



Edwin Grover &lt;edwin.grover@lacity.org&gt;

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

1 message

**Staci Roberts** <staci.roberts@lacity.org>  
To: Edwin Grover <edwin.grover@lacity.org>

Wed, May 23, 2018 at 10:25 AM

Ed,  
Please upload.

----- Forwarded message -----

From: **John White** <john.white@lacity.org>  
Date: Wed, May 23, 2018 at 8:00 AM  
Subject: Fwd: Public Comment Regarding Council File 17-1125 "Dockless Bike Share Systems / Pilot Program."  
To: Staci Roberts <staci.roberts@lacity.org>

Please attach the accompanying letter to CF 17-1125 as a communication from the public

----- Forwarded message -----

From: **Anna Martinez** <anna.martinez@lacity.org>  
Date: Wed, May 23, 2018 at 7:57 AM  
Subject: Fwd: Public Comment Regarding Council File 17-1125 "Dockless Bike Share Systems / Pilot Program."  
To: John White <john.white@lacity.org>, Michael Espinosa <michael.espinosa@lacity.org>, Gloria Pinon <gloria.pinon@lacity.org>

Please see email below.

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**Anna Martinez**  
**Office of the City Clerk**  
200 N. Spring St., Rm. 360  
Los Angeles, CA 90012  
213-978-1025  
213-978-1027 - FAX  
Mail Stop 160-01



----- Forwarded message -----

From: **Andy Freeland** <andy@andyfreeland.net>  
Date: Tue, May 22, 2018 at 10:07 PM  
Subject: Public Comment Regarding Council File 17-1125 "Dockless Bike Share Systems / Pilot Program."  
To: CityClerk@lacity.org, councilmember.martinez@lacity.org, paul.koretz@lacity.org, councilmember.bonin@lacity.org, ladot@lacity.org

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/> In Singapore, dockless bikes have doubled cycling's modal share in less than one year! <https://cyclingindustry.news/study-of-singapores-mobike-users-shows-shift-away-from-private-cars-and-doubled-modal-share/>

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.

If the city feels that a quota is necessary, it must be far larger. The proposed quota is less than 1 bike per 1,000 residents. Cities that have had success with dockless bike share, like Dublin, permit far more bikes. In Dublin, there are 13 bikes per 1,000 residents. In Los Angeles, this would mean a total fleet of more than 50,000 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 completion that will hurt people who want to use bike share. Trying to protect metro bike share from competition is misguided. As a member of Metro bike share since its launch, I hope that the system learns from why and how riders use both docked and dockless programs and adjusts and improves its own services. Banning cheaper bikes, electric assist bikes, and scooters from operating near Metro bike share will not make Metro bike share more popular. If anything, it will encourage neighborhoods to opt out of Metro bike share expansion — why would they want Metro bike share if it locks them out from cheaper and more flexible options? 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 lat 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 who 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 could confuse riders and 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.

Andy Freeland  
Los Angeles, CA 90015

--  
John A. White  
Legislative Assistant  
Information, Technology, and General Services Committee  
Trade, Travel, and Tourism Committee  
(213) 978-1072





Edwin Grover &lt;edwin.grover@lacity.org&gt;

## Fwd: CF 17-1125 Dockless Bike Share Systems/Pilot Program

1 message

**Staci Roberts** <staci.roberts@lacity.org>  
To: Edwin Grover <edwin.grover@lacity.org>

Wed, May 23, 2018 at 8:41 AM

Ed,

Please attach to file.  
Thanks

----- Forwarded message -----

From: **John White** <john.white@lacity.org>  
Date: Wed, May 23, 2018 at 7:54 AM  
Subject: Fwd: CF 17-1125 Dockless Bike Share Systems/Pilot Program  
To: Staci Roberts <staci.roberts@lacity.org>

Please attach the accompanying letter to CF 17-1125 as a communication from the public

----- Forwarded message -----

From: **Diana Nave** <diananave@gmail.com>  
Date: Tue, May 22, 2018 at 7:36 PM  
Subject: CF 17-1125 Dockless Bike Share Systems/Pilot Program  
To: JOHN.WHITE@lacity.org  
Cc: councilmember.martinez@lacity.org, councilmember.bonin@lacity.org, councilmember.koretz@lacity.org, Nathan Holmes <nathan.holmes@lacity.org>

Councilman Mike Bonin and Committee Members:

Attached is a letter previously prepared by the Northwest San Pedro Neighborhood Council with regard to the Lime Bikes, dockless bicycles in San Pedro. While the letter does not specifically address Council File 17-1125, it supports the continued presence of these bicycles in our community while providing some suggested improvements, some of which are covered in the proposed regulations.

The proposed 3 mile geofence around Metro bikes would basically eliminate this desirable asset from the San Pedro area. The Lime bicycles are a good complement to the Metro bikes. They are used more frequently, cover a much wider geographic area, and provide a lot more flexibility.

Please reconsider the proposed 3 mile geo-fence from Metro bikes.

Thank you for considering our community input.

Diana Nave, Chair  
Northwest San Pedro Neighborhood Council  
Planning and Land Use Committee

310-831-1975  
310-930-0217

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John A. White  
Legislative Assistant  
Information, Technology, and General Services Committee  
Trade, Travel, and Tourism Committee  
(213) 978-1072



# NORTHWEST SAN PEDRO NEIGHBORHOOD COUNCIL



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Lee Williams  
Darlene Zavalney  
Sky Zaarour (Youth Seat)

Certified Neighborhood Council  
Certification Date 02-12-02

TELEPHONE: (310) 732-4522  
WEBSITE: NWSanPedro.org  
E-MAIL: BOARD@NWSanPedro.org  
NW San Pedro Neighborhood Council  
638 S. Beacon Street, Box 688  
San Pedro, CA 90731

March 22, 2018

Toby Sun, CEO  
Lime Bikes  
c/o Lakeysha Hayes, Manager  
[lakeysha.hayes@limebike.com](mailto:lakeysha.hayes@limebike.com)  
[toby.sun@limebike.com](mailto:toby.sun@limebike.com)

Dear Mr. Sun:

The Lime bikes have had a net positive response from our community and as the 90-day pilot program nears completion the NWSPNC would like to offer our SUPPORT for its extension as a permanent program with the following recommendations.

We offer this support under the condition Lime Bikes continue to police their bikes throughout the community by:

- Daily drive-bys to make sure the bikes are properly parked and not blocking driveways or pedestrian areas such as sidewalks.
- Make sure vandalized and abandoned bikes are cleared from parks, beaches and public areas within 48 hours.
- Offer statistical data around ridership in our community
- Be responsive to community members complaints of abandoned bikes.
- Encourage riders to watch a "proper use" video at sign-up.
- Encourage the app/system to track riders who consistently misuse or mis-park bikes.
- Encourage Lime Bikes to increase their social media advertising to promote proper ridership video views.

In light of recent mail thefts involving Lime Bikes, we would also request the company :

- Add large number license plates to make it easier for stakeholders to identify individual bikes.
- Ensure the system prohibits anonymous ridership both in iPhone and non-iPhone users using promo codes.

**NORTHWEST SAN PEDRO**  
NEIGHBORHOOD COUNCIL

Page Two

- Lime Bikes should have an agreement with the Harbor Division of LAPD to identify individual riders who may be using Lime Bikes in criminal activities.

Example: A stakeholder witnesses a Lime Bike involved in mail theft from neighborhoods. They report the individual bike used and the time of the activity. Lime Bikes will retain these records and make them available to investigating police personnel with any and all identifying information Lime Bikes has on the suspect involved.

We look forward to supporting Lime Bike's continued positive contribution to our community.

Sincerely,



Ray Regalado, President  
On behalf of the **Northwest San Pedro Neighborhood Council**

cc: Councilmember Joe Buscaino  
cc: Nathan Holmes, CD15



Edwin Grover &lt;edwin.grover@lacity.org&gt;

**Fwd: Letter for Council File 17-1125, "Dockless Bike Share Systems/Pilot Program"**

1 message

**Staci Roberts** <staci.roberts@lacity.org>  
To: Edwin Grover <edwin.grover@lacity.org>

Wed, May 23, 2018 at 12:43 PM

Ed,

Here's another one.  
Thanks

----- Forwarded message -----

From: **John White** <john.white@lacity.org>  
Date: Wed, May 23, 2018 at 12:29 PM  
Subject: Fwd: Letter for Council File 17-1125, "Dockless Bike Share Systems/Pilot Program"  
To: Staci Roberts <staci.roberts@lacity.org>

Please attach the accompanying letter to CF 17-1125 as a communication from the public

----- Forwarded message -----

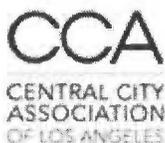
From: **Joanne Danganan** <jdanganan@ccala.org>  
Date: Wed, May 23, 2018 at 11:49 AM  
Subject: Letter for Council File 17-1125, "Dockless Bike Share Systems/Pilot Program"  
To: "john.white@lacity.org" <john.white@lacity.org>  
Cc: "eric.bruins@lacity.org" <eric.bruins@lacity.org>, "arceila.arce@lacity.org" <arceila.arce@lacity.org>, "jim.dantona@lacity.org" <jim.dantona@lacity.org>, "faisal.alserri@lacity.org" <faisal.alserri@lacity.org>

Hi John,

See attached CCA's comment letter regarding the City's Dockless Bike and Scooter Share Pilot Program. Please distribute to the members of the Transportation Committee.

Kindly confirm receipt.

Thanks so much,



**Joanne Danganan**  
Associate Director, Public Policy and Membership

o: 213.416.7511 | c: 310.936.3948

jdanganan@ccala.org | ccala.org

626 Wilshire Blvd., Suite 850, Los Angeles, CA 90017

\*Please note our new address\*



--  
John A. White  
Legislative Assistant  
Information, Technology, and General Services Committee  
Trade, Travel, and Tourism Committee  
(213) 978-1072



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 **05-23-18 Dockless Bike and Scooter Share Pilot Program.pdf**  
570K



May 23, 2018

Councilmember Mike Bonin, Chair  
Transportation Committee  
200 N. Spring Street  
Los Angeles, CA 90012

**Re: Council File 17-1125, "Dockless Bike Share Systems/Pilot Program"**

Dear Councilmember Bonin,

Through advocacy, influence and engagement Central City Association (CCA) is committed to supporting Downtown's vibrancy and increasing investment in the region. As the voice for Downtown as the region's center for growth, we support projects and initiatives that promote mobility and sustainability.

Dockless bikes and scooters have sky-rocketed in popularity in Los Angeles in just the last year, with companies like LimeBike and Bird proving that creative options for first/last-mile travel are in high demand. They have created scalable systems that do not require expensive docks, giving them the ability to charge a competitive price to users. Overall, we support efforts to make first/last-mile travel easy throughout the City, especially in Downtown LA.

While we appreciate the City's efforts to establish predictable rules for all dockless mobility operators, CCA has a few concerns with the Los Angeles Department of Transportation's (LADOT) proposed rules and guidelines for dockless bike share and scooters. These proposed rules and guidelines appear to be exclusive, anti-competitive and cost-prohibitive to operators.

Based on an analysis of the City's regulations, the proposed three-mile buffer around the Downtown LA Metro Bike Share service area would block 52 square miles and leave as many as 860,000 people without the ability to use any dockless services. Downtown-adjacent neighborhoods like Boyle Heights, Lincoln Heights and Cypress Park have no planned Metro Bike Share expansion and, under this proposal, would be barred from having dockless bike or scooter share services all together. Further, banning scooters in Downtown is especially troublesome because Metro offers no similar service. We do not see dockless bikes and scooters as directly competitive to Metro Bike Share; instead, we see them as complementary. They can serve areas of Downtown that are currently without Metro Bike Share stations as well as areas beyond the three-mile buffer that have no stations at all.

Our next concern is that the initial cap of 500 vehicles per operator is too few, especially for a large city like Los Angeles. We know from experience with Metro Bike Share and other bike share systems that broad coverage and high concentration are essential for attracting a critical mass of users, and we believe the proposed caps will make it hard to achieve both. Metro Bike Share opened with approximately 1,000 bikes and we all agree that the geographic area it covered was too small to maximize use, which has spurred the forthcoming expansion to USC, Westlake, Koreatown, and other Downtown-adjacent neighborhoods.



Regarding the fee table, the \$50 per bike fee is very high. We understand the desire for the city to recover the cost of managing services and enforcement, but we should start more conservatively and scale up as these services grow, especially given the sustainable nature of dockless transportation services. By charging so high a fee at the start, and likely forcing the operator to push the cost on to the user, the City may discourage use and prevent a critical mass of users from establishing itself.

Finally, the requirement to have an external locking feature is a major change from how dockless bike and scooter services have operated elsewhere. This would essentially require that these dockless bikes and scooters have makeshift docks, which is the opposite of their purpose. We ask that this not be required at this point and instead ask that operators and LADOT work through a solution together in the coming months, using the experience of riders as a guide for best practices.

We appreciate your consideration and ask that you continue this item for two weeks so we can meet with LADOT to enhance the proposed rules and guidelines.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Lall", written in a cursive style.

Jessica Lall  
President & CEO

cc: Councilmember Nury Martinez, 6<sup>th</sup> District, City of Los Angeles  
Councilmember Paul Koretz, 5<sup>th</sup> District, City of Los Angeles