



April 27, 2021

10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
Attention: Matthew Green

**Re: IE21.7 - E-scooters - Accessibility and Insurance Issues**

Dear Councillor Jennifer McKelvie, Chair, and Members of Infrastructure and Environment Committee,

FoNTRA represents over 30 residents associations in Midtown, North Toronto and North York. We strongly support the staff report analysis and recommendation, dated April 14, 2021. We continue to have serious concerns with the proposal, consistent with our comments submitted in regard to the earlier staff report on this important matter.<sup>1</sup>

We appreciate the extensive research and stakeholder consultations now being reported on by Transportation Services Division staff, including the learning from other jurisdictions with more experience on the matter. Experiments in large cities such as Chicago, New York, London, and Amsterdam, which have comparable population size and density to Toronto, point to many unresolved issues associated with the use of e-scooters. The experience of e-scooter-associated issues in those cities are more likely to be similar and relevant, than that of smaller cities like Ottawa and Calgary. However, we note that even Ottawa, one of those smaller cities, has banned e-scooters from its most popular destination, the Byward Market, and from National Capital Commission walkways and paths.

The staff report outlines in detail the unique risk factors associated with Toronto's existing public infrastructure - both road and sidewalk design - that did not contemplate the addition of e-scooters. These include:

- Risks to public safety
- Risks to public health
- Impacts on the vulnerable, seniors and people with disabilities
- Community nuisance
- Burden and costs to health care resources
- Liability and cost to the City

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<sup>1</sup> (July 8, 2020) Letter from Geoff Kettel and Cathie Macdonald, Co-Chairs, Federation of North Toronto Residents Associations (IE.New.IE14.10.10)  
(<http://www.toronto.ca/legdocs/mmis/2020/ie/comm/communicationfile-108188.pdf>)

- Lack of available medical and disability coverage for e-scooter users and non-users when injured

For example, some of the key concerns related to these risks that have not been resolved:

- additional barriers created for pedestrians and persons with disabilities who use sidewalks out of necessity, especially people living with no vision/low vision, users of mobility assistive devices, or older adults encountering illegal sidewalk riding or poorly parked e-scooters;
- significant challenges and difficulties with enforcing moving violations (i.e., lack of policing resources to witness/enforce illegal e-scooter use on sidewalks, 'hit and runs', and the inability to identify the e-scooter rider); and
- how someone injured by an e-scooter rider or trip hazard caused by an improperly parked e-scooter would be compensated for damages (i.e. rehabilitation, lost wages, and medical costs).
- e-scooters tend to replace bike share programs, and would certainly make walking less safe.

FONTRA supports alternative modes of transportation, especially climate friendly modes that reduce GHG emissions; however we believe that devoting increased City resources to improving pedestrian and biking infrastructure would provide more benefit, and safer transportation to more of the City's population, than e-scooters, and without the increased risks and costs associated with them.

FoNTRA recommends:

- **that Planning and Housing Committee recommend to City Council that it decline the option to participate in O.Reg 389/19 – Pilot Project – Electric Kick-Scooters**

Yours truly,

Geoff Kettel  
Co-Chair, FoNTRA

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Cc: Barbara Gray, General Manager, Transportation Services Division  
Elyse Parker, Director, Policy and Innovation, Transportation Services Division  
Janet Lo, Senior Project Manager, Transportation Services Division

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.