

December 18, 2020

Ministry of Transportation
Road Safety Program Development Office
87 Sir William Hearst Avenue, Building A, Room 212
Toronto, ON
M3M0B4
Canada

RE: York Region Response - Power-Assisted Bicycle (E-bike) and Cargo E-Bike Pilot Program Proposals – Environmental Registry of Ontario (ERO) Number 019-2745

York Region thanks the Province for continuing to promote the highest standards of safety for all Ontarians who travel on our roads, including drivers, cyclists, and pedestrians and for consulting with stakeholders on the Power-Assisted Bicycle (E-bike) and Cargo E-bike Pilot Program Proposals via ERO posting 019-2745. This letter outlines key comments and recommendations from York Region staff on the proposal.

York Region staff would like to highlight the following key comments:

York Region supports the use of micromobility technologies to increase transportation options for travelers and support more sustainable travel choices

Reducing single-occupancy vehicle trips on our road network during rush hours continues to be a priority. Expanded micromobility options provides residents with alternative choices to travel throughout the Region. In [November 2020](#), Regional Council demonstrated its support for more sustainable transportation options by approving E-Bikes and Electric Scooters “E-Scooters” on Regionally designated bike lanes to improve the efficiency of the road network.

Distinguishing between Power-Assisted Bicycles and Motor-Assisted Bicycles will provide clarity

York Region staff support the provincial proposal for further clarity regarding the definitions of Power-Assisted Bicycles and Motor-Assisted Bicycles that has historically led to confusion among potential users and enforcement bodies. Providing additional clarity will lead to a more consistent application throughout the Province of these technologies and support expanded implementation.

The Region recommends the revised definitions:

- Continue to use the terms Power-Assisted Bicycles and Motor-Assisted Bicycles as municipalities have already enacted bylaws with this terminology.
- Include additional descriptors in the definition such as Power-Assisted Bicycles (“E-Bikes”) and Motor-Assisted Bicycles (Moped, Motorcycle Style) to help provide clarity to the public that these definitions include vehicles that have a common name associated with them.
- The definition should be limited to items of a non-technical nature that can be easily established through a visual inspection by any person to determine whether the vehicle is a

Power-Assisted Bicycle or a Motor-Assisted Bicycle. This will lead to less confusion as to the type of vehicle.

- The definition should not include the standards and specifications of the Power-Assisted Bicycle or the Motor-Assisted Bicycle. These should be set out in a regulation; for example, the requirement that a label be affixed, who affixes the label (manufacturer or vendor), maximum weight, maximum attainable speed, wheel diameter (measured to the outside of an inflated tire or the outside of the rim, maximum horsepower, etc.).
- Amend the first portion of s. 104(1) of the *Highway Traffic Act* to read the same as s. 103 (2) (No person shall ride on, drive or operate) and amend s. 104 (2) of the *Highway Traffic Act* to add motor-assisted bicycles so that the operator must ensure that a passenger under the age of sixteen wears a helmet.

The Cargo E-Bike Pilot will provide increased opportunity to assist with first- and last-mile trips

Cargo E-Bikes present an opportunity to allow for shorter trips to be completed by E-Bike rather than single-occupancy vehicles. The ability to carry increased cargo, such as additional passengers, parcel and food delivery, provide an environmentally-friendly and cost-effective solution for multiple users. Creating additional transportation options that provide flexibility for users to complete shorter trips will aid in shifting travel behaviour to more sustainable options.

Municipal leadership is an important consideration in ensuring successful implementation

There are nine local municipalities within York Region with varied infrastructure, land use, and populations. Providing municipalities with the ability to determine which infrastructure is best-suited for these micromobility technologies will help lead to a more successful integration into the road network, given the wide-ranging geographies. Through bylaws, municipalities can be responsive to the needs of their specific communities.

As noted above, micromobility technologies provide a significant opportunity to address Regional and local municipal priorities of expanding transportation options for residents while reducing single-occupancy trips during rush hours. York Region staff are appreciative of the opportunity to give feedback and look forward to further consultation with the Province and local stakeholders.

If you have questions regarding this response or would like to further discuss, please contact John Kazilis, Manager, Transportation Development Planning at John.Kazilis@york.ca or (905) 830-4444 ext. 71578.

Sincerely

A handwritten signature in black ink that reads "B Titherington".

Brian Titherington
Director, Transportation and Infrastructure Planning