking supply can be entered directly into an equation which provides a direct result.

We also note that users need only concern themselves with one of the categories that pertains to their specific total parking supply. In other words, the user skips to the clause that applies to their specific required total number of parking spaces and then uses the equation in that clause to determine the number of accessible parking spaces required.

A comparison of the accessible parking supply requirements using the proposed alternate methodology **verses** AODA, for a wide range of total parking supplies (99 spaces to 5,001 spaces) including key parking supply thresholds, is presented in **Table 1**.

As listed in Table 1, the proposed alternate methodology matches the AODA requirements for most of the total parking supplies of between 101 and 1,000 parking spaces. Please note that the methodology does result in a an extra accessible parking space for total parking supplies of between 126 to 133 spaces and between 151 to 166 spaces. The alternate methodology also completely matches the results of the AODA requirements for all parking space supplies over 1,000 spaces. For example:

- Alternate methodology does not exceed AODA at 1,000 total spaces
- Alternate methodology does not exceed AODA at 2,000 total spaces
- Alternate methodology does not exceed AODA at 3,000 total spaces
- Alternate methodology does not exceed AODA at 4,000 total spaces
- Alternate methodology does not exceed AODA at 5,000 total spaces, etc.

The **recommended** alternate wording and methodology for determining the number of accessible parking spaces is as follows:

Section 200.15.10 Parking Rate

> *(A) if the number of required **parking spaces** less than 13, a minimum of 1 parking space must comply with all regulations for an accessible parking space in Section 200.15; and*
>
> *(B) if the number of required **parking spaces** is 13 to 150, a minimum of 1 parking space for every 25 **parking spaces** or part thereof must comply with all regulations for an accessible **parking space** in Section 200.15; and*
>
> *(C) if the number of required **parking spaces** is 151 to 200, a minimum of 3 **parking spaces** plus 1 parking space for every 50 **parking spaces** or part thereof must comply with all regulations for an accessible **parking space** in Section 200.15; and*

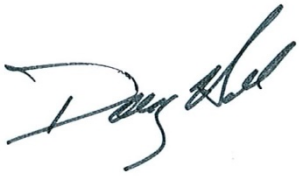
*(D) if the number of required **parking spaces** is less 201 to 1,000, a minimum of 2 **parking spaces** plus 1 **parking space** for every 50 **parking spaces** or part thereof must comply with all regulations for an accessible **parking space** in Section 200.15; and*

*(E) if the number of required **parking spaces** is more than 1,000, a minimum of 11 **parking spaces** plus 1 **parking space** for every 100 **parking spaces** or part thereof must comply with all regulations for an accessible **parking space** in Section 200.15.*

The calculated number of accessible parking spaces resulting from the foregoing alternate methodology exactly matches the calculated number of accessible parking spaces resulting from the AODA methodology contained within Provincial Regulation 191/11 for most total parking space supplies. Total parking supplies between 126 and 133 and between 151 and 167 spaces, result in one accessible parking space in excess of the AODA requirement.

Based on the foregoing, we believe that the City should adopt the recommended alternate wording and methodology because it is simpler and is more consistent with AODA, in particular, for total parking supplies in excess of 1,000 spaces.

Sincerely,
BA Consulting Group Ltd.



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