

Given the information that we have received, in addition to both lived experience and the examples set by Canadian municipalities such as Montreal and Toronto, the City of London's Accessibility Advisory Committee is unable to support the City's participation in a pilot project allowing electronic scooters (e-scooters) in public.

While the majority of our concerns are specific to challenges that these scooters pose to members of the accessibility community, they are complemented by a lack of proven benefit that would set the foundation for further discussion. The supposed environmental benefits, as proven in a North Carolina study looking at e-scooter user behaviour, are spurious at best. These e-scooters are not being used by those forsaking vehicles, but rather are generally used by those who normally walk or bike to destinations -- both of which are far more ecologically responsible forms of transportation.

And we have yet to broach the topics of injury liability, potential for theft and the related replacement costs, and additional enforcement costs that the City would be forced to absorb to meet even the minimum safety and accessibility thresholds we would expect.

So with little to no benefit, yet so much risk, we see no reason to move forward with this project. As per the City of London's Diversity and Inclusion Policy states, the City is committed to "removing system barriers to accessibility and access as experienced by our community by listening and responding to the voices of those who are marginalized."

Our "marginalized" community is expressing these concerns in advance in order to prevent the establishment of a system barrier, and we hope that prevention carries just as much weight as after-the-fact remediation efforts.

Our concerns are as follows:

- E-scooters are often discarded in locations away from their designated areas. As staff have suggested that these scooters are intended for last-kilometer traffic, one could make a reasonable assumption that they will be left on sidewalks and doorways that represent the end of that destination. That "reasonable assumption" is further reinforced by the examples of cities like Montreal, where pilot projects were ended due to this behaviour.
- Discarded e-scooters pose a risk to those with visual challenges, mobility challenges, and who use wheelchairs. Unexpected obstacles on the sidewalk, boulevard, or even along the street can pose trip-and-fall hazards for people with visual challenges, and they can effectively block people in wheelchairs, people pushing strollers, or those using walkers from progressing down pedestrian walkways.
- E-scooters are silent and pose a risk to those with visual and auditory challenges. If ridden on the sidewalk, they are an unexpected vehicle on a pedestrian-first pathway.

The Accessibility Advisory Committee fully supports the development of a multi-modal transportation model for the City of London. We have supported the integration of safely designed bike lanes, but we feel e-scooters have proven to be problematic in other communities and we encourage you to follow the example set by the City of Toronto in not voting to support a pilot project.

If the Toronto example does not suffice, we encourage you to learn from the experiences of other communities, such as Montreal, which shut down their projects specifically as a result of the manifestation of the concerns that we've expressed.

We appreciate that the lobbyist for the vendor has suggested that these concerns can be alleviated through enforcement and technological restrictions that would prevent these devices from accessing sidewalks. But we question at what cost? Who bears both the additional upfront costs and the ongoing residual costs (e.g. enforcement officers? Technological maintenance to ensure that "no-ride" zones are maintained?)

We feel that the risks, both in terms of accessibility, liability, and long-term costs far outweigh any perceived benefit (which, at this point, is restricted to some nebulous "cool factor" for the downtown, as the environmental benefits are simply non-existent -- especially when one factors in the environmental cost of producing these scooters, and, ultimately, maintaining and replacing them.)

It is our hope that the Civic Works Committee and/or Municipal Council rejects the opportunity to participate in this pilot project.

Signed,

The City of London's Accessibility Advisory Committee
Letter endorsed at its June 24, 2021 meeting.