
Dear LADOT Director and staff, Councilmembers and City Clerk,

I write to comment on **Council File 17-1125 "Dockless Bike Share Systems / Pilot Program."**

The dockless bike and scooter options that are springing up in Los Angeles offer new mobility options to many residents and visitors. For a city suffering from an epidemic of pedestrian and cyclist deaths from vehicle collisions, from ongoing air pollution challenges, and from frustrating traffic, dockless mobility devices are a potentially important way to enhance safety, sustainability and freedom.

These programs and others that may arise can help people get where they need to go without needing to use motor vehicles. They offer a first mile-last mile solution that complements the region's large investment in transit. And they can help advance the goals of the city's adopted mobility element. Many Angelenos are voting with their feet and using dockless mobility devices; and some of the companies innovating in the dockless industry are based in L.A.

It is therefore disappointing to see that the draft regulations include a number of harmful and anti-competitive quotas, exclusion zones and high fees. As a resident who enjoys having diverse mobility options and who has worked on, taught about and advocated for safe streets and multi-modal transportation, I encourage you to modify the regulations to reduce these barriers.

With fewer arbitrary limits on dockless options, the city can focus on safety, data, equitable pricing and other worthwhile requirements while allowing expansion of dockless options. **I encourage you to look at what dockless bikes and scooters have accomplished when allowed to be deployed in large numbers.** According to data from Chinese cities with large numbers of dockless bikes, "people take 55 percent fewer trips by cars, and illegal motorcycles that used to provide 'last-mile' transportation solutions have been reduced by 53 percent.. [and the use of just one bike] reduced the equivalent of 6062.5 metric tons of carbon emissions."

<https://www.newsecuritybeat.org/2017/11/bike-sharing-data-cities-lessons-chinas-experience/>

While impacts in Los Angeles will not necessarily mirror other places, the point is that **we should be aiming for positive, transformative results rather than reacting in a moral panic when people see something new and different.**

1. Eliminate quotas

The draft regulations set a series of maximum quotas and minimum thresholds for operators. The initial quota is 500, expandable to up to 2500 at the discretion of the city plus up to another 2500 vehicles in environmental justice neighborhoods. Quotas such as those that are imposed on imports or by cities to allocate licenses (such as taxi medallions or sidewalk vending caps) are usually considered to be a bad policy tool. Quotas function as a non-transparent tax. They can lead to corruption or the appearance of corruption and often foster a black market.

The specific quotas proposed may also reduce the use of dockless bikes and scooters in Los Angeles. This will reduce people's mobility options, increase car usage and harm public health. Quotas on dockless services could also increase the cost of rides if demand rises faster than supply. Imposing quotas on small, zero emission vehicles seems especially perverse in a city with no quotas at the personal or fleet level on millions of heavy, dangerous, polluting motor vehicles.

The draft regulations also require that operators have a minimum fleet size of 500 vehicles (unless they solely provide adaptive bikes). Because companies starting dockless operations will usually want to have a fleet large enough to offer prospective users enough bikes or scooters to make it a useful service, there is no need to set an arbitrary minimum fleet size. There also may be small start-ups testing new vehicles and/or programs with fewer than 500 vehicles. A minimum fleet size of 500 will prevent new smaller entries and test programs, potentially stifling competition and innovation.

The draft regulations also have a secondary quota that at least 50 percent of fleets be electric assist vehicles. Electric assist vehicles are a useful service and good addition to mobility options in LA. But as with the other quotas in the regulation, this 50% figure is arbitrary. Customer preferences and operator business plans and fleet mix will vary and it is better to let users decide whether that want to use electric-assist or non assist vehicles.

2. Eliminate 3 mile exclusion zone from downtown and metro bike share locations

The draft regulations would ban dockless bicycles within three miles of existing Metro Bikeshare stations, and ban scooters within three miles of Downtown Los Angeles. The ban near bike share is a restraint on competition that will hurt people who want to use bike share. Trying to protect metro bike share from competition is misguided. As a supporter of Metro bike share, I hope that the system learns from why and how riders use both docked and dockless programs and adjusts and improves its own services. The three mile ban zone is also bizarre and counterproductive because, by definition, there

are no Metro bike share bikes in the three mile buffer surrounding zones with docks. This policy would essentially create 'bike share deserts' in a three mile ring surrounding existing locations. Because most dockless bike share systems are less expensive than Metro bike share, the ban would also hurt riders pocketbooks, especially lower income riders.

Banning dockless scooters in and within 3 miles of Downtown Los Angeles is also a very bad idea. Downtown is an area where scooters may be an attractive option because there are many daytime workers who may not have their own bike or scooter or skateboard with them to use, and because scooters can serve as a first mile last mile option from part of downtown that are not immediately adjacent to rail stations. As Mehmet Berker has calculated, the proposed downtown L.A. three-mile buffer would effectively block 52 sq. miles and approximately 860,000 people living in disadvantaged communities (as identified by CalEnviroScreen 3.0) from using dockless scooters.

3. Set reasonable fees and lower fees in disadvantaged communities

Fees are not bad in and of themselves. Fees can help pay for program monitoring and enforcement. Fees are better than quotas because they impose costs more transparently and predictably. However, other than the hourly rate for city workers have to move dockless vehicles, it is unclear how LADOT calculated program fees besides looking at some U.S. city fees and usually picking the highest cost. L.A.'s proposed fees per vehicle, for vehicle recovery and for deposits will be the highest or tied for the higher in the nation. Moreover, combined with quotas and unwise exclusion zones, the higher-end fees recommended give the perception of trying to restrict dockless services rather than helping it flourish. I don't know what fees are reasonable, but the city should balance recovering costs with keeping fees low to so that dockless bikes and scooters can remain as an affordable service.

Because I recommend eliminating quotas (which eliminates one incentive for provision of dockless vehicles in disadvantaged communities), I also suggest imposing lower fees on any vehicles provided in these disadvantaged areas so as to encourage equitable distribution.

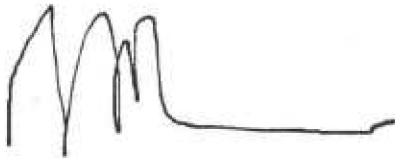
4. Ensure safety and collect data

I support most of the recommendations on safety and data. It is important to protect riders and pedestrians, to keep sidewalks passable, and to understand usage. However, I would eliminate the requirement that each dockless vehicle be equipped with a locking mechanism. Regulations to require that vehicles be placed upright in the street furniture

zone are sufficient. Further, this locking mechanism may mean that vehicles are locked in improper locations. It is also important to clarify that it is ok to leave dockless bikes and scooters adjacent to parklets and transit zones as long as they do not block access to these amenities.

☐☐ In summary, **I encourage the city to treat dockless bikes and scooters as an asset and opportunity for expanded and sustainable mobility rather than as a nuisance to be over-regulated.** Adopt safety and data standards but eliminate the quotas and exclusion zones.

thank you for considering my views.

A handwritten signature in black ink, appearing to be 'Mark Vallianatos', written in a cursive style.

Mark Vallianatos

Director, LAplus