

**PROVINCIAL
ACCESSIBLE
PARKING
TASKFORCE**

November 10, 2021

Michael Hain, Program Manager
City Planning Division
Transportation Planning, Policy and Analysis
City Hall, 100 Queen Street West, East Tower, 21st Floor
Toronto, Ontario

Dear Mr. Hain;

Toronto residents with disabilities, along with seniors and supporting organizations are keenly interested in the outcome of the City of Toronto's Review of Parking Requirements for New Development, as it pertains to accessible parking. We represent leading national and provincial organizations that provide service and advocate for people with disabilities and seniors. As a community, we have formed a provincial working group on this issue, seeking improvements and innovation in accessible parking across the province.

We appreciate the City of Toronto's leadership in ensuring accessibility considerations are addressed in the proposed amendments to parking requirements. In reviewing materials and collectively speaking with you, we have some recommendations to share regarding the forthcoming city staff report. We are eager to read the review findings, provide our input, and participate in the deputation process.

Based on our discussions, we are urging the City to be bold in a few aspects of you Review:

1. **Proportion of accessible spaces:** We are pleased to hear the recommendation that the number of accessible parking spaces would be maintained or increased under the City staff's proposed formula, and the former maximum number of accessible spaces becoming the new minimum. The proposed 10% is in line with previous research showing that approximately 1 in 10 Canadian adults live with a mobility disability (Statistics Canada, 2020). It should further be noted that this number does not include those requiring an accessible parking permit for a limited duration as a result of a medical procedure or short-term disability, so the actual percentage of Toronto's population is likely higher.

Given the existing challenges for accessible parking permit holders in finding accessible spaces, it is crucial that proposed amendments to parking requirements do not decrease the availability of accessible spaces in our city. As a result, we support this updated formula and encourage City staff to maintain this proposal in their recommendations to Council.

2. **Location of spaces:** The location of spaces is important for our community members safety, accessibility and dignity. We encourage City staff to recommend that the requirement for accessible parking spots to be closest to the entrance is maintained. For seniors and people experiencing mobility barriers, having to make an arduous trek from the back of a parking lot is

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unacceptable. Moreover, it is crucial that accessible spots are not just located at the front, but are positioned to enable accessible entrance to the building, a barrier that is not always currently addressed.

3. **Types of spaces:** We appreciate the recommendation to propose Class A accessible spaces only (i.e. the larger space that enables side entry to vehicles). We have heard from our community members the barriers presented by the smaller, Class B accessible spaces. However, if the size neglects the maximum space threshold of 10%, we would prefer a combination of space types to maintain the 10% requirement.
4. **Further review of accessible parking:** We strongly recommend further work be done on this issue, as little data is available to paint an accurate picture of the current barriers and challenges with accessible parking in the City of Toronto. We encourage Council to direct City staff to do a comprehensive review of the needs and expectations of accessible parking in the city.

We thank you for the opportunity to share the needs and perspectives of our community members. Please inform us of upcoming opportunities to contribute to the Review process. We look forward to reading your final report, and will be following this issue closely.

Yours sincerely,

Peter Athanasopoulos – on behalf of the taskforce

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The Provincial Accessible Parking Task Force:

Spinal Cord Injury Ontario

March of Dimes Canada

Easter Seals Ontario

CARP (Canadian Association of Retired People)

Multiple Sclerosis Society of Canada

Muscular Dystrophy Canada

Accessible Parking Permit Users