



**Complete  
Streets**

**tcat** toronto centre for  
active transportation 



April 8, 2014

RE: PW 30.8 – Confirmation of Levels of Service for Winter Maintenance of Bikeways, Windrow Opening, Sidewalks and Accessibility for Ontarians with Disabilities Act (AODA) Compliance

Dear Chairman Minnan-Wong and Members of the Public Works and Infrastructure Committee,

I am writing on behalf of the Toronto Centre for Active Transportation (TCAT), a project of the registered charity Clean Air Partnership. TCAT's mission is to advance knowledge and evidence to build support for safe and inclusive streets for walking and cycling.

The clearing of bikeways and sidewalks is critical for Torontonians to get around our city safely on foot and by bike. The current level of service creates dangerous conditions and is simply unacceptable. Many seniors and people with disabilities are virtually prisoners in their homes during the winter months, and many potential cyclists leave their bikes at home choosing either to drive or attempting to cram on an already over-crowded public transit system.

Cycling and walking in the winter can be an all-year transportation mode but the slippery road conditions and poor snow clearing quality are significant barriers. Each year Toronto is found negligent in slip-and-fall lawsuits for its failure to remove snow and ice and pays out millions of dollars in taxpayers' money to resolve these claims. These costs, as well as the human and health care costs of injuries sustained by Torontonians, could be dramatically reduced with 100% mechanical sidewalk clearing.

TCAT recognizes the positive efforts by the City of Toronto to propose levels of service in the 2015/16 winter season for cycling facilities and increased clearing for sidewalks. However, these efforts do not go far enough and we believe there are solutions that could be further investigated to increase pedestrian and cyclist safety during the winter months. We provide the following recommendations for your consideration:

- That all newly constructed or renovated sidewalks be built to a standard that provides adequate snow clearance (meeting AODA minimum of 1.5m) capable of mechanical sidewalk clearing;
- That all sidewalks be cleared as standard practice, not only the suggested subset;
- That a phased approach to the introduction of 100% mechanical sidewalk clearing be investigated where higher priority is given to identified destinations (e.g. proximity to transit stops, public services, etc.)
- That any future bike lanes, paths or sharrows, including pilot projects, be automatically identified as requiring priority winter clearing;
- That cyclists be considered in the snow clearing practices of all other roads without bicycle facilities, taking into account the amount of space they need to ride safely, and the adequacy of snow removal.

Walking and cycling are active and healthy forms of transportation and shouldn't be restricted only to summer months, or only for those who have full mobility. We request the committee to ensure that an adequate level of service is being provided for bicycles and pedestrians, as is the case for motor vehicles.

Thank you for the opportunity to comment.

Sincerely,



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