

September 27, 2024

**Submitted online via the Ontario Regulatory Registry**

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

**RE: ORR Proposal 24-MTO015 – Extension of the Electric Kick-Scooter pilot under O.Reg. 389/19**

The City of Guelph (the “City” or “Guelph”) appreciates the opportunity to provide feedback regarding the proposed extension of the electric kick-scooter pilot program under O.Reg. 389/19 until November 2029. In this submission, you will find the overall comments and recommendations from the City of Guelph regarding this proposal:

**1. Alignment With the Strategic Direction in Guelph’s Transportation Master Plan**

“[Moving Guelph Forward](#),” Guelph’s 2022 Transportation Master Plan (TMP), provides a long-term strategic direction with a horizon of 2051. Personal micromobility devices, including e-scooters, have been identified as sustainable transportation modes and are included in the “Cycling Priority Network.” This network comprises routes designed to offer high-quality infrastructure for micromobility users. The strategic direction emphasizes adopting new and emerging transportation modes, such as e-scooters, to create a future-ready transportation system and achieve the mode share targets outlined in the TMP.

**2. Exploration of Commercial Operation of E-Micromobility in Guelph**

The City of Guelph is currently exploring the potential for commercial operation of e-micromobility solutions, such as e-scooters and e-bikes, through a shared e-micromobility strategy. This initiative aims to assess the feasibility and safety of these eco-friendly transportation options before deciding on implementing the program. Depending on the outcomes of the pilot and further feasibility studies, a commercial shared e-scooter system remains one of the options the City is considering. Given Guelph’s topographical characteristics and hilly routes, electric-assisted micromobility options are among the preferred sustainable modes of transportation for the community. These options provide an

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efficient and eco-friendly way for residents to navigate the city's varied terrain.

### **3. Limited Capacity for Data Collection**

One of the challenges in administering the program was data collection. City staff lacked sufficient resources to allocate to this program and gather e-scooter-specific traffic data to understand ridership during the pilot. Since the Ministry of Transportation (MTO) updated the Motor Vehicle Collision Reporting (MVCR) in 2023 to include a specific code for e-scooters (CODE 38), no collisions have been reported under this code to date.

### **4. Need for Re-Evaluation of Minimum Maintenance Standards (MMS)**

In Guelph, e-scooters are permitted on City streets, bike lanes, and designated multi-use paths. However, the existing Minimum Maintenance Standards (MMS) are designed for larger and heavier vehicles, such as automobiles and bicycles. E-scooters, with their higher power-to-mass ratio, can achieve higher speeds due to their lighter weight. This characteristic, while beneficial for speed, makes them less stable on rough road conditions, such as potholes, cracks, and roots, providing users with less reaction time. Since the MMS were developed before the prevalence of these emerging technologies, it is essential to enhance the standards to ensure a safe environment for micromobility users with smaller and lighter vehicles.

We appreciate the opportunity to provide input on this matter - should you have any questions or require additional details, please do not hesitate to contact the City at [intergovernmental.relations@guelph.ca](mailto:intergovernmental.relations@guelph.ca).

Sincerely,

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