

Communication from Public

Name: Charlie Mastoloni

Date Submitted: 04/13/2023 04:18 PM

Council File No: 17-1125

Comments for Public Posting: Re: Request to Delay LADOT “On-Demand Mobility Program Trip Fee Update” To Los Angeles City Council Members, The City of Los Angeles and LADOT have built one of the most successful shared micromobility programs in the country. Since launching the Dockless On-Demand Personal Mobility Pilot Program in 2018, it has generated millions of zero-emission trips and has enrolled over 10,000 within equity areas. LADOT has created a local regulatory environment that is tough but fair, prioritizing serving equity areas and achieving sustainability goals. We write to express our concern over the proposed updated trip fee schedule for the On-Demand Mobility Program in the "On-Demand Mobility Program Trip Fee Update" from Council File 17-1125. We are also concerned about LADOT's proposal to require mandatory parking in Downtown Los Angeles with a limited number of spots, as we believe these proposals would negatively impact the program, and specifically, users enrolled within equity plans. We understand that LADOT has received insufficient trip fee revenue to cover the current program costs. However, the steep increase in per-trip fees proposed by LADOT, compounded with the city’s extraordinarily low fare requirement for equity zones, will lead to unsustainably high operating costs and negatively impact our ability to serve equity areas. The proposed increase in per-trip fees in some districts is as high as 300+%. The program's "open permit" nature helps drive innovation and competition. However, we have already seen two large companies (Lyft and Spin) exit the Los Angeles market due to some of the highest fees in the country and an unsustainable business environment. An increase in the fee structure could lead to more operators leaving Los Angeles and cause residents to lose a clean and affordable transportation option. LADOT's proposal would significantly impact riders in equity zones. Currently, if a rider starts their trip in an equity zone and ends their ride outside of an equity zone, operators are not charged a per-trip fee. Under the new proposal, operators would be subject to the per-trip fee of the corresponding zone where a rider ends their trip. This would lead to operators shifting services away from equity zones. We stand ready to work with LADOT on a different proposal to ensure the program can cover costs without negatively impacting ridership. We have prepared an alternative fee schedule we can

present to staff that we believe will ultimately yield more revenue for LADOT while maintaining a sustainable environment for shared mobility. LADOT has proposed requiring mandatory parking in response to residents' parking concerns. While we support proactive parking solutions such as mandatory parking areas to keep streets tidy and scooters out of the right of way, LADOT's current proposal does not identify enough designated parking areas for riders. Without enough mandatory parking areas, deployment and ridership would drop. Potential riders would be discouraged from choosing to ride if there weren't enough parking spots near them. Data shows that the chance that someone will take a trip nearly drops in half as users get farther away from vehicles. Average trip distances in Downtown Los Angeles are just over one mile or 13 minutes. Riders choose micromobility because of the convenience and time-saving benefit, both of which would be a challenge under LADOT's current proposal. Instead, we request a delay in the implementation of mandatory parking areas indefinitely until there are sufficient locations to support the ridership in the area. During the delay, we will work with LADOT to identify sufficient mandatory parking areas to ensure streets are clear and ridership is not significantly impacted. Further, increased fees should not be applied within the Downtown SOZ until such time as LADOT and all operators are able to assess the impact on ridership of mandatory parking within the area. It is our position that LADOT's proposed changes in the "On-Demand Mobility Program Trip Fee Update" would significantly impact users enrolled in our respective equity programs. We ask the City and LADOT to delay a vote on the proposed changes until we can better understand the impact they would have on users enrolled in equity programs and ensure they will not be negatively impacted. Sincerely, Lime Bird Veo Superpedestrian



April 13, 2023

Los Angeles City Council
200 N Spring St.
Los Angeles, CA 90012
Delivered via Email

Re: Request to Delay LADOT “On-Demand Mobility Program Trip Fee Update”

To Los Angeles City Council Members,

The City of Los Angeles and LADOT have built one of the most successful shared micromobility programs in the country. Since launching the Dockless On-Demand Personal Mobility Pilot Program in 2018, it has generated millions of zero-emission trips and has enrolled over 10,000 within equity areas. LADOT has created a local regulatory environment that is tough but fair, prioritizing serving equity areas and achieving sustainability goals.

We write to express our concern over the proposed updated trip fee schedule for the On-Demand Mobility Program in the "On-Demand Mobility Program Trip Fee Update" from Council File 17-1125. We are also concerned about LADOT's proposal to require mandatory parking in Downtown Los Angeles with a limited number of spots, as we believe these proposals would negatively impact the program, and specifically, users enrolled within equity plans.

Trip Fee Schedule

We understand that LADOT has received insufficient trip fee revenue to cover the current program costs. However, the steep increase in per-trip fees proposed by LADOT, compounded with the city’s extraordinarily low fare requirement for equity zones, will lead to unsustainably high operating costs and negatively impact our ability to serve equity areas. The proposed increase in per-trip fees in some districts is as high as 300+%.

Geography	Applicability	Per Trip Fee*
Equity-Focused Mobility Development District (EFMDD)	Trips that end in the Equity Focus Mobility Development District	\$0.00/ No Cost
Mobility Development District (MDD)	Trips that end in the Mobility Development District	\$0.25
Standard Permitted District (SPD)	Trips that end in the Standard Permitted District	\$0.50
Special Operation Zone (SOZ)	Trips that end in the Special Operations Zone	\$0.75

Proposed Fee Structure

Geography	Applicability	Per Trip Fee*
Equity-Focused Mobility Development District (EFMDD)	Trips that start or end in the Equity Focus Mobility Development District	\$0.00/ No Cost
Mobility Development District (MDD)	Trips that start or end in a Mobility Development District	\$0.06
Standard Permitted District (SPD)	Trips that start and end in a Standard Permitted District	\$0.20
Special Operation Zone (SOZ)	Trips that start or end in Special Operations Zone	\$0.40

Current Fee Structure

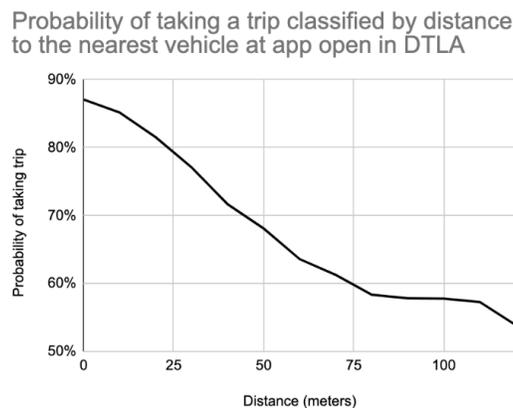
The program's "open permit" nature helps drive innovation and competition. However, we have already seen two large companies (Lyft and Spin) exit the Los Angeles market due to some of the highest fees in the country and an unsustainable business environment. An increase in the fee structure could lead to more operators leaving Los Angeles and cause residents to lose a clean and affordable transportation option.

LADOT's proposal would significantly impact riders in equity zones. Currently, if a rider starts their trip in an equity zone and ends their ride outside of an equity zone, operators are not charged a per-trip fee. Under the new proposal, operators would be subject to the per-trip fee of the corresponding zone where a rider ends their trip. This would lead to operators shifting services away from equity zones.

We stand ready to work with LADOT on a different proposal to ensure the program can cover costs without negatively impacting ridership. We have prepared an alternative fee schedule we can present to staff that we believe will ultimately yield more revenue for LADOT while maintaining a sustainable environment for shared mobility.

Mandatory Parking in Downtown Los Angeles

LADOT has proposed requiring mandatory parking in response to residents' parking concerns. While we support proactive parking solutions such as mandatory parking areas to keep streets tidy and scooters out of the right of way, LADOT's current proposal does not identify enough designated parking areas for riders. Without enough mandatory parking areas, deployment and ridership would drop. Potential riders would be discouraged from choosing to ride if there weren't enough parking spots near them. Data shows that the chance that someone will take a trip nearly drops in half as users get farther away from vehicles. Below is a chart that highlights the probability of taking a trip classified by distance to the nearest vehicle at the app open.



Probability of taking a trip classified by distance to the nearest vehicle at app open in Downtown Los Angeles

Average trip distances in Downtown Los Angeles are just over one mile or 13 minutes. Riders choose micromobility because of the convenience and time-saving benefit, both of which would be a challenge under LADOT's current proposal.

Instead, we request a delay in the implementation of mandatory parking areas indefinitely until there are sufficient locations to support the ridership in the area. During the delay, we will work with LADOT to identify sufficient mandatory parking areas to ensure streets are clear and ridership is not significantly impacted. Further, increased fees should not be applied within the Downtown SOZ until such time as LADOT and all operators are able to assess the impact on ridership of mandatory parking within the area.

It is our position that LADOT's proposed changes in the "On-Demand Mobility Program Trip Fee Update" would significantly impact users on enrolled in our respective equity programs. We ask the City and LADOT to **delay a vote on the proposed changes until we can better understand the impact they would have on users enrolled in equity programs and ensure they will not be negatively impacted.**

Sincerely,

Lime

Bird

Veo

Superpedestrian