

Infrastructure and Environment Committee
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

IE14.10.6

July 7, 2020

The CNIB Foundation would like to provide the following recommendations to the Infrastructure and Environment Committee for consideration as part of agenda item IE14.10 "E-Scooters - A Vision Zero Road Safety Approach".

We commend the City of Toronto for its intention to carry out further investigations on the impact of e-scooters before moving forward with a pilot, especially looking into the collision and injury data and possible public health implications. Introducing e-scooters onto our city streets is not a decision that is to be made lightly, especially in a city such as Toronto where sidewalk space is at a premium in many busy areas.

Injury Data Collection

The CNIB Foundation is concerned about how the City of Toronto and future e-scooter providers will enforce safe use of these vehicles. Complaints to the City via 311 and current available injury data collection methods (i.e. hospital records) are insufficient mechanisms for capturing the impact of e-scooters in our community. This data does not capture a) incidents that cause minor injury but do not require medical attention or b) when an e-scooter is removed from being improperly parked in a pedestrian pathway without being reported to 311 or the e-scooter companies. It is likely that these minor incidents will occur more frequently than major ones, and so cannot be overlooked in the data collection methodology.

We support the City's proposal to request that the Ontario Ministry of Transportation amend the Motor Vehicle Collision Report to add electric kick-scooters as a vehicle type and to treat e-scooters as a motor vehicle for reporting purposes. Furthermore, data capture must be reflective of social characteristics such as people with disabilities. Currently, injury data is silent when it comes to documenting persons with disabilities in collisions, including the City of Toronto's Vision Zero data. By defining e-scooters as a vehicle type and enriching the data capture protocols the City of Toronto will be better equipped to evaluate its e-scooter pilot.

Enforcement

Furthermore, it has been a long-standing issue that some cyclists choose to disregard rules about riding on sidewalks, and with a rise in the use of private e-scooters, the lack

of compliance and enforcement concerning riding on the sidewalk remains a serious concern to CNIB.

For the above noted reasons, we remain unconvinced that the City of Toronto enforcement mechanisms will be adequate to ensure that pedestrians with sight loss will not be negatively impacted by continued deployment of shared or privately owned e-scooters.


The City of Toronto should also look to cities such as Calgary for examples of penalties when city bylaw infractions take place. Calgary has introduced graduated fines ranging from \$75 for inappropriate parking an e-scooter to \$400 for more serious violations. Recognizing that infractions will happen and that these will likely represent a minor segment of e-scooter riders, it is still imperative that the City of Toronto has the necessary enforcement in place otherwise fines will be ineffective deterrents.

E-Scooter Parking

We were encouraged that the City is moving towards an e-scooter program which would complement the existing Bike Share Toronto program, if this can be taken as an indication that the City is planning towards a docked parking system. E-scooters should only be parked in designated areas which are clearly marked and are cane detectible. The most accessible option for pedestrians is for the City of Toronto to repurpose existing car parking spaces for e-scooters, as this would help keep the sidewalk navigable for everyone, especially pedestrians with sight loss.

If this is not possible then e-scooters should be docked close to other items within the furniture zone on the sidewalk, without encroaching on the pedestrian path of travel. Permitting people to leave the scooters anywhere they wish puts rider convenience above the safety of vulnerable pedestrians, including seniors and people with disabilities. 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 safely around an abandoned device parked haphazardly on a public pathway. The Calgary pilot recently approved on-street parking zones for e-scooters. Additionally, Calgary has begun to investigate the viability of parking zones within the furniture area of a sidewalk, placing it clear of the path of travel. These considerations would make it simpler for all pedestrians to travel unobstructed along a well-defined path of travel.

In addition to the issues directly raised in the Transportation Services Report, we would like to urge the City of Toronto to follow the lead of other Canadian municipalities who have banned sidewalk riding for e-scooters. As mentioned above, cycling on sidewalks is already a pervasive issue across the City, which poses a risk to pedestrians with sight loss who may not be able to see a cyclist or an e-scooter coming towards them on the sidewalk or hear an e-scooter approaching them from behind. This could lead to



collisions, resulting in serious injuries. E-scooters must be treated as bicycles and operators must follow the same rules of the road as cyclists.

Furthermore, we recommend e-scooters also not be permitted on Multi-Use Pathways (MUPs) as this is another space shared with vulnerable pedestrians.

As outlined in the Transportation Service's report, further consultations will help ensure that the City of Toronto has at its disposal robust data and comments from all citizens, including persons with disabilities. These consultations should further include accessibility experts in the built environment, such as Orientation and Mobility Specialists.

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

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

Sincerely,

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