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## Public Comment Regarding Council File: 17-1125 "Dockless Bike Share Systems / Pilot Program"

1 message

**Mehmet Berker** <mehmetikberker@gmail.com>

Tue, May 22, 2018 at 10:16 AM

Reply-To: mehmetikberker@gmail.com

To: CityClerk@lacity.org

Cc: eric.bruins@lacity.org, Robert Oliver &lt;robert.oliver@lacity.org&gt;, Jay Greenstein &lt;jay.greenstein@lacity.org&gt;, councilmember.martinez@lacity.org, john.white@lacity.org

**Dear City Clerk, and members of the Transportation Committee,**

**Please find attached a letter containing public comment regarding Council File 17-1125 "Dockless Bike Share Systems / Pilot Program".**

**In addition, please find the text of the letter included in the body of this email below.:**

**To the members of the Transportation Committee:**

I applaud the Los Angeles Department of Transportation (LADOT) for taking the time to draft a set of regulations for dockless bicycles and scooters. These new transportation models are an exciting addition to our transportation environment. However, I question the area-wide location restrictions proposed and believe the City Council should consider removing or altering these restrictions from the proposed regulations.

The LADOT staff report proposes that dockless bicycles would not be able to operate within three miles of existing Metro Bikeshare stations, and that scooters would not be able to operate within three miles of Downtown Los Angeles. These arbitrary restrictions are misguided for the following reasons:

1. The three-mile buffer is likely based on how far someone could ride during an average 30 minute bike share trip. However the Metro Bikeshare system is a docked system -- so these 30 minute bike share trips would be rides to nowhere as there would be no place for the user to dock three miles outside the current service area. The neighborhoods within the proposed three-mile buffer, yet outside the reach of either the existing (or future) Metro Bikeshare system include Frogtown, Lincoln Heights, Boyle Heights, and South LA around downtown; and Westchester, Mar Vista, and West LA around Venice. (And in Wilmington, where the Metro Bikeshare stations are clustered south of Anaheim St, stakeholders north of Anaheim St and in Harbor City would also be out of reach). These proposed restriction areas would mean that the residents and stakeholders of these communities that are not slated for bikeshare expansion would be shut out of both docked and dockless bikeshare and scooter-share;
2. The area restrictions should, if at all, be based only where stations currently exist. I do not entirely agree that LADOT should foreclose on having dockless bicycles inside the existing service area, but if there is a boundary it should be for the service area alone. A three-mile buffer is arbitrary because it extends to areas where you cannot actually dock a Metro Bike, creating the "no-mans land" mentioned above;
3. These new systems provide a much cheaper option than the current Metro Bikeshare pricing model. Competitive pricing should only be a restriction **after** proposed pricing changes for Metro (reducing from the currently steep price of \$3.50 per ride) take effect;
4. I see no reason why dockless scooters are to be blocked from Downtown Los Angeles. If the purpose of the restriction is to protect Metro Bikeshare market share, we do not know whether people who ride bikeshare are the same people who take the dockless scooters. If the purpose of the restriction is born out of a concern of a lot of people using scooters, that is an unfortunate, and ultimately misguided reason because if people can get around Downtown using scooters rather than taking a car, why should they be blocked from doing so?;

5. Using just the Downtown Los Angeles Metro Bikeshare service area as an example, the proposed three-mile buffer would effectively block 52 sq. miles and approximately 860,000 people living in Disadvantaged Communities (as identified by CalEnviroScreen 3.0) where Metro Bikeshare doesn't currently exist and where the three-mile buffer would prohibit their use -- and again only some of these neighborhoods, such as USC, Echo Park, Silver Lake, and parts of Koreatown, are slated for future imminent Metro Bikeshare expansion.

It is especially confusing that such a prohibition would exist for these Disadvantaged Communities since elsewhere in the proposed regulations, operators are encouraged to place vehicles in Disadvantaged Communities by being able to place 2,500 vehicles in such communities that do not count towards their overall city-wide vehicle cap; and

6. Since scooters would be banned from a three-mile geofence outside of Downtown, scooters would be unavailable in the same large 52-mile swath of Los Angeles outside of Downtown (or at least I assume it is the same, the staff report just says "Downtown Los Angeles"). The report provides zero backing for this prohibition and, as far as I know, there is no reason to believe that such an exclusion would form good public policy.

Besides the arbitrary three-mile buffer restrictions, there are other concerns with the proposed regulations as outlined in the LADOT staff report:

- The requirement that each dockless vehicle be equipped with a locking mechanism to lock to a fixed object effectively means that dockless scooters will not be allowed in their current form as they do not have said lock. Further, this locking mechanism may mean that vehicles improperly placed and then locked cannot be moved by someone besides the operator. The vehicle placement regulations should cover any issue this proposed locking mechanism is to solve. While the requirement does say that it can be waived at LADOT discretion, the regulations should be clearer on when and why they would be waived or should be stricken from the regulation altogether.
- While parking restrictions for dockless bikes and scooters on or directly adjacent to certain public right of way features make sense, two restrictions, in particular do not:
  - Parklets; and
  - Transit zones, including bus stops, shelters, passenger waiting areas and bus layover and staging zones, except at existing bicycle racks;

While it makes sense to restrict parking *within* parklets and transit stops, it makes absolutely no sense to restrict parking *adjacent* to these features since they are destinations people may want to ride their dockless vehicles to.

Especially as it pertains to transit stops -- if a transit user uses a dockless vehicle to complete their first-mile/last-mile trip to transit, where else would they park? If anything, areas adjacent to transit stops are prime opportunity zones for dockless parking

Overall, there are definitely positive elements to the LADOT staff report and proposed regulations. The data standards for companies to follow are especially good and would protect the public interest and create a true partnership between the City and private operators.

Ultimately however, trial period or not, the proposed regulations -- especially as they pertain to area-wide restrictions based on a three-mile buffer of existing Metro Bikeshare stations -- would do an immediate and unnecessary disservice to at least a quarter of Los Angeles residents. That is an unacceptable outcome, and it is also bad policy.

Thank you,

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Board Member, Mid City West Community Council  
Representative for Council District 5, Los Angeles Pedestrian Advisory Council

**Please include this comment in the official record,**

**Thank you,**

**Mehmet**

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**Mehmet Berker**

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