



To: Chair McKelvie and Members of the Infrastructure and Environment Committee
Copy: Mayor Tory
From: Walk Toronto (Steering Committee)
Date: April 26, 2021
Re: IE21.7 E-scooters - Accessibility and Insurance Issues

Walk Toronto is a grassroots pedestrian advocacy group that works with various levels of government, community groups and citizens to improve walking conditions and safety in Toronto.

Walk Toronto strongly supports the City staff recommendation that Toronto decline the option to participate in the Ontario e-scooter pilot, known officially as O.Reg 389/19 – Pilot Project – Electric Kick-Scooters. As the staff report notes, accessibility barriers, safety concerns and insurance issues remain unresolved. Walk Toronto is also concerned about impacts on active transportation, costs to the City, business, equity and inclusion issues, environmental considerations, and challenges for enforcement.

The accessibility of Toronto's streets and sidewalks is a key consideration in everything that Walk Toronto advocates for. We work to improve walking conditions for people of all ages, with and without disabilities, and to create vibrant spaces. During the COVID-19 pandemic, walking outdoors and access to safe walking infrastructure have become even more vital for public health. A pilot project that results in the proliferation of e-scooters would, without a doubt, encroach on our sidewalks, and would have dangerous accessibility and safety ramifications.

Accessibility and safety should be primary considerations, not an afterthought. We commend City staff for taking the feedback and concerns of the disability community seriously. E-scooters pose significant safety risks to pedestrians, particularly to those with disabilities. Unfortunately, the solutions proposed by the e-scooter industry fail to address these concerns.

I am totally blind and get around with the help of my guide dog. I have the same concerns voiced by others with disabilities: if e-scooters are permitted to legally operate in our city, it would mean a blow to my independence. E-scooters emit no sound, and this makes them a silent menace for blind or low vision pedestrians, who may be unaware of their presence. Moreover, it may not always be obvious to someone riding an e-scooter that they are approaching a pedestrian who can neither see nor hear them.

The City should not be allowing any opportunity to use pedestrian infrastructure for motorized devices that can travel above 20 km/h -- twice the permitted speed for a power wheelchair. This is not an acceptable risk to impose on pedestrians, especially pedestrians who are blind or have mobility disabilities.

The experience from other cities shows that, regardless of the law, e-scooter users do often ride on the sidewalk rather than on the road. Furthermore, shared e-scooters are frequently left in inappropriate locations once a user's trip is complete. Abandoned machines may be stumbled upon at intersections and on sidewalks, creating tripping hazards for pedestrians which potentially lead to injuries; they can compromise access to Accessible Pedestrian Signal (APS) buttons and stair handrails; and they can obstruct transit entrances, business storefronts and other random locations.

The staff report indicates that the City of Toronto does not have adequate resources to enforce dangerous sidewalk riding, or improper parking of shared e-scooters.

The problems that e-scooters pose to pedestrians of all abilities are many. We are disappointed that members of the e-scooter industry have failed to address most of the concerns raised by the disability community. They are issuing overly optimistic and often misleading statements about their devices. For example, E-scooter sharing companies have been touting a "lock-to technology" (a small cable) that has not been especially effective in preventing their devices from being locked in inappropriate locations. It is also clear that the e-scooter companies do not have proven solutions in place to prevent their customers from riding on the sidewalk, thereby endangering pedestrians who cannot get out of the way. We are being promised that geofencing will prevent sidewalk riding – yet geofencing is known to be too imprecise to distinguish a sidewalk from the roadway.

Meanwhile, we are still waiting for the development of technical remedies that are of real value — for example, the addition of audible tones to alert blind people to the presence of the devices.

After more than one year of social distancing and lockdowns, allowing these shared devices on our streets would only create further threats and isolation in the disability community. While e-scooter companies may claim that they are providing an additional transportation option, the reality is that they are reducing options for many people with visual disabilities. These businesses are putting commercial opportunity ahead of our safety.

Walk Toronto made an extensive comments detailing these and our other concerns (including cost to the city, precarious work, equity and inclusion, and environmental issues) that were submitted to the Toronto Accessibility Advisory Committee ahead of its meeting of February 25, 2021. They can be found here:

<http://www.toronto.ca/legdocs/mmis/2021/di/comm/communicationfile-128098.pdf>.

Yours truly,

Daniella Levy-Pinto

On behalf of Walk Toronto

www.walktoronto.ca