RE: CF-17-1125
8/6/2018

To the members of the Public Works & Gang Reduction Committee,

Please support the Draft Dockless On-demand Personal Mobility Rules & Guidelines as prepared and presented by the Los Angeles Department of Transportation (LADOT) with one change noted in the third paragraph below. While there are also certain proactive measures in regard to parking locations for dockless vehicles which I feel the City should undertake and which are described later in this letter, they can be addressed separately or as a later addition to these regulations as currently proposed by LADOT.

In order to meet our Climate Change and transportation goals, the City of Los Angeles needs to step up to the plate and lead the country in adopting, as soon as possible, these well-thought out, and forward-thinking proposed guidelines.

Personally, I am excited to see what we can achieve through instituting these guidelines. The provisions for community outreach, serving underserved neighborhoods, data-sharing, dynamic fleet-sizing, and operations show a commitment from LADOT to responsibly manage and grow this sector of our transportation network. The one point I would like to see changed in these draft guidelines have to do with the need to receive written approval from a Council District in order to operate. Individual Councilmembers should not be given veto-power over the introduction of dockless vehicles, but rather should work with LADOT and dockless operators to effectively manage and oversee operations.

In the short time that they have been present on the streets of Santa Monica and the City of Los Angeles, electronic dockless vehicles, especially dockless e-scooters, have proven to be an immensely popular and useful form of transportation. This fact should be seen as mana from heaven for those of us serious about reducing our carbon footprint since dockless vehicles like e-scooters, e-assisted bikes, and bicycles are right-sized modes of transportation that use little to no energy and create zero emissions.

If we are to be serious as a City about reducing our carbon footprint, then we need to reckon with the Greenhouse Gas (GHG) emissions from our transportation sector. This means we need to incentivize more non-car vehicle use by Angelenos. Contrary to sensationalist fearmongering, this does not amount to a “war on cars”, rather it means that as a City we need to do all we can to make using all transportation modes as practical as driving is now for most people.
Dockless vehicles are right-sized, which means they are only as big as they need to be to transport a person. They’re perfect for first mile/last mile trips to and from transit, and have the added benefit of enabling public investment to flow to areas where it is truly needed. For example, high-traffic tourist areas could be effectively serviced by dockless companies while public share-services could fill in the gaps in underserved neighborhoods to create a more equitable transportation network.

Personally, since being introduced in my neighborhood near Fairfax High School, they have been a fantastic addition to the transportation options that my wife and I can turn to in our car-free household. Specifically, they have been a now almost invaluable option for us on dangerously hot days, a spate of which we have had recently (and which we are due for more of in our warming future). Previously we have had to walk, bike, or walk to transit (which is not pleasant in the least, and outright dangerous in the worst) or use Lyft (which is more expensive, creates congestion, and more likely than not creates GHG emissions) on over-hot days. This is one small example of the direct benefit dockless vehicles are offering Angelenos right now.

Some have reacted with alarm to the presence of dockless vehicles in the past few months, and have said that they are a nuisance, and have even called for banning them. It is odd that these same people seem to not have the same reaction to cars, which take up far more of our public space, are incredibly burdensome financially to their owners, and kill hundreds of Angelenos every year, especially the most vulnerable.

As far as how users currently use, and will use dockless vehicles in the future, they are governed by the California Vehicular Code (CVC). Discussions on enforcement of said laws vis a vis customer use should be a separate discussion, apart from these guidelines.

As a city, we should also absolutely be discussing the implications of thousands to tens of thousands of car trips per day being replaced by dockless trips. The changes to our transportation network that we have needed for decades -- and have adopted in the form of our 2010 Bicycle Plan and Mobility 2035 -- namely, a more safe, equitable, just, and diversified transportation network that offers choice to Angelenos, would most likely be given increased urgency by such a change in trips.

And what a welcome development that would be.
Lastly, as for parking requirements, my points for consideration at a later date would be these:

1. Remove restrictions from parking adjacent to transit zones. Rather, work with Metro, JC Decaux and dockless operators to create a Transit Dockless Parking Zone program where specific parking zones can be established either in the landscape/furniture zone or on the roadway in corral-style areas;

2. Work with dockless operators and local groups like Neighborhood Councils, BIDs, and others to establish a Dockless Parking Zone program where specific parking zones can be established either in the landscape/furniture zone or on the roadway in corral-style areas;

3. In general, the City should consider implementing a city-wide dockless/bicycle parking initiative where specified dockless/bicycle parking areas are created in the roadway on block faces along commercial corridors and high-density residential, and high-density employment areas. The parking sites could be implemented along with the introduction of dockless into a new area.

In conclusion, we need a future full of different vehicle options sized appropriately for need (walking, biking, single-person dockless vehicles for single-person trips; mass-transit for major arterials with frequent headways; and multi-person vehicles for group point-to-point transportation). It is a future that anyone serious about a human-scaled and sustainable Los Angeles should want to see.

Without having urgency now in introducing a great transportation option like dockless vehicles, we could be furthering a future of more and more cars, increased congestion, and more energy use. It is not a future that anyone serious about meeting our Climate Change goals should want.

I therefore urge you to approve the Draft Dockless On-demand Personal Mobility Rules & Guidelines.

Thank you,

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Sent via email to Michael Espinoza, Legislative Assistant: michael.espinoza@lacity.org
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