

## **Authorized Vehicles in City Parks: Review of Operating Procedures and Policies**

**Date:** May 28, 2025

**To:** Infrastructure and Environment Committee

**From:** General Manager, Parks and Recreation and General Manager, Fleet Services

**Wards:** All

### **SUMMARY**

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Under Toronto Municipal Code, Chapter 608, Parks, vehicles are not allowed in a park except on roadways or parking areas unless authorized. Such authorization is limited to trained drivers of emergency vehicles and vehicles delivering City or agency services, as well as third parties with written permission from the City (e.g., permits, license agreements, Park Access Agreements, construction agreements, and contracts).

In response to City Council direction ([2024.IE15.7](#)), this report reviews the City's policies, procedures, and training related to the authorized use of motor vehicles outside of formal road systems in City parks with a focus on the following: (i) limiting vehicle use; (ii) safe driving; (iii) use of guides on foot to accompany vehicles; (iv) access for emergency vehicles; (v) turf and tree protection; and (vi) reducing emissions. This report also provides a progress update on the use of alternative vehicle types for park operations and the forthcoming Parks Electrification Pilot Project.

All the materials reviewed address safety and provide basic instruction to limit unnecessary vehicle use in parks. The Fleet Safety Policy and Procedures, which apply to all City fleet operators, not including emergency services, and focuses on safe operating practices. Parks and Recreation (PR) and Urban Forestry procedures and training reinforce these safe operating practices and in addition, provide focused guidance on the protection of turf, trees, and natural areas when operating a vehicle in a park. Up until now, this focus on protecting natural assets in parks has not been required of all City fleet operators. Toronto Police, Toronto Fire, and Toronto Paramedic Services have their own regulations, procedures, and training for vehicle operation.

Staff have drawn upon these various documents to develop updated, consolidated guidance that will apply to all authorized motor vehicle use in parks. The intention of this consolidated and updated guidance document is to ensure that everyone who is driving a vehicle in a park for an authorized purpose be subject to consistent, rigorous standards, with emphasis on safety and the protection of natural assets in parks.

This guidance will be used to update all of the policies, procedures, and training materials reviewed and will be provided to emergency services and City agencies. Future agreements with third parties will also be updated to align with the updated guidance. Additionally, going forward, informed by Parks and Recreation/Urban Forestry training materials, all City fleet operators will receive instruction in specific considerations for driving in parks.

City fleet operators who do not follow procedures may face a range of enforcement measures, as well as retraining, depending on the severity of the incidence. Issues related to third-party vehicle operation in parks are monitored and enforced in multiple ways. This would include follow up to ensure compliance through education, additional requirements for future use, and/or seeking damages.

Staff will report on implementation progress in Q4 2025.

## **RECOMMENDATIONS**

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The General Manager, Parks and Recreation and the General Manager, Fleet Services recommend that:

1. City Council request the General Manager of Parks and Recreation, as well as other relevant Division Heads, in consultation with the City Solicitor, to: (i) update the template terms and conditions of future Parks and Recreation third-party agreements, supplier contracts, and permits which allow for vehicle access in parks, to reflect the Consolidated and Updated Guidance found in Attachment 1 to this report; and (ii) develop and implement a public education campaign about the authorized use of vehicles in parks, precautions taken to protect people and park assets, and how to report a problem.
2. City Council request the General Manager of Parks and Recreation Division, working with the General Manager of Fleet Services Division and the Executive Director of Customer Service Experience Division, to identify opportunities for enhanced reporting of damage caused by vehicles in parks, as part of future work on the Parks/311 Integration.
3. City Council request the General Manager of Fleet Services, in consultation with the General Manager of Parks and Recreation to: (i) develop, by the end of Q3 2025, an enhanced supplementary training module on vehicle operation in parks to reflect the Consolidated and Updated Guidance found in Attachment 1 to this report; (ii) integrate the enhanced module on vehicle operations in parks into standard vehicle training and testing required of all new and incoming City fleet operators, beginning in Q4 2025; (iii) deliver staff education campaign focused on vehicles in parks beginning in Q4 2025; and (iv) require all current City fleet operators to complete the enhanced supplementary training module on vehicle operation in parks by Q1 2026.
4. City Council direct the General Manager, Fleet Services Division, and the General Manager, Parks and Recreation, to report to Infrastructure and Environment Committee in Q4 2025 on implementation progress.

## FINANCIAL IMPACT

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There are no financial implications resulting from the recommendations in this report. Recommendations in this report will be supported by existing resources within divisional budgets.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the information as presented in the Financial Impact Section.

## DECISION HISTORY

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At its meeting on July 24 and 25, 2024, City Council requested the General Manager, Parks and Recreation (formerly Parks, Forestry and Recreation) and the General Manager, Fleet Services Division, in consultation with other relevant City divisions and the Toronto Police Service, to report to the Infrastructure and Environment Committee in the first quarter 2025 on a review of standard operating procedure that governs the use of permitted vehicles under Chapter 608 of the Toronto Municipal Code in areas of City-owned parks without formal road systems, and to provide an update on efforts to acquire and implement alternative vehicle and equipment types (such as Kei trucks, golf karts, cargo bicycles, and handcarts) for work functions that occur in City parks.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.IE15.7>

At its meeting on June 10, 2014, City Council adopted criteria to determine when special event permits may allow for temporary parking in areas within parks that are not designated for parking and authorized the General Manager of Parks and Recreation to apply criteria.

<https://secure.toronto.ca/council/agenda-item.do?item=2014.PE27.3>

## COMMENTS

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### 1. Introduction

People visiting City parks do not expect to encounter motor vehicles outside of formal roadways and parking areas. Extra care must be used when driving in and around City parks to ensure public safety and the protection of turf and the natural environment, as the use of vehicles outside of formal road systems may have negative impacts unless proper precautions are taken.

City staff are required to deliver services throughout parks, and there are times when authorized vehicles need to be driven in parks, either on the paved pathways or even onto the turf, on unpaved paths, and in natural areas. Motor vehicles are required in parks to carry equipment and personnel to maintain and operate parkland and recreation facilities, perform tree maintenance and natural area management, support community events taking place in parks, and perform other services for the City, such as waste pick-up, snow clearing, infrastructure repair, and construction. Vehicles are

also sometimes required for the safety of staff working in parks. When authorized to operate a vehicle in a park, drivers must follow rigorous standards to protect the safety and enjoyment of park users and avoid damage to turf, trees, natural areas, and other City assets.

In response to City Council's direction ([2024.IE15.7](#)), the Parks and Recreation Division (PR) and Fleet Services Division (FSD) reviewed and, by Q2 2026, will have completed updating standard operating procedures and training for the authorized use of vehicles in parks by City staff and third parties to ensure that everyone who is driving a vehicle in a park for an authorized purpose is subject to consistent, rigorous standards for safety and environmental protection in parks. A summary of the updates is provided in this report.

### **1.1. Vehicles Authorized to Operate in Parks**

The operation of vehicles in parks is governed by the provisions set out in Toronto Municipal Code Chapter 608, Parks. Per Chapter 608-26B, no person shall while in a park drive, operate, pull, or ride a vehicle except on a roadway or parking area, unless authorized by permit.

Bylaw compliance is best achieved through a combination of communication, education, and enforcement. Parks and Recreation Division's role is to ensure residents are aware of park rules and how to comply with them. If there are persistent issues, a service request can be submitted through 311, and the Municipal Licensing and Standards (MLS) Division investigates park use issues. Bylaw Enforcement Officers may take enforcement action as appropriate, aiming to achieve compliance through education up to issuing fines and charges as necessary.

It should be noted that Bylaw Enforcement Officers are not emergency responders and do not respond to complaints on an emergency basis. Enforcement is also specific to stationary, parked vehicles. MLS staff do not have the authority to respond to concerns with moving vehicles. In addition, if it is parking issue, an issue regarding road safety or driving dangerously, and/or towing is required, the Toronto Police Service (TPS) and/or the Toronto Parking Authority (TPA) must be involved. Chapter 608 is not designed to regulate the conduct of City staff in parks. Employees and agents of the City must adhere to the policies and procedures applicable to their work duties and to the operation of vehicles as required for the operation of their work.

#### ***Authorized Vehicle Operation in Parks***

Many City Divisions sometimes need to operate a vehicle in a park; in particular, Parks and Recreation; Environment, Climate and Forestry; Solid Waste Management Services; and Corporate Real Estate Management. City vehicles used in parks range from pick-up trucks and trailers carrying landscape equipment to construction equipment, lawn tractors, forestry trucks, and commercial vehicles for solid waste collection.

The scope of this report is limited to policies, procedures, and training for the safe, appropriate, and authorized operation of motor vehicles on paved pathways [1] in parks or on the turf. Authorization to operate motor vehicles in parks outside of formal roadways is limited to:

- Trained drivers of emergency vehicles and vehicles delivering City or agency services (see Attachment 2 for Divisions that operate vehicles in parks).
- Third parties with agreements for activities in a park (formal permission is required for vehicle access, with conditions defined in an agreement with the City), including:
  - Contractors performing work on behalf of the City
  - Partnered organizations (e.g., Toronto and Region Conservation Authority)
  - Lease and license holders (e.g., concession stand operators)
  - Special Event Permit Holders
  - Other organizations doing work in a park (e.g., Metrolinx)

## **2. Current Policies, Procedures, Training and Compliance**

### **2.1 Applicable Policies and Procedures**

The City of Toronto Fleet Services Policies, including the Fleet Safety Policy and Procedures, govern the acceptable use and safe operation obligations of all City Divisions that use owned, rented or leased Fleet vehicles. City agencies and corporations that have entered into fleet services agreements with the City to adopt these policies and, in some cases, augment them with their own policies or procedures. Some City Divisions that frequently have vehicles in parks have also developed Division-specific procedures and training requirements for vehicle user groups and/or vehicle types on parkland.

Toronto Fire Services, Toronto Paramedic Services, and the Toronto Police Service have their own regulatory frameworks for vehicle operations and have developed their own operation-specific fleet policies, procedures, and fleet operator training. Although their policies generally align with City of Toronto Fleet Services Division's, they are not bound by the Fleet Services Division policies and procedures and have exceptions as outlined in the Highway Traffic Act.

For this report, 12 policies, procedures, and training material were reviewed for considerations related to vehicles in parks, including procedures and policies for City staff and for third parties operating in parks (e.g., permit conditions, license agreements, Park Access Agreements, contract terms and conditions, supplier orientation packages). Refer to Attachment 3 for details of the materials reviewed.

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1. Paved pathways in parks are designed to serve as both service vehicle access routes and as paths for park visitors. The siting and design of these paved routes are planned carefully to meet accessibility standards, accommodate the widest vehicles that operate in parks, and reduce impacts of vehicles and people on sensitive natural areas. Because these paths are used by people as well as vehicles, vehicle operators must exercise a high degree of caution.

## **2.2 Training and Communication**

### *City of Toronto Staff*

Prior to the use of any City vehicle, staff from divisions operating Fleet Services Division governed, City-owned, leased, or rented vehicles are required to successfully complete training and testing to obtain a City of Toronto Fleet Operator's Permit ("the Permit").

Training and testing ensure that staff operating fleet vehicles are aware of and able to comply with federal and provincial laws, City bylaws, policies, and procedures (including the Fleet Safety Policy and Procedures). Training delivered by FSD covers how to safely operate City of Toronto vehicles and is specific to each equipment type. Staff are made aware of their responsibilities and the importance of safe driving for themselves, other staff, and the public. Training to obtain the Permit includes core basics for operating in City parks (such as speed limits, staying on roadways and paved pathways, not running over objects, etc.). The Permit also lists the equipment and vehicle types staff have been certified to operate.

Where applicable, City Divisions provide additional training to their operators to drive specific types of vehicles/equipment. All new and returning Parks and Urban Forestry staff receive annual training on safe and appropriate use of vehicles in parks, along with information sessions throughout the season. This training covers:

- minimizing vehicle operation outside of roadways and paved pathways
- safe vehicle operation
- preventing damage to trees and turf
- procedures to address accidental damage
- appropriate locations to park vehicles
- procedures to address unauthorized third-party vehicles in the park
- appropriate vehicle operation in ravines and Environmentally Significant Areas (for Urban Forestry staff, where applicable)

### *Third Parties*

Some agreements with third parties (e.g. contractors, special event permit holders, etc.) that include permission to operate motor vehicles in a park (e.g., Permit Letter of Conditions, License Agreement, supplier contract, or Park Access Agreement) contain specific terms and conditions. Third parties are expected to use formal roads and parking areas unless not available, in which case they may drive on multi-use paved pathways. Permission is required if there is a need to drive on turf outside of paved pathways. For longer-term contracts and large events, the conditions of the agreement and supplementary instructions related to vehicle use (e.g., designated access routes or parking areas) are discussed in a meeting with City staff either by phone/video and/or at the site, depending on the situation.

## **3.0 Review of Policy, Procedures and Training**

In response to City Council direction, the vehicle-use policies, procedures, and training were reviewed for the following considerations (See Attachment 4 for details):

1. Limiting vehicle usage in parks to necessary activities
2. Alignment with Vision Zero: Safety of pedestrians and park users
3. Use of guides on foot to accompany vehicles through parks
4. Safe access for emergency vehicles

5. Turf protection; tree/tree root protection
6. Alignment with TransformTO: Reducing vehicle emissions

Most of the policy, procedures, and training documents reviewed address: (i) limiting vehicle usage to necessary activities (e.g., work requirements, safety); (ii) safety of pedestrians and other park users (e.g., speed limit, hazard lights, safe backing procedures); (iii) use of guides on foot to accompany vehicles through the park where required; and (iv) turf protection (e.g., preventing ruts/damage to grassy areas).

As directed, staff also engaged with Toronto Police Service, Fire Services, and Toronto Paramedic Services (see Attachment 4 for a summary of the relevant vehicle operation procedures). The three emergency services have not identified concerns with their ability to access parks to respond to emergencies.

### **3.1 Addressing Gaps through Procedural and Training Updates**

Some areas identified in the Council direction were not consistently addressed in the documents reviewed, for example, guidance related to the idling ban and guidance related to tree root protection did not appear throughout all of the materials. Furthermore, instruction to keep emergency access routes clear and to remove vehicles from parks when not required, were implied but not explicit in the guidance.

Based on this review, Parks and Recreation and Fleet Services have developed consolidated and updated guidance that will apply to all authorized motor vehicle use in parks, with particular emphasis on safety and the protection of turf, which is the City asset most often damaged by vehicles in parks. This guidance will be used to update all of the policies, procedures, and training materials reviewed. Staff training and testing, as well as future agreements with third parties, will be updated to align with the updated guidance and ensure rigorous, consistent standards for vehicle operation in parks.

Up until now, Fleet Services' training for City fleet operators has focused on safe operating practices through adherence to speed limits, use of hazard lights and sounds, use of a guide on foot, situational awareness, and adherence to safe backing and parking procedures, with less emphasis on turf protection. Parks and Recreation and Urban Forestry training reinforce these safety requirements and also provide significantly more guidance on the protection of turf, trees, and natural areas. Going forward, informed by Parks and Recreation training materials, all City fleet operators will receive instruction with specific considerations for driving in parks.

### **3.2 Compliance and Enforcement**

In addition to dissemination of information and training, FSD and Parks and Recreation will emphasize compliance of City fleet operators and third parties with the Updated and Consolidated Guidance, as described below.

#### *City of Toronto Staff*

FSD conducts audits, inspections, and investigations to ensure that City of Toronto operators and vehicles are compliant with relevant regulatory and policy requirements, including those imposed by Transport Canada, the Ontario Ministry of Transportation,

and City of Toronto municipal by-laws. From 2022 to April 2025, FSD conducted 1,910 total compliance checks and retained records of their findings and any remedial action that ensued.

City fleet operators who do not follow procedures or are found to be violation of regulations may have their City Fleet Operator's Permit inactivated until they complete remedial actions, ranging from completing additional or refresher training and/or being re-tested in areas of concern. Where appropriate, they may also have disciplinary measures imposed by their respective divisions.

In the case of damage to turf by City vehicles, staff must report any damage to the Park Supervisor as soon as possible so that Parks and Recreation can repair the area. If unreported damage is discovered, Parks and Recreation will attempt to identify and follow up with the responsible Division, and Parks staff will repair the damage.

### *Third Parties*

Issues related to third-party vehicle operation in parks are monitored and enforced in the following ways:

- **Post-Event Review:** Completed by the Park Supervisor following a special event in a park. Any damage following a special event is documented, and costs for the damage may be retained from the event deposit.
- **Contractor Performance Evaluations:** Cover five categories of evaluation: (a) health and safety compliance; (b) quality of deliverables; (c) organization – work plan and management; (d) execution – work performance; and (e) administration. These evaluations can be used by the City to inform decisions about contract renewal.
- **Documentation of construction sites:** Photos of access and egress routes are taken prior to the start of construction by all parties. After work completion, City staff document any damage, and the site must be restored at the contractor's expense. The contractor's damage deposit will be returned when the park is restored to its original condition based on the Park Supervisor's inspection.
- **Complaints received from the public.**

If any concerns are observed regarding third-party agreement holders driving unsafely in parks or operating vehicles outside of approved areas, PR follows up with the organization to report and document the incident. Depending on the severity of the issue, PR will seek to bring the agreement holder into compliance through education, additional requirements for future permits, and/or retaining the damage deposit. If repeat complaints are received, the organization may be issued a legal notice. If third-party organizations park vehicles in a park without permission, they may be ticketed or towed. If Bylaw officers observe authorized vehicles operating unsafely, they will use their discretion to speak to the vehicle operator and/or alert the Park Supervisor.

### *Complaints*

Over the past three years (2022-2024), 311 Toronto received 90 complaints related to parking violation off roadways in a park. Where recorded details were provided, most complaints (approximately 47 per cent) concerned vehicles parked on grass, on a sports field, or on a pathway. Parks and Recreation and 311 Toronto are in the process of integrating the 311 service with Parks and Recreation service requests, with



expected completion by Q4 2025. Through this integration, new data will become available to enable better tracking and reporting of issues related to vehicle use in parks.

## 4.0 Alternative Vehicles

Under 2024.IE15.7, Council directed staff, as part of this report, to provide an update on efforts to acquire and implement alternative vehicle types for work in parks.

As part of TransformTO and the Sustainable Fleets Plan, FSD is working towards transitioning City Fleets to sustainable, resilient, net zero operations by 2040. This is being achieved through various initiatives:

- Anti-idling training and awareness, including dashboard reporting on idling to influence behaviour change. Fleet Services will report fleet idling performance through the annual TransformTO Net Zero Progress and Accountability Report.
- Procuring low- and zero-emission vehicles and alternative vehicles for divisions. To date, FSD has procured 30 alternative vehicles for Parks and Recreation, including electric and manual cargo bikes, electric mowers, and utility carts. Parks and Recreation is incorporating these alternative vehicles in park operations, including for staff transportation between parks in some contexts where cycling infrastructure exists (e.g., certain waterfront parks).
- Fleet Services has also procured 32 manual and electric bikes and is working with Parks to further explore and evaluate the use of bikes, where operationally feasible.
- The Parks Electrification Pilot Project, which is a collaboration between FSD and Parks and Recreation, to explore the electrification of an entire City park, including vehicles, equipment, and building infrastructure, where feasible. The project is currently scoped to include between one and three large- and small-scale parks to gain a better understanding of how sites can be transitioned to fully electrified sites.

## 5.0 Implementation

Based on this review, Parks and Recreation and Fleet Services have developed updated guidance for motor vehicle use on parklands (see Attachment 1). The intention of this consolidated and updated guidance document is to ensure that everyone who is driving a vehicle in a park for an authorized purpose be subject to consistent, rigorous standards.

FSD has already incorporated this guidance into an updated version of the Fleet Safety Policy and Procedures to ensure that vehicle operators are using appropriate protocols in parks, with added attention paid to protection of natural assets. Updates to the policy and procedures for driving in parks specifically address: adhering to speed limits; watching for pedestrians and cyclists; not driving over any debris, garbage, or cardboard; limiting driving on turf in poor and wet conditions; and not parking on turf under trees or in planted areas. Starting immediately, Fleet Services and Parks and Recreation will also integrate the new guidance into training and education at various levels, as shown in the table below.

A report back on progress will be prepared for Q4 2025.

Division	Update Policies and Procedures	Improve Training and Compliance
Fleet Services will:	<ul style="list-style-type: none"> <li>• Provide, for implementation, the updated guidance and FSD Policies to City Divisions and Agencies that operate Fleet Vehicles via Fleet Steering and Client Advisory Committees (Q2-Q3 2025).</li> <li>• Provide, for consideration and implementation, the updated guidance with Toronto Police Service, Toronto Fire Service, and Toronto Paramedic Services (Q2-Q3 2025).</li> </ul>	<ul style="list-style-type: none"> <li>• Develop an enhanced supplementary training module on vehicle operation in parks (Q3 2025).</li> <li>• Integrate the enhanced module on vehicle operations in parks into standard vehicle training and testing required of all new and incoming City fleet operators, beginning in Q4 2025.</li> <li>• Require all active City Fleet Permit Holders and newly hired City fleet operators to complete enhanced training (Q1 2026).</li> <li>• Deliver awareness campaigns to client divisions through multiple mediums (memos, in-person tailgate talks, digital message boards, where available (Q4 2025)).</li> </ul>

Division	Update Policies and Procedures	Improve Training and Compliance
Parks and Recreation will:	<ul style="list-style-type: none"> <li>• Update the template terms and conditions for future third-party agreements and permits which allow for vehicle access in parks to reflect the updated guidance (Q4 2025).</li> <li>• Work with Legal Services to update template terms and conditions for future supplier contracts that include vehicle access in parks to reflect updated guidance (Q4 2025).</li> <li>• Work with the Customer Experience Division and Fleet Services to identify opportunities for enhanced reporting of damage caused by vehicles in parks.</li> <li>• Update Parks and Recreation procedures and manuals to reflect the updated guidance (Q4 2025-Q2 2026).</li> <li>• Provide, for implementation, updated guidance to Toronto and Region Conservation Authority (Q3 2025).</li> </ul>	<ul style="list-style-type: none"> <li>• Reinforce communications from Fleet Services with a memo to staff and poster campaign at all parks service yards (Q3 2025).</li> <li>• Develop public communications materials on allowed vehicle use in parks, precautions taken to protect people and park assets, and how to report a problem (Q3-Q4 2025).</li> </ul>

## **CONTACT**

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## **SIGNATURE**

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## **ATTACHMENTS**

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1. Consolidated and Updated Guidance on Vehicle Operation in Parks
2. City Divisions/Agencies Operating Vehicles in Parks
3. Policies, Procedures and Training Materials Reviewed
4. Discussion of Review Findings