

January 28, 2020

Toronto Accessibility Advisory Committee

City Clerk's Office
12th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

We would like to provide the following information for consideration for the Toronto Accessibility Advisory Committee as part of agenda item DI7.3

Impact on vulnerable road users and pedestrians

The CNIB Foundation is pleased to see that Canadian jurisdictions are open to innovative approaches which have the potential to lessen greenhouse gases, reduce congestion on city streets, and better utilize public transit via first/last mile transportation.

However, if e-scooters are permitted to travel within Canadian cities, expectations must be in place to promote the safety of both pedestrians and e-scooter riders.

Of concern to the CNIB Foundation is the lack of expectations for parking or storing the devices when not in use. Parking zones for e-scooters are not designated and therefore do not keep a clear path of travel for pedestrians.

The CNIB Foundation recommends municipalities expect e-scooter riders to park the device in designated areas only. This is in line with the existing practice of e-bikes and car share initiatives. Parking zones should be designed to keep a clear path of travel for pedestrians, leaving a minimum of 1.8 meters of unobstructed space around the parking zone. The parking zone should also be well marked using both high contrast and tactile markings.

The CNIB Foundation also recommends e-scooters follow similar classification as bicycles, meaning they must not be permitted to travel along city sidewalks. E-scooters can reach speeds of up to 32 kilometers per hour; in cities with limited sidewalk space, this presents a safety hazard to all pedestrians – particularly those who are blind or partially sighted.

Pedestrians with sight loss, including guide dog handlers, cannot be expected to step off a sidewalk onto a street or rough terrain to avoid a collision with an e-scooter or navigate around an abandoned device parked haphazardly on a public pathway.

Finally, when e-scooters are discovered to be parked inappropriately, reporting this to operators and/or municipal enforcement agencies should be facilitated using a QR like code or accessible mobile app. Operators and riders alike should be expected to deploy or ride e-scooters responsibly. When this does not happen, then strong, effective deterrents or by-law penalties should be enforced.

Recommendations:

1. E-scooters must be treated as bicycles and operators must follow the same rules of the road as cyclists.
2. E-scooters should only be parked in designated areas which are clearly marked and are cane detectible.
3. Designated parking areas must not impede a path of travel and a minimum of 1.8 meters space should exist around the parking area to enable pedestrians with sight loss to safely navigate around these designated areas.
4. E-scooters should include a scannable QR code prominently situated on the device and marked using tactile and high contrast lettering. If a vulnerable road user encounters an e-scooter, they can report the device location.
5. When duly reported to micro mobility operators, expectations should be established by municipalities that prompt action is taken to remove the e-scooter and take it to a designated parking spot.
6. Municipalities should establish appropriate mechanisms and/or administrative penalties which will serve to discourage unsafe practices such as excessive speed or careless abandonment of e-scooters.

We hope that the City of Toronto will seriously take into account the safety and accessibility needs of pedestrians who are blind or partially sighted when considering e-scooter use within the City.

If you have any further questions, please do not hesitate to get in touch.

Sincerely,

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