

March 29, 2018

Ibrahima Sow,  
Director (A), Road Safety Programs  
Transport Canada  
330 Sparks Street  
Ottawa, ON K1A 0N5

**Re: Summary Report - Vulnerable Road Users and Heavy Vehicles Countermeasures Project**

Dear Mr. Sow,

On behalf of the Toronto Centre for Active Transportation, I am writing in response to the Summary Report – Vulnerable Road Users and Heavy Vehicles Countermeasures Project. Thank you for the opportunity to comment on this important topic. We are pleased to see Transport Canada considering safety measures to reduce the risk of conflict and collisions between vulnerable road users and heavy vehicles.

The Toronto Centre for Active Transportation (TCAT) is a project of the registered charity Clean Air Partnership. TCAT's mission is to advance knowledge and evidence to build support for safe and inclusive streets for walking and cycling. TCAT is a leading voice in Canada's Complete Streets movement, and has been a key actor in shaping policies, practices, and programs to support vulnerable road users since 2006.

While we appreciate Transport Canada's detailed review of practices, presented in the *Summary Report - Vulnerable Road Users and Heavy Vehicles Countermeasures Project*, we have a number of concerns and suggestions for improvement.

1. **Provide synthesis and prioritization of countermeasures.** Our overall perception of the summary report is that, while it presents a comprehensive review of all existing potential countermeasures, and of the issues and evidence associated with each, it lacks a meaningful analysis or synthesis of these countermeasures to provide guidance on which are the most effective. We appreciate that making recommendations may not be within the scope of this project. However, it is challenging to respond to the report as a whole, without some prioritization of countermeasures. While there are measures in the summary report that TCAT would certainly support, there are other countermeasures that we deem less effective. We strongly support, first and foremost, countermeasures that create broad systemic and spatial change as they are the most effective in providing a safe environment for vulnerable road users and thus preventing collisions from happening in the first place. In particular, we are in favour of the

improvement of infrastructure, especially segregated bicycle lanes and intersection design to prioritize vulnerable road users. We are also in support of measures that place the onus of responsibility on heavy vehicles (e.g. truck side guards and side skirts) thus acknowledging the great risk they impose on vulnerable road users. In contrast to measures that create systemic change, we are less supportive of the countermeasures in the report that place individual responsibility on already vulnerable road users (e.g., the discussion of bicycle helmet use, enforcement of traffic laws for all road users, the use of bicycle running lights), or present other concerns such as the protection of integrity and privacy (e.g., the use of video surveillance cameras).

2. **Be solutions based.** Another broad concern we identified with the report is the presentation of barriers, without equal consideration given to solutions. We appreciate that there are challenges to implementing each of these countermeasures. However, there are a growing list of successful examples of the implementation of each of these measures from jurisdictions across Canada and beyond. In the “barriers/considerations” section of each countermeasure, it would be beneficial to also present “solutions/success stories” for overcoming the barriers.
3. **Provide additional evidence.** We have identified some gaps in the background research and documentation used in the report. As a leader in the Complete Streets movement in Canada for over ten years, TCAT has produced high quality research, policy, and design guidance. In particular, TCAT's work could strengthen your discussion of the Complete Streets movement in Canada. We invite you to review our online Complete Streets policy and design hub, <http://completestreetsforcanada.ca/>. This website includes Complete Streets policy recommendations and resources, evaluation tools for Complete Streets projects, case studies, and research. At minimum, we feel that this resource should be included as an additional reference in the Complete Streets section of your report. Similarly, while you have presented a review of practices, we feel that there are references missing to academic research that has been conducted in this field. Scholars such as Dr. Kay Teschke, Dr. John Pucher, among others, have large bodies of research related to the protection of vulnerable road users.
4. **Provide an equity lens.** Finally, we identified a lack of discussion of equity in this report. TCAT's [Active Neighbourhoods Canada](#) project addresses the intersection between transportation and healthy equity. While countermeasures to protect all vulnerable road users are necessary, an equity lens would improve this report. Factors such as income, gender, age, ability, and race impact the level of vulnerability experienced by road users—not all pedestrians and cyclists experience the same level of vulnerability on our roads. Historic and current lack of investment in infrastructure in neighbourhoods experiencing social and economic vulnerabilities has resulted in disparities in safety and health outcomes for these neighbourhoods. [Charles Brown](#) of the [Alan M. Voorhees Transportation Center \(VTC\)](#) in New Jersey has undertaken research to map collision data relative to equity factors, and has found that VRUs in areas experiencing social and economic marginalization also experience disproportionate traffic injuries and fatalities. Our Active Neighbourhoods partnership is currently undertaking similar work in Canadian jurisdictions, and we look forward to sharing this work with you in the future.

We thank you for your work on the countermeasures report, and for the opportunity to provide our comments. We look forward to engaging with you in future policy development around the protection of vulnerable road users, and the enhancement of our transportation system for all users.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Smith Lea". The signature is written in a cursive style with a large initial "N".

Nancy Smith Lea, Director  
Toronto Centre for Active Transportation  
Clean Air Partnership