



## **London Civic Works Committee**

London City Hall  
300 Dufferin Ave,  
London, ON N6B 1Z2

August 31, 2021

### **Regarding: Commercial e-scooters in the City of London**

Dear Committee Members,

CNIB recommends that the City of London **ban the use of e-scooters** on all city roads, sidewalks, pathways, and in all other areas of the city. We urge the City of London to consider the recent decision by the City of Toronto to uphold a ban on e-scooters and City of Montreal's decision to ban e-scooters after they were introduced due to improper parking concerns. We request that the Civic Works Committee similarly prioritize the safety of vulnerable pedestrians by voting against commercial e-scooters in the city.

CNIB is pleased to see that the City of London is open to innovative approaches which have the potential to lessen greenhouse gases, reduce congestion on city streets, and better utilize public transit via first/last mile transportation. We applaud the City's decision to prioritize enforcement capabilities, use small pilot areas, include both visual and tactile identifiers on devices, and ensure that pedestrian areas are kept free from obstructions.

However, these measures are not sufficient to ensure the safety of vulnerable pedestrians, such as people who are blind or partially sighted. From consultations with our community members living in municipalities where e-scooters are permitted,



we know that e-scooters can create safety and accessibility barriers for people who are blind or partially sighted.

We ask that the Civic Works Committee consider the following in their upcoming decision.

## **Considerations**

- Pedestrians who are blind or partially sighted may not be aware of an approaching e-scooter. An automatic acoustic alerting system must be in place to ensure pedestrian safety. An acoustic alerting system that relies on rider activation (such as a bell) is not sufficient to ensure the safety of vulnerable pedestrians, such as people who are blind or partially sighted, as riders may fail to activate the alert or may activate the alert beyond the point at which a pedestrian is able to react.
- Pedestrians who are blind or partially sighted are not able to navigate safely around an abandoned device or a device that is parked in a shared space or public pathway, which may result in injury. The Transportation Advisory Committee's recommendation of providing docking stations that people can choose to use is unrealistic in its expectation that it will stop people from parking wherever they choose and in dangerous and inappropriate locations. If the City introduces docking stations then it must require e-scooters to park in those designated spaces in order to mitigate dangerously parked e-scooters
- Docking stations and locking devices are not sufficient to mitigate the pedestrian safety hazards posed by e-scooters. In other jurisdictions where e-scooters are permitted, including Ottawa and Windsor, there have been significant issues with riders abandoning devices on sidewalks and in areas that block entrances, accessibility ramps, and accessible pedestrian signals. The Transportation Advisory

Committee's report references the Montreal project but fails to note that the Montreal project was cancelled due to issues with improperly parked and abandoned devices.

- The process for reporting an abandoned or improperly parked device must be simple, accessible, and widely advertised to the public to ensure that the impact of e-scooters is accurately captured, including incidents that cause minor injury and incidents involving the removal of abandoned devices by members of the public. It is likely that these minor incidents will occur more frequently than major incidents, and they should not be overlooked.
- E-scooters on sidewalks pose a critical safety risk to vulnerable pedestrians. Sidewalk riding is a major issue in jurisdictions where sidewalk riding has been banned. There is not an existing technological solution that is refined enough to geofence the sidewalk from the roadway.

## **Recommendations**

1. E-scooters should be banned on all City of London roads, sidewalks, pathways, and in all other areas of the city until e-scooters and their operators are trained, licensed, insured, and fully regulated by the province of Ontario.
2. If e-scooters are permitted, they must be treated as bicycles and operators must follow the same rules of the road as cyclists.
3. If e-scooters are permitted, the City of London should ban e-scooters on sidewalks and in most parks, as well as multi use pathways.
4. If e-scooters are permitted, the City of London should limit speed to no more than jogging speed at most
5. If e-scooters are permitted, they should be prevented from operating in heavily populated and pedestrian dense areas through the use of geofencing
6. If e-scooters are permitted, an automatic acoustic alerting system should be mandated to ensure the safety of



vulnerable pedestrians, including people who are blind or partially sighted.

7. If e-scooters are permitted, they should only be parked in designated docking stations which are clearly marked and are cane detectible. We support repurposing car parking spaces for e-scooters, as this would help keep sidewalks clear from obstacles. If this is not possible, then riders should park close to other items within the furniture zone on the sidewalk, without encroaching on pedestrian spaces.
8. If e-scooters are permitted, designated parking areas must not impede a path of travel and a minimum of 1.8 meters space should exist around the parking area to enable pedestrians with sight loss to safely navigate around these designated areas.
9. If e-scooters are permitted, the process for reporting infractions should be simple and accessible, such as calls to 311. Additionally, the City of London should ensure the prominent placement of a scannable QR code on each device which is marked using tactile and high contrast lettering, similar to a motor vehicle license plate for identification purposes. These measures will ensure that all citizens, including those who are not able to see branding or information displayed on an e-scooter, have equal opportunity to report infractions.
10. If e-scooters are permitted, prompt action should be taken by e-scooter operators to remove a device and relocate it to a designated parking area when the device has been abandoned or improperly parked.
11. If e-scooters are permitted, the City of London should ensure effective enforcement of administrative penalties.



The above photo shows two e-scooters parked in an accessible parking space. The e-scooters are parked haphazardly in a parking space, impeding both cars and pedestrians.

We respectfully ask that the City of London give serious consideration to the safety of pedestrians who are blind or partially sighted and ban commercial e-scooters in all areas of the



city until e-scooters and their riders can be trained, licensed, insured, and regulated by the province of Ontario.

If you have any questions, please reach out to me at any time.

Sincerely,

Robert Gaunt  
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CNIB  
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### **About CNIB**

Celebrating 100 years in 2018, CNIB is a non-profit organization driven to change what it is to be blind today. We deliver innovative programs and powerful advocacy that empowers people impacted by blindness to live their dreams and tear down barriers to inclusion. Now, as CNIB enters our second century of operation, we're going to be even bolder in tackling the issues before us.