



May 15, 2019

Alix Bockelman
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Metropolitan Transportation Commission
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RE: Proposal to Expand the Bike Share Equity Fund, Invest in Active Transportation Infrastructure Regionally, and Increase MTC's Leadership in Emerging Mobility

Dear Ms. Bockelman,

We are writing to underscore the importance for the Metropolitan Transportation Commission (MTC) to take bold action now to guide options that seriously encourage Bay Area residents out of their cars, prevent climate disaster, and prioritize at the highest levels the safety and access for everyone using our streets.

We simply cannot continue in the direction we are headed with two-thirds of commute trips by private automobile and over 90% of all trips by the same. Every year thousands of Bay Area residents are killed and seriously injured on our streets because traffic engineering principles prioritize the movement and storage of cars. Meanwhile, our planet is headed for a climate emergency, with alarming reports in the headlines every month.

Micro mobility options are changing this trend. They are offering an unprecedented ability to compete with auto travel and encourage mode shift, particularly dockless, electrified bike and scooter share. Done well, micro mobility can elevate our region's serious commitment to public transit by enabling much needed connections to transit and key destinations where our current systems have been less effective.

The Bay Area is home to the majority of these micro mobility companies, and our region is in the unique position to partner with the industry. With the right vision, regulatory and

funding environment, we can harness emerging mobility technologies to meet our climate goals while simultaneously providing affordable, shared, and electric transportation options to those most impacted by the housing affordability crisis.

Transportation Network Companies (TNCs) Uber and Lyft have now entered the micro mobility market in a big way, while micro mobility companies Lime, Bird, Skip, Spin, Scoot and others are seeing TNC-like user growth. According to NACTO's shared micro mobility ridership report, 84 million trips were taken on shared micro mobility in 2018—more than twice as many trips in compared to 2017.¹ The widespread popularity of scooter share alongside the fear of public safety for sidewalk users and drivers alike has highlighted that we stand at a clear inflection point for the future use of our roads. **Either we are bold and make more room for vulnerable travelers on our streets, or we continue to do business as usual and allow cars to dominate our mobility landscape.**

As active transportation advocates, we contend that new emerging modes (bike share, scooter share, and other micro mobility options) should not have to compete with automobiles on busy streets. It is time to boldly redesign our streets with our own set of principles and values. We need your help, as this challenge is far beyond the ability of Caltrans to address alone. Caltrans's statewide Walk Bike Advisory Committee is looking at many related issues, but is looking for local leadership statewide.

We would like to follow-up on our recommendations within the Bike Share for All Equity Outreach Evaluation Report and urge MTC to act on the unprecedented opportunity our region has to respond to the demand for programming and infrastructure to encourage increased levels of active transportation made clear by the recent proliferation of micro mobility options in the form of e-scooter share. To that end, we urge MTC to:

Steer new mobility to provide solutions for those with the fewest options.

- 1. Further fund the Bike Share Equity Fund and expand it to become the Micro Mobility Equity Fund to improve low-income access to new mobility options.** Building on the existing momentum and commitment, micro mobility services should be targeted and oriented around the needs of Communities of Concern and populations with the greatest barriers to accessing economic and social

¹ <https://nacto.org/2019/04/17/84-million-trips-on-shared-bikes-and-scooters/>

opportunities. Ridership should at a minimum reflect the income and ethnic diversity of the Bay Area. Previously, MTC regularly coordinated a Bike Share Equity Working Group to ensure the expansion of bike share was tailored to respond to the needs of low-income residents including a discount program with culturally sensitive outreach. Today, because of the collective efforts of grassroots groups, active transportation advocates, the bike share cities, MTC, and Motivate (now owned by Lyft), Ford GoBike is a model system that has expanded access to new mobility for some of our region's most vulnerable residents.

In April 2015, Dr. Susan Shaheen from UC Berkeley's Transportation Sustainability Research Center published demographics on Bay Area Bike Share riders. At the time only 3% of members on the system had incomes under \$25,000. Today, because of Bike Share Equity Working Group efforts and outreach in MTC's Communities of Concern, 23% of members on the system access the Bike Share For All (BS4A) discount. That's close to 4,000 low income Bay Area residents who access this new active transportation option (March 2019).

The overall success of the Ford GoBike system has depended on creative approaches to public-private partnership with government and advocates pushing the bike share operator to remove barriers to access, tailor the program to better meet the needs of low-income residents, and a specific Equity Working Group goal for bike share ridership to reflect the diversity of the Bay Area. Ford GoBike has since incorporated many of our recommendations into their day-to-day operations, including a dedicated full staff person to BS4A who sends monthly reports on equity metrics and outreach efforts.

Your agency's leadership and funding of equity efforts has been instrumental in elevating what can and should be required of new mobility companies and has informed the permitting process for dozens of cities now permitting new micro mobility options.

NACTO's Guidelines for the Regulation and Management of Shared Active Transportation (July, 2018)² offers a good list of equity engagement and education programs to which we would more explicitly add community rides, user-education classes, and events that allow test rides of micro mobility

² <https://nacto.org/wp-content/uploads/2018/07/NACTO-Shared-Active-Transportation-Guidelines.pdf>

vehicles. Based on a recent U.S. Bicycling Participation Report³ by PeopleForBikes adults across the nation (47%) want to ride more often, however aggressive driving and fear of being hit by a car remain serious barriers. The report identifies key non-infrastructure strategies for increasing rides:

1. Help infrequent riders find great places to ride;
2. Help infrequent riders find people to ride with; and
3. Connect infrequent riders with mentors.

These findings confirm many of the recommendations from our Bike Share Equity Outreach evaluation report for funding non-infrastructure efforts such as bike education classes and community rides. While micro mobility options proliferate—improving access to bikes and scooters—rider education and encouragement remains a crucial missing link to increasing ridership by low-income communities. For example, even as BS4A members comprise 23% of total memberships on our bike share system, their rides continue to account for about 10% of total trips.

All micro mobility companies must be held to similar reporting and outreach standards as Ford GoBike.

- 2. Focus additional expansion of bike and scooter share in Communities of Concern and suburban locations near regional transit.** Micromobility companies tend to locate in higher density cities and therefore are less likely to deploy bike and scooter share in low-density suburbs where poverty is now concentrated. MTC should allocate Climate Initiatives Program funds to incent new mobility companies to come up with new models of micro mobility deployment in suburban low income communities where most of our greenhouse gas emissions are generated and poverty is increasing.
- 3. Expand MTC's Means-Based Fare Program to sync up with low-income discounts on all micro mobility options.** MTC's means-based fare program is a great start to encouraging transit ridership by those who need affordable options the most. We understand that this program will include a program specific Clipper Card with efforts underway to ensure these participants can easily qualify and receive information about Ford GoBike's BS4A discount. We believe that all other

³ <https://peopleforbikes.org/resources/u-s-bicycling-participation-report/>

micro mobility companies should receive similar ability to sync up with and access the region's database of low-income Clipper card holders.

Aggressively fund much needed active transportation infrastructure.

4. Fund a tenfold increase in active transportation infrastructure and programming. Reform the Active Transportation Program, both at the state level and regional level to deliver more projects with higher impact.

We are still not meeting our region's goals for Active Transportation. In 2015, Caltrans had a state goal to triple biking and double walking rates by 2020. The Bay Area, leading in bicycle and pedestrian planning, has not done nearly enough to help us meet those goals. According to the most recent American Community Survey data (2016), only 1.7% of Bay Area residents commute by bike to work. Even in the most bike-friendly cities across the region, less than 10% of residents travel by bike. Set a goal of 20% of trips by active transportation by 2040.

Plan Bay Area (PBA) 2040 allocates less than 2% of transportation investments to Active Transportation. It also includes programmatic categories for funding active transportation needs such as Multimodal Streetscapes and Bicycle and Pedestrian programs for each county. While this amounts to over \$5 billion in funding for complete streets and active transportation projects over the next 24 years, this is a mere 1.7% of the Plan's \$303 billion investment. Any serious commitment to increasing rates of walking and biking in the Bay Area requires commensurate investment.

There has been consistently high demand by cities across the region for bicycle/pedestrian funding. In each of the last three cycles of Active Transportation Program (ATP) funding, the Bay Area has requested far more money than has been available. "In the latest cycle, adopted in early 2017, Bay Area cities and counties submitted more than \$165 million in project requests for ATP funds — or 7.5 times the \$22 million available."⁴ Between the state and regional call for projects awarded this year, only 9 Bay Area projects will be funded out of 72 applications submitted.

⁴ http://2040.planbayarea.org/sites/default/files/2017-07/Investment%20Strategy_PBA2040_7-2017.pdf

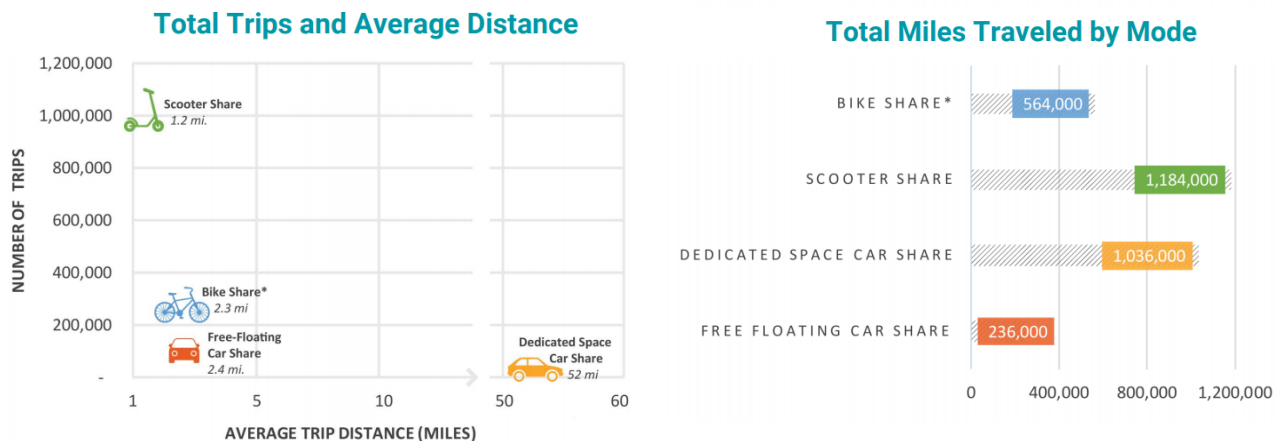
- a. **Work with state and local agencies to secure additional flexible funding for quick-build, bike/ped projects.** Bridge tolls, transportation sales taxes, and bond measures are some examples of our region's most flexible sources of funding. These do not have the same onerous requirements as state and federal fund sources and enable jurisdictions to quickly implement innovative bicycle/pedestrian treatments.
- b. **Prioritize MTC's existing flexible bike/ped funds to shovel-ready, quick build projects that facilitate micro mobility trips to transit.** In Regional Measure 3 alone, \$150 million from the most recent bridge toll increase will fund Bay Trail and a second round of Safe Routes to Transit (SR2T) projects. SR2T, which funds first and last mile improvements to regional transit, should prioritize projects that facilitate micro mobility trips to regional transit hubs. This strategy secures micro mobility as a complement to public transit. Third-party micro mobility data platforms like Remix and Populous have the ability to aggregate bike and scooter share trip paths across operators -- this data can help MTC identify priority corridors and streets.

Provide regional vision and leadership.

5. **Take a regional lead on reforming traffic engineering rules and regulations to allow for rapid redesign of streets for people to bike, walk, and use micro mobility devices.** Micro mobility supporters and naysayers both point to the urgency of redesigning our roads for people not cars. The e-scooter craze has proven that there is real, latent demand for non-auto travel at unprecedented rates. More and more Bay Area residents each day are getting exposed to micro mobility options and the experience of being a vulnerable road user on our streets.

The sidewalk conflicts of e-scooters with pedestrians, strollers, and wheelchairs all point to the increased opportunity we have to reallocate roadway space away from cars to more sustainable options like bikes, e-bikes, and e-scooters. People wouldn't ride e-scooters on the sidewalk if there was a safe option on the street, like protected bike lanes.

In Oakland alone, e-scooter riders have taken over 1 million trips totalling over 1 million miles in just 8 months of operations, this far surpasses the number of trips taken on Ford GoBike over the last year, and even miles driven in dedicated space and free-floating car share. (See March 2019 graphs from Oakland Department of Transportation below).



Recommendations for street changes:

- Create regional pilot program for eliminating stop sign warrants for bike/ped crossings of arterial streets
- Immediately eliminate level of service (LOS) considerations for bike-ped projects, as a regional emergency to reduce greenhouse gas emissions and increase active mobility and transit use.
- Reform Caltrans' policy of prohibiting traffic backups onto freeways from local streets for complete street projects.
- Require every jurisdiction to have a micro mobility network plan approved and a network built within five years. The plan should show the micro mobility network and the years each project will be built. Make funding eligibility contingent on complying with these plans.
- Prioritize funding to forward thinking projects that enhance people-centered streets via parking removal and parklets.

6. Provide regional guidance and technical assistance to Bay Area cities on emerging mobility policy and implementation. MTC has a crucial role to assume in guiding how new mobility helps meet regional climate and equity goals.

The local permit process has created a patchwork of inconsistent rules and regulations that micro mobility companies have to navigate. And each city

negotiates individually for data from companies. MTC should work to streamline data requests across cities and make this data accessible to public agencies and local jurisdictions, so cities have a regional view of how residents use these new options beyond city/county lines. MTC can obtain a regional license to third party micro mobility data platforms via Remix, Populous, or other research institutions.

Such data sharing should include the ongoing collection and analysis of anonymized race and income data, which allows government and local policymakers to understand whether low-income residents continue to have barriers to accessing new mobility. This should include the metrics we outlined in our Bike Share Equity Outreach Evaluation Report. Micro mobility companies do not collect basic income and race data from their riders, and annual rider surveys administered by the companies have painfully low response rates. We do not have great understanding of which groups continue to have disparate access to these new modes. NACTO outlines a solid set of data standards in its Guidelines for Shared Active Transportation.

Cities struggle with limited staff capacity to address micromobility issues, including slow hiring processes that delay their ability to be responsive to this transportation innovation showing up on their right of way. MTC can house a technical assistance team of shared mobility planners that assist cities in harmonizing efforts (permitting, data-sharing, etc.).⁵

MTC can play a strategic role of regularly convening cities and agencies on the topic of shared mobility to increase collaboration, encourage knowledge sharing, and shape a shared vision for new mobility in our region. For example, Motivate had model local hire and employment practices that should translate to others in the industry. This may help dramatically minimize limited public sector staff time (e.g. time spent chasing down information on best practices and calling around to other cities for model permit requirements).

The time is now for bold moves towards embracing innovation and uncapping the suppressed demand for streets designed for people and active transportation. The ecosystem and players are constantly changing. New formats like e-skateboards, shared cargo bikes, e-bikes, and more are just around the corner. With the tech sector

⁵ We have also developed recommendations for model permit language for micro mobility sharing programs for cities to adopt. See Appendix A.

headquartered in the Bay Area, MTC has the opportunity to be the public sector leader to harness the energy behind micro mobility to reinforce public goals. We must set the tone for all these new mobility options now by reasserting our region's values of equity, access, and responsibility and being proactive about how our streets should look and our system should move people.

We look forward to working with MTC staff to ensure that micro mobility alongside the necessary investments in programs and infrastructure will help us meet our regional goals and improve the safety of our streets to increase active transportation and protect vulnerable road users.

Sincerely,

Ginger Jui, Executive Director
Bike East Bay

Brian Wiedenmeier, Executive Director
San Francisco Bicycle Coalition

Shiloh Ballard, President & Executive Director
Silicon Valley Bicycle Coalition

Clarrissa Cabansagan, New Mobility Policy Director
TransForm

Appendix A

Recommended Regulations for Cities' Permit Programs for Dockless Devices

Selected provisions for dockless bikes and e-scooter regulation, drawn from NACTO guidelines and selected additional local policies as cited (see references below).

- Permits should be issued for a limited period of time with vendors required to reapply for approval.
- Vendors should be required to carry insurance.
- Cities should charge fees to cover the cost of administration and maintenance.
- Cities should consider options for vendors to pay toward city infrastructure like better bike lanes or parking areas for dockless devices.
- Companies should be required to remove vehicles that are damaged or abandoned within a specified time frame, and face penalties for failure to do so.
- Cities should develop and require adherence to protocols for trash removal in vehicle areas, for special events (parades, major sports events), and for extreme weather and disasters (flood, fire).
- Cities should require operators respond in a timely manner to incidents resulting from program operations, including customer service requests and improperly parked devices (this wording is from San Jose).
- Data sharing: Cities should require that vendors provide data to the city in General Bike Share Feed Specification (GBFS) format, with additional data fields that record small vehicle location. Cities should require that companies make anonymized trip data available to the public for use in creating apps that are not affiliated with the companies or the city. Cities should also retain the right to request aggregated reports on system use, compliance, and other aspects of operations (e.g. parking complaints, crashes, damaged or lost small vehicles).
- Data privacy: Companies must ensure customer data privacy with written justification for why access to each type of customer data is needed. Customers shall not be required to provide access to their contacts, camera, photos, and other private data to sue the mobility service, nor shall customers be required to share personal data with third parties (advertisers, investors etc.) in order to use the services. Customers may opt in to providing access to personal data and to share personal data.
- Companies must ensure that all small vehicles are inspected, maintained, and/or replaced on a mutually agreed-upon schedule with the city.
- Cities should work regionally/subregionally to develop equity programs, and vendors should be required to participate in such programs, including:
 - offering a multilingual website and other promotional materials

- offering low-income memberships or fees, like the Bike Share for All program.
- Good solutions for parking include corrals, painted storage areas, using curb space at the end of a block that is required to be unblocked for visibility, and allowing locking to fixed objects (NACTO, plus feedback among active transportation supporters).
- Cities should create an evaluation process to assess the performance of the permit program, considering collisions, parking practices and compliance, location of device use, response time, and customer service (from San Jose policy).
- Cities should have the ability to require a survey of users of dockless mobility devices (NACTO).
- Vendors should be required to have some system to educate users: whether it's a pop-up in the app, messages on devices, emails, or other format.
- Engagement Programs As new mobility options emerge, cities may want to require companies to provide community engagement and education programming to offset the burden to the city of explaining what is going on. Cities should also ensure that education and engagement efforts are provided in all the languages commonly spoken in the area. Examples of education and engagement programming include:
 - Company participation or attendance at public events and meetings
 - Company participation or attendance at community-led events or gatherings
 - Company participation or provision of bike education classes, distributed equitably throughout all neighborhoods
 - Companies partner with job-training programs, youth programs
 - Multilingual mobile app and/or other interfaces, as applicable
 - Companies pursue grants with municipal and/or non-profit organizations to develop ambassador programs