Walk Toronto is a grassroots pedestrian advocacy group that works with various levels of government, community groups and citizens to improve walking conditions and safety in Toronto.

Introduction

Walk Toronto is supportive of the Vision Zero 2.0 Plan, which is the most significant pedestrian safety initiative the City of Toronto has ever undertaken, and a significant improvement in terms of a road safety plan.

We commend the expressed commitment to the safe systems approach highlighted in the staff report\(^1\): Vision Zero 2.0 "reiterates that human life should be prioritized over all other objectives within all aspects of the transportation system", even if the changes implemented are at odds with a desire to reduce motor vehicle delays. We believe that this is a significant step towards reducing deaths and serious injuries in our streets.

Nevertheless, we feel that City staff’s 2.0 edition of the plan has its limitations; we had been hoping for a comprehensive Vision Zero strategy that would involve a change in the default speed limits across the whole city, as well as other measures to minimize the consequences of human error, such as a ban on right turns on red.

In this submission, we highlight the many positive recommendations contained in the staff report, which are sensible and will lead to positive outcomes. We also include some additional considerations that we believe would deepen the impact of the changes proposed by City staff.

\(^1\) June 13, 2019
Road design improvements
It is encouraging to see that there will be a greater focus on geometric modifications to the design of the road, as this is one of the most important factors that influence drivers’ behaviour; road design is, more than speed limits, one of the most effective ways to achieve the intended target speed.

Prioritize so-called mid-block crossings
Walk Toronto applauds the recommendation that future staff reports on traffic signals will be based more upon contextual considerations, and will likely result in traffic signals being recommended despite not meeting the numerical warrant. Likewise, we support basing decisions on PXOs using factors such as distance from adjacent controls (which is omitted from the Ontario Traffic Manual warrants). It should be noted that many of the much needed controlled crossings are not mid-block, they are at actual intersections. Enhancements of crossings at intersections generally will provide greater safety for pedestrians. For example, at some suburban intersection locations the nearest existing stoplight might be a kilometre away. On wide roads that have several lanes of traffic and high travel speeds, pedestrians need to have safe crossings at regular intervals. No one should be expected to walk ten minutes out of their way just to get to a safe place to cross the street. Long detours can be even more time-consuming and physically taxing for slow walkers, including seniors, parents with young children, or people with disabilities.

Furthermore, we would like to propose one addition to the package of recommendations in the report: to **make a City policy that all TTC stops have a controlled crossing in the immediate vicinity, and that this policy not reduce the number of TTC stops, and that this policy have a final implementation date of 2023.**

Proactive application of pedestrian head start signals
Walk Toronto applauds this measure, also known as a leading-pedestrian interval, which is intended to give pedestrians a head start and prevent conflicts with vehicles that are turning into their path. When it comes to accessibility, however, it is imperative that all leading-pedestrian interval signals implemented have audible and vibro-tactile features to alert pedestrians with visual impairments that they have the right-of-way. Without accessible signal information, blind pedestrians will wait during the leading pedestrian interval and start crossing when the vehicles begin to move — when drivers are not expecting pedestrians to be starting to cross.
We recommend prioritizing the retrofitting of leading pedestrian interval lights with accessible pedestrian signals, for accessibility.

**Missing sidewalks**

Walk Toronto supports the recommendations related to missing sidewalks, which will lead to a more efficient and streamlined process, in line with Complete Streets guidelines and accessibility considerations.

Delegating to the General Manager, Transportation Services, the final decision-making authority to add sidewalks to local roads as part of a road reconstruction or for disability accommodation, will bring clarity to the process and expedite improvements to pedestrian safety and accessibility.

We believe that the Missing Sidewalk Installation Policy attaches excessive weight to the road classification system – which is based on motor vehicle traffic volumes – while assigning secondary importance to pedestrian volumes. We would propose a more balanced approach for consideration, that would give them each equal weighting. The vehicle volumes would give an indication of the levels of danger and risk posed to people walking, while pedestrian volumes would indicate potential demand for sidewalks. This would also be in line with the social justice goals of Vision Zero 2.0.

Sidewalks are highly relevant from an equity lens: sidewalks are an essential piece of the City’s transportation infrastructure, providing accessibility and safety for all, including children, seniors, and people with disabilities. Where sidewalks are missing, people have no alternative but to dodge cars on the roadway, or walk on the shoulder of the road or along a ditch; these places are no-go zones for some people.

**Proactively addressing turning collisions at signalized intersections**

While it is encouraging to see plans for proactively addressing turning collisions at signalized intersections, right turns on red are particularly risky for vulnerable road users. The plan mentions prohibiting some right-turn-on-red at intersections with known relevant collision patterns, but Walk Toronto would like to see right turns on red stopped once and for all throughout the city.

Drivers who make a right turn on a red light without coming to a complete stop first, as established in the Highway Traffic Act, create a particularly dangerous environment for vulnerable road users, especially people with visual impairments, children and seniors. As drivers look left for a gap in traffic, they are more likely to strike a pedestrian or bicyclist crossing on their right. Walk Toronto believes
that prohibiting all right turns on red throughout the entirety of Toronto would make intersections safer for pedestrians. Moreover, this default measure would make leading pedestrian intervals much more effective.

This blanket measure is consistent with the “proactive and systemic prioritization” that the Vision Zero 2.0 staff report\(^2\) reminds us is at the heart of the Vision Zero approach — as opposed to the traditional road safety approach, which reacts to historical crashes.

**Revised speed limit setting practices**
A systemic approach to speed reduction consists of several elements, and it is good to see the emphasis on road design improvements as part of a holistic speed management strategy. Speed limits must be compatible with the design speed of the road.

Beyond this, implementing lower, city-wide, default speed limits is a critical component in preventing traffic fatalities. We believe that a consistent approach to speed limits is more conducive to systemic change and mitigation of risky behaviour; in contrast, the selective approach to speed limit reductions, targeting specific stretches of road, can be confusing for drivers when the posted speeds for a road change from location to location. For this reason, blanket default speed reduction policies are preferable. This being said, we believe that staff’s proposals to reduce speed limits on certain roads is an important first step in making safety changes on suburban arterials.

The good news is that almost all arterials in North York and Scarborough will be slowed to 50 km/h, with a few roads near Eglinton actually going down to 40 km/h. The bad news is that most arterials in Etobicoke retain their existing high speed limits — this despite evidence provided by Overall KSI maps demonstrating that the degree of road carnage in Etobicoke is broadly comparable to that in other Toronto suburbs. Walk Toronto is disappointed by the reluctance to enact a measure in Etobicoke that will potentially save the lives of its residents.

**Expansion of the red light camera program**
Automated speed enforcement is a critical component of road safety, and we are pleased to see that it is part of Vision Zero 2.0. Accelerating the implementation of automated safety cameras will save lives. Red light cameras, first introduced in Toronto in 2000, have been reported by the City of Toronto to reduce

\(^2\) page 13.
instances of crashes and injury by up to 60% in the intersections where they've been implemented.³

In line with the equity lens of Vision Zero 2.0, automated enforcement also serves to approach enforcement in a more systemic and unbiased manner. In particular, automated enforcement prevents police enforcement of speeding or distracted driving from being applied unequally, potentially targeting certain racialized groups.

Adding safety features such as side guards to large vehicles in the City’s fleet

The risk that trucks pose to pedestrians is significant. Walk Toronto praises staff’s commitment to a dual approach to truck safety. Video-based telematics that eliminate blindspots and provide greater visibility will help prevent under-ride collisions between trucks and vulnerable road users. This feature is complemented by the addition of truck side guards, which will contribute to the minimization of harm if a truck sideswipes a pedestrian or cyclist — and a crash does occur. Vision Zero 2.0 thus covers both angles: prevention and harm mitigation. We agree with any recommendation that side guards and video-based telematics should be mandatory on garbage trucks and other heavy vehicles that are operated by, or on behalf of, the City of Toronto. We applaud Solid Waste Management Services for their willingness to invest in measures that will save lives and reduce the number of crushing injuries.

Emphasis areas

While the plan focuses on 6 emphasis areas of pedestrians, cyclists, motorcyclists, school-aged children, older adults and aggressive and distracted driving, people with disabilities are not mentioned. We believe that this is a significant omission, involving a set of road users that is, in general, more vulnerable than others: they have additional challenges to get around the city compared to able-bodied persons; for example, people using mobility devices may be less visible to motorists than other road users, or may need more time to cross the street; blind persons may not be aware of an imminent risk posed by a distracted or careless driver making a turn on their crossing path, or be able to make sure that a driver has seen them.

The findings of a study out of Georgetown University in 2015 suggests that pedestrian wheelchair users are a third more likely to be killed in a collision than members of the general public.⁴ Related evidence comes from a study of vision-
impaired adults who were interviewed about any accidents they had ever had while travelling or walking (Gallon, Fowkes and Edwards, 1995). Collisions while crossing the road were reported by 89 (29 per cent) of the 302 respondents. There were 36 accidents resulting in injury, of which 17 had occurred during the previous five years. When compared with pedestrian injury rates in the general population over the same five-year period, people in the vision-impaired sample had a significantly higher risk.  

Creating an emphasis on this set of people is also in line with the social justice and equity lens of the Vision Zero 2.0 Road Safety Plan. In order to better understand the risks for this population, it would be useful to collect data regarding instances of road fatalities or serious injuries among people with disabilities. Police could specify in their reports whether the victim of traffic-related violence was using a mobility device, or has a visual disability.

Conclusion
The most significant benchmark by far in any Vision Zero strategy is the extent to which it reduces traffic deaths. The stated goal of Toronto’s Vision Zero Road Safety Plan, as adopted by Council in 2016, is to “reduce the number of road fatalities and serious injuries to zero as part of the five-year Road Safety Plan.” What Toronto has committed itself to by subscribing to the Vision Zero philosophy, transcends the limited, workaday objectives of a traditional traffic safety unit. Citizens really do expect a bold Vision to take hold at city hall, inspired by an uncompromising goal of Zero deaths on our roads. This is transformative, and requires transformative measures to succeed.

While Walk Toronto supports the Vision Zero 2.0 staff report and its recommendations, we consider it to be of an interim nature — another step on the way to eliminating deaths and serious injuries in Toronto. Ultimately, we believe that Toronto needs a comprehensive, true Vision Zero strategy that includes lower default speed limits, no right turns on red city-wide, and a systematic implementation of traffic calming measures.

http://bmjopen.bmj.com/content/bmjopen/5/11/e008396.full.pdf