



Safe streets  
Healthy city  
Vibrant voice

192 Spadina Ave, Suite 215  
Toronto, ON M5T 2C2  
416-644-7188 | [cycleto.ca](http://cycleto.ca)

## **Vehicle-for-Hire Bylaw Review**

Municipal Licensing and Standards  
City Hall  
100 Queen St. W, 16th Fl. West Tower  
M5H 2N2

30 April 2019

Dear Vehicle-for-Hire Bylaw Review Team,

### **Vehicle-for-Hire Bylaw Review: Cycle Toronto Submission**

Cycle Toronto welcomes the opportunity to comment on the Vehicle-for-Hire bylaw review.

The relatively recent increase in cars being operated as taxis through private transportation companies (PTCs) in Toronto, and across North America, is concerning. We note that PTC services are correlated with an “an overall 180 percent increase in driving on city streets.”<sup>1</sup> The associated increase in traffic (vehicle miles driven) contributes to increased air pollution and greenhouse gas emissions, but most importantly for us, increased road danger.<sup>2</sup> All of which at a time when all of these trends should be in reverse.

We have a number of concerns as a result of the low standards the city has set for PTCs and their drivers. Our members report numerous incidences of distracted driving and the obstruction of bike lanes, resulting in near misses and injury.

---

<sup>1</sup> Schaller, B. (2018) The New Automobility: Lyft, Uber and the Future of American Cities, Schaller Consulting, <http://www.schallerconsult.com/rideservices/automobility.pdf>

<sup>2</sup> Barrios, J. M. et al. (2018) The cost of Convenience: Ridesharing and Traffic Fatalities, Stigler Center for the Study of the Economy and the State, University of Chicago, October 2018  
<https://research.chicagobooth.edu/-/media/research/stigler/pdfs/workingpapers/27thecostofconvenience.pdf>



Safe streets  
Healthy city  
Vibrant voice

192 Spadina Ave, Suite 215  
Toronto, ON M5T 2C2  
416-644-7188 | cycleto.ca

While the provision of protected bike lanes and intersections will eradicate much of the dangers to people cycling from traffic, we believe there is some scope to move us toward City Council's Vision Zero commitment – and reduce the dangers on our streets – by updating the vehicle-for-hire bylaw on the grounds we outline below:

### 1. Reducing dangerous bike lane obstructions

We are deeply concerned by the increased danger posed by PTC drivers performing curbside drop-off and pick-up in cycling facilities, forcing people who are cycling to take the risk of entering the main roadway and mixing with traffic, or simply bringing them to an abrupt halt, making every day journeys that should be easy quite challenging.

The city should note that high quality protected bike lanes are our favoured solution – designed so as to prevent drivers from blocking the lanes and ensure people cycling are protected.

However, noting that these are medium to longer-term solutions, we believe the city should take immediate steps through the bylaw review to:

- **Mandate PTCs to prevent pick-up and drop-off in painted bike lanes and where there are 'no-stopping' regulations through their apps. The City or Toronto Police service must also enforce driver compliance.** For all other modes of transport, curb space is carefully regulated – for parking, loading, bus stops and crosswalks – a more sensible approach to PTC pick-up and drop-off is required that reduces dangerous maneuvers. This can be achieved by the bylaw mandating ride-hailing apps to operate 'no-go' areas for pick-up and drop-off where there are bike lanes. Similar restrictions are in place at many airports. In return, the City should, where it is safe to do so, create dedicated lay-bys to drop-off and pick-up passengers. However, the majority of pick-ups or drop-offs would likely take place at existing parking bays or near intersections on adjacent streets with the exception of passengers with disabilities who require more accessibility.. This should be further supported as part of newly refreshed and required driver training, and enforced by regular action taken by the City or Toronto Police Service.



192 Spadina Ave, Suite 215  
Toronto, ON M5T 2C2  
416-644-7188 | cycleto.ca

## 2. Reduce distracted and dangerous driving

We are concerned by distracted driving as a result of smartphone use by all drivers. While this is not unique to PTC drivers, PTCs and their drivers have an extra duty of care in carrying out their business on public streets through a smartphone app.

We urge the police to deliver more widespread and visible enforcement of distracted driving. We also believe the city should work with PTCs to reduce distractions in the app and interactions with it, while their drivers are operating their vehicles. Consideration should also be given to reduce the maximum shift length to increase driver alertness.

In addition, we believe the City should:

- **Introduce and mandate a new Taxi and PTC driver training programme:** with a focus on safe and responsible driving and taxi operation around vulnerable people (walking and cycling). This should include safe pick-up, drop-off, U-turning and three-point turning, and door opening. It should also clarify the law around cycling infrastructure in urban areas for drivers.
- **Improve driver accountability and reporting:** to maintain accountability for dangerous driving and near misses, we support the requirement for PTCs to have a form of clear and unique identification, such as a sticker with unique ID tag, to allow for incident reporting. The city should require that incident reporting is available through PTC apps and that the data collected is shared with the city and police.
- **Investigate the effectiveness of rear door-mounted mirrors** in the minimum standards for vehicles-for-hire, for passengers to see if someone cycling is coming from behind, in addition to stickers that remind passengers to check for people biking before they open their door.



Safe streets  
Healthy city  
Vibrant voice

192 Spadina Ave, Suite 215  
Toronto, ON M5T 2C2  
416-644-7188 | [cycleto.ca](http://cycleto.ca)

The City should hold the right to withhold or remove a person's or PTCs licence on public safety grounds.

Taken together these measures would help to raise the standards of professional driving in Toronto, helping to move us toward Vision Zero.

Cycle Toronto thanks the City of Toronto for the opportunity to comment on the Vehicle-for-Hire Bylaw Review. We would be keen to discuss with you the design and content of a refreshed driving training program for cycling awareness, and look forward to working with you to improve safety in our city.

Sincerely Yours,

Nicholas Sanderson, John Taranu, Keagan Gartz, Robert Zaichkowski , Laura Bast  
Cycle Toronto Advocacy Committee

A handwritten signature in black ink, appearing to read "Jared Kolb".

Jared Kolb  
Executive Director