



**2019 – 2020
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October 29, 2019

Glenn Engelmann
President

District Department of Transportation
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Re: Dockless Bike and Scooter Share 2020

The Dupont Circle Citizens Association (DCCA) strongly objects to the DC Department of Transportation's (DDOT) proposal in the document "Dockless Bike and Scooter Share 2020" to increase the number of permitted dockless e-scooters (legally defined as personal mobility devices, PMDs) from the current 6,210 to 10,000 in 2020. This represents more than a 60% increase in the number of e-scooters in DC in a single year, with the potential to again increase the numbers even more on a semi-annual basis.

DCCA is generally in favor of increasing transportation options in the city and the goals of the goDCgo initiative to encourage the use of sustainable transportation and decrease traffic congestion. Given our observations and the concerns raised by DCCA members since the introduction of e-scooters in the past year, however, we think that major increases in the number of e-scooters at this time will negatively impact the quality of life in our area and present serious safety concerns for pedestrians, e-scooter riders, and bicyclists.

DDOT's document "Dockless Bike and Scooter Share 2020" does include some Terms and Conditions for e-scooter operators that may mitigate some of the current problems with e-scooters, but DCCA is concerned that it does not adequately address serious problems that residents of Dupont Circle have observed with the existing 6,200 e-scooters currently allowed:

- **E-scooters are frequently ridden on the sidewalks, endangering pedestrians:** E-scooters are frequently ridden on the sidewalk and pose serious safety hazards for pedestrians. E-scooters often move too fast and unpredictably on the sidewalks for pedestrians, especially children, people with hearing or mobility impairments, dog walkers, and senior citizens, to avoid them. E-scooter riders cannot safely share the road with cars because, with their lower profile and rear light at road level, e-scooters are not nearly as visible as bicycles. E-scooter riders could potentially use protected bike lanes as an alternative to sidewalks or roadways, but the current protected bike lane infrastructure is inadequate for this purpose. Approximately 40% of DCCA's boundary area is within the Central

Business District, where e-scooters and bicycles are not allowed on the sidewalk, but where sidewalk e-scooter riding is nevertheless common. The law banning sidewalk e-scooter riding and imposing a paltry \$25 fine in these areas is not being enforced. The other 60% of DCCA's boundary area is a very dense residential and commercial area, often with narrow sidewalks, where riding e-scooters on the sidewalks is legal but results in numerous instances of conflict with pedestrians.

- **E-scooters litter the sidewalks, endangering pedestrians:** Although e-scooters are supposed to be parked upright, out of the way of pedestrians, they are often in the pedestrian right of way, where they pose a safety hazard. E-scooter users frequently park the vehicles in the middle of the sidewalk. Even when parked appropriately, they often get knocked over into the right of way. DDOT has marked a few areas as micromobility corrals in our area, and we understand that there are plans for additional micromobility corrals. However, the increase in the number of scooters is not being coordinated with the additional corrals. And where they exist, the corrals do not appear to be used (e.g., the corral at 20th and Q Streets NW). During a recent windy morning, one of us observed small fleets of four or five e-scooters neatly deployed along 15th St. NW. Within an hour, about a third of these had been either blown or knocked over (including into the roadway) within an hour. E-scooters are required to have kickstands, but apparently, they are not required to have triad or dual kickstands, which means they are easily knocked over.
- **Other E-Scooter Hazards:**
 - The proposed Terms and Conditions in the document "Dockless Bike and Scooter Share 2020" stipulate that e-scooters should be equipped with speed governors that ensure they will not travel faster than 10 miles per hour. Operating e-scooters at 10 mph on the sidewalks poses risks to pedestrians. In bike lanes, operating e-scooters at 10 mph may result in conflicts with bicycles, which travel at an average of 12 miles per hour; because of the perception that 10 mph is too low for bike lanes and especially for roadways, e-scooters riders may opt to ride on the sidewalk. Paris has asked electric scooter companies to limit their speeds to 12 mph across the city and to just 5 mph in areas with high pedestrian traffic. A bill being considered by the DC Council, the "Electric Mobility Device Amendment Act of 2019," would increase the e-scooter speed limit to 15 mph on the street or bike lane and to 6 mph on the sidewalk.
 - The proposed Terms and Conditions stipulate that e-scooters should have lights on the front and back, but they do not stipulate that the front light should be at the level of the handlebar. This should be required.

NEW RULES SHOULD WAIT UNTIL THE DC COUNCIL HAS CONSIDERED THE "ELECTRIC MOBILITY DEVICES AMENDMENT ACT OF 2019." DCCA agrees with some, but not all the provisions in the "Electric Mobility Device Amendment Act of 2019" proposed by Councilmember Mary Cheh in June 2019. Mainly, however, we think that it would be good policy to have the DC Council discuss this bill to have the pros and cons of e-scooters in the District considered in a democratic process before DDOT proceeds with the proposed drastic increase in the number of e-scooters. We also would like to see the collection of data regarding crashes and injuries involving e-scooters.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Engelmann', with a long horizontal line extending to the right.

Glenn Engelmann
President, DCCA
president@dupont-circle.org

Cc: Jeff Marootian, Director