

November 18, 2016

RE: PW17.10 -- Sherbourne Street and Wellesley Street Cycle Track Review and Design Improvements

Dear Chair Jaye Robinson and Members of Public Works and Infrastructure Committee,

I am writing on behalf of Cycle Toronto regarding PW17.10 **with serious concern about City staff's recommendations**. Cycle Toronto is a diverse, member-supported organization that advocates for a healthy, safe, cycling-friendly city for all and currently represents over 2,700 Torontonians.

In 2014, Cycle Toronto launched its Minimum Grid campaign, the main goal of which is to build a connected network of protected bike lanes that can be used safely and confidently by people of all abilities who are riding bicycles that may be adapted to their individual needs. Toronto's present road infrastructure presents many barriers to Torontonians who would like to use the bicycle as a mobility device. In other cities such as Copenhagen, separated bike lanes that protect vulnerable cyclists from motor vehicle incursions are giving people with mobility disabilities a tremendous freedom to get around. It is our goal to do the same in Toronto.

We believe the issue of improving the mobility options of Torontonians with accessible needs is a vital issue in our city.

We're concerned that the current recommendation to enable vehicles displaying valid Accessible Parking Permits to load and unload persons with disabilities in bicycle lanes and cycle tracks pose an adverse safety risk to cyclists and pedestrians in Toronto. More specifically:

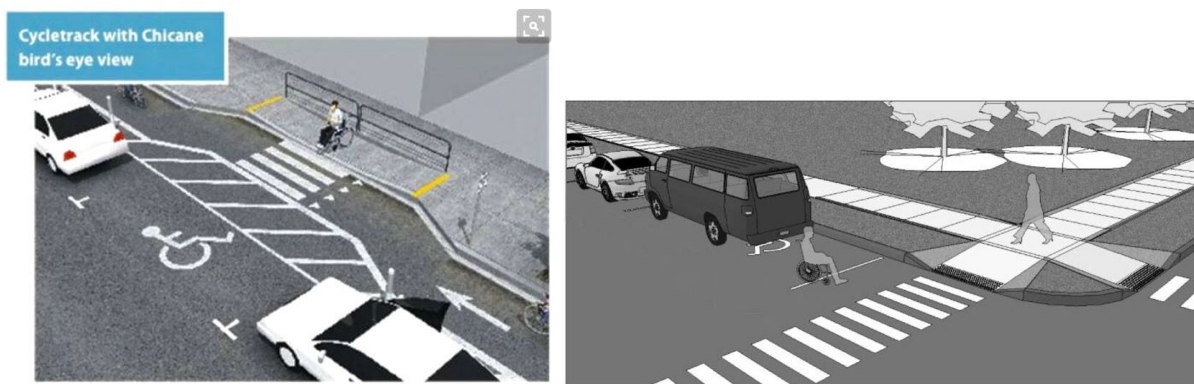
- 1) The proposed solution prioritizes the convenience of one vulnerable road user group over the safety of another. Research demonstrates that separated bike lanes are substantially safer than painted bike lanes. However, safety is reduced if frequent incursions take place by vehicles, regardless of their accessibility status.
- 2) The proposed solution will increase tension between cyclists, motorists and pedestrians which we want to avoid. With nearly 700,000 active Accessible Parking Permits across Ontario, people riding in protected bike lanes will likely experience some sort of interaction with these vehicles under the current proposal. However, due to the location of the accessibility sticker, there's no way for a cyclist to know if a car has the right to stop in their lane or not. This may result in increased tension between cyclists and motorists, which is already at breaking point in Toronto.



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- 3) Toronto's cycle tracks are relatively narrow. For a cyclist riding along a busy cycle track, there is no way for them to know whether a person stopped in a bike lane has a legitimate claim to being there. Some will wait, the strong & fearless will risk venturing into the unsafe adjacent travel lane, and some may ride on the sidewalk, displacing risk onto pedestrians.
- 4) There is no precedent for such a recommendation in any other major city. San Francisco is closest but even it only allows cabs and they must apply for the designation and display a sticker on their rear bumper.
- 5) There was no consultation with pedestrian or cycling advocates in the crafting of this recommendation. With significant consequences for cyclists and pedestrians, we feel a full consultation with all stakeholders is appropriate.
- 6) Some people with disabilities use bikes as a mobility device and will be displaced if this proposal is accepted. Specialized bicycles offer some people with disabilities the freedom and mobility they do not have otherwise. If their path is impeded by vehicles loading or unloading other people with disabilities, then cycling may become problematic for them.



A more comprehensive recommendation involves rethinking our bikeway design standards. Toronto should investigate designs developed by other jurisdictions for accessible parking spaces and loading areas that do not compromise the safety of bike lanes. For instance, Minneapolis has produced a sophisticated 'floating' island design (pictured above, left), and Vancouver places many of its accessible parking lay-bys on side streets, close to arterial intersections (pictured above, right).

We would recommend that this item be deferred and integrated into the On-Street Bikeway Design Guidelines process that City staff comment on in the report.



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We believe making Toronto accessible for all road users is a vital issue for Toronto. All stakeholders should be involved in the process and that this issue should be properly addressed through better-developed standards for protected bike lanes across the City.

We do not wish to mark divisions between legal disabilities and less chronic health conditions, or between users of two-wheeled, three-wheeled or four-wheeled mobility devices. Cycle Toronto believes in Complete Streets. Our goal is inclusivity, and we strive to maintain the dignity and safety of all road users.

Sincerely,



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