

**From:** "Mochrie, Paul" <Paul.Mochrie@vancouver.ca>  
**To:** "Kirby-Yung, Sarah" <Sarah.Kirby-Yung@vancouver.ca>  
"Dominato, Lisa" <Lisa.Dominato@vancouver.ca>  
**Date:** 7/10/2023 3:13:13 PM  
**Subject:** RE: Standing Committee - report 3 questions

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Thanks for those questions, Sarah. Our responses are incorporated below.

- Now the **proposed bylaw is suggesting publishing notice a minimum of 7 days in advance**. This appears to be a degradation of the lead notice time for the public. Can you advise? I'm considering amending to maintain two weeks and would welcome input on that.

The Province is allowing for less than 2 weeks notice. There is nothing that would prevent staff from exceeding the requirements of the by-law by continuing with the current practice of providing two weeks notice. It should be noted that the proposed method of publication would be continuous and would not be like an add in a daily newspaper. It should also be noted that 2 weeks notice often means less than 14 days notice, because the rule was simply two consecutive weeks and did not require a full week between publications. Sometimes this was as short as a Friday and then again on a Monday.

- Secondly, the report notes that online mediums can provide for more accessibility. I'd specifically like to understand language capability and intent. There's nothing in the bylaw that commits to providing in language notice for different cultural communities. Can you advise on the feasibility of doing so on the City website and any notation in the bylaw? Is it not mentioned in the bylaw so as to provide flexibility on what is translated in what languages?

We would like to clarify that we revised the public Council report late Friday evening to specify that the City would pursue website and online newspaper ads (not Facebook) as the primary channels for pushing out Public Notice Ads. This approach is to ensure the City does not rely on a specific social media platform to push out this information, particularly in light of the current volatility of social media (i.e. the significant decline of Facebook usage, the instability of Twitter and the rise of Threads).

We recommend focusing on our online presence (website) which ensures we can have the content available in one, easy to access, web page, which will align with COV accessibility standards. Additionally, this will also allow us to expand our offerings if needed in the future to encompass translated copy. Our second channel will be online newspaper ads which will have greater ROI for less cost and will allow us to link the public to our online page for the information. Social media can always augment the notices as appropriate, but not specifying which platform enables us to use what is most appropriate at that time.

The Language Access Policy recently adopted does not apply to members of City Council, Council proceedings, and Council-appointed agencies, boards and commissions. While there is an option to translate into other languages on a case-by-case basis as project teams deem appropriate based on local home language use, we would recommend against such an action in instances where the public hearing proceedings were not also offered in multiple languages/the same languages or with an offer of active interpretation.

Best,  
Paul

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From: Kirby-Yung, Sarah <Sarah.Kirby-Yung@vancouver.ca>  
Sent: Monday, July 10, 2023 11:09 AM  
To: Mochrie, Paul <Paul.Mochrie@vancouver.ca>; Dominato, Lisa <Lisa.Dominato@vancouver.ca>  
Cc: Direct to Mayor and Council - DL  
City Manager's Correspondence Group - DL  
Subject: RE: Standing Committee - report 3 questions

Morning Paul,

I have further questions on the proposed bylaw.

First the report notes that this has been the practice:

Council Authority/Previous Decisions The VC sets out the basic notice provisions that govern the City. The revised notice provisions are found in sections 3, 3.1 and 3.2 of the VC. Before the Regulation and the VC amendments were enacted, section 3 generally required notices to be **published in a newspaper once each week for 2 consecutive weeks**. This could include publication in more than one newspaper. Alternative publication methods were generally not permitted.

Now the **proposed bylaw is suggesting publishing notice a minimum of 7 days in advance**.

This appears to be a degradation of the lead notice time for the public. Can you advise? I'm considering amending to maintain two weeks and would welcome input on that.

Secondly, the report notes that online mediums can provide for more accessibility. I'd specifically like to understand language capability and intent. There's nothing in the bylaw that commits to providing in language notice for different cultural communities. Can you advise on the feasibility of doing so on the City website and any notation in the bylaw? Is it not mentioned in the bylaw so as to provide flexibility on what is translated in what languages?

The spirit of my question is about moving forward on our path to become a more inclusive and accessible city for our different cultural groups.

Thanks,

Sarah Kirby-Yung, MBA she/her  
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I am humbly thankful that I live and work on the territories of the x<sup>w</sup>məθk<sup>w</sup>əyəm ([Musqueam](#)), Skwx̱wú7mesh ([Squamish](#)) and səłl̓wətaʔt̓ / səłl̓wítulh ([Tsleil-Waututh](#)) Nations.

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From: Mochrie, Paul <[Paul.Mochrie@vancouver.ca](mailto:Paul.Mochrie@vancouver.ca)>

Sent: Monday, July 10, 2023 10:27 AM

To: Dominato, Lisa <[Lisa.Dominato@vancouver.ca](mailto:Lisa.Dominato@vancouver.ca)>

Cc: Direct to Mayor and Council - DL

Subject: RE: Standing Committee - report 3 questions

City Manager's Correspondence Group - DL

Good morning Lisa,

Further to the updated report that was circulated this morning (attached here for reference, please see the following information in response to your questions:

1. Was an accessibility lens applied to these proposed changes? Were any members of the persons with disabilities community consulted or engaged on these proposals?

The report recommends public notice methods that will support accessibility by moving away from printed newspaper ads. Staff have revised the recommendation to adopt online newspaper ads, rather than Facebook, in order to reach a wider audience. The recommendation to use the City website has not been revised. The Disabilities community was not actively engaged. The regulations specify that any method adopted must be reliable, suitable and accessible. The city's website is designed to be accessible to the widest possible audience regardless of technology or ability.

2. Was an age demographic lens applied to these proposed changes? (both in terms of where younger and older residents access information)

This consideration informed staff's recommendations to recommend the city's website and online newspaper advertising in order to meet the regulations.

3. How was it determined that the City's web site and Facebook met the test of "reliability, suitability and accessibility"? I ask this question in the context of demographic and trend use of FB (versus other existing and emerging platforms).

The discussion of these issues and the specifics of the criteria are set out in the report. As noted in the report, the regulation says that:

- Means of publication are reliable if (a)they provide factual information, and (b)publication takes place at least once a month or, if the means of publication is a website, the website is updated at least once a month.
- Means of publication are suitable for providing notices if (a)they allow all information in a notice to be displayed legibly, (b)they allow a notice to be published by the required date, and (c)they allow a person to consult a notice more than once during the period from the date of publication until the date of the matter for which notice is required.
- Means of publication are accessible if (a)they are directed or made available to a diverse audience or readership, and (b)they are easily found.

We understood that the proposed means of publication met these requirements. We also note that the Province embraced Facebook, online newspaper ads and a local government's website as suitable.

"Staff are proposing the adoption of the Public Notice By-law to replace newspaper publication with notices on the City's website and the City's Facebook page. Staff consider these two methods of providing notice to meet the requirements of reliability, suitability and accessibility specified in the Regulation."

4. What is the current approach in other jurisdictions?

As a result of local newspapers no longer in print, the Province amended the regulations to allow alternative means. There are a handful of smaller municipalities (RDOS, Nelson, Nanaimo) who have adopted a Public Notice By-law and their publication methods include their website, email subscription service, notice boards or newspaper.

5. Was consideration given to enable both print AND online publication to ensure broad reach given the scope of notifications (which includes election and public hearing notices)?

The proposed by-law does not restrict our ability to use print publications, in addition to what the by-law will require. We can do more than what the by-law says – but if we require it in the by-law, we must do that in all circumstances. As noted in the report, the current postcard notification and signage practice related to Public Hearings will not change. It should be noted that the Vancouver Courier stopped publication in 2020 and Vancouver Is Awesome stopped their publication in June 2023. Public Hearing ads now only appear in the Vancouver Sun which is not widely targeted.

Best,  
Paul

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From: Dominato, Lisa <[Lisa.Dominato@vancouver.ca](mailto:Lisa.Dominato@vancouver.ca)>  
Sent: Monday, July 10, 2023 6:44 AM  
To: Mochrie, Paul <[Paul.Mochrie@vancouver.ca](mailto:Paul.Mochrie@vancouver.ca)>  
Cc: Direct to Mayor and Council - DL  
Subject: Standing Committee - report 3 questions  
Importance: High

Hi Paul,

A few questions regarding the proposed revisions to the Public Notice bylaw – [Report - Public Notice By-law - Standing Committee on City Finance and Services - July 12, 2023 \(vancouver.ca\)](#)

1. Was an accessibility lens applied to these proposed changes? Were any members of the persons with disabilities community consulted or engaged on these proposals?
2. Was an age demographic lens applied to these proposed changes? (both in terms of where younger and older residents access information)
3. How was it determined that the City's web site and Facebook met the test of "reliability, suitability and accessibility"? I ask this question in the context of demographic and trend use of FB (versus other existing and emerging platforms).

"Staff are proposing the adoption of the Public Notice By-law to replace newspaper publication with notices on the City's website and the City's Facebook page. Staff consider these two methods of providing notice to meet the requirements of reliability, suitability and accessibility specified in the Regulation."

4. What is the current approach in other jurisdictions?
5. Was consideration given to enable both print AND online publication to ensure broad reach given the scope of notifications (which includes election and

public hearing notices?

Sincerely,

Lisa

**Lisa Dominato, MA** | she/her

Councillor | City of Vancouver

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“The two skills of the warrior are compassion and insight. Compassion is easy - it arises spontaneously from an open heart. Insight or discernment requires more skill. We have to choose our battles.”

— Margaret J. Wheatley