

Attachment 1 – Letters from Stakeholders

Attachment 1 Part 1



AODA Alliance

Accessibility for Ontarians with Disabilities Act Alliance

AODA Alliance Asks Toronto Mayor John Tory to Stand up for People with Disabilities and to Stand up to Corporate Lobbyists for Electric Scooter Rental Companies who are Inundating City Hall

Accessibility for Ontarians with Disabilities Act Alliance
Update

United for a Barrier-Free Society for All People with Disa-
bilities

Web: www.aodaalliance.org Email: [aodafeed-
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AODA Alliance Asks Toronto Mayor John Tory to Stand up for People with Disabilities and to Stand up to Corporate Lobbyists for Electric Scooter Rental Companies who are Inundating City Hall

November 4, 2020

SUMMARY

The AODA Alliance today wrote an important letter to Toronto Mayor John Tory (See below). We asked him not to allow electric scooters (e-scooters) in Toronto. They endanger the safety of the public and especially people with disabilities and seniors. We've been told over and over that he will make the ultimate decision.

If he won't just stop this now, we urge Mayor Tory to himself hold an open, accessible series of virtual town halls with people with disabilities in Toronto to hear our concerns about e-scooters. Our October 30, 2020 news release revealed how City Hall has been the target of a well-funded feeding frenzy by corporate lobbyists for e-scooter rental companies. In today's letter, we ask Mayor Tory to stand up for Torontonians with disabilities and to stand up to the e-scooter corporate lobbyists.

You can help us with this important issue. Please email Mayor Tory. Tell him not to allow e-scooters in Toronto. Tell him to listen to people with disabilities, and not to the e-scooter corporate lobbyists. You can write him at:

Mayor_Tory@toronto.ca

For more tips on how you can help people with disabilities, seniors and others, press the City of Toronto not to unleash the dangers of e-scooters upon us, check out the AODA Alliance's [Toronto e-scooters Action Kit](#).

We've gotten word that some of the e-scooter rental companies are trying to hold some sort of meeting or consultation to hear from people with disabilities about their concerns with e-scooters. We take a dim view of this. Those companies are well aware of our well-documented concerns. They showed no such interest until it became clear that our concerns were impeding their allied members of City Council from railroading this issue through the City in a hurry. We anticipate that those corporate lobbyists are trying to position themselves on the disability issue so they look like they are genuinely concerned.

It is the City of Toronto, and particularly Mayor Tory, that should be holding a major, open and accessible public consultation with people with disabilities on their concerns regarding the dangers that e-scooters create. The e-scooter companies have an unalterable financial goal, which is to spread e-scooter rentals as far as they can.

We always welcome your feedback. Write us at aodafeedback@gmail.com

For more background:

1. The AODA Alliance's July 8, 2020 brief to the City of Toronto Infrastructure and Environment Committee, already endorsed by Spinal Cord Injury Ontario and the March of Dimes of Canada
2. The open letter to all Ontario municipal councils from 11 major disability organizations, opposing e-scooters in Ontario, and
3. A sampling of news reports on the serious injuries that e-scooters have caused in communities that permit them.
4. The AODA Alliance e-scooters web page.

MORE DETAILS

November 4, 2020 Letter to Toronto Mayor John Tory from the AODA Alliance

Accessibility for Ontarians with Disabilities Act Alliance

United for a Barrier-Free Society for All People with Disabilities

Web: www.aodaalliance.org Email: aodafeedback@gmail.com Twitter: @aodaalliance Facebook: www.facebook.com/aodaalliance/

November 4, 2020

To: Mayor John Tory

Via Email: mayor_tory@toronto.ca

Office of the Mayor

City Hall, 2nd Floor

100 Queen St. W.

Toronto, ON M5H 2N2

Twitter: @JohnTory

Dear Mayor Tory,

Re: Protecting Torontonians from the Dangers of Electric Scooters

We seek your leadership to protect all Torontonians, and especially people with disabilities and seniors, whose safety is endangered if Toronto permits electric scooters (e-scooters). By all accounts, the practical decision will be yours, as our mayor, on whether to allow e-scooters. If you say no, enough members of City Council will follow your lead to stop this danger.

We seek your leadership in standing up to e-scooter corporate lobbyists and to stand up for the many Torontoni-

ans who don't want to be injured by e-scooters. To that end, we ask that you:

1. Please stop the City's consideration of e-scooters before it goes any further.
2. If not, then at the very least, put any consideration of e-scooters on hold until the COVID-19 pandemic is well behind us. No doubt, City Council and staff now have much higher priorities.
3. If not, then if any steps at all are to happen on this issue over the next months, you, as mayor, should personally lead an open, accessible and extensive City consultation with people with disabilities and seniors on the dangers that e-scooters pose. That would be the best way to act upon the City Council's July 28, 2020 motion, addressed below. As Toronto's mayor, we ask that you hold public virtual face-to-face town hall meetings with these Torontonians so you hear directly from them.

The Issue

An e-scooter is a silent motor vehicle. If allowed, a joy-rider with no license or training could rocket around on an e-scooter at 20 kph or faster. E-scooter riders and innocent pedestrians would get seriously injured or killed. See a recent CBC report on e-scooter injuries suffered in Calgary.

The silent menace of e-scooters especially endangers seniors and people with disabilities, such as people who are blind or have low vision or balance issues, or whose disability makes them slower to scramble out of the way. A blind pedestrian can't know when a silent e-scooter races toward them at over 20 kph, driven by a fun-seeking unlicensed, untrained, uninsured, unhelmetted rider.

The Dangers to People with Disabilities, Seniors and Others

In cities where e-scooters are allowed, rental e-scooters, left strewn around public places, create new mobility barriers to accessibility for people using a wheelchair, walker or other mobility device. For people who are blind, deaf-blind or have low vision, they are a serious unexpected tripping hazard.

When you spoke with me back on December 9, 2019, you were awaiting a City Staff report on e-scooters. Since then, a detailed [June 24, 2020 City of Toronto Staff Report](#) showed that to allow e-scooters in Toronto will endanger public safety, send e-scooter riders and innocent pedestrians to hospital emergency rooms, require significant new law enforcement efforts and impose new financial burdens on the taxpayer to cover added costs that e-scooters trigger. The [Staff Report](#) also shows that e-scooters do not bring the great benefits for reduced car traffic and pollution that corporate lobbyists for e-scooter rental companies claim.

E-scooters would especially endanger public safety and accessibility for people with disabilities and others on sidewalks. The City Staff Report shows that in cities where e-scooters are allowed but banned on sidewalks, they are nevertheless ridden on sidewalks. At the July 9, 2020 Toronto Infrastructure and Environment Committee meeting, law enforcement officials told Councilors that overburdened officers have no capacity to handle added burdens of enforcing new e-scooter regulations, if enacted. One Councilor remarked that City law enforcement officials don't now even enforce restrictions on riding bikes on sidewalks.

This shows that Toronto should reject e-scooters. Why then is the City and City Council still considering this at all, much less during the current devastating COVID-19 pandemic?

Feeding Frenzy at City Hall by E-scooter Rental Companies' Corporate Lobbyists

A recent AODA Alliance report provides insight. It documents that City Hall has been flooded by a well-funded feeding frenzy by corporate lobbyists for the e-scooter rental companies. Entries in Toronto's Lobbyist Registry, filling fully 73 pages, reveal that from June 2018 to the present, eight e-scooter rental companies and three lobbying firms had 1,384 contacts with City Hall in person, by phone, by virtual meeting, or by email. Among these are at least 112 meetings and 1,153 emails with City officials.

Among many other City officials, this includes contacts with the Mayor's Office, including 10 with you; 58 with your Senior Advisor, Legislative Affairs; 15 with your Director of Legislative Affairs; 10 with your Chief of Staff; and 1 with your Deputy Chief of Staff.

It is a long-standing, time-tested requirement that motor vehicles are only permitted when the motor vehicle and the driver are properly licensed, when the driver has had to undergo mandatory training, where the vehicle is subjected to safety technical standards, and where both the driver and vehicle are insured. These important safeguards are needed to protect public safety.

The e-scooter corporate lobbyists are trying to get you to let them duck all these safeguards. Those corporate lobbyists want to make money on e-scooter rentals, laughing all the way to the bank as seriously injured pedestrians sob all the way to hospital emergency rooms. They falsely claim that the City can approve e-scooters at no cost to the City or the public.

The June 24, 2020 City Staff report overwhelmingly supports the conclusion that the City of Toronto should not lift the ban on e-scooters. Why then did the Staff Report reach an irrational and unexplained suggestion that Toronto should run a pilot with e-scooters? The report does not say. It makes no sense, given the report's conclu-

sions about e-scooters' known dangers and unrealized benefits.

Moreover, to run a pilot would be to expose Torontonians to serious injuries if not deaths, just to see if e-scooters are a good idea. Experimenting on the public, when the risks are so serious, would be demonstrably immoral.

The corporate lobbyists seek a "pilot" as a pretext to establish a market in Toronto for their product, as a fait accompli.

The only explanation is the e-scooter corporate lobbyists' feeding frenzy at City Hall. Our report reveals that they have not only been vigourously lobbying your office and your colleagues on City Council, but a stunning spectrum of City employees as well, such as the Project Lead, Big Data Innovation Team, Transportation Services (62 contacts), the Manager, Street Furniture Management, Transportation Services (41 contacts), the Project Officer, Pedestrian Projects, Transportation Services (37 contacts), the Manager, Operational Policy & Innovation Transportation Services (36 contacts), the Manager, Data & Analytics Transportation Services (26 contacts), the Manager, Transportation Policy & Innovation, Transportation Services (25 contacts), the Director, Policy & Innovation, Transportation Services (22 contacts), the Coordinator Bicycle Safety Education, Transportation Services (18 contacts), the General Manager, Transportation Services (18 contacts), the Manager Transportation Services (18

contacts), the Project Lead Environment, Policy & Research, Environment and Energy (13 contacts), the Director, Transportation Infrastructure Management, Transportation Services (12 contacts), the Manager, Policy and Research Environment & Energy (10 contacts), the Manager, Strategic Policy and Innovation, Transportation Services (7 contacts) and the Manager, Cycling Infrastructure & Programs Transportation Services (7 contacts).

Earlier this year, on February 3, 2020, the municipally appointed Toronto Accessibility Advisory Committee unanimously recommended to City Council that Toronto should not allow e-scooters because they endanger people with disabilities. On July 28, 2020, City Council voted to direct City Staff to report back on the disability accessibility concerns regarding e-scooters. We thank you for voting in support of that motion.

It was deeply disturbing that fully 11 City Council members voted on July 28, 2020 to oppose getting more information on the dangers that e-scooters create for people with disabilities. That appears explicable by the e-scooter corporate lobbyists' relentless pressure.

That the e-scooter corporate lobbyists argue that the COVID-19 pandemic would be a great time to start allowing e-scooters in Toronto would only pile hardship upon hardship for society's most vulnerable People with disa-

bilities are now suffering disproportionate hardships due to the COVID-19 crisis.

Let's Talk

Can I speak with you by phone about these issues? It has been almost a year since we had our earlier discussion. Please make your legacy one which made this city safer and more accessible for people with disabilities. Do not leave a legacy of a Toronto where it becomes harder and more dangerous for us to get around.

Sincerely,

David Lepofsky CM, O. Ont

Chair Accessibility for Ontarians with Disabilities Act Alliance

Attachment 1 Part 2

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT ALLIANCE
NEWS RELEASE - FOR IMMEDIATE RELEASE

Major Disability Organizations' Open Letter to the Ford Government and Ontario Municipalities – Don't Allow Electric Scooters On Our Roads, Sidewalks and Public Places Because They Endanger Our Safety and Create New Barriers to Accessibility

January 22, 2020 Toronto: Eleven major community organizations concerned with the rights of over 2 million Ontarians with disabilities today made public a compelling open letter (set out below) to the Ford Government and mayors and councils of all Ontario municipalities, urging them not to permit electric scooters (e-scooters) on roads, sidewalks or other public places.

Last November, the Ford Government [passed a regulation](#) which lets municipalities permit dangerously fast e-scooters on roads, sidewalks and other public places. It ignored serious safety and accessibility concerns documented by Ontarians with disabilities. Rental e-scooters, strewn in public places, will be new mobility barriers to accessibility for people with disabilities. Silent e-scooters, racing at 24 kph, driven by uninsured, unlicensed untrained riders as young as 16, will endanger the physical safety of people with disabilities and others on sidewalks and in other public places.

That regulation lifts the provincial ban on e-scooters, but none may be used unless a municipality passes a bylaw permitting it. The Ford Government did not set strong, mandatory provincial rules to prevent the dangers that e-scooters pose nor did it ensure that municipalities would do so.

This open letter urges the Ontario Government to call off this “pilot project”, now authorized for an excessive five years. It calls on the mayors and councils of each municipality not to allow e-scooters in their communities. If a municipality does nothing, the danger is avoided, at least in that community. We are confident that municipalities have many other pressing priorities to deal with.

“This regulation inflicts on Ontarians with disabilities the undue hardship of having to campaign in hundreds of municipalities across Ontario, one after the next, to prevent this danger,” said David Lepofsky, chair of the non-partisan AODA Alliance, a grassroots disability coalition that

has led the campaign on this issue. “We fear that the e-scooter rental companies’ corporate lobbyists are lobbying city councillors behind closed doors.”

This open letter opposes e-scooters altogether. However, if permitted, mandatory provincial laws should require each e-scooter and driver to have a license, a helmet (even if over age 17) and insurance. If an e-scooter is left in a public place like a sidewalk, it should be forfeited and confiscated. E-scooter rental companies should have liability for any injuries that e-scooters cause, and limits on the number of e-scooters.

Contact: [AODA Alliance](#) Chair David Lepofsky, aodafeedback@gmail.com

Twitter: @aodaalliance

Open Letter

January 22, 2020

To: Hon. Premier Doug Ford

Via Email: premier@ontario.ca Doug.ford@Pc.ola.org

Room 281, Legislative Building

Queen's Park

Toronto, Ontario

M7A 1A1

And to: All Members of the Ontario Legislature

And to: The Mayors and Councils of All Municipalities in Ontario

Copy to: The Hon. Raymond Cho, Minister for Accessibility and Seniors

Via email: Raymond.cho@ontario.ca

College Park 5th Floor

777 Bay St

Toronto, ON M7A 1S5

And copied to:

The Hon. Caroline Mulroney, Minister of Transportation

Via email: caroline.mulroney@pc.ola.org

5th Floor

777 Bay St.
Toronto, ON M7A 1Z8

I. Introduction

The undersigned community organizations and groups ask the Ontario Government and Ontario municipalities to take the actions listed below to protect the public, and especially Ontarians with disabilities, from the danger to public safety and the accessibility of their communities that is created by the Ontario Government's new regulation on electric scooters (e-scooters). This regulation lets municipalities choose to permit people to use e-scooters in public.

On November 27, 2019, the Ontario Government announced a new regulation. It lets Ontario municipalities allow the use of e-scooters for a pilot of up to five years. An e-scooter is a motor vehicle that a person rides standing up. It can be very quickly throttled up to fast speeds of at least 24 KPH. It is silent even when ridden at fast speeds.

This Ontario regulation lets e-scooters be ridden on roads as well as sidewalks. It does not require a rider to have a driver's license, or to have training in the e-scooter's safe use or in the rules of the road. It does not require the e-scooter's driver or owner to have insurance.

The e-scooter model does not have to be certified as safe by the Canada Safety Association or other recognized certifying body. The e-scooter need not have a vehicle license, or display a license number, that could help identify the vehicle in the case of an injury.

The Ontario Government said that this pilot is to study use of e-scooters. However, the regulation has not required a municipality that permits e-scooters to study their impact, or to report any study to the public. There has been no showing why five years is needed.

II. E-Scooters Endanger Public Safety, Especially for People with Disabilities

Unlicensed, untrained, uninsured people racing on silent e-scooters in public places, including sidewalks, endanger the public, and especially people with disabilities. Ontarians with disabilities and others will be exposed to the danger of serious personal injuries or worse. Pedestrians cannot hear silent e-scooters racing towards them. This is especially dangerous for

people who are blind or have low vision or balance issues, or whose disability makes them slower to move out of the way.

In jurisdictions where they are allowed, e-scooters present these dangers. Ontario does not need a pilot to prove this. In an August 30, 2019 [CityTV report](#), the Ontario Government stated that it had compromised between protecting public safety on the one hand, and advancing business opportunities and consumer choice on the other, when it first designed its proposal for a five-year e-scooter pilot.

III. E-Scooters Will Create New Accessibility Barriers for People with Disabilities

The new Ontario e-scooter regulation will also lead to the creation of serious new accessibility barriers against accessibility for Ontarians with disabilities. In jurisdictions where e-scooters are allowed, e-scooters are frequently left lying in public, strewn around sidewalks and other public places.

Leaving e-scooters on sidewalks is central to the plans of at least some businesses who want to rent e-scooters in Ontario, according to a [September 10, 2019 Toronto Star article](#). The companies that rent e-scooters to the public provide a mobile app. Using that app, anyone can pick up an e-scooter, rent it, ride it to their destination, and then leave it in a random place on the sidewalk or other public place for another person to later pick it up and rent it.

For people who are blind, deafblind or have low vision, e-scooters can be a serious and unexpected tripping hazard. There is no way to plan a walking route to avoid them. They should not have to face the new prospect of e-scooters potentially lying in their path at any time.

Leaving e-scooters randomly on sidewalks also creates a serious, unpredictable new accessibility barrier for people using a wheelchair, walker or other mobility device. An e-scooter can block them from continuing along an otherwise-accessible sidewalk. People with disabilities using a mobility device may not be able to go up on the grass or down onto the road, to get around an e-scooter blocking the sidewalk. Sidewalks or other public spaces should not be made available to private e-scooter rental companies as free publicly-funded parking spaces.

Under the Charter of Rights, the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act, the Ontario Government and municipalities are required to prevent the creation of new accessibility barriers against Ontarians with disabilities. As the 2019 [final report](#) of the most recent Independent Review of the AODA's implementation, by former Lieutenant Governor David Onley revealed, Ontario is behind schedule for becoming accessible by 2025.

The [Onley report](#) found that Ontario remains a province full of "soul-crushing barriers". The introduction of e-scooters will create new barriers and make this worse.

IV. Measures In Place Don't Effectively Remove These Serious Dangers to Public Safety and Disability Accessibility

The Ontario Government's November 27, 2019 announcement of its new e-scooter regulation did not refer to any disability concerns. The Government announced some restrictions on use of e-scooters. However, those measures do not effectively address the serious concerns raised here.

The Government lists some optional recommended "best practices" for municipalities. Those don't remove the dangers to public safety or accessibility for people with disabilities. In any event, no municipality is required to implement them.

The regulation permits the use of e-scooters on sidewalks if a municipality wishes. It has restrictions on the speed for riding an e-scooter on sidewalks, and on the rider leaving an e-scooter on the ground, blocking pedestrian travel. However, these are extremely difficult, if not impossible, to enforce. Municipalities don't have enforcement officers on every sidewalk to catch offenders. When a pedestrian, including a person with a disability, is blocked by an e-scooter abandoned on the sidewalk, there is no way to identify the rider who left it there. A pedestrian who is the victim of a hit and run, will find it extremely difficult if not impossible to identify who hit them. E-scooter rental companies are not made responsible for their e-scooters endangering public safety or accessibility.

E-scooters will increase costs for the taxpayer, including hospital and ambulance costs and law enforcement costs. The Ontario Government has not announced any new funding for municipalities for these costs.

The new Ontario regulation leaves it to each municipality to decide whether to allow e-scooters, and if so, on what terms. This requires Ontarians with disabilities to have to advocate to hundreds of municipalities, one at a time, to protect their safety and accessibility in public places. Ontarians with disabilities don't have the resources and capacity for this.

It would not be sufficient for e-scooter rental companies to launch a campaign to urge renters not to leave e-scooters on sidewalks, or for e-scooter rental companies to make it a condition on their mobile app that the user will not leave a rented e-scooter on a sidewalk. People

routinely agree to mobile app conditions without reading them. This does not excuse e-scooter rental companies from e-scooters' known dangers.

V. Actions We Ask the Ontario Government and Ontario Municipalities To Take

We therefore ask for the following actions to protect Ontarians with disabilities:

(i) Actions We Ask The Ontario Government To Take

1. E-scooters should not be allowed in public places in Ontario. There should be no pilot project in Ontario because it would endanger public safety and disability accessibility. If the Ontario Government wants to study e-scooters, it should study their impact on public safety and disability accessibility in other jurisdictions that have allowed them.

2. If, despite these concerns, the Ontario Government wants to hold a trial period with e-scooters, it should suspend its new Ontario e-scooters regulation until it has implemented measures to ensure that they do not endanger the public's safety or accessibility for people with disabilities.

3. If Ontario holds an e-scooter pilot, it should be for much less than five years, e.g. six months. The Ontario Government should retain a trusted independent organization with expertise in public safety and disability accessibility to study e-scooters' impact. It should make public the study's findings.

4. If despite these dangers, Ontario allows the use of e-scooters in public in Ontario, the Ontario Government should first enact and effectively enforce the following strong province-wide mandatory legal requirements for their use. Ontarians with disabilities should not have to advocate to each of the hundreds of Ontario municipalities to set these requirements:

a) Riding an e-scooter on any sidewalk should be strictly prohibited with strong penalties.

b) The rental of e-scooters should be prohibited, because the rental business model is based on e-scooters being left strewn about in public places like sidewalks.

c) There should be a strict ban on leaving an e-scooter in a public sidewalk or like public location, except in a municipally-approved rack that is located well out of the path of

pedestrian travel. If an e-scooter is left on a sidewalk or other public place that is not such a rack, it should be subject to immediate confiscation and forfeiture, as well as a strict penalty.

d) If e-scooter rentals are allowed, rental companies should be required to obtain a license. They should be liable for loss or injuries caused by any renter of the company's e-scooter.

e) There should be a ban on parking an e-scooter within 250 meters of a public establishment serving alcohol.

f) If e-scooters are permitted, they should be required to make an ongoing clearly audible beeping sound when powered on, to warn others of their approach.

g) The speed limit for e-scooters should be set much lower than 24 KPH, such as 15 KPH.

h) An e-scooter driver should be required to successfully complete training on its safe operation and on the rules of the road, and to get a license.

i) Each e-scooter should be required to have a vehicle license whose number is visibly displayed.

j) An e-scooter's owner and driver should be required to carry sufficient liability insurance for injuries or damages that the e-scooter causes to others.

k) E-scooter drivers of any age should be required to wear a helmet, and not just those under 18.

5. If the Ontario Government does not impose all the safety and accessibility requirements in Recommendation 4 above, then it should pass legislation that empowers each municipality to impose all the preceding requirements.

(ii) Actions We Ask Each Municipality in Ontario To Take

6. To protect the safety of the public, including people with disabilities, and to avoid creating new barriers to accessibility impeding people with disabilities, no municipality should allow e-scooters in their community.

7. If a municipality nevertheless decides to allow e-scooters, it should impose all the requirements in Recommendation 4 above. It should not allow e-scooters for more than six

months as a pilot project, while undertaking the study on their impact on public safety and accessibility for people with disabilities.

In proposing these seven measures, we emphasize that nothing should be done to reduce or restrict the availability or use of powered mobility devices used by people with disabilities, which travel at much slower speeds and which are a vital form of accessibility technology.

Signed,

1. Accessibility for Ontarians with Disabilities Act Alliance
2. March of Dimes of Canada
3. Canadian National Institute for the Blind
4. ARCH Disability Law Centre
5. Spinal Cord Injury Ontario
6. Ontario Autism Coalition
7. Older Women's Network
8. Alliance for Equality of Blind Canadians
9. Guide Dog Users of Canada
10. Views for the Visually Impaired
11. Citizens With Disabilities – Ontario

November 10, 2020

Hon. Mayor John Tory
Toronto City Hall
100 Queen Street West,
Suite – 2nd floor
Toronto, Ontario
M5H 2N2

RE: E-Scooters and their Effect on Public Safety and Persons with Disabilities

Dear Hon. Mayor Tory,

On behalf of B'nai Brith Canada's *Canadians with Disabilities Subcommittee*, I am writing to your office to encourage the City of Toronto and the City Council of Toronto Council to ban the use of e-scooters throughout the City, as there is a lack of existing regulation and licensing regimes to ensure the safety and well-being of Canadians utilizing shared sidewalks where such e-scooters would be used.

B'nai Brith Canada's position on the banning of e-scooters is consistent with that of other disability advocacy groups, including that of the [Accessibility for Ontarians with Disabilities Act Alliance](#), recognizing the danger these devices pose to people living with all manners of disabilities.

First and foremost, where e-scooters are already in operation, they are frequently strewn about on sidewalks making it difficult for individuals like myself who utilize a mobility scooter to navigate their paths to and from any destination. Far too often, I have had to—humiliatingly—ask for the assistance of passersby to move these e-scooters out of my path when I have encountered them elsewhere, as they are typically abandoned in wanton fashion, so I could make my way. However, these e-scooters are not merely a nuisance or inconvenience but a serious hazard.

It is not at all atypical for individuals to careen around corners, or travel at high speeds that put people with disabilities in danger of serious injury, or worse. Moreover, as no insurance is associated with e-scooters, there is nothing to stop an individual—or any way to trace their whereabouts—in the event that they crash into a visually impaired person, injuring them, and then simply walking away leaving the injured person to their own devices without any consequence.



With no requisite training, licensing, or regulation, victims of crashes are all too often left with no legal recourse. This problem is all the more compounded for visually impaired, hearing impaired, and mobility impaired individuals, as e-scooters are virtually silent as they approach, making them, as one [advocate](#) recently (and rightly) referred to them, “silent killers.”

One avenue by which e-scooters could reasonably be permitted would be to limit their use solely to roads, but this is unlikely to deter individuals who may illegally utilize them on sidewalks should that become a relevant future bylaw. There are already enough problems faced by people with disabilities through the use of bicycles, skateboards, rollerblades and other recreational modes of conveyance, but e-scooters pose a unique set of dangers in that they are discarded along set paths, operate at high speeds, make no sound, and are meant to be utilized on sidewalks, all of which occurs with no liability for the user.

By way of example, I have attached photographs taken by myself in Ft. Lauderdale, Florida in February 2020 (see below) to demonstrate the degree to which many of the users of these e-scooters have no regard for public safety in general, and the safety of people with disabilities who share the sidewalk with them, in particular.

As such, I urge you to ban the use of e-scooters in Toronto, as the City already has ample public transportation options to serve the public. The costs—in terms of public health and liabilities to the City as only some of the otherwise unpredictable costs—are too high to bear barring specific, clear, and coherent bylaws with robust enforcement regimes that guarantee the safety of Torontonians and Canadians with disabilities on public sidewalks.

As a Torontonian, taxpayer, and citizen who lives with a disability, I urge you to heed my voice and the voice of thousands of Torontonians with disabilities—and those who may one day acquire a disability—and think of the well-being of all the City’s inhabitants by preventing the use of e-scooters in the City we all love.

Thank you for your consideration.

Sincerely,



Edward Rice
Chair, Canadians with Disabilities Subcommittee
B'nai Brith Canada, League for Human Rights

P.S. I have regards for you from my good friend Louise Russo.





**B'NAI BRITH OF CANADA LEAGUE FOR HUMAN RIGHTS
LIGUE DES DROITS DE LA PERSONNE**

Co-signed

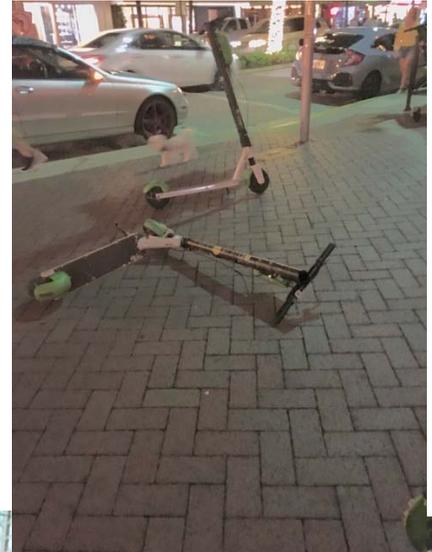
Michael Mostyn
Chief Executive Officer
B'nai Brith Canada

Co-signed

Ran Ukashi
National Director, League for Human Rights
B'nai Brith Canada



Photos of e-Scooter Safety Hazards - Feb 2020 Ft.Laurderdale FL USA



Attachment 1 Part 4

From: Ian White

Sent: October 19, 2020 1:34 PM

To: Mayor Tory

Subject: Letter from CCB Toronto Visionaries Chapter, Canadian Council of the Blind re: banning e-scooters

Attachments: Letter to Mayor Tory re Banning E-scooters- 2020-10-19 on Letterhead.docx

Your Worship,

Please find attached a letter from the CCB Toronto Visionaries Chapter, Canadian Council of the Blind, requesting that you act decisively to uphold the current ban on e-scooters in Toronto.

Thank you for your attention to this important matter.

Respectfully,

Ian White,

President, CCB Toronto Visionaries Chapter,

Canadian Council of the Blind,

www.cbtorontovisionaries.ca



CCB Toronto Visionaries Chapter, Canadian Council of the Blind
c/o 85 Evans Avenue, Toronto, ON, M6S 3V9

His Worship, Mayor John Tory
Office of the Mayor – City of Toronto, City Hall, 2nd Floor
100 Queen St. W. Toronto, ON M5H 2N2
(Via email)

October 19, 2020

Your Worship,

RE: A Call to Uphold the Ban on E-scooters in the City of Toronto

On behalf of the CCB Toronto Visionaries Chapter, Canadian Council of the Blind (CCB), I am writing to urge you to act decisively to block passage of any by-law that would allow e-scooters to be used on the streets of the City of Toronto. For many residents here in Toronto, and especially for those with vision loss, e-scooters constitute an unprecedented hazard to our safety and, as such, should not be permitted anywhere in our City. E-scooters are fast-moving, agile, unlicensed motor vehicles whose movements on our streets and sidewalks cannot be anticipated by those with seeing disabilities. They constitute a silent, high-speed hazard and pose a real threat of serious injury to those with vision loss, as well as to seniors, those with mobility or balance issues, and many others.

The CCB is a registered national charity comprised of 87 locally-organized and volunteer-driven Chapters across Canada. In Toronto, there are 10 active chapters of the CCB serving people with seeing disabilities, their friends and families. The CCB Toronto Visionaries Chapter alone represents over 150 registered members in Toronto. We work to bring those living with vision loss together with their peers, to share information and resources essential to breaking the isolation that so often accompanies vision loss, and to help those with seeing disabilities overcome the barriers to full participation in Canadian society.

As has been proven in every jurisdiction where these conveyances have been permitted, e-scooters have been responsible for increased personal injury (both to the riders and to pedestrians), they are operated on sidewalks as well as roads, they are operated without helmets leading to an increased risk of head injuries, they are left abandoned on sidewalks constituting a tripping hazard and obstruction of accessible walkways. And Toronto's own Police Services has publicly admitted that they have the resources to enforce neither moving nor standing violations perpetrated by those using e-scooters. These silent, unlicensed, high-speed motor vehicles are dangerous and a direct threat to the safety of those with disabilities. Please act in the best interests of your constituents and help keep the citizens of Toronto safe by voting against the introduction of e-scooters.

Respectfully yours,

Ian White, President
CCB Toronto Visionaries Chapter
Canadian Council of the Blind

Attachment 1 Part 5



HONORARY PATRON / PATRON HONORAIRE

Her Excellency the Right Honourable
Julie Payette / Son Excellence la
très honorable Julie Payette
C.C., C.M.M., C.O.M., C.Q., C.D.
Governor General of Canada /
Gouverneure générale du Canada

PATRONS

The Honourable / L'honorable
David C. Onley,
O. Ont / O. Ont.

Bret "The Hitman" Hart

HONORARY CHAIR / PRÉSIDENT HONORAIRE

The Honourable / L'honorable
David Peterson,
P.C., Q.C., / C.P., C.R.

HONORARY CAMPAIGN CHAIR / PRÉSIDENT HONORAIRE DE LA CAMPAGNE

William Shatner

CHAIR / PRÉSIDENT DU CONSEIL D'ADMINISTRATION

Catherine Sherrard

PRESIDENT & CEO / PRÉSIDENT ET PDG

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Charitable Registration No. /
N° d'enreg. d'org. de bienfaisance
10788 3928 RR0001

September 28, 2020

His Worship John Tory
Mayor, City of Toronto
100 Queen St. W.
City Hall, Second Floor, West
Toronto, Ontario
M5H 2N2

Dear Sir:

I am writing today with serious concern regarding the City of Toronto's consideration of an e-scooter rental pilot project.

March of Dimes Canada, headquartered in East York with six additional service hubs in the City of Toronto, is a nationally registered charitable organization providing support services to people with disabilities, their families and caregivers across Canada. Our goal is to enhance the independence and community participation of people with disabilities every day through a wide range of programs and services across Canada.

While the province of Ontario has allowed municipalities to consider e-scooter rentals, on behalf of people with disabilities, March of Dimes Canada is emphatically not in favour of pursuing this service in the City of Toronto.

Indeed, a staff report from June 24, 2020 presented the dangers of pursuing an e-scooter pilot project. Travelling at speeds up to 20 kilometers per hour, the presence of e-scooters on Toronto's streets and pedestrian sidewalks present yet another dangerous challenge for our community due to several issues:

- Seniors and people with disabilities such as mobility, vision and hearing loss will not be able to detect silent, fast-moving e-scooters around them nor move out of the way quickly enough to prevent collisions and significant injuries.



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- Toronto doesn't yet have the bike lanes to meet demand from cyclists, let alone e-scooter riders, who inevitably turn to pedestrian sidewalks to ride instead of sharing the road with cyclists, cars and trucks.
- E-scooters left strewn about pedestrian sidewalks have caused people with disabilities significant difficulties in navigating otherwise-accessible walkways. During their pilot phase, Montrealers only parked e-scooters in designated areas 20 per cent of the time, resulting in serious concerns for people with disabilities.
- E-scooter riders are not reliable in adhering to requirements that they ride in bike lanes or on roadways, rather have been shown in other jurisdictions to ride unlicensed, uninsured – and often without a helmet, despite legal requirements – on pedestrian sidewalks. On July 9, 2020, the Toronto Police Service reported to the Infrastructure and Environment Committee that it does not have the capacity to deliver the effective enforcement required to keep all Torontonians safe on their sidewalks.

We believe it is important that the City of Toronto learn valuable lessons from other, comparable jurisdictions. In February, 2020, the Cite de Montreal announced that e-scooter rentals would not be returning due to noncompliance with rules by both renters and rental company owners. Indeed, the City of Toronto's own staff reported that no jurisdiction has been able to implement and effectively enforce e-scooter laws. This poses an insurmountable challenge to people with disabilities who live, work, play and visit in our city.

Toronto's pedestrian sidewalks already present hindrances to people with disabilities due to unequal footings, unequal/unflush curb heights and construction and weather damage. Along with the reduction in sidewalk space due to extended CafeTO patios, e-scooters will only add to the obstacles that people with disabilities have in using and sharing pedestrian sidewalks safely. Moreover, the potential costs to the City of Toronto in personal injury claims, as well as funding increases for law enforcement capacity, could certainly be better allocated at a time when our city has more pressing needs.

I understand that stakeholders in our community, along with city staff, law enforcement, and individuals have advised against implementing an e-scooter pilot project in our city. We are advocating that when deciding on this issue you consider the challenges people with disabilities already face in Toronto, and whether the additional safety risks are worth the costs, and most importantly, the risks to our own citizens.

If you have any questions or further inquiries, I would be pleased to discuss this matter with you at any time. I can be reached at your convenience via email at lbaker@marchofdimes.ca.

Best regards,



Leonard Baker
President and Chief Executive Officer
March of Dimes Canada

cc. Toronto City Council
Mr. Luke Robertson, Chief of Staff, Office of the Mayor
Mr. Don Peat, Executive Director of Communications and Strategic Issues
Management, Officer of the Mayor
Ms Barbara Grey, General Manager, Transportation Services, City of Toronto
Mr. David Lepofsky, AODA Alliance
Ms Victoria Pearson, Director, Communications and Public Affairs, MODC
Ms Amanda MacKenzie, Manager, Public Affairs, MODC