

IE8.6.1

From: [Dylan Reid](#)
To: [Infrastructure and Environment](#)
Cc: daniella.levypinto@gmail.com
Subject: My comments for 2019.IE8.6 on October 17, 2019 Infrastructure and Environment Committee
Date: October 16, 2019 1:02:49 PM
Attachments: [WT Snow Clearing submission October 2019.pdf](#)

To the City Clerk:

Please add the attached comments to the agenda for the October 17, 2019 Infrastructure and Environment Committee meeting on item 2019.IE8.6, Winter Maintenance Program Review. I am submitting them at the request of and on behalf of Daniella Levy-Pinto, a member of Walk Toronto's steering committee, who is copied here and should be identified as the submitter. The document has been converted to PDF so that it can be linked to on the agenda page.

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

Dylan Reid, on behalf of Daniella Levy-Pinto



Walk Toronto Comments on Winter Maintenance Program Review

To: Members of The Infrastructure and Environment Committee

From: Steering Committee, Walk Toronto

Re: Winter Maintenance Program Review IE8.6

Date: October 16, 2019

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.

Since 2014, Walk Toronto has advocated for the City of Toronto to take responsibility for clearing snow from all sidewalks on a comprehensive basis, for several reasons.

Harmonizing winter maintenance service levels across the city is equitable. We cannot work at designing Complete Streets that serve the needs of all users and at the same time be miserly with operating funds to the extent that sidewalks are often unsafe, and even unusable, in the winter.

We are pleased to see that Transportation Services continues to review winter operations services, and we believe that the pilot to use equipment to mechanically clear snow from sidewalks in areas of the city not currently serviced will prove its value. Moreover, it is encouraging that staff will undertake the development of an inventory of sidewalk conditions and encroachments, to correct these when appropriate. As well, we are pleased that sidewalks on local roads that currently already receive snow plowing will now benefit from enhanced service levels.

We believe, however, that the recommendations included in the staff report are only the first step, and that the goal should be a safe and reliable network for all, including those who get around using active transportation. Ultimately, the City should provide the same service to all its residents, instead of clearing the snow from only some sidewalks and not others. We believe that consistent and harmonized snow removal standards are the only way to ensure safety, accessibility and equity for pedestrians.

While the pilot project will result in snow removal from some sidewalks provided by the City, we would have liked to see a larger area for the pilot. In addition, we consider that Toronto should be compared with other cities with better standards, not to smaller municipalities in the GTA.

Accessibility, safety and equity

While cities that clear snow comprehensively benefit all residents, especially those living with disabilities, Toronto has been stuck with an inequitable system that doesn't serve residents well in the older parts of the city. Moreover, taxpayers are footing the bill for



millions of dollars to settle slip and fall claims, plus more money for an inefficient program to plow sidewalks where seniors and people with disabilities live.

The staff report recommends that the pilot project prioritize locations that are currently part of the senior sidewalk clearing program, where seniors and persons with disabilities can apply to have their sidewalks cleared manually by the City at no cost. This will not ensure that people with disabilities can get around safely in Toronto in the winter. In the areas where the City does not provide snow removal service to home owners, it takes only one negligent homeowner who fails to shovel the sidewalk adjacent to their property for that sidewalk to become hazardous for seniors, individuals with balance problems, wheelchair users, etc. Anyone who lives in the “no plough zone” knows that, inevitably, there is someone on every block who is negligent, and this results in unpassable streets for people with disabilities and seniors. It’s the ‘weakest link in the chain’ principle: any snowfall or ice accumulation makes pretty much every residential sidewalk in which snow is not removed by the City dangerous for vulnerable people until the next melt.

Service levels should be consistent across the entire city. Just as motorists expect Toronto’s roadways to be passable in all four seasons, so pedestrians must be treated with equal consideration. Furthermore, we believe that the assistance program to clear sidewalks adjacent to the residences of seniors and people with disabilities is of limited use: it does not ensure that sidewalks are passable beyond the properties of the individuals enrolled in the program. The only way to ensure accessibility and safety for everyone to get around on Toronto's sidewalks on the winter is to provide comprehensive, snow clearing services.

Walking “the first and last mile” is an integral component of a transit journey. To be viable throughout the year, this component must be made safe – rather than an extreme sport. A comprehensive sidewalk clearing program will achieve this goal. The costs of sidewalk winter maintenance are a small fraction of overall expenditures on public transit. As such, it does not make sense for governments to be spending billions of dollars on transit capital projects if these investments aren’t supported by adequate operations budgets that include winter maintenance.

When sidewalks are clogged with snow and ice, many transit riders will avoid them and arrange to be driven either to the transit start point, or all the way to their destination. In both cases, road congestion is increased during a critical period when it’s prudent to be keeping the streets clear for snow ploughs and emergency vehicles.

Comparable jurisdictions

We would like to draw attention to the discussion in the HDR consultant’s report of peer cities. 4 out of the 6 cities that were selected are American. We feel that this is not an appropriate choice for properly assessing the winter maintenance policies of comparable metropolises because the United States has a tradition of offloading the provision of



services to its citizenry and the private sector — whereas in Canada there is greater willingness to have government take responsibility for certain functions (such as sidewalk snow clearing).

Moreover, we find that in HDR’s examination of policies in the GTA, they have cherry-picked jurisdictions where sidewalk snow clearing is the responsibility of property owners. This creates an unreliable and lopsided representation of the level of government involvement in winter maintenance programs across Ontario. If a more accurate big picture of snow clearing policies is to be arrived at, then it is necessary to fill in the omissions in the HDR report. Aside from the cities of Ottawa and Montreal, the following Canadian municipalities provide sidewalk snow clearing for their residents:

- In Ontario — Aurora, Barrie, Belleville, Burlington, Kingston, London, Oakville, Peterborough, Richmond Hill, Stratford, Thunder Bay, and Vaughan
- Outside the province — Charlottetown, Fredericton, Gatineau (with a few exceptions), Halifax, Quebec City and Winnipeg

These lists are not exhaustive, but they are long enough to support our contention that many cities in Canada which are less affluent than Toronto are providing superior sidewalk winter maintenance.

Economic Competitiveness

The HDR and staff reports do not address the issue of economic competitiveness. This requires that we look at fair-weather jurisdictions rather than comparable “winter cities”. Much of Toronto’s prosperity depends on its ability to lure to Ontario’s capital companies and individuals in the technology, financial and other ‘creative class’ sectors. Our city has become a hotbed of innovation. But it is not inevitable that Toronto will continue to be a magnet for high-end employment. We are competing against regions such as Silicon Valley that enjoy far more attractive, snow-free climates. The City of Toronto obviously cannot abolish snowfalls, ice storms and freezing temperatures. But what it can do is intelligently devote civic resources to mitigating the effects of our harsh winters.

Because of its reputation for livability, Toronto’s downtown is considered extremely desirable as a location for offices and the people who work in them — many of whom prefer to live within walking distance of their workplace. It is imperative that the City do its best to maintain good walking conditions in the downtown, throughout all four seasons. This means that our municipal government should take full responsibility of clearing sidewalks, and provide to the older parts of the city the same high level of service that the suburbs currently enjoy.



Silicon Valley isn't very walkable, but it attracts business by promoting the advantages of its California lifestyle. Toronto is a northern city that gets lots of snow. Let's deal with this fact. If we want to compete effectively on a global level, we should be making a commitment to harmonize our winter maintenance policies as soon as possible.

Other Considerations

Walk Toronto strongly supports harmonization for safety, accessibility and equity considerations. We do not believe that harmonization will impose substantial extra costs on taxpayers. It will replace the expensive program currently in place to clear sidewalks abutting property owned by seniors and people with disabilities. Also, better maintained sidewalks will bring down the number of slip and fall incidents, in turn reducing the settlements that the City of Toronto makes for negligence claims. These costs are in the millions of dollars, as are the amounts paid by OHIP for the treatment of slip and fall related injuries.

The alternative to harmonization is properly enforcing the current requirement for owners to clear sidewalks abutting their property. Staff conclude that "it is estimated that in order to provide general proactive enforcement, with adequate inspections, follow ups, issuance of charges, clearing, etc., three to four Transportation Standards Officers would be required per Ward, representing a doubling or tripling of the current staff compliment [of ten]". (Staff report: "Clearing Snow from Sidewalks", Transportation Services, Oct. 27, 2015, page 4 <https://www.toronto.ca/legdocs/mmis/2015/pw/bgrd/backgroundfile-85337.pdf>)

This means that 20 to 30 extra enforcement officers would have to be hired to make the current flawed policy work properly. In Walk Toronto's opinion, it would make more sense simply for the City to hire 20 to 30 sidewalk plow operators who would be directly responsible for getting the job done — rather than wasting time on enforcement paperwork.

Finally, regarding the recommendation to implement an improved communications campaign to better inform the public about the services the City provides and the service levels they can expect during winter weather, our suggestion is to include this information as part of the garbage calendar, since that is targeted to specific areas of the city.