

Communication from Public

Name: Trevor Dawn

Date Submitted: 05/16/2019 05:14 PM

Council File No: 17-1125

Comments for Public Posting: If police need a name of a scooter rider seems they can go about it by getting a warrant. No need to expose Angelenos to warrantless surveillance when they very likely will have no idea that they're agreeing to that when they take a ride.

Communication from Public

Name: Larry Gene Fortin

Date Submitted: 06/25/2019 07:51 PM

Council File No: 17-1125

Comments for Public Posting: AN OPEN LETTER TO THE LOS ANGELES CITY COUNCIL AND MAYOR GARCETTI: The city is being plagued by motorized scooters and dangerously stupid people riding them. I avoided hitting 2 of them today because one was riding down the street as I turn, with plenty of time, into a business only to have the guys 10 year old grandson come shooting out from behind parked cars ON THE SIDEWALK because they were racing each other. I am in the Valley near Valley College in the Valley Village area and it has become a horrible nuisance. I ask the following: 1) Because they are motorized electric scooters why are they not required to have a license plate from DMV like a motorized bike? 2) Why are the drivers of these motorized vehicles not required to have a drivers license from DMV to drive them in public? 3) Why are the drivers not required to carry insurance to drive them to protect anyone they may have an incident with? 4) Why are children allowed to ride motorized scooters in our public streets? 5) Why are they allowed to just dump these scooters all over our streets and sidewalks making pedestrians having to walk around them and often having them block our driveways when they are dumped after use? It makes it look like the City Council is getting something from these companies in order to allow them on the streets with NO guidelines or safe guards. If not, fix it and get rid of them.

Communication from Public

Name: Larry Gene Fortin

Date Submitted: 06/25/2019 07:53 PM

Council File No: 17-1125

Comments for Public Posting: AN OPEN LETTER TO THE LOS ANGELES CITY COUNCIL AND MAYOR GARCETTI: The city is being plagued by motorized scooters and dangerously stupid people riding them. I avoided hitting 2 of them today because one was riding down the street as I turn, with plenty of time, into a business only to have the guys 10 year old grandson come shooting out from behind parked cars ON THE SIDEWALK because they were racing each other. I am in the Valley near Valley College in the Valley Village area and it has become a horrible nuisance. I ask the following: 1) Because they are motorized electric scooters why are they not required to have a license plate from DMV like a motorized bike? 2) Why are the drivers of these motorized vehicles not required to have a drivers license from DMV to drive them in public? 3) Why are the drivers not required to carry insurance to drive them to protect anyone they may have an incident with? 4) Why are children allowed to ride motorized scooters in our public streets? 5) Why are they allowed to just dump these scooters all over our streets and sidewalks making pedestrians having to walk around them and often having them block our driveways when they are dumped after use? It makes it look like the City Council is getting something from these companies in order to allow them on the streets with NO guidelines or safe guards. If not, fix it and get rid of them.

Communication from Public

Name: Mark Steinberg
Date Submitted: 07/22/2019 02:24 PM
Council File No: 17-1125
Comments for Public Posting: Please ignore an earlier Comment that I posted to this file, and treat the attached pdf as my submission. I apologize for any confusion or inconvenience I may have caused..

To: The Honorable Members of the Los Angeles City Council
From: Mark Steinberg (resident of Council District 4)
Re: Council File 17-1125, the Dockless Bike Share Systems/ Pilot Program,

Although I am aware that the Council took action on this matter in June, I feel obliged to submit these comments to underscore the urgent need for meaningful enforcement of the "Rules and Guidelines" section of the LADOT publication that governs the program, "Dockless On-Demand Personal Mobility One-Year Permit."

<http://basic.cityofla.acsitefactory.com/sites/g/files/wph266/f/Final%20One-Year%20Dockless%20Permit.pdf>

Over the past several months I've spent significant time driving and walking through Council District 4 and adjacent Council Districts. In the course of these excursions, I've seen or experienced violations of the entire spectrum of prohibitions set out in the Rules and Guidelines Specifically:

1. Scooters* ridden on sidewalks;
2. Scooters ridden by two persons;
3. Scooters ridden by clearly underage operators;
4. Scooters ridden, both on sidewalks and streets, by riders wearing earphones;
5. Scooters ridden on a sidewalk with a dog leashed to the user;
6. Accidents, both injury and non-injury, involving scooters;
7. Scooters parked illegally:
 - a. in front of driveways, crosswalks, and transit stops;
 - b. near fire hydrants;
 - c. next to "color curbs," such as "no parking," loading, and accessible parking zones;
 - d. on landscaped areas or grass;
 - e. in front of driveways, crosswalks, and transit stops; and
 - f. on private or public property (my spouse encountered a scooter abandoned halfway up a dirt trail to the Griffith Park Observatory).
8. Scooters destroyed or dismantled, with parts strewn on streets, sidewalks, and private property.

Perhaps most disturbingly, I have seen employees of the Operators unload and arrange scooters at red ("No Parking") and other colored curbs.

The Rules and Guidelines place the lion's share of enforcement responsibility on the Operators. Unfortunately, these responsibilities are in direct conflict with the goal of most entrepreneurs: to generate and maximize profits. As regulations, by definition, inhibit profit maximization, it's hardly surprising that only a few months into the Pilot Program, the providers have failed repeatedly to meet their obligations.

<https://la.curbed.com/2019/6/14/1867904/los-angeles-scooters-rules-pilot>

While there are non-conflicted entities, such as the LAPD, that have been delegated the power to enforce certain of the key Rules and Guidelines, such as the prohibition on riding on sidewalks, my impression, like that of many others with whom I've spoken, is that the LAPD seldom exercises that power.

As I've noted, in the course of my neighborhood driving/walking trips I've seen scores of illegally parked and illegally operated scooters. Though on several occasions LAPD officers witnessed the violations, none made an effort to address them. On Hollywood Boulevard, the situation was simply absurd. Scooters sped down sidewalks within a few feet of an LAPD car, sometimes stopping to take pictures of a star imbedded in the Walk of Fame. On another occasion, I came upon three scooters leaning against a red curb, beside which a Parking Enforcement officer was ticketing an illegally parked car. When I asked the officer if he intended to ticket the scooters, he said only the LAPD had that authority.

It's difficult to pin down the reason for the LAPD's apparent inaction. It might be that the Department is failing to inform its officers of their responsibility to enforce the Rules and Guidelines. Alternatively, it may be that LAPD officers are aware of the laws but have relegated their enforcement to the bottom of their priority lists. If so, it would be a logical decision. Not only does pursuing a sidewalk-riding scooter scofflaw involve sometimes dangerous weaving through pedestrian traffic, it also consumes time disproportionate to its value in dollars or deterrence. The

number of trips taken on these vehicles runs in the millions, as evidenced by the fact that 1.9 million rides were taken during the limited six month test period that preceded the Council's approval of the pilot program. Such overwhelming numbers render a citation a molecule in an ocean

The question, then, resolves to whether I correctly perceive that the Dockless Mobility Program is ineffectively regulated, enforced or, perhaps, misconceived, or whether it is serving a purpose that outweighs its deficiencies. In other words, has the City instituted a program that trades safety and municipal esthetics for convenience and motorized litter?

If the Council chooses to address these questions, I suggest it needs more than occasional reports from the LADOT. Rather, it needs detailed information about what is (or isn't) happening on the ground, as well as a tool for taking the public's temperature on the use and ubiquity of these devices. To that end, I propose that the Council consider an order to the following effect:

1. Directing all firms and individuals holding permits to operate Dockless Mobility Vehicles in the City of Los Angeles to provide:

- a. Documents and records that specify the location of the Operators' operations centers and the number of employees at the operations centers who are assigned to work in the City of Los Angeles;
- b. A description of the operators' practices in enforcing the Rules and Guidelines;
- c. All documents summarizing or reporting the average number of personnel assigned to enforcing the Rules and Guidelines on each day over the period [insert dates], specifying as to each such individual whether he or she was assigned to enforcement duties in the streets or in the Operations Center;
- d. All documents reporting, summarizing or recording, for the period [insert dates], the results of the enforcement activities referenced in 1.c., above, including logs of "live" conversations in the streets, telephone conversations, emails, and text messages received at the telephone numbers imprinted on their devices;
- e. All documents recording the results of their enforcement practices, including records of the number of vehicle riders who have been banned from using the devices and the reason for the banishment;
- f. All documents reporting or reflecting the improper operation of devices by users, including their use on sidewalks and other pedestrian thoroughfares, and the responses to such events;
- g. All documents reporting or reflecting the operation of devices by underage users;
- h. All documents reporting or reflecting the operation of devices with two passengers;
- i. All documents recording or reflecting the operation of devices by users wearing earphones or other items that interfere with the safe operation of the devices.

2. Directing the LAPD, LADOT, LAFD, Parking Enforcement, all Traffic Divisions, and the Bureau of Sanitation, to provide the following information:

- a. All documents reporting the number and subject matter of citations or tickets issued for violation of the Rules and Guidelines, including but not limited to the operation of vehicles on sidewalks and the illegal parking of vehicles;
- b. All records, including all electronic recordings, received by the City's 311 line concerning violation of the Rule and Guidelines;
- c. The number of users personally warned (as distinct from warnings attached to the vehicles) or banned from use of vehicles for violation of any of the Rule and Guidelines;
- d. The number of reported accidents or other incidents involving a scooter or vehicle, as defined, including any reports by public or private health facilities, resulting in human injury or property damage.
- e. All documents reporting or reflecting the number of citations or other enforcement actions taken in response to calls to the City's 311 line;
- f. All documents or electronic recordings that report or reflect the number of citations or enforcement actions initiated by any source other than the City's 311 line, identified by source;
- g. All documents, records, whether in paper or electronic form, that detail or explain any training given to personnel of any of the entities enumerated above, the provisions of the Dockless Mobility Program, including but not limited to the Rules and Guidelines;

h. All notes, reports and any other records, whether written or electronic, of citizen comments concerning the Dockless Mobility Program, including the enforcement of its Rules and Guidelines.

3. Directing the LADOT to commission a poll by an independent research organization for the purpose of determining the public's opinions regarding the Dockless Mobility Program. A partial list of the relevant questions might include the need for such a Program; its likely or actual effectiveness; its impact upon individuals and the physical City; the age, gender, geographic home and [if appropriate] ethnicity of the actual or likely users; and any experiences a subject of the poll has had with the devices.

You will be pleased, perhaps shocked, to learn that you have come to the end of my comment, and I apologize for its length. My only excuse is my belief that the City is losing its grasp and control of the Dockless Mobility Program, and that addressing its deficiencies should not abide the expiration of the Pilot Program's life.

Respectfully submitted
Mark Steinberg

*I use interchangeably in these comments the terms "scooters," "devices," and "vehicles" as "vehicles" is defined in the Rules and Guidelines.

Communication from Public

Name: Mark Steinberg
Date Submitted: 07/22/2019 02:28 PM
Council File No: 17-1125
Comments for Public Posting: Please ignore an earlier Comment that I posted to this file, and treat the attached pdf as my submission. I apologize for any confusion or inconvenience I may have caused..

To: The Honorable Members of the Los Angeles City Council
From: Mark Steinberg (resident of Council District 4)
Re: Council File 17-1125, the Dockless Bike Share Systems/ Pilot Program,

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<http://basic.cityofla.acsitefactory.com/sites/g/files/wph266/f/Final%20One-Year%20Dockless%20Permit.pdf>

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 - a. in front of driveways, crosswalks, and transit stops;
 - b. near fire hydrants;
 - c. next to "color curbs," such as "no parking," loading, and accessible parking zones;
 - d. on landscaped areas or grass;
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 - f. on private or public property (my spouse encountered a scooter abandoned halfway up a dirt trail to the Griffith Park Observatory).
8. Scooters destroyed or dismantled, with parts strewn on streets, sidewalks, and private property.

Perhaps most disturbingly, I have seen employees of the Operators unload and arrange scooters at red ("No Parking") and other colored curbs.

The Rules and Guidelines place the lion's share of enforcement responsibility on the Operators. Unfortunately, these responsibilities are in direct conflict with the goal of most entrepreneurs: to generate and maximize profits. As regulations, by definition, inhibit profit maximization, it's hardly surprising that only a few months into the Pilot Program, the providers have failed repeatedly to meet their obligations.

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As I've noted, in the course of my neighborhood driving/walking trips I've seen scores of illegally parked and illegally operated scooters. Though on several occasions LAPD officers witnessed the violations, none made an effort to address them. On Hollywood Boulevard, the situation was simply absurd. Scooters sped down sidewalks within a few feet of an LAPD car, sometimes stopping to take pictures of a star imbedded in the Walk of Fame. On another occasion, I came upon three scooters leaning against a red curb, beside which a Parking Enforcement officer was ticketing an illegally parked car. When I asked the officer if he intended to ticket the scooters, he said only the LAPD had that authority.

It's difficult to pin down the reason for the LAPD's apparent inaction. It might be that the Department is failing to inform its officers of their responsibility to enforce the Rules and Guidelines. Alternatively, it may be that LAPD officers are aware of the laws but have relegated their enforcement to the bottom of their priority lists. If so, it would be a logical decision. Not only does pursuing a sidewalk-riding scooter scofflaw involve sometimes dangerous weaving through pedestrian traffic, it also consumes time disproportionate to its value in dollars or deterrence. The

number of trips taken on these vehicles runs in the millions, as evidenced by the fact that 1.9 million rides were taken during the limited six month test period that preceded the Council's approval of the pilot program. Such overwhelming numbers render a citation a molecule in an ocean

The question, then, resolves to whether I correctly perceive that the Dockless Mobility Program is ineffectively regulated, enforced or, perhaps, misconceived, or whether it is serving a purpose that outweighs its deficiencies. In other words, has the City instituted a program that trades safety and municipal esthetics for convenience and motorized litter?

If the Council chooses to address these questions, I suggest it needs more than occasional reports from the LADOT. Rather, it needs detailed information about what is (or isn't) happening on the ground, as well as a tool for taking the public's temperature on the use and ubiquity of these devices. To that end, I propose that the Council consider an order to the following effect:

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- b. A description of the operators' practices in enforcing the Rules and Guidelines;
- c. All documents summarizing or reporting the average number of personnel assigned to enforcing the Rules and Guidelines on each day over the period [insert dates], specifying as to each such individual whether he or she was assigned to enforcement duties in the streets or in the Operations Center;
- d. All documents reporting, summarizing or recording, for the period [insert dates], the results of the enforcement activities referenced in 1.c., above, including logs of "live" conversations in the streets, telephone conversations, emails, and text messages received at the telephone numbers imprinted on their devices;
- e. All documents recording the results of their enforcement practices, including records of the number of vehicle riders who have been banned from using the devices and the reason for the banishment;
- f. All documents reporting or reflecting the improper operation of devices by users, including their use on sidewalks and other pedestrian thoroughfares, and the responses to such events;
- g. All documents reporting or reflecting the operation of devices by underage users;
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- c. The number of users personally warned (as distinct from warnings attached to the vehicles) or banned from use of vehicles for violation of any of the Rule and Guidelines;
- d. The number of reported accidents or other incidents involving a scooter or vehicle, as defined, including any reports by public or private health facilities, resulting in human injury or property damage.
- e. All documents reporting or reflecting the number of citations or other enforcement actions taken in response to calls to the City's 311 line;
- f. All documents or electronic recordings that report or reflect the number of citations or enforcement actions initiated by any source other than the City's 311 line, identified by source;
- g. All documents, records, whether in paper or electronic form, that detail or explain any training given to personnel of any of the entities enumerated above, the provisions of the Dockless Mobility Program, including but not limited to the Rules and Guidelines;

h. All notes, reports and any other records, whether written or electronic, of citizen comments concerning the Dockless Mobility Program, including the enforcement of its Rules and Guidelines.

3. Directing the LADOT to commission a poll by an independent research organization for the purpose of determining the public's opinions regarding the Dockless Mobility Program. A partial list of the relevant questions might include the need for such a Program; its likely or actual effectiveness; its impact upon individuals and the physical City; the age, gender, geographic home and [if appropriate] ethnicity of the actual or likely users; and any experiences a subject of the poll has had with the devices.

You will be pleased, perhaps shocked, to learn that you have come to the end of my comment, and I apologize for its length. My only excuse is my belief that the City is losing its grasp and control of the Dockless Mobility Program, and that addressing its deficiencies should not abide the expiration of the Pilot Program's life.

Respectfully submitted
Mark Steinberg

*I use interchangeably in these comments the terms "scooters," "devices," and "vehicles" as "vehicles" is defined in the Rules and Guidelines.

Communication from Public

Name: Maurice Chauvet

Date Submitted: 07/14/2019 01:45 PM

Council File No: 17-1125

Comments for Public Posting: I live in Venice, CA on Clubhouse Ave. between Speedway and Pacific. Our neighborhood has been hugely impacted by scooters. 1) Scooters CANNOT BE ALLOWED ON SIDEWALKS AT ALL. It is dangerous and they are moving, motorized vehicles. Allowing them on sidewalks at all is idiotic. 2) Riders must wear helmets. I have seen many accidents -- these are accidents between MOVING VEHICLES and scooter-riders are basically unprotected. 3) Scooter riders, almost in every case, do not understand that they are MOVING, MOTORIZED VEHICLES and ride wrong-way against traffic, on sidewalks, on private property -- they have a false sense of safety because they are not in cars. The majority of tragic and near-tragic accidents are a result of this rider-delusion. This delusion of fun, safe travel is encouraged by the scooter companies. It is dangerous. 4) Scooters cannot be allowed on Bike Path (along Venice Beach). This path is for bicycles, not motorized vehicles. 5) Scooters cannot be allowed on Boardwalk. It is for pedestrians (not bicycles or motorized vehicles).

Communication from Public

Name: Mark Steinberg
Date Submitted: 07/20/2019 11:47 AM
Council File No: 17-1125

Comments for Public Posting: [Due to length limitation, this post is in two parts. Part 1 is below.] To: The Honorable Members of the Los Angeles City Council Re: Council File 17-1125, the Dockless Bike Share Systems/ Pilot Program, Although I am aware that the Council took action on this matter in June, I feel obliged to lodge these comments because I see evidence on a daily basis that close examination of the Dockless Mobility program and, in particular, the enforcement of its Rules and Guidelines, is urgently required. Over the past several months I have spent significant time driving and walking through the Council District in which I live (District 4) and in adjacent Districts. In the course of these excursions, I've witnessed violations of the entire spectrum of Rules and Guidelines applicable to Operators and users of these vehicles, as set out in the "Dockless On-Demand Personal Mobility One-Year Permit" plan
<http://basic.cityofla.acsitefactory.com/sites/g/files/wph266/f/Final%20One-Year%20Dockless%20Permit.pdf> ("Rules and Guidelines").* Specifically, I have seen or experienced: 1. A scooter ridden on a sidewalk; 2. A scooter ridden by two persons; 3. A scooter ridden by a clearly underage operator; 4. A scooter ridden, both on a sidewalk and in a street, by a rider wearing earphones; 5. A scooter ridden on a sidewalk with a dog leashed to the user; 6. Accidents, both injury and non-injury, involving scooters; 7. Scooters parked illegally: a. in front of driveways, crosswalks, and transit stops; b. near fire hydrants; c. next to "color curbs" such as "no parking," loading, and accessible parking zones; d. on landscaped areas or grass; e. in front of driveways, crosswalks, and transit stops; f. on private or public property (my spouse encountered a scooter abandoned halfway up a dirt trail to the Griffith Park Observatory). 8. Scooters destroyed or dismantled, with parts strewn on the streets, sidewalks, and private property. Perhaps most disturbingly, I have seen employees of the Operators unload and arrange scooters at red ("No Parking") and other colored curbs. The Rules and Guidelines place the lion's share of enforcement responsibility on the Operators. Unfortunately, these responsibilities are in direct conflict with the goals of these entrepreneurs: to generate and maximize profits. As regulations, by definition, inhibit profit maximization, it's hardly surprising that only a few months into the Pilot Program, the providers have failed repeatedly to meet their obligations. <https://la.curbed.com/2019/6/14/1867904/los-angeles-scooters-rules-pilot> While there are non-conflicted entities, such as LAPD, that have the power to enforce certain of the key Rules and Guidelines, such as the prohibition of sidewalk riding, my impression, and that of many individuals with whom I've spoken, is that the LAPD has not filled the gap between what the Rules and Guidelines require the Operators to do, and what they are actually doing. As I've noted above, in the course of my driving/walking trips I've seen scores of illegally parked and illegally operated scooters. Though on several occasions LAPD officers witnessed the violations, none made an effort to address them. On Hollywood Boulevard, the situation was simply absurd. Scooters sped down sidewalks within a few feet of an LAPD car, sometimes stopping adjacent to the vehicle to take pictures of one of the embedded stars. On another occasion, I came upon three scooters leaning against a red curb, beside which a Parking Enforcement officer was ticketing an illegally parked car. When I asked the officer if he intended to ticket the scooters, he said that only the LAPD had that authority. Even if what I saw is representative of what is occurring across the City, one can hardly fault the LAPD. Officers may well be unaware of their duty to enforce the Rules and Guidelines pertaining to scooters. Even if they were aware that they bore such responsibility, it would be logical if they placed such offenses at the bottom of their priority list. Not only does pursuing a sidewalk-riding scooter scofflaw involve weaving through pedestrian traffic, it also consumes time disproportionate to its monetary value to the City and its deterrent effect on other riders or potential riders. Beyond that, the use of these vehicles has risen from a river--1.9 million trips during the six month conditional period--to an ocean. This, in this environment, a citation is less than a drop in the ocean. The question, then, resolves to whether I correctly perceive that the Dockless Mobility Program is misconceived and ineffectively regulated, or whether it is serving a purpose that outweighs its deficiencies, i.e. whether the Program has become a tradeoff of safety and municipal esthetics for convenience and motorized litter. (continued on next message)

Communication from Public

Name: Mark Steinberg

Date Submitted: 07/20/2019 11:52 AM

Council File No: 17-1125

Comments for Public Posting: [This is the second part of a two-part submission Re: Council File 17-1125, the Dockless Bike Share Systems/ Pilot Program] The question, then, resolves to whether I correctly perceive that the Dockless Mobility Program is misconceived and ineffectively regulated, or whether it is serving a purpose that outweighs its deficiencies, i.e. whether the Program has become a tradeoff of safety and municipal esthetics for convenience and motorized litter. I suggest that the Council needs more than regular reports from LADOT to answer these questions. What is required is detailed information about what is (or isn't) happening on the ground. To that end, the Council might consider an order or resolution to the following effect: 1. Directing all firms and individuals holding permits to operate Dockless Mobility Vehicles in Los Angeles to provide: a. A description of their plans and practices to enforce the Rules and Guidelines, including the number of individuals assigned to enforcement activities; b. All logs and records of enforcement events, including but not limited to the retrieval of improperly parked devices; the improper operation of devices by users, including their use on sidewalks and other pedestrian thoroughfares; the operation of devices by underage users; the operation of devices with two passengers; and the operation of devices by users wearing earphones or other items that interfere with the safe operation of the vehicles. c. Enumeration of the number and substance of all communications received by any City entity concerning violation of any of the Rules and Guidelines, including but not limited to the use, operation and location of the devices. d. The length of the period between receipt and final action on all communications responsive to item "c.", above; e. The number of users personally warned (as distinct from warnings attached to the vehicles) or banned from use of vehicles for violation of any of the Rule and Guidelines; f. The number of reported accidents or other incidents involving a vehicle, including any reports by public or private health facilities, resulting in human injury or property damage; g. The location of the Operators' operations centers, the number of employees assigned to work in the City of Los Angeles, and the average time required for an employee to reach a location at which a reported violation of the Rules and Guidelines has occurred. 2. Directing, as appropriate, the LAPD, LADOT,

Parking Enforcement, and any other City entity involved in enforcing the Rules and Guidelines, to provide the following information: a. The number and subject matter of citations issued for violation of the Rules and Guidelines, including the improper operation and illegal parking of vehicles. b. The number and subject matter of calls received by the City's 311 line concerning violation of the Rules and Guidelines. c. The number of citations or other enforcement actions taken in response to calls to the City's 311 line. d. A detailed description of the training given to personnel of the LAPD, LADOT and Parking Enforcement authorities concerning enforcement of the Rules and Guidelines. e. Notes, recordings or other records of citizen comments, including any complaints, on the Dockless On-Demand Personal Mobility One-Year Permit program. I apologize for the length of this submission, but I believe that only detailed, specific data will enable the Council to determine whether this program is accomplishing a goal that outweighs its impact on the City and its citizens. Respectfully submitted, Mark Steinberg

Communication from Public

Name: Mark Steinberg
Date Submitted: 07/20/2019 03:47 PM
Council File No: 17-1125
Comments for Public Posting: Due to a formatting problem in a comment I posted earlier today, I am resubmitting it as a pdf attachment. I apologize for any inconvenience.

To: The Honorable Members of the Los Angeles City Council
Re: Council File 17-1125, the Dockless Bike Share Systems/ Pilot Program,

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Specifically, I have seen or experienced:

1. A scooter ridden on a sidewalk;
2. A scooter ridden by two persons;
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The Rules and Guidelines place the lion's share of enforcement responsibility on the Operators. Unfortunately, these responsibilities are in direct conflict with the goals of these entrepreneurs: to generate and maximize profits. As regulations, by definition, inhibit profit maximization, it's hardly surprising that only a few months into the Pilot Program, the providers have failed repeatedly to meet their obligations. <https://la.curbed.com/2019/6/14/1867904/los-angeles-scooters-rules-pilot>

While there are non-conflicted entities, such as LAPD, that have the power to enforce certain of the key Rules and Guidelines, such as the prohibition of sidewalk riding, my impression, and that of many individuals with whom I've spoken, is that the LAPD has not filled the gap between what the Rules and Guidelines require the Operators to do, and what they are actually doing.

As I've noted above, in the course of my driving/walking trips I've seen scores of illegally parked and illegally operated scooters. Though on several occasions LAPD officers witnessed the violations, none made an effort to address them. On Hollywood Boulevard, the situation was simply absurd. Scooters sped down sidewalks within a few feet of an LAPD car, sometimes stopping adjacent to the vehicle to take pictures of one of the embedded stars. On another occasion, I came upon three scooters leaning against a red curb, beside which a Parking Enforcement officer was ticketing an illegally parked car. When I asked the officer if he intended to ticket the scooters, he said that only the LAPD had that authority.

Even if what I saw is representative of what is occurring across the City, one can hardly fault the LAPD. Officers may well be unaware of their duty to enforce the Rules and Guidelines pertaining to scooters. Even if they were aware that they bore such responsibility, it would be logical if they placed such offenses at the bottom of their priority list. Not only does pursuing a sidewalk-riding scooter scofflaw involve weaving through pedestrian traffic, it also consumes time disproportionate to its monetary value to the City and its deterrent effect on other riders or potential riders. Beyond that, the use of these vehicles has risen from a river--1.9 million trips during the six month conditional period--to an ocean. This, in this environment, a citation is less than a drop in the ocean.

The question, then, resolves to whether I correctly perceive that the Dockless Mobility Program is misconceived and ineffectively regulated, or whether it is serving a purpose that outweighs its deficiencies, *i.e.* whether the Program has become a tradeoff of safety and municipal esthetics for convenience and motorized litter.

I suggest that the Council needs more than regular reports from LADOT to answer these questions. What is required is detailed information about what is (or isn't) happening on the ground. To that end, the Council might consider an order or resolution to the following effect:

1. Directing all firms and individuals holding permits to operate Dockless Mobility Vehicles in Los Angeles to provide:

- a. A description of their plans and practices to enforce the Rules and Guidelines, including the number of individuals assigned to enforcement activities;
- b. All logs and records of enforcement events, including but not limited to the retrieval of improperly parked devices; the improper operation of devices by users, including their use on sidewalks and other pedestrian thoroughfares; the operation of devices by underage users; the operation of devices with two passengers; and the operation of devices by users wearing earphones or other items that interfere with the safe operation of the vehicles.
- c. Enumeration of the number and substance of all communications received by any City entity concerning violation of any of the Rules and Guidelines, including but not limited to the use, operation and location of the devices.
- d. The length of the period between receipt and final action on all communications responsive to item "c.", above;
- e. The number of users personally warned (as distinct from warnings attached to the vehicles) or banned from use of vehicles for violation of any of the Rule and Guidelines;
- f. The number of reported accidents or other incidents involving a vehicle, including any reports by public or private health facilities, resulting in human injury or property damage;
- g. The location of the Operators' operations centers, the number of employees assigned to work in the City of Los Angeles, and the average time required for an employee to reach a location at which a reported violation of the Rules and Guidelines has occurred.

2. Directing, as appropriate, the LAPD, LADOT, Parking Enforcement, and any other City entity involved in enforcing the Rules and Guidelines, to provide the following information:

- a. The number and subject matter of citations issued for violation of the Rules and Guidelines, including the improper operation and illegal parking of vehicles.**
- b. The number and subject matter of calls received by the City's 311 line concerning violation of the Rules and Guidelines.**
- c. The number of citations or other enforcement actions taken in response to calls to the City's 311 line.**
- d. A detailed description of the training given to personnel of the LAPD, LADOT and Parking Enforcement authorities concerning enforcement of the Rules and Guidelines.**
- e. Notes, recordings or other records of citizen comments, including any complaints, on the Dockless On-Demand Personal Mobility One-Year Permit program.**

I apologize for the length of this submission, but I believe that only detailed, specific data will enable the Council to determine whether this program is accomplishing a goal that outweighs its impact on the City and its citizens.

**Respectfully submitted
Mark Steinberg**

***I use interchangeably the terms "vehicles," "devices," and "scooters" in this document as the term "vehicles" is defined in the Rules and Guidelines.**