



**Complete  
Streets**

**tcat** toronto centre for  
active transportation 



May 13, 2014

RE: PW 31.1 – Confirmation of Levels of Service for Winter Maintenance of Bikeways, Windrow Opening, Sidewalks and Accessibility for Ontarians with Disabilities Act (AODA) Compliance

Dear Chairman Minnan-Wong and Members of the Public Works and Infrastructure Committee,

I am writing on behalf of the Toronto Centre for Active Transportation (TCAT), a project of the registered charity Clean Air Partnership. TCAT's mission is to advance knowledge and evidence to build support for safe and inclusive streets for walking and cycling.

In April 2014, TCAT expressed to the Committee that the current level of service for clearing bikeways and walkways is unacceptable. Cycling and walking in the winter can be an all-year transportation mode but the slippery road conditions and poor snow clearing quality are significant barriers. Each year Toronto is found negligent in slip-and-fall lawsuits for its failure to remove snow and ice and pays out millions of dollars in taxpayers' money to resolve these claims. These costs, as well as the human and health care costs of injuries sustained by Torontonians, could be dramatically reduced with 100% mechanical sidewalk clearing. The main shortcoming of the current winter maintenance program is the lack of standard width clearance for cycling facilities, as well as the piecemeal approach to winter clearing for both cycling and pedestrian infrastructure.

Although this effort to create a level of service for bikeway and sidewalk clearing is a good first step toward reducing the barriers to winter cycling and walking, the current recommendations fall short of creating a truly inclusive winter maintenance program for cyclists and pedestrians.

Previously, TCAT identified several areas which are critical to a successful winter maintenance program:

- That all newly constructed or renovated sidewalks be built to a standard that provides adequate snow clearance (meeting AODA minimum of 1.5m) capable of mechanical sidewalk clearing;
- That all sidewalks be cleared as standard practice, not only the suggested subset;
- That a phased approach to the introduction of 100% mechanical sidewalk clearing be investigated where higher priority is given to identified destinations (e.g. proximity to transit stops, public services, etc.)
- That any future bike lanes, paths or sharrows, including pilot projects, be automatically identified as requiring priority winter clearing;
- That cyclists be considered in the snow clearing practices of all other roads without bicycle facilities, taking into account the amount of space they need to ride safely, and the adequacy of snow removal.

The incorporation of these elements into the proposed winter maintenance program for bikeways and walkways will result in a more comprehensive approach to ensure the safety and comfort of pedestrians and cyclists across the City. We request the Committee to ensure that an adequate level of service is provided for bicycles and pedestrians by considering our recommendations.

Thank you for the opportunity to comment.

Sincerely,



Nancy Smith Lea  
Director, Toronto Centre for Active Transportation (TCAT)  
Clean Air Partnership  
75 Elizabeth Street, Toronto, ON M5G 1P4  
Phone: 416-392-0290  
Email: [nsmithlea@tcat.ca](mailto:nsmithlea@tcat.ca)