

Communication from Public

Name: Dalyan Cemaletin

Date Submitted: 08/04/2020 06:44 AM

Council File No: 17-1125

Comments for Public Posting: I am writing in to the city today to express my support for micro-mobility and e-scooters. I live in Santa Monica and have used e-scooters constantly throughout the week to run errands, get to work, show friends around the city, and get to know SoCal a bit better. They have expanded my horizon of the city and made everything more accessible. If anything, more money needs to be put towards infrastructure change and rider safety. We need to stop car congestion and find alternative modes of moving around, these modes are already here and making the city a better place to live, we need to support micro-mobility!

Communication from Public

Name: Trevor

Date Submitted: 08/04/2020 08:38 AM

Council File No: 17-1125

Comments for Public Posting: To the City Council, this message is regarding the contributions of rental scooters and micromobility in connecting our large sprawling city together. I bought a house in the last couple years in the mid-city area. This area is somewhat of a "dead zone" in terms of public transportation. Sure, the bus lines run through the main arteries, but it's just too far to walk to the Expo line and too inconvenient to walk to the bus stops for quick trips. If it weren't for the microbility systems that have laid down roots in the city, I would be persuaded to drive my car most everywhere. These scooters have been a great benefit to the city at large, despite some of their admitted drawbacks. Especially in a city with the topology of Los Angeles, which is spread out but quite flat, making scooter riding easy and safe. If anything, we need to add more infrastructure to the city (like more bike lanes!!!) to support this new mode of transportation. Levying restrictions on these scooters will discourage folks like me from riding them, and we will eventually get back in our cars. I urge the Council to support and encourage these new innovations in transportation, not hinder progress. Thank you.

Communication from Public

Name: Carli Olson

Date Submitted: 08/04/2020 11:17 AM

Council File No: 17-1125

Comments for Public Posting: RE: Agenda Item 1, Joint Public Works and Gang Reduction & Transportation Committee Hearing Dear Councilmembers Bonin and Blumenfield, On behalf of the Hollywood Chamber of Commerce and our more than 800 members we represent, we urge the Los Angeles Department of Transportation to postpone implementation of the proposed guidelines and continue the current Dockless On-Demand Personal Mobility Pilot Program through March 15, 2021. The Hollywood Chamber of Commerce is concerned with the lack of industry and stakeholder input before the proposed guidelines were introduced to the public. We believe in equitable, reliable transportation for our community members and feel that the current pilot program must remain in place until all affected parties are able to fairly address and work with the Department of Transportation on the new guidelines. The recently released Department of Transportation rules and guidelines, although laudable in its goals to create more equitable transportation opportunities for all Angelenos and visitors, may have the opposite effect and remove micro mobility options. With over 10.3 million trips taken throughout Los Angeles during Year One of the pilot program, potential industry exit from the market area would be detrimental to our local economy. With the local business community currently struggling to attract customers during the coronavirus epidemic, microtransit companies have offered socially-distanced, feasible transportation options for our community. Furthermore, the proposed guidelines for the implementation of Equity Zone price capping, changes to the permit fee structure, and fixed locking mechanism requirements subject microtransit companies to sweeping systematic changes without industry input on the potential unintended consequences. The Hollywood Chamber of Commerce applauds the Council's commitment to reliable transportation opportunities for all members of the community but is concerned that these changes made without industry input could seriously impact Hollywood residents and tourists. We agree that changes must be made because of pilot program findings. For these reasons, we ask your committee to continue item 1 on the agenda and delay implementation of the proposed guidelines. We ask necessary conversations to take place between all stakeholders and ensure that a program beneficial for all parties and community members

continues forward. If you have any questions please contact Carli Olson, Director of Public Policy and Economic Development, at carli@hollywoodchamber.net or (323)785-1761 ext. 115.



August 3, 2020

Honorable Councilmembers Bonin and Blumenfield
Los Angeles City Hall
200 N Spring St
Los Angeles, CA 90012

RE: Agenda Item 1, Joint Public Works and Gang Reduction & Transportation Committee Hearing

Dear Councilmembers Bonin and Blumenfield,

On behalf of the Hollywood Chamber of Commerce and our more than 800 members we represent, **we urge the Los Angeles Department of Transportation to postpone implementation of the proposed guidelines and continue the current Dockless On-Demand Personal Mobility Pilot Program through March 15, 2021.** The Hollywood Chamber of Commerce is concerned with the lack of industry and stakeholder input before the proposed guidelines were introduced to the public. We believe in equitable, reliable transportation for our community members and feel that the current pilot program must remain in place until all affected parties are able to fairly address and work with the Department of Transportation on the new guidelines.

The recently released Department of Transportation rules and guidelines, although laudable in its goals to create more equitable transportation opportunities for all Angelenos and visitors, may have the opposite effect and remove micro mobility options. With over 10.3 million trips taken throughout Los Angeles during Year One of the pilot program, potential industry exit from the market area would be detrimental to our local economy. With the local business community currently struggling to attract customers during the coronavirus epidemic, microtransit companies have offered socially-distanced, feasible transportation options for our community.

Furthermore, the proposed guidelines for the implementation of Equity Zone price capping, changes to the permit fee structure, and fixed locking mechanism requirements subject microtransit companies to sweeping systematic changes without industry input on the potential unintended consequences. The Hollywood Chamber of Commerce applauds the Council's commitment to reliable transportation opportunities for all members of the community but is concerned that these changes made without industry input could seriously impact Hollywood residents and tourists.

We agree that changes must be made because of pilot program findings. For these reasons, we ask your committee to continue item 1 on the agenda and delay implementation of the proposed guidelines. We ask necessary conversations to take place between all stakeholders and ensure that a program beneficial for all parties and community members continues forward. If you have any questions please contact Carli Olson, Director of Public Policy and Economic Development, at carli@hollywoodchamber.net or (323)785-1761 ext. 115.

Sincerely,

Rana Ghadban
President & CEO

Communication from Public

Name: Björn

Date Submitted: 08/04/2020 11:50 AM

Council File No: 17-1125

Comments for Public Posting: I heard from a friend that the City of Los Angeles is planning to crack down on e-scooters with a new restrictive city-wide permit. As a 10+ year citizen of LA living on the West Side, I have to tell you that being able to easily and with fun get from A to B across Venice, Marina Del Ray and Santa Monica is something I fell in love with and would hate to see being taken away. Since Bird, Lime and co launched, I almost never take Uber anymore, but just hop on a scooter and go and enjoy the breeze. I actually wish you would open the beach bike path again, that was the best thing ever! I urge you to design your permit in a way that we will have more access to scooters, for me personally especially on the West Side and in DTLA, not less. Best regards, Björn

Communication from Public

Name: Daniel

Date Submitted: 08/04/2020 12:28 PM

Council File No: 17-1125

Comments for Public Posting: Hi City Council! I'm writing to share my story of what it's like to live a car-free life in LA. I've been car-free for 6 years now, starting in Denver and now in LA. Everyone said it would be impossible to live in LA without a car, but I've been able to do so for two reasons – the Expo line and dockless scooters. I am always amazed by the Expo line's consistency of service and upkeep. The opportunity to go from midcity to the beach or downtown has allowed me to discover LA just as I would be able to with a car. But while the Expo is great, I can't use it for everything. That's where scooters come in. The Expo Line helps me travel horizontally along a fixed corridor, but scooters help me travel vertically and horizontally, just as affordably. The other week I took a Bird from Culver City to Hollywood to get coffee with an old friend... The trip cost me less than the coffee! Scooters let me zig-zag between errands without parking, traffic, or the stress of losing a personal bike (I don't have one, because the scooters are great!). Scooters give me an extra 15 minutes of exploring Sawtelle before heading to the Expo line. Scooters allow me to pop over to the grocery store and back for a missing ingredient while dinner is cooking. The abundance and affordability of scooters is essential to my mobility in Los Angeles. There's a statistic that owning a car costs about \$9,000 a year, so it goes without saying that scooters have saved me thousands of dollars. It's one of the reasons I was able to move to a better apartment. It's also worth mentioning that during the pandemic, they're my only form of mobility – the Expo and Ubers are way too risky! I wanted to write to say thank you for letting me have a car-free life in LA. I love to see the positive change these electric vehicles have brought to our streets, and I hope that LA continues to pave the bright-green way for more people to choose a car-free life. Thanks!

Communication from Public

Name: Allie

Date Submitted: 08/04/2020 03:22 PM

Council File No: 17-1125

Comments for Public Posting: Regarding Micromobility Regulation: Scooters were invaluable to me as I was living in Hollywood last year (now I'm in Culver City, and still use them all the time). They were the only reliable way to get to and from places where parking is nearly impossible and traffic is terrible (e.g. concerts at the Hollywood bowl), and the perfect vehicle to take me down Hollywood Blvd to restaurants and locations <2 miles away. I explored (and still do) so many local restaurants and coffee shops and local businesses thanks to scooters that I would otherwise pass by with a car, and I felt very connected with my neighborhood thanks to this. It would be really sad to see scooters regulated and treated like public nuisances, when they provide so much value to this city, especially when we are otherwise so reliant on cars. I love having alternative options to get me places other than driving a car, and in a city like LA that is so spread out, there are very few other solutions that are so useful. Even bikes have drawbacks, since they make you sweaty and you can't ride them in a dress/skirt, which is not ideal for many situations. I would hope that you see the value in making LA more accessible by means other than cars, and making it a safer place to use micromobility options. The one downside I experienced in Hollywood was the lack of bike lanes. We should be encouraging these modes of transportation, especially now in a pandemic when people are encouraged to stay outside and socially distanced! A city where people can get around without cars (even in a pandemic, without taking the subway!) is infinitely more accessible, enjoyable and green.

Communication from Public

Name: Lisa Casey

Date Submitted: 08/04/2020 03:45 PM

Council File No: 17-1125

Comments for Public Posting: Hi - please add more bike lanes! It's great for micro mobility - I love my Bird Scooter.... my husband and I travel around Santa Monica to view this beautiful city. Once my office opens up I will go back to using this vehicle to commute to work... safe, easy and no gas payment. Love seeing tourists use this in our town. We should encourage this versus polluting the air with car fumes. More lanes please! Best, Lisa

Communication from Public

Name: Evanne Holloway

Date Submitted: 08/04/2020 03:56 PM

Council File No: 17-1125

Comments for Public Posting: Los Angeles vibrant communities are best experienced outside of a car - I use micromobility to connect to the city and the places in the city I love. Scooters and bike share provide me the freedom to leave my car at home, and I am so thankful to live in a city that provides multiple transportation options.

Communication from Public

Name:

Date Submitted: 08/04/2020 04:59 PM

Council File No: 17-1125

Comments for Public Posting: Letter from Bird CEO, Travis VanderZanden



To our city leaders,

Los Angeles is a world leader and innovator in micromobility, and the City's commitment to sustainable transportation has proven invaluable as it navigates the current global pandemic. Because of LA's investment in micromobility and other sustainable transportation options, millions of essential workers are able to travel safely and sustainably every day. That's something policy makers should feel proud about.

I'm concerned, however, that the City is now considering the implementation of changes to this newly minted essential service that rolls back much of that progress and limits micromobility options for Angelenos exactly when they're needed most. The recently proposed regulations for LA's micromobility program damage sustainable mobility and make it difficult for operators to provide affordable zero-emission transportation.

For example, Los Angeles proposes to charge scooter riders substantial fees that do not apply to Uber or Lyft riders, pushing Angelenos towards cars instead of scooters. Of these fees, less than 5% are allocated to improving micromobility infrastructure. We have seen other cities across the country from Atlanta to neighboring Santa Monica spend as much as 35% of their micromobility-generated revenue to ensure that riders feel safer on the street, and we urge Los Angeles to do the same.

Moreover, Los Angeles' proposal to cap certain fares at less than \$2 per ride does not reflect the realistic cost of providing micromobility services. It also sets two troubling precedents: first, it would codify an apparent belief that sustainable micromobility should shoulder more regulatory burden than the heavily-polluting ride hailing industry that has no such fare limits; second, it would create an unfair distinction between shared cars, bicycles and transit, all of which receive significant public subsidies, and scooter sharing, which receives no public funding. Unlike other transit options that receive subsidies, our operational and regulatory costs must be paid entirely by rider fares.

Though we were not invited to participate in the year-long roundtable discussions that led to these new regulations, Bird remains committed to working with the City and the Department of Transportation to help Los Angeles meet its climate action goals and make micromobility work for all Angelenos. It has always been our belief that we have a responsibility to help uplift the communities we serve. Whether it's through programs here in LA like our free rides for medical and emergency personnel or our commitment to providing hundreds of employment opportunities for local residents during an economic downturn, we're fully invested in the success of Los Angeles.



We only ask that the City remains invested in the success of micromobility as well.

This industry is young, and there's still much that we can learn together even as tens of millions of riders around the world benefit from electric scooters every year. Here in Los Angeles, we can do more for Angelenos than implementing rushed and damaging regulations that would stunt sustainable mobility growth at a time when it's needed most. Let's find a better way forward together.

Bird respectfully requests that we extend the current pilot program and form a working group to discuss the staff report's recommendations. Thank you for your time and continued service to the city.

Respectfully,

A handwritten signature in black ink, appearing to read "T. VanderZanden".

Travis VanderZanden
Founder and CEO of Bird

Communication from Public

Name: Tim Alborg
Date Submitted: 08/04/2020 02:00 PM
Council File No: 17-1125
Comments for Public Posting: Please see attached letter from Spin.

August 4, 2020

Los Angeles City Council
City of Los Angeles
200 N Spring Street
Los Angeles, California 90012

Re: Dockless Mobility Program Recommendations

Dear Honorable Councilmembers:

We sincerely appreciate the City's efforts to help dockless mobility providers scale responsibly by supporting a per-ride fee structure and creating guidelines to penalize bad actors and incentivize good partners. Spin supports the proposed framework as drafted by LADOT to ensure equity and accountability, with the following changes:

- **Increase flexibility for fees and pricing**
 - Replace price caps with a requirement to enroll low-income users and measure the percentage of rides from low-income users
 - Close the gap between tiered per-trip fees in different zones
 - Require 50% off rides in place of unlimited trips under 30 minutes
- **Remove lock equipment requirement**
- **Lower the fleet cap at launch from 3,500 to 1,500 vehicles to create additional pressure on companies to follow the program rules**

Flexible Fee Structure

*“To ensure that equity zone trips are available and affordable for those in the area, the LADOT requires **outreach and enrollment of qualified low-income residents and workers in a 50%-off discount program** the following maximum charges for trips in these areas:*

- ~~*Trips that begin or end in MEZs shall not exceed \$1.25 per trip per customer.*~~
- ~~*Trips that begin or end in MDZs will not exceed \$1.75 per trip per customer.*~~
- ~~*Trips that use adaptive vehicles shall not exceed \$1.25 per trip, per customer in any zone.” (MEZ and MDZ Price Capping, page 14)*~~

Equity Zone Per-trip Fees

Spin commits to contributing to the City's goal of expanding equitable and affordable access to transportation. However, we have concerns that a \$1.25 per-trip cap for rides that begin or end in MEZs, and a \$1.75 per trip cap for rides in MDZs will be unsustainable and, long-term, result in lessened access to transportation options for Angelenos. We understand that these price caps mimic current transit fares and are intended to provide individuals living or working in Equity Zones greater access to another mode of transportation for short-distance trips. However, **private**

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providers are not typically considered for subsidies and funding on the scale available to public transportation agencies. In fact, Spin currently receives no subsidies to operate in Los Angeles.

Los Angeles is a world-class city with an expanding tourism market, instituting a simple price cap does not guarantee that individuals who live and work in Equity Zones will be able to access micromobility. Spin respectfully asks that LADOT not apply a simple price cap. Instead, **we welcome any and all LA residents and workers with a low income and limited transportation options to consider our Spin Access program**, which provides 50% off all rides for those that enroll. Prior to Safer At Home, the **average duration of a Spin Access trip last year was 14 minutes, which would cost \$2.53.** Being onboarded through the Spin Access program can also ensure that the **intended benefactors of the discounts are eligible residents and workers**, not visitors or those with high incomes.

Moreover, micromobility is a powerful tool to further the City's objectives to improve congestion and reduce carbon footprints while complementing public transit, yet this industry faces significantly more regulatory bias than ride-hailing providers. We recognize that price-caps were recommended to prevent micromobility trips from costing more than ride-hailing, which would not contribute to sustainability goals to reduce Vehicles Miles Traveled. However, **Spin does not prioritize car trips in our app like some other providers. We hope the City of Los Angeles will embrace modal neutrality by adopting requirements that are equitably enforced across transportation categories.**

We also continue to advocate for the **adoption of an all W2 workforce** to contribute to the long-term success of the Dockless On-demand Micromobility Program in LA and across the U.S. Spin's employees are full-time team members with benefits. As a consequence of Spin's investment in our team, we can reliably provide quality service in Los Angeles. **We do not believe in outsourcing the safety-critical tasks** of inspections, maintenance, and repairs to untrained contractors and gig-economy workers. Simply put, a respected, valued, and happy workforce provides a higher quality, safer, and more sustainable service to users, community members, and the City of Los Angeles. **Spin would appreciate the flexibility to determine pricing in a way that supports the City's equity goals while maintaining the sustainability of our operations in Los Angeles.**

Tiered Per-Trip Fees

“Upon Approval of the application and deployment of vehicles on the right of way, the permittee shall be subject to trip fees of ~~\$0.03~~ ~~\$0.06~~ to ~~\$0.25~~ ~~\$0.40~~ as follows:

Geography	Applicability	Per Trip Fee*
Base	Trip that begin or end outside of SOZ and MEZ	\$0.20 — \$0.23
SOZ	Trip that begin or end in SOZ	\$0.40 — \$0.25
MEZ	Trip that begin or end in MEZ	\$0.00 \$0.03
MDZ	Trip that begin or end in MDZ	\$0.06 \$0.09

(Application process and Permit Fees, Page 7)

We commend the City for pioneering a first-of-its-kind, tiered per-ride fee to encourage equitable deployment and usage. **To encourage widespread adoption of micromobility instead of ride-hailing or single-occupancy vehicles, the City should consider lowering the per-ride fees** in the SOZ to \$0.25 per trip and supplement the gap by increasing per-ride fees in other zones by \$0.03. Undoubtedly, there are residents who live in Equity Zones but work in SOZ and use micromobility to get to and from their workplaces. Shrinking the financial gap between SOZ and MEZ per-ride fees can **encourage further adoption of micromobility** across the City.

Overall, we support the City’s goal of providing accessible, affordable service through discounts and other programs, but Los Angeles should balance subsidies designed to create equity against the need to **provide a self-sufficient and sustainable service to everyone who chooses an environmentally-alternative to single occupancy automobile trips.**

Rethinking Equity Programs to Expand Access

“Operators will offer a one-year low-income Customer plan that waives any applicable bicycle/e-scooter deposit and offers an affordable cash payment option and **50% off fares unlimited trips under 30 minutes** to any customer with an income level at or below 200% of the federal poverty guidelines, subject to annual renewal.” (Outreach and Equity, G, page 29)

Many cities have required micromobility operators to provide discounts to low-income users, recognizing that transportation options need to be accessible. Public transit systems can keep fares low in large part thanks to subsidies from the local, state, and federal governments.

Spin encourages the City to create equity program requirements that would **allow vendors to offer a more flexible range of equity programs that increases access to scooters**, while also providing private companies versatility to balance the operational budget and offer a sustainable

program long-term. For example, currently, Los Angeles requires vendors to offer unlimited, free 30 minutes or a discount rate through a special cash payment system. As mentioned above, Spin is exploring different ways to improve our equity program and believe that adding flexibility in the program's requirements would allow Spin to expand our equity program through new and different discount programs and initiatives that would allow more users to take advantage of our access program.

Spin has always proven our commitment to equity through action. During the pilot program when there was no measurable requirement for outreach and enrollment in our discount program, we **voluntarily connected with nearly 50 organizations** to promote Spin Access. As mentioned earlier, during the Safer At Home Emergency Order, **usage of Spin Access doubled and comprised almost 30% of total Spin trips.**

Spin offers a 50%-off discount for eligible users in all but three cities in the U.S., where it is more feasible to expand access through additional outreach to organizations, their clients, and attract new Spin Access users. We respectfully request that the City consider adopting the **50%-off program in place of unlimited, 30-minute rides in an effort to expand and standardize equity access programs** across the United States.

Flexible Lock-to Solutions

*“Throughout the course of Permit year 2020-2021, but no later than March 1, 2021, **Operators who equip every Vehicle shall be equipped with a locking mechanism to lock to a fixed object preferably a bicycle rack shall be qualified for an additional 500 vehicles fleet increase. Operators shall provide the City with plans to educate or incentivize riders to encourage parking of vehicles at bike racks where available.**” (Parking, B, page 16)*

Los Angeles should not require lock-to equipment on dockless vehicles, but instead work with providers to **encourage the deployment of parking and charging infrastructure**, while **incentivizing the parking of vehicles at parking infrastructure through ride credits and other means.**

We share in LADOT's goal to mitigate tipped-over devices and disorderly parked vehicles; that is why Spin is the only micromobility provider actively installing Spin Hubs, a parking and charging solution, in cities across the United States. Though the City has invested in growing bike rack inventory over the years, due to the large geography of Los Angeles, **many neighborhoods are, in effect, mobility deserts without infrastructure.** Existing infrastructure concentrates on main streets with busy traffic while many small corridors have bike racks more than half a mile away, like Historic South Central and Central Hollywood.

LADOT's proposed requirement may **unintentionally create a secondary burden for communities lacking resources, adding barriers to the frequent use of micromobility, and reducing the convenience of micromobility.** Furthermore, requiring lock-to equipment can

overwhelm existing infrastructure and generate further friction that deters new and existing users from using e-scooters to replace single occupancy car trips. **Micromobility has experienced incredible adoption over the past few years due, in part, to its dockless nature.**

Lowering Initial Fleet Cap to Incentivize Compliance

“Additional vehicles after the total ~~3,500~~ 1,500 fleet maximum may be permitted at the discretion of the General Manager and may depend on factors related to performance and Program compliance.” (Fleet Size, B, page 12)

The City should consider lowering the proposed **fleet cap from 3,500 to 1,500 vehicles to encourage providers to comply and earn their rights to a fleet increase, rather than “buying” their way to a large fleet.** The highest average monthly deployment in Los Angeles during the last year was 17,746 and the lowest was 9,056 vehicles. Without limiting the number of vendors, should all six current providers apply to deploy the maximum number of vehicles, that would equate to **21,000 devices in the public right of way.** One of the largest providers of dockless mobility services in Los Angeles today deploys nearly 3,500 vehicles each day. Large urban cities across the United States allow companies to deploy a much more conservative initial fleet to ensure that operators earn their way to a larger fleet.

During its Powered Scooter Share 2019 Permit Program, the **City of San Francisco selected 4 vendors and allowed an initial fleet of 500 per operator.** Washington D.C. only allows each of its 4 vendors to deploy 2,500 vehicles across the City and caps the total number of scooters to **1,000 per provider in the Central Business Districts.** Lowering the proposed starting fleet cap from 3,500 to 1,500 will create a competitive environment to ensure that the best performers earn their privilege to grow in Los Angeles.

Additionally, as programs evolve from the experience of both municipal staff and micromobility companies themselves, cities across the country are **limiting vendors to encourage compliance and help manage staff resources and workload.** By selecting a limited number of qualified and compliant providers, these cities are establishing a better working relationship with each operator, and operators are encouraged to follow the program’s rules as limited permits create a natural incentive to self-regulate.

Additionally, in Spin’s experience, working closely with cities has allowed us to explore different service models aimed at expanding equitable access to mobility choices. For example, we have worked with the city of Detroit to provide subsidized monthly scooter rentals. This **collaboration allowed us to shift our scooter deployment to address transportation gaps that disproportionately affect low-income and underserved communities,** which would have been nearly impossible to accomplish with multiple operators.

Conclusion

In summary, Spin stands ready to work with the City of Los Angeles to explore different regulations and fee structures that expand access, create pathways to foster a sustainable micromobility program, and mitigate disorderly conduct caused by providers deploying with a growth-at-all-costs strategy. It is a privilege to serve Angelenos and visitors and we appreciate the opportunity to continue partnering with City Council and LADOT to move Los Angeles forward by delivering equitable, safe, and sustainable transportation options that get people out of cars and onto other modes of transport.

Best regards,

A handwritten signature in black ink, appearing to read 'T. Alborg', with a large, stylized flourish at the end.

Tim Alborg
Head of Government Partnerships - US West
Spin
(770) 595-0190
tim.alborg@spin.pm

Communication from Public

Name: Chris Balonek

Date Submitted: 08/04/2020 06:09 PM

Council File No: 17-1125

Comments for Public Posting: I am a strong proponent of micromobility options for CD15. The San Pedro area is a vibrant community with a variety of unique and thriving commercial and civic destinations that would be better supported with micromobility access. Our local small businesses downtown, our picturesque parks and beaches, our harborfront and world renowned historic landmarks like the Korean Bell, Fort MacArthur and the historic waterfront are all easily accessible by bicycle and scooter. As a local homeowner, I strongly believe that our residents and guests deserve a fun and affordable mobility option that helps eliminate motor vehicle congestion and carbon emissions in our community. As the founder of a popular local grassroots neighborhood watch organization, I'm also pleased to see that there's a focus on enforcement in the proposed permanent guidelines. It is my hope that the Council considers CD15 and San Pedro as a key area of concentration for any micromobility initiatives.

Communication from Public

Name: Streets For All

Date Submitted: 08/04/2020 07:47 PM

Council File No: 17-1125

Comments for Public Posting: Dear Councilmember Bonin and Councilmember Blumenfield, Streets for All is a local organization dedicated to building a transportation revolution in Los Angeles. We are confident that Los Angeles has all the necessary ingredients to become a model for other cities to emulate as we fight climate change, traffic violence, and congestion globally. In order to accomplish this, we believe the city must invest quickly in a network of protected mobility lanes that help people that ride bikes or scooters feel safe, whether they're eight or eighty years old. Over the last 18 months, LADOT has pioneered its On-Demand Mobility Program with one of the highest ridership and total fleet sizes of any micromobility program in the country. However, we are concerned about the viability of shared micromobility in Los Angeles under LADOT's newly proposed draft rules and guidelines. As an LA-based mobility advocacy group that cares deeply about the future of micromobility in Los Angeles, we ask that the City Council delay the implementation of LADOT's draft rules and guidelines and extend the current On-Demand Mobility Program for six months. We ask that the city and LADOT use this time to engage with operators and relevant stakeholders and work to resolve shared concerns. We do not want micromobility to go away or be greatly reduced in Los Angeles and we are concerned that this will happen if the draft rules and guidelines are implemented in their current form. Some major concerns we have: Disproportionately High Insurance: Insurance limits should align with the underlying exposure, however LADOT's current insurance requirements fundamentally mischaracterize micromobility by requesting an insurance limit that is incredibly disproportionate to the potential harm. It is very difficult for a bike or scooter to cause significant damage to a third party given their small size and speed relative to an automobile, however LADOT is requiring that shared micromobility operators evidence more than 10x the insurance limit of cars in LA. This not only preferences dirty forms of transportation, it's financially infeasible long term. Lock-to Devices: LADOT is proposing a new requirement that all vehicles are equipped with an external locking device by March 2021. We support the intent of this requirement, as it could lead to safer sidewalks, but we do not believe Los Angeles has the necessary parking and locking

infrastructure in place to support all forms of mobility today, and by adding thousands of new devices to the mix suggests more challenges will be created than solved. We support a large scale investment in bike racks, bike corrals, and other micromobility parking infrastructure, as this will have positive impacts for both the micromobility program and other private forms of mobility. The current plan, however, only appears to be devoting a small fraction of fees toward any such improvements. Safe Street Infrastructure: If LADOT wants micromobility to grow and expand beyond the 14 Million trips seen over the last year, the agency needs to make major commitments to building out a network of bike, scooter, and pedestrian infrastructure, as highlighted in the City's own Mobility Plan 2035, and focus on areas of higher need based on the Los Angeles High Injury Network. The reality is that the vast majority of LA streets are unsafe for anyone other than an automobile driver. If Los Angeles can support 14 Million micromobility trips in one year with very limited infrastructure, then there is potential for a major mode shift with a serious commitment to establishing a safe infrastructure network. Now is a perfect time for bold action from LADOT to make life-saving infrastructure improvements to areas of the city that have been ignored or overlooked for too long, and set them up for successful shared micromobility and other transportation services. As safe mobility advocates, Streets for All wants to make sure that we give people real alternatives to the car. We want to ensure that shared micromobility in Los Angeles continues to be a success for years to come, and that we promptly build out infrastructure to further encourage its use and keep people safe. Thank you for your attention to this important issue. Sincerely, Michael Schneider Founder, Streets for All



August 4, 2020

VIA E-MAIL

Councilmember Bonin, Chair of Transportation Committee
Councilmember Blumenfield, Chair of Public Works and Gang Reduction Committee
City of Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

Re: Council File 17-1125 - LADOT's On-Demand Mobility Program

Dear Councilmember Bonin and Councilmember Blumenfield,

[Streets for All](#) is a local organization dedicated to building a transportation revolution in Los Angeles. We are confident that Los Angeles has all the necessary ingredients to become a model for other cities to emulate as we fight climate change, traffic violence, and congestion globally. In order to accomplish this, we believe the city must invest quickly in a network of protected mobility lanes that help people that ride bikes or scooters feel safe, whether they're eight or eighty years old. Over the last 18 months, LADOT has pioneered its On-Demand Mobility Program with one of the highest ridership and total fleet sizes of any micromobility program in the country. However, we are concerned about the viability of shared micromobility in Los Angeles under LADOT's newly proposed draft [rules and guidelines](#). **As an LA-based mobility advocacy group that cares deeply about the future of micromobility in Los Angeles, we ask that the City Council delay the implementation of LADOT's draft rules and guidelines and extend the current On-Demand Mobility Program for six months. We ask that the city and LADOT use this time to engage with operators and relevant stakeholders and work to resolve shared concerns.**

We do not want micromobility to go away or be greatly reduced in Los Angeles and we are concerned that this will happen if the draft rules and guidelines are implemented in their current form.

Some major concerns we have:

Disproportionately High Insurance: Insurance limits should align with the underlying exposure, however LADOT's current insurance requirements fundamentally mischaracterize micromobility by

requesting an insurance limit that is incredibly disproportionate to the potential harm. It is very difficult for a bike or scooter to cause significant damage to a third party given their small size and speed relative to an automobile, however LADOT is requiring that shared micromobility operators evidence more than *10x the insurance limit of cars in LA*. This not only preferences dirty forms of transportation, it's financially infeasible long term.

Lock-to Devices: LADOT is proposing a new requirement that all vehicles are equipped with an external locking device by March 2021. We support the intent of this requirement, as it could lead to safer sidewalks, but we do not believe Los Angeles has the necessary parking and locking infrastructure in place to support all forms of mobility today, and by adding thousands of new devices to the mix suggests more challenges will be created than solved. We support a large scale investment in bike racks, bike corrals, and other micromobility parking infrastructure, as this will have positive impacts for both the micromobility program and other private forms of mobility. The current plan, however, only appears to be devoting a small fraction of fees toward any such improvements.

Safe Street Infrastructure: If LADOT wants micromobility to grow and expand beyond the 14 Million trips seen over the last year, the agency needs to make major commitments to building out a network of bike, scooter, and pedestrian infrastructure, as highlighted in the City's own [Mobility Plan 2035](#), and focus on areas of higher need based on the [Los Angeles High Injury Network](#). The reality is that the vast majority of LA streets are unsafe for anyone other than an automobile driver. If Los Angeles can support 14 Million micromobility trips in one year with very limited infrastructure, then there is potential for a major mode shift with a serious commitment to establishing a safe infrastructure network. Now is a perfect time for bold action from LADOT to make life-saving infrastructure improvements to areas of the city that have been ignored or overlooked for too long, and set them up for successful shared micromobility and other transportation services.

As safe mobility advocates, Streets for All wants to make sure that we give people real alternatives to the car. We want to ensure that shared micromobility in Los Angeles continues to be a success for years to come, and that we promptly build out infrastructure to further encourage its use and keep people safe.

Thank you for your attention to this important issue.

Sincerely,

A handwritten signature in black ink, appearing to be 'M Schneider', with a long horizontal line extending to the right.

Michael Schneider
Founder, Streets for All

Communication from Public

Name: George Palaziol
Date Submitted: 08/04/2020 11:38 PM
Council File No: 17-1125
Comments for Public Posting: in regards to bikes and scooters for rent in San Pedro. I personally saw them as an asset when they were here. They were used and enjoyed by many. We live in an area that attracts many tourists and we will soon have our new waterfront and Little Italy with people out and about to enjoy the area. These are a great way to get around as long as theyre maintained. It's understood that some will mistreat them and abuse them but the benefits outweigh the negative here. Many people in our community feel we are constantly forgotten about way over here in San Pedro. It's time we start receiving the perks that other parts of the city seem to be fortunate enough to have. Thank you.