



Friday, June 10, 2022

Barbara Gray, General Manager,  
Transportation Services Division  
Toronto City Hall, 24th Floor E  
100 Queen St. West  
Toronto, ON M5H 2N2

Dear Barbara Gray,

***Re: follow up from meeting on illegal parking in bike lanes,  
cycling infrastructure, and safety***

Our thanks for meeting with the *Toronto Community Bikeways Coalition* (Mary Ann Neary, Albert Koehl, and Marc Goldgrub) and *Friends and Families for Safe Streets* (Jess Spieker) on June 7. We appreciated not only your time, attention, and insights but also that of senior city staff who attended, namely, Vincent Sferrazza, Roger Browne, Jacquelyn Hayward, and Becky Katz.

In this letter we set out at some length our discussion to serve as a benchmark against which to measure progress as we move forward.

We were pleased to have the opportunity to articulate our concerns about illegal parking in bike lanes and to put forward our recommendations about improving the current situation. We know that you and your staff share our safety concerns. In solving this ongoing problem, our ambition is to bring together all parties that have a role in solving the problem, which includes not only Transportation Services, but the police parking enforcement unit, Municipal Licensing & Standards (which regulates ride hailing services), delivery companies, and Uber and Lyft (which are responsible for a disproportionate share of bike lane parking violations).

Our discussion generally followed the outline of our letter of April 21, 2022:

**Quality and maintenance of infrastructure**

Vincent Sferrazza elaborated on a new monitoring/patrol staff team that has been established (initially as a trial and now made permanent) to identify, record and resolve maintenance issues

in bike lanes, including items such as damaged or displaced dividers (bollards, planters, cement curbs). This is important because when dividers, for example, are out of place, it is easier for illegal intrusions into the bike lane. We understand that the best way for the public to bring maintenance issues to the attention of appropriate officials is via the “311” reporting system. We understand that the only reason for a delayed response to work orders is the availability of adequate staff (a matter that should be resolved shortly) or materials, such as bollards. In fact, it was noted that there is a specific “service timeline” for a staff response.

As you are aware, complaints about bike lane maintenance are commonly and frequently posted by cyclists on social media. We urge you to include in your monitoring system the capacity for public submissions where photos, videos, and other complaints can easily and quickly be communicated to relevant city staff, including your new patrol unit. Cycling puts thousands of eyes on the road, and by integrating these eyes into your system the city can improve its monitoring capacity while also defusing much of the anger that now exists among city residents who rely on bike lanes.

We understand that service request codes specific to cycling infrastructure issues are being developed for the 311 system. This would allow problems with bike lanes to be more quickly identified and communicated to the cycling unit. We were advised that callers to 311 should be encouraged to specify that a problem relates to a bike lane.

Moving forward, we would appreciate seeing the metrics related to the bike lane maintenance patrol team.

### **Gaps in protection for cycling infrastructure**

We outlined our concerns about “permanent” gaps on bike lanes that have the effect of inviting illegal parking. These gaps are usually the result of design decisions, or, in the case of older bike lanes the result of standards from a previous era. We appreciate that the city is updating some of its older bike lanes, although we understand that there is not an inventory *per se* of such gaps. These gaps undermine the safety --- and therefore the usefulness --- of bike lanes, while also undermining the city’s goal of converting, within eight years, short motor trips to active modes to achieve our climate goals.

We urge you to correct unprotected gaps by quickly adding an effective barrier where feasible.

We also noted that the gaps in bike lanes make it easier for construction vehicles to illegally park in them. These vehicles, given their size, are a particular problem, especially in a city (as your staff noted) where the construction of residential and other towers ranks first among Canadian and U.S. cities. The prevalence of this problem is likely to grow, especially given that construction work not only relates to new towers but to the Ontario Line and the modernization of utilities such as watermains. You outlined the fact of five new construction

hubs in the city along the Ontario Line where, as a trial project, there are designated waiting areas, and even designated routes, for construction vehicles.

It is clear to us, based on our observations, that construction equipment (moving or parked) remains a significant problem that must be addressed before a tragedy occurs. This may require the consideration of reducing motor traffic lanes while maintaining bike lanes and sidewalks during construction work. We suggest that slight inconvenience to motorists is consistent with a Vision Zero approach that prioritizes the safety of people over automobiles. In some areas, it may be that bicycle and foot traffic will have to be given priority over motor traffic. Indeed, the rebalancing of roads to promote active transportation and to reduce driving has long been an articulated city goal. Developers may also have to be required to engage extra security personnel to divert construction vehicles from blocking bike lanes and sidewalks.

We will look forward to hearing about the progress of this trial program.

### **Public education**

We appeared to be in agreement that an education campaign related to illegal parking in the bike lane is both feasible and desirable. Illegal parking may be explained by a variety of potential reasons, for example, the failure to appreciate the illegality of the conduct (perhaps by a motorist not accustomed to bike lanes) or a culture where a motorist feels entitled to park illegally (on the myth that motorists alone pay for roads) or does not appreciate the risk to which city residents on bikes are put. We often hear “I’ll just be a minute” to excuse an illegal stop in a bike lane. Sadly, we also know that it may only take seconds for a cyclist to be seriously injured when skirting around an illegally parked vehicle.

We look forward to collaborating with Transportation Services and other community groups in developing an appropriate campaign, perhaps under the Vision Zero mandate.

### **Other issues**

We appreciate that there may be good reasons to not use permanent materials *i.e.*, cement curbs near intersections (perhaps because of a bus stop), however, we encourage you to develop other means to pre-empt motorists from using these unprotected areas to stop or park. The rubber platform in the southbound lane of Yonge Street at MacPherson is an excellent example of a design intervention that could be expanded at nearly every intersection with a TTC stop alongside a bike lane.

We did not touch on the issue of automated enforcement in bike lanes, but it is worth considering, especially where violations are common. The city already effectively uses speed cameras to charge motorists who disobey speed limits. A camera-based enforcement program

for illegal bike lane parking merits similar consideration. We appreciate that the authority for such automated enforcement would require provincial cooperation.

Bicycle-riding parking enforcement officers (PEOs) do an excellent job in patrolling bike lanes. Unfortunately, during an eight hour shift a PEO may only be able to visit a particular location once. We have previously encouraged police to expand their dedicated bicycle patrol unit to cover evenings after 6pm and weekends (instead of occasionally re-allocating resources.) We would appreciate your efforts to encourage police to expand this patrol unit.

We also believe that Municipal Licensing & Standards, which regulates Uber and Lyft, could use evidence (photos, videos) about illegal parking in the bike lane as part of the licensing process, revoking licenses when a threshold of illegal behaviour is passed. A Vision Zero city cannot tolerate ongoing public endangerment by licensed corporate operators.

The size of delivery vehicles such FedEx and Purolator continues to be a significant problem, not only blocking bike lanes but parking on sidewalks. There is no physical reason why a long list of small items (books, soaps, posters, etc.) have to be delivered by trucks that double as storage depots. We hope you will continue to encourage the expansion of deliveries by cargo bikes, consistent with the city's recent trial program. The proliferation of electric pedal vehicles makes these options even more desirable and practical, but a shift will require regulation. We understand that you will follow up to clarify the city's authority to regulate large delivery vehicles. (As well, for food delivery, there is no good reason why a 2,000-lb vehicle, instead of a bicycle, is being used to deliver a 16-ounce burger. The "right-sizing" of vehicles to tasks merits a separate conversation. This morning we observed a large city pickup truck parked in the busy Bloor bike lane while a single worker scraped a poster off an adjacent lamp post.)

Parking spaces for delivery vehicles continue to be a problem. This issue can be addressed in a variety of ways by re-allocating some parking spaces (on side-streets, for example), although this issue requires the engagement of the parking authority and local residents. This matter requires new attitudes and an innovative approach.

## **Conclusion**

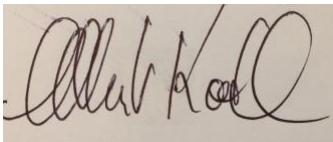
We all appreciate how challenging it has been to install bike lanes in Toronto, making it all the more frustrating when this infrastructure is illegally appropriated by a small percentage of drivers and corporations for their own purposes, mindless of the risks created to city residents on bikes. In fact, given the broad interest in the issues outlined above, we provided an update and discussed the results of our meeting with you at the June 7 meeting of the Toronto Road Safety Collaborative, an initiative now counting over 20 road safety groups.

Finally, we look forward to progress on addressing, in collaboration with other city departments and private enterprise, the problem of illegal parking in bikes.

Sincerely,



Jess Spieker  
*Friends and Families for Safe Streets*



Albert Koehl (for Marc Goldgrub and Mary Ann Neary)  
*Toronto Community Bikeways Coalition*

Cc      Jacquelyn Hayward, Director, Transportation Project Design & Management  
          Vincent Sferrazza, Director, Transportation Operations and Maintenance  
          Becky Katz, Cycling and Pedestrian Projects Unit  
          Roger Browne, Director, Traffic Management  
          Brian Moniz, Supervisor, TPS Parking Enforcement Operations