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**To:** [councilmeeting](#); [Clerk](#)  
**Cc:** [Mayor Chow](#); [Councillor Ainslie](#); [Councillor Bradford](#); [Councillor Bravo](#); [Councillor Burnside](#); [Councillor Carroll](#); [Councillor Cheng](#); [Councillor Colle8](#); [Councillor Crisanti](#); [Councillor Fletcher](#); [Councillor Holyday](#); [Councillor Kandavel](#); [Councillor Malik](#); [Councillor Mantas](#); [Councillor Matlow](#); [Councillor McKelvie](#); [Councillor Moise](#); [Councillor Morley](#); [Councillor Myers](#); [Councillor Nunziata](#); [Councillor Pasternak](#); [Councillor Perks](#); [Councillor Perruzza](#); [Councillor Saxe](#); [Councillor Thompson](#)  
**Subject:** [External Sender] Submission to City Council re Item IE13.1 A Micromobility Strategy for Toronto  
**Date:** May 21, 2024 3:33:05 PM  
**Attachments:** [image001.png](#)  
[FoSTRA\\_Developing a Micromobility Strategy.pdf](#)

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Dear Sir/Madam,

FoSTRA believes that the 10s of 1000s of e-kick scooters that can currently be seen on our streets, bike paths, parks and sidewalks cannot simply be ignored. The province's Pilot Project is not perfect, but at least, it recognizes their growing use and the need to regulate and control them. Not opting in will not reduce the city's liability. In fact, FoSTRA believes not doing so will certainly increase the likelihood of accidents.

We hope that this submission helps create a strategy that addresses existing concerns and a workable framework for the future.

Sincerely,

Rick Green

**Chair**



Federation of  
South Toronto  
**RESIDENTS'  
ASSOCIATIONS**

[chair@fostrato.ca](mailto:chair@fostrato.ca)



**Federation of  
South Toronto  
RESIDENTS'  
ASSOCIATIONS**

# **City of Toronto Initiative: Developing a Micromobility Strategy**

May 19, 2024.

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## About FoSTRA

The Federation of South Toronto Residents' Associations (FoSTRA) represents twenty-seven (27) resident associations in Toronto's five (5) downtown Wards (4, 9, 10, 11, 13) that contain over 600,000 residents. FoSTRA is committed to a livable and affordable Toronto, and its members are concerned about the consequences of this initiative. FoSTRA requests consideration of the effects of this strategy on our resident associations and their members, as well as the neighborhoods they represent in a city we love. Our aim is to contribute to the Micro Mobility Strategy currently under development by the City of Toronto.

## City of Toronto Micro Mobility Strategy

### Overview

The City of Toronto declined participation in Ontario's Pilot Project for Electric Kick Scooters in May of 2021 due to safety, liability, and accessibility concerns<sup>1</sup>. The City of Toronto is participating in Ontario's Pilot Project for Low Speed Vehicles<sup>2</sup>. Electric Kick Scooters are not currently legal for use on roadways, sidewalks, or trails, and current policy restricts their use to private property<sup>3</sup> and yet are everywhere. This initiative will revisit regulation, policy, and respective enforcement as it is apparent that stand-up electric kick-scooters can no longer be forbidden, but must be regulated.

### Goals

Toronto's Micro Mobility Strategy seeks to define challenges and regulatory changes related to micro mobility devices, and incorporate such into local policies and by-laws. Highlights in this area include, but are not limited to:

- Deterring illegal behaviour by those who operate motorized or motor-assisted vehicles on sidewalks<sup>4</sup>.
- Coordination with several other stakeholders and agencies to incorporate related policies and programs into this strategy in preparation for new micro mobility

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<sup>1</sup> [City of Toronto Council Agenda Item 2021.IE21.7](#)

<sup>2</sup> [IE13.1 - A Micromobility Strategy for Toronto.](#)

<sup>3</sup> [City of Toronto: Electric Bicycles \(E-Bikes\) & E-Scooters](#)

<sup>4</sup> [City of Toronto Council Agenda Item 2023.DM6.3](#)

regulations for the Province of Ontario; for example, BikeShare Toronto, Cycle Network Plan, TTC 4-Year Service Plan<sup>5</sup>.

- Mandatory helmets for operators of electric kick-scooters<sup>6</sup>.

FoSTRA finds the goals of this strategy commendable.

## Ontario's Pilot Project - Electric Kick-Scooters

The current pilot project related to electric kick-scooters is outlined in Ontario Regulation 389/19 and carries several stipulations, including, but not limited to:

- Their use is restricted to those sixteen (16) years of age or older<sup>7</sup>.
- Helmets are required for operators under eighteen (18) years of age<sup>8</sup>.
- The motor must not provide a maximum speed of more than twenty-four (24) kilometers per hour<sup>9</sup>.
- Their use is permitted on roadways<sup>10 11</sup> and prohibited on sidewalks<sup>12</sup>, with some exceptions.

While the above regulations need further review and adjustment, in principle FoSTRA is supportive of a recalibrated pilot project.

## Ontario's Pilot Project - Low Speed Vehicles

The current pilot project related to low speed vehicles is outlined in Ontario Regulation 215/17 and carries several stipulations, including, but not limited to:

- The vehicle must be insured<sup>13</sup>.
- The driver must be licensed<sup>14</sup>.
- Their use is permitted on some roadways and prohibited on sidewalks<sup>15</sup>.

FoSTRA is supportive of the regulations mentioned above. However, the definition of a low speed vehicle may encompass future devices which have not yet been created. FoSTRA

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<sup>5</sup> [Developing a Micromobility Strategy. City of Toronto: Strategy Overview](#)

<sup>6</sup> [City of Toronto Council Agenda Item 2023.IE5.5](#)

<sup>7</sup> [O. Reg. 389/19, s. 8.1](#)

<sup>8</sup> [O. Reg. 389/19, s. 10](#)

<sup>9</sup> [O. Reg. 389/19, s. 1.1\(d\)](#)

<sup>10</sup> [O. Reg. 389/19, s. 4](#)

<sup>11</sup> [O. Reg. 389/19, s. 5](#)

<sup>12</sup> [O. Reg. 389/19, s. 3](#)

<sup>13</sup> [O. Reg. 215/17, s. 4](#)

<sup>14</sup> [O. Reg. 215/17, s. 5](#)

<sup>15</sup> [O. Reg. 215/17, s. 5](#)

would like to highlight that the City of Toronto's participation in this project is applauded, though does not include the types of devices in which we seek regulations for at this time.

## Research

Around the world, several cities have recognized issues with the platform of shared e-scooter networks. In Paris, France, rental e-scooters were banned in the fall of 2023<sup>16</sup>; a non-binding referendum found 90% of Parisians were in favour of said ban following e-scooter inception in 2018<sup>17</sup>. According to Reuters, there were 459 accidents and 3 deaths involving e-scooters or adjacent vehicles in Paris in 2022<sup>18</sup>.

Several scientific studies further solidify concerns in shared scooter networks. A study in Brisbane, Australia, found that illegal behaviours were observed significantly less on owned e-scooters in comparison to rental e-scooters; for example, helmet wearing was found to be 95.5% of riders for owned and 61.4% for rentals in February 2019<sup>19</sup>. Another study further confirmed the lack of helmet use in Berlin, Germany, finding that none of the observed 777 shared e-scooter riders were wearing a helmet over a 12.5 hour period and noted that helmet policies are not effectively enforceable through the digital rental platform<sup>20</sup>. Considering these statistics, craniofacial injuries are common in e-scooter riders involved in collisions as seen in F. Faraji et al., 2020,<sup>21</sup> and supported in K. Kazemzadeh et al., 2023, described in more detail below. Therefore, concerns regarding safety and enforcement are clear in other jurisdictions.

Several studies have been conducted into the cause of e-scooter accidents. A literature review by Q. Ma et al., 2021, describes the impacts of severe vibrations as a confounding factor in e-scooter control. This study found that asphalt resulted in lower vibration frequency in comparison to concrete over the same length of time<sup>22</sup>. Therefore, asphalt roadways would be a preferred substrate in comparison to concrete.

A literature review by K. Kazemzadeh et al., 2023, found that the interactions between e-scooters and other road users is an imperative area of study in order to develop adequate safety measures<sup>23</sup>; this was echoed in Q. Ma et al., 2021, regarding the proximity to other objects such as other road users. A study by S. R. Gehrke et al., 2021, further recognizes e-scooter spatial interactions based on data collected in Boston, USA, noting a

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<sup>16</sup> [Le Monde: Rental e-scooters cleared from Paris streets as ban comes into effect](#)

<sup>17</sup> [CNBC: Paris set to ban rented e-scooters after an overwhelming 90% vote for their removal](#)

<sup>18</sup> [Reuters: Paris to ban e-scooters from September](#)

<sup>19</sup> [Changes in shared and private e-scooter use in Brisbane. Australia and their safety implications](#)

<sup>20</sup> [Safety Related Behaviors and Law Adherence of Shared E-Scooter Riders in Germany](#)

<sup>21</sup> [Electric scooter craniofacial trauma](#)

<sup>22</sup> [E-Scooter safety: The riding risk analysis based on mobile sensing data](#)

<sup>23</sup> [Electric scooter safety: An integrative review of evidence from transport and medical research domains](#)

connection between shared e-scooter users and long-term crash activity<sup>24</sup>. It is clear that built infrastructure, multi-use roadways or paths, and the environment are factors in micro mobility safety.

Key takeaways from these studies are the need for regulatory policy, environmental analysis, infrastructure suitability, and enforcement effectiveness.

## Recommendations of FoSTRA

We ask the City of Toronto to consider the following factors in their micro mobility strategy:

- Operation of all vehicles, excluding wheelchairs, is prohibited on sidewalks. This is supported in the research noted above, the existing provincial e-scooter pilot project, and accessibility concerns described by the city.
- Increased enforcement of regulations concerning sidewalk use per the goals of this strategy and by-laws mentioned above.
  - Expansion of enforcement and the prosecution of infractions which plague local sidewalks, trails, and paths, already underway by 52 Division.
  - Creation of, or the amendment to an existing bylaw to empower a special class of officers who will target sidewalk operators, bike lane parking violators, and other moving vehicle infractions that inhibit accessibility and safe transit, particularly in the downtown core where population density is high.
  - Costs associated with enforcement could be recuperated through new or increased fines, covering the labour costs of a special class of enforcement officers.
- The maximum possible speed of micro mobility devices is limited to twenty-four (24) kilometers per hour in line with the provincial pilot project. However, FoSTRA believes that the allowable speed should be limited to thirty-two (32) kilometers per hour in line with e-bike speed limits.
  - All micro mobility devices must comply with hardware regulations established by government and associated governing bodies in line with expected safety standards.
  - Speed is regulated on all shared paths and trails to encourage pedestrian safety and accessible use in line with spatial interaction research.
- Helmets must be mandatory for all riders in line with craniofacial injury research, accident statistics, and spatial interaction analysis, which is currently not in line with the provincial pilot project.

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<sup>24</sup> [Spatial interactions of shared e-scooter trip generation and vulnerable road user crash frequency](#)

- Parking considerations must be made as existing policy would prohibit the parking of micro mobility devices on roads and sidewalks<sup>25</sup>.
- Education programs must be introduced following policy changes to allow for safe operation, best-practices, and collision avoidance knowledge similarly to courses for operating a larger motor vehicle.
  - Particularly if there is an expansion into a shared-use network due to the research and poor performance outcomes in other metropolitan areas.
- The policy and regulations must include gyroscopically balanced vehicles such as Segways, hoverboards, et cetera, among other types of emerging modes of alternative transportation which are not considered under the kick e-scooter title nor definition.
- Roadways and bike paths must be made suitable for device use based on agility capabilities as defined in research on accidents correlated to impacts and small wheel diameter.
- The City of Toronto must participate in O. Reg. 389/19 - Kick E-Scooter Pilot Project.
  - ***In the unfortunate event that the City of Toronto does not participate, these devices should be banned, and enforcement measures must be enacted.***
  - FoSTRA recommends that participation is prioritized, and a ban is the absolute last resort.

We, FoSTRA, ask the City of Toronto to incorporate the aforementioned recommendations into the design of the Micro Mobility Strategy.

## Conclusion

FoSTRA is supportive of the development of a Micro Mobility Strategy, and finds the City of Toronto's work commendable; the Infrastructure and Environment Committee (IEC) has made several recommendations which FoSTRA is agreeable with. Unfortunately, most apply only to low speed vehicles as outlined in Ontario Regulation 215/17.

Our key recommendations relate to enforcement of offences, particularly regarding sidewalk and shared trail usage, and participation in the provincial kick e-scooter pilot project. Our support of this initiative is hinged on clear guidelines regarding micro-mobility vehicle use in all spaces; for example, roads, sidewalks, shared trails, parks, et cetera. Governing standards and associated regulation must be established, and enforced, in order to defend the safety and security of our residents. Existing research outlines several concerns in line with the safety and accessibility concerns mentioned by the City of Toronto, and FoSTRA stands with those concerns.

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<sup>25</sup> [Toronto Municipal Code Chapter 950 Traffic and Parking](#)