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June 26, 2018

Chair Bonin and Members of the Los Angeles City Council Transportation Committee
Los Angeles City Council
200 N. Spring Street, Room 435
Los Angeles, CA 90012
Via email: richard.williams@lacity.org

Re: CF# 17-1125 - Dockless Bike/Scooter Share Pilot Program

Dear Chair Bonin and Committee Members:

We are so glad to see the City of Los Angeles embrace new technology like dockless bicycles and scooters -- technology that has the potential to reduce many residents' reliance on automobiles and shrink their environmental footprint. **More shared personal mobility options may also result in more walking, improving individual health and community health, which we wholeheartedly support.**

That said, we have reservations about the Los Angeles Department of Transportation's (LADOT) proposed On-demand Personal Mobility Rules and Guidelines, specifically **regarding three elements of the guidelines: community engagement, dockless bicycle and scooter parking, and enforcement.**

Our concerns are based on the needs of some of the city's most vulnerable residents – older adults and people with physical disabilities. We are confident that the City also has these groups' best interest in mind and can devise a personal mobility strategy that does not compromise their safety and access for others' convenience.

Community Engagement

We appreciate LADOT incorporating a community engagement component into the permit application, which may help to ease tensions around new and unfamiliar technology. However, as is often the case, the program's engagement and equity considerations leave out two significant groups:



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the 19% of the population that reports having a disability, and the 13% of the population who are age 65 or older (2010).

The permit application should specifically require operators to engage with representatives from the disability rights community, stakeholders and clients at independent living centers, and members of senior centers within the program area. Operators should clearly articulate parking restrictions, how individuals are to report improper parking, and should provide the company’s contact information.

Parking and Enforcement

As a pilot, this program will offer LADOT and the City of Los Angeles an opportunity to test the viability and responsibility of dockless e-scooter and bicycle companies and their users. LADOT has laid out clear specifications for dockless bicycle and scooter parking in its rules and guidelines, and we appreciate the department’s initial instinct to require “lock to” equipment.

With the revised guidelines eliminating “lock to” equipment, we wonder how operators will monitor parking behavior, identify and penalize users who park improperly, and how the City will ensure compliance in removing vehicles blocking the right-of-way.

We already see that even when parked near a bicycle rack, as specified in the guidelines, scooters may block a clear path of travel to a curb ramp. While this is a nuisance to someone pushing a cart, as in the photo below, the sidewalk shown would be impassable for someone operating a wheelchair and a hazard to someone with a visual impairment - people who often stick to a set route that they are accustomed to.



Venice, California. June 10, 2018. Photo by Emilia Crotty.

We understand that operators will have two hours to remove equipment blocking public access, but recommend that the City revise the Enforcement Flowchart (LADOT Attachment E) to incorporate members of the public into the equation. How will general residents know where to direct removal requests? Will this information be communicated only during initial outreach required by the permit application? Are there ongoing requirements for public communications of this nature?



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As an organization working to improve safety and accessibility for people walking in Los Angeles, we ask that City Councilmembers keep people of all ages and abilities in mind as we welcome new technology into our public realm.

Thank you for considering these concerns and recommendations.

Sincerely,



Emilia Crotty, Executive Director

Cc:

General Manager Seleta Reynolds, Department of Transportation

