

October 1, 2019

Mayor Tory and Toronto City Council
Toronto City Hall, 2nd Floor
100 Queen St W
Toronto, ON M5H 2N2

**Improving Vulnerable Road User Safety in Toronto, submission regarding MM10.14:
Targeting Heavy Trucks in the Vision Zero Road Safety Plan**

Dear Mayor Tory and Toronto City Council,

Friends and Families for Safe Streets (FFSS) was greatly affected to hear of the fatal collision that occurred at Yonge St and Erskine Ave on September 17, 2019. We advocate strongly to improve the safety of our streets so that no more lives are lost.

National Association of Transportation Officials (NACTO) [‘Downsizing’ report](#)

In the US, large vehicles, such as commercial trucks, are a small portion of the vehicle fleet (4%) yet are involved in a disproportionately high number of fatalities: 7% of pedestrian fatalities, 11% of bicyclist fatalities, and 12% of car/light-truck occupant fatalities. The number of fatalities due to these larger vehicles increased by 9% from 2016 to 2017.

Large vehicles are dangerous in several manners that compound on one another:

- They typically have large blind spots making it harder for the driver to see people or objects next to or in front of them.
- Decreased visibility contributes to slower reaction time to an impending collision.
- Their increased mass requires more time and distance to slow down and stop.
- Their increased mass results in more force when they do hit people.

The NACTO ‘Downsizing’ report highlights how urban environments would benefit from smaller commercial vehicles that maintain or exceed their larger counterparts’ capabilities much as have been distributed in Europe or Asia.

It is imperative that Toronto take action to downsize its vehicles in order to achieve the goals of Vision Zero.

Here is an example of a **smaller concrete truck with better visibility** that would be appropriate in a dense, construction-heavy city with many cyclists and pedestrians such as Toronto:



Mercedes Benz Econic cement mixer from 'Downsizing' report (p.34).

Truck side guards

The [2012 Ontario Coroner's report on pedestrian fatalities](#) included Recommendation #11 to Transport Canada to “make side-guards mandatory on heavy trucks in Canada. In addition, consideration should be given to requiring additional equipment (such as blind spot mirrors and blind spot warning signs) to make pedestrians more visible to trucks and decrease the chance of a collision, especially during right-hand turns.”

Similarly, the [2012 Ontario Coroner's report on cyclist fatalities](#) included the recommendation to have mandatory side-guards on trucks.

City Council in 2010 [directed staff to look into side guards for trucks](#). Now a decade later with no progress, and with a new Vision Zero Road Safety mandate, it is time to revisit and implement this.

Safe Fleet Transition Plan

New York City has annually been updating a document such as this, a '[Safe Fleet Transition Plan](#)' and includes many recommendations for improving large vehicle safety within their own vehicle fleet. Toronto needs to be developing a similar document for its fleet.

Guidelines for safer heavy-duty vehicles

Beyond city-owned vehicles, London, England has been developing guidelines with industry to produce safer heavy-duty vehicles, including construction and delivery vehicles. [See an example pertaining to 'Direct Vision Standard' here.](#)

Conclusion

In conclusion, we recommend the following initiatives to ensure the safety of vulnerable road users:

- Adopt guidelines to encourage smaller trucks with better visibility and regulations to prohibit dangerous large trucks in Toronto
- Make side-guards mandatory on heavy trucks in Toronto
- Develop a Safe Fleet Transition Plan for all City of Toronto vehicles
- Work with other levels of government to develop standards to produce safer heavy-duty trucks in Ontario and Canada

We must implement measures that will achieve the core mission of Vision Zero: that *no* loss of life or health on our streets is ever acceptable.

Regards,

Kasia Briegmann-Samson
Friends and Families for Safe Streets

About

Friends and Families for Safe Streets is working to end traffic violence in Toronto by changing laws, enforcement, street design, public attitudes, and traffic culture to make our vibrant streets safer and more equitable for all road users, while supporting those who are survivors.

For more information, please visit ffsafestreets.ca or email us at advocacy@ffsafestreets.ca.