



Safe streets
Healthy city
Vibrant voice

IE7.13.3

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October 1, 2019

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

Dear Toronto City Council and Mayor Tory,

Re: IE7.13 - E-Scooter Oversight and Management

I am writing on behalf of Cycle Toronto, a member-supported not-for-profit organization that works to make Toronto a healthy, safe and vibrant cycling city for all. Our organization is focused on advocacy, education and encouragement, as we work to shape policy and infrastructure, and build community to transform our city's cycling culture. We engage a diversity of people in our work, pursuing evidence-based solutions that make cycling a viable option for all Torontonians. We represent 3,000 members.

As our streets gets busier and denser, they must evolve to accommodate many types of mobilities. Electric bikes and scooters are increasing in popularity and are a great option for people to get around. We see an important opportunity to create safer streets for all by recognizing that bike lanes can accomodate people using multiple mobilities.

We are supportive of a kick-style e-scooter pilot proposed by the Ontario Ministry of Transportation on Toronto roads and multi-use trails. Due to the differences in physical environment, existing regulations, and goals within municipalities, we also want to ensure that municipalities have power over shared scooter fleets through the tendering and contracting process. In an urban context, we agree that scooters make sense to be in places where bicycles can operate, but given the large volume of cyclists already using our infrastructure in Toronto, the following things need to be implemented to ensure safety for all road users:

Where scooters are allowed: We are supportive of scooters being allowed wherever bicycles are allowed. However, due to speed considerations, The City of Toronto must have the right to govern over scooter operators where scooters can and cannot be ridden, for example on sidewalks, and where speeds can be reduced, for example in protected bike lanes and on multi-use trails.





Speed: A maximum speed of 24 km/hr must be regulated in cycle tracks, bike lanes, and multi-use trails in order to be safe mixing with bicycles. Where there are no cycle tracks or bike lanes, the City of Toronto should consider the road's posted speed limit when considering where scooters can and cannot ride for user safety.

Parking: The City of Toronto must be able to restrict where scooters can be parked to safeguard the public right of way. Parking options can include providing on-street corral rental space to scooter operators and/or docking points, thereby generating revenue for the City in valuable space. For the safety and accessibility of those using our sidewalks, dockless scooter parking cannot be permitted in the public right of way and must be the operator's responsibility to respond to violations in a timely manner.

Number of shared fleet operators: Municipalities must be able to limit the number of operators to ensure they can manage the additional communication, compliance and enforcement associated with the pilot. Municipalities should undertake a selective bid process which could award operators points where the shared scooter system demonstrates high quality design safety (for example, can withstand crossing streetcar tracks and potholes safely), equity across neighbourhoods, and sustainability features (charging stations / rechargeable batteries) which contribute to achieving the municipalities' active mobility, sustainability, or mode share goals.

Accountability: User accountability reporting should be mandated for operators. Each trip and scooter should have a unique identifier assigned by the operator as was implemented in San Francisco. Operators should be required to contact users about compliance or safety issues and report all injuries or fatalities to the City of Toronto and the Ministry of Transportation within 24 hours of the incident. We also want to understand who would be liable for any manufacturing defect that could injure or kill an e-scooter passenger on our roads, and what standards will be used to assess the safety of scooters.

Price: Operators should not be restricted from setting their own price points, but should be restricted from setting different price points for different areas to ensure equity across all areas of Toronto. Low income price points should be encouraged by the City and set in advance by the operator. Rates should not be permitted to be increased during the pilot period.





Lights / safety features: If lights are required, the manufacturer should be required to have them built into their product. Similarly, if bells or other safety accessories are required, the manufacturer should be required to have them built into their product.

Education: The City should require operators to provide an educational component in their bid, which includes how and where kick-style e-scooters can be used and how to safely share road space with other users.

Best Practice Review: The City should review the recently released National Association of City Transportation Officials (NACTO) [shared mobility guidelines](#) with case studies from cities who have implemented scooter pilots across North America, and consider the best practices within prior to approval of a pilot.

Reporting: Reporting should be undertaken annually and made available publicly. The City should require operators to report the number of kilometres travelled per day (not the number of rides per day), as shorter trips are often trips that can be easily walked or biked and do not contribute significantly to the reduction in personal automobile use or rideshare trips. Active transportation should be prioritized because it provides cardiovascular health benefits to users. Longer distances travelled is a better indicator of whether scooter trips are replacing automobile or public transit trips.

Pilot Duration: We recommend a pilot period of no more than one year from the date of approval. The MTO proposed five year pilot period is excessive to measure results, and adjustments may need to be made sooner than that in the event of unforeseen circumstances and evolving technology. A pilot period could include the preparatory period during which municipalities can set regulations as well as the operational period, which is consistent with other pilot operational periods in Waterloo, Ontario (6 months), and Chicago (6 months).

Cycle Toronto supports all kinds of active mobility and e-mobility devices that allow people to move themselves and their goods safely. Given the similar speeds at which people using kick-style e-scooters, skateboards, e-wheelchairs, rollerblades, pedal assist e-bikes and cargo bikes travel, it makes sense to have everyone sharing the lane. Legally recognizing how many people already use our streets will lead to healthier, safer, and better designed communities for everyone.





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Feel free to reach out should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Keagan Gartz".

Keagan Gartz, Interim Executive Director
Cycle Toronto

