

Friday, December 18, 2020

Ministry of Transportation
Road Safety Program Development Office
Safety Program Development Branch
87 Sir William Hearst Avenue
Building "A," Room 212
Toronto, Ontario
M3M 0B4

Good morning,

RE: 20-MTO091, Consultation on Ontario's E-Bike Proposal

Thank you for the opportunity to review the E-bike Framework currently under consideration by the Province of Ontario. The City of Guelph ("the City") is generally supportive of the proposal and offers the following comments for consideration.

Vehicle Requirements:

The City of Guelph questions the value of necessitating a wheel diameter of 350 mm or greater. Staff feel it is not advisable to exclude certain models (for instance recumbents, folding e-bikes) because of this stipulation.

The City is supportive of the direction to not require registration or insurance for e-bikes or cargo e-bikes, however, cargo bikes being used for deliveries may be subject to additional business licensing or insurance requirements.

The City supports the maximum allowable weight of 65 kg for e-bikes.

The City supports the amendment of the definition of Limited-Speed Motorcycle, to include reference to electric power.

Cargo E-Bikes Pilot Program:

The City is supportive of this program, as cargo e-bikes currently hold substantial potential to shift modal choices in Ontario. We would like to point out however, that many cargo e-bikes have more than 2 wheels. Further, some mobility devices such as scooters, which have 4 wheels, have wheel diameters between 355mm and 407mm. Wording will need to be clear so as to differentiate between these two types of vehicles.

The City suggests under the operator/passenger requirements for the E-bikes pilot program that both drivers and passengers under the age of 18 be required to wear helmets, per existing regulations.

Sincerely,



Benita van Miltenburg, Project Manager
Sustainable Transportation, **Transportation and Engineering Services**
Guelph City Hall

T 519-822-1260 extension 2357

TTY 519-826-9771

Benita.vanMiltenburg@guelph.ca

guelph.ca

C Jennifer Juste, Manager, Transportation Planning, Engineering and Transportation Services, City of Guelph