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September 10, 2018

Subject: Recommendations for Local Governments Regulating Dockless Mobility

To Whom It May Concern:

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to share recommendations for how local governments should approach regulation of dockless bicycle and scooter share programs. This letter reflects our strong belief that dockless technology should be embraced and can support our longstanding goal to provide more transportation choices.

Circulate has been an early supporter of dockless vehicles because they create excellent mobility choices for San Diegans, consistent with our mission. Dockless vehicles are human or electric powered, with little or no greenhouse gas impact from their use. Furthermore they can support further greenhouse gas reduction goals by providing first and last mile options to replace short car trips and to make transit a more convenient choice. Dockless vehicles have increased the number of people travelling without a car, and that increases the urgency for safe street infrastructure for all road users to save lives. Dockless vehicles also provide more transportation options in historically underserved communities, especially for people who do not drive, or who cannot afford a car. For these reasons, Circulate supports the emergence of dockless vehicles and urges jurisdictions in the San Diego region to facilitate their use.

Circulate supports thoughtful regulations that encourage the availability and use of dockless vehicles. These are Circulate's recommendations for any jurisdiction considering regulating or creating a permitting structure for dockless vehicles:

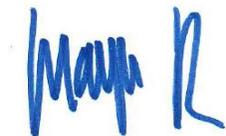
- **Mobility choices:** Jurisdictions should allow for multiple operators to compete within their boundaries and should not impose caps on the number of dockless vehicles available to the public.
- **Permit fees:** If fees are imposed, fees should be reasonable so as to not disincentivize providers from bringing their vehicles to the market. Jurisdictions should consider different fee structures between scooters and bicycles, reflective of their pricing structures.
- **Safety for scooter riders:** Jurisdictions should promote safety for scooter riders by educating users, and giving warnings instead of citations for minor safety violations during the early stages of scooter deployment. Equitable enforcement of traffic rules should be calculated to prevent injuries, not to discourage use.
- **Safety for other road users:** The use of dockless vehicles should ensure safety for other road users, especially pedestrians. Safety and Vision Zero goals should be advanced by education and equitable enforcement of safety laws like existing prohibitions of powered fast vehicles on

sidewalks. Education and enforcement are better tools than imposing bans or other ad hoc use restrictions.

- **Education and Encouragement:** Policy should ensure that revenues generated from permit fees are used quickly and effectively. Instead of waiting to accumulate funding over years to fund expensive infrastructure projects, fee revenues should be applied to education, encouragement, and awareness programs. These programs are quick to deploy and they can promote safe walking, bicycling, and scooter riding. Education and encouragement should promote dockless usage to support climate action plans and safety initiatives like Vision Zero.
- **Data Sharing:** Local governments should require operators to share meaningful data to demonstrate how and where the services are being utilized, following NACTO's [Guidelines for the Regulation and Management of Shared Active Transportation](#).
- **Equity Focus:** Licenses to operate should include reasonable and equitable requirements for distribution and balancing of vehicles throughout a jurisdiction. Operators should not remove historically underserved communities from their core operating areas or ban parking of vehicles in those communities.
- **Infrastructure Funding:** Jurisdictions' existing transportation funding must be prioritized to implement safe bicycle and scooter infrastructure to accommodate the growth in vulnerable street users.
- **Pedestrian Conflicts:** Attractive areas for pedestrians, bicyclists, and scooter riders should be upgraded with appropriate signage to clarify rules, and be administered with equitable enforcement of traffic rules to ensure safety for every road user.

Circulate supports dockless bicycle and scooter share programs throughout the San Diego region and the benefits that these programs can bring to the region. We hope that these recommendations will help local governments to safely embrace new mobility options.

Sincerely,



Maya Rosas
Policy Director