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February 4, 2024

Toronto Accessibility Advisory Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

DI5.1 - Micromobility Strategy Development - Accessibility Feedback

Dear members of the Accessibility Advisory Committee,

I am writing on behalf of March of Dimes Canada, a leading national charity committed to championing equity, empowering ability, and creating real change that will help people living with disabilities across the country unlock the richness of their lives. Founded over 70 years ago, we have a long history of providing service to Toronto residents with disabilities, and today operate out of multiple sites across the city.

Based on our many decades of service, we have seen firsthand the barriers experienced by people with disabilities in navigating city streets. E-scooters represent yet another barrier to safety and accessibility, from the dangers posed by sidewalk riding to the trip hazards created by improperly parked scooters.

In 2020-21, we were part of a group of disability stakeholders and advocates who shared our concerns about the risks associated with undertaking an e-scooter pilot in Toronto. At the time, city staff and council were unanimous in upholding the ban on e-scooters.¹ Having listened to the voices of the disability community, they found that the safety, liability and accessibility risks were unresolved for both privately-owned and rental e-scooters.² The reality is that Toronto does not have the resources for enforcement, its infrastructure is not yet designed for this new form of transportation, and that riders are still learning how to use the technology.

E-scooters represent a safety risk for all pedestrians in the city. They are silent, unlicensed, uninsured, and move at speeds of up to 24 kilometres per hour. Most jurisdictions that have authorized e-scooter use experience illegal sidewalk riding.³ The risks are compounded for pedestrians with disabilities. People with limited mobility often do not have the time or space to move out of the way of these fast-moving vehicles. Those with vision or hearing loss may not even realize that a scooter is approaching. This can result in collisions where both pedestrian and rider are injured. This is not a hypothetical scenario; in Calgary, there were 700 scooter-related emergency-room and urgent-care visits in the first season of their e-scooter pilot.⁴ By Toronto city

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staff's estimation, riding a shared e-scooter is "potentially about 350 times more likely to result in a serious injury than riding a shared bike on a per km basis."⁵

In addition to dangerous riding, improper parking is a serious issue, with e-scooters littering public spaces. Illegally parked scooters are not only a trip hazard, but also create an accessibility challenge for pedestrians navigating the city's sidewalks. An otherwise accessible pathway may become impassible when improperly parked scooters block the sidewalk. Again, this is not merely theoretical; in Montreal, the city opted not to renew their e-scooter pilot, given that 80% of e-scooter users parked illegally, causing serious accessibility issues in the downtown core.⁶

Dangerous riding and improper parking have been well-documented by accessibility advocates in other Ontario cities that have embarked on e-scooter pilots. Another city staff report is not necessary to demonstrate that e-scooters will be dangerous for people with disabilities, as we already have the evidence from other jurisdictions. For this reason, we are calling on the Infrastructure and Environment Committee not to reopen the debate on e-scooters, and instead continue and enforce the ban on e-scooters in public spaces in Toronto.

Thank you for the opportunity to represent the perspectives of the March of Dimes Canada community. We will be following this issue closely.

Sincerely,



Amanda MacKenzie
National Director, External Affairs
March of Dimes Canada

¹ P. Tsekouras, "Toronto votes unanimously to opt out of e-scooter pilot," *CTV News*, May 5, 2021, Retrieved from <https://toronto.ctvnews.ca/toronto-votes-unanimously-to-opt-out-of-e-scooter-pilot-1.5415871>

² B. Gray, *E-Scooters – Accessibility and Insurance Issues*, City of Toronto Transportation Services Report to the Infrastructure and Environment Committee, April 12, 2021. Retrieved from <https://www.toronto.ca/legdocs/mmis/2021/ie/bgrd/backgroundfile-165818.pdf>

³ B. Gray, *E-Scooters – A Vision Zero Road Safety Approach*, City of Toronto Transportation Services Report to the Infrastructure and Environment Committee, June 24, 2020. Retrieved from <https://www.toronto.ca/legdocs/mmis/2020/ie/bgrd/backgroundfile-148266.pdf>

⁴ E. Carpenter, "Injuries rise with popularity of e-scooters on Calgary streets," *CBC News*, July 21, 2020. Retrieved from <https://www.cbc.ca/news/canada/calgary/injuries-rise-with-popularity-escooters-calgary-streets-1.5657159>

⁵ Gray, 2020.

⁶ R. Lau, "No more shared e-scooters in Montreal because they weren't being parked legally: city officials," *CTV News*, February 19, 2020. Retrieved from <https://montreal.ctvnews.ca/no-more-shared-e-scooters-in-montreal-because-they-weren-t-being-parked-legally-city-officials-1.4818347>