



City of Pittsburgh - Allegheny County
Task Force on Disabilities



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July 9, 2021

Dear Director Ricks:

The City of Pittsburgh-Allegheny County Task Force on Disabilities is a 13-member panel of people with disabilities and community advocates appointed by the Mayor and County Executive who advise the City and County on issues that affect people with disabilities in the region.

At the June 21, 2021 Task Force meeting, you and DOMI representatives presented and discussed the work of the Pittsburgh Mobility Collective (PMC) "a city-led initiative to establish an integrated Mobility as a Service (MaaS) transportation offering" (formed two years ago): <https://pittsburghpa.gov/press-releases/press-releases.html?id=3152>; with a stated purpose of creating "a unified mobility service offering providing last mile connections to transit and sustainable transportation alternatives to private drive-alone auto trips. . . The collective will provide a suite of mobility services, platforms and infrastructure tailored to the needs of Pittsburgh residents, workers and visitors." The focus of the meeting was discussion around DOMI's plan to initiate an eScooter pilot in Pittsburgh. This meeting was the first time we heard about the Pittsburgh Mobility Collective and the proposed eScooter pilot.

We are writing to express two strong objections: (1) process, and (2) law.

People with disabilities and mobility impairments experience this "last mile" gap in public transit acutely. Accordingly, we can't understand how a City-led effort around mobility didn't include representatives from communities that are the most mobility-challenged. On our Task Force sit individuals who worked with ACCESS to develop our paratransit system; who worked with Port Authority to transform its fleet and procedures to be one of most accessible large transit systems in the nation; and who worked to create the

statewide Shared Ride Program for People with Disabilities . . . but none of us have been asked to participate in the planning of this unified mobility service.

Since this was the first the Task Force was hearing about the PMC, most of the meeting involved a briefing on the “last mile” problem, the past actions and efforts of the PMC, steps taken to find a corporate partner for the eScooter pilot, and strategies adopted to proactively address the experience in other cities that scooters become obstacles in the public right-of-way. Very little time was available to discuss the pilot.

Of particular concern to the Task Force is the inaccessible nature of eScooters. In fact, each of the constituent parts of this “unified mobility service” is inaccessible to people with disabilities, and the sum total of these constituent parts becomes a brand-new inaccessible mobility service. We believe this violates the duties the City of Pittsburgh has under Title II of the Americans with Disabilities Act. The A.D.A. requires that services, programs and activities when viewed in their entirety must be readily accessible to and usable by persons with disabilities. This requirement appears to have been lost in the process of designing this “unified mobility service.”

From our perspective –

- A problem was identified: last-mile transit gaps.
- An inaccessible, ableist system was developed – solving the problem for the most able, but not for those to whom the last-mile burden gap is actually the most severe.
- A “pilot” is presented to us – where we don’t know the alternatives that were available; had no role in designing the planned responses to “scooters as sidewalk obstacles” problem; and have no way of judging the claims that access barriers will be handled within 60 minutes. (Spin, the company providing the eScooters, claims to be in dozens of cities – but didn’t present anything about the response standards in other cities, or how Spin performs in clearing A.D.A. obstacles in those cities.)
- We’re left with no proposed solutions for people with individual circumstances for whom eScooters are not a safe, accessible and appropriate transportation solution.
- But once again we are asked to accept a system **designed to be inaccessible** and then (as usually happens) have the burden shift to us to find ways to retrofit or modify that system AND find the funds to make that possible.

In its role as an advisory board, the Task Force recommends that the city **postpone** moving forward with the eScooter pilot.

We urge the City to invite people with disabilities and accessibility experts to become part of the Pittsburgh Mobility Collective, and to design an **accessible** last mile unified mobility service that is “readily accessible to and usable by persons with disabilities” and which truly provides “a suite of mobility services, platforms and infrastructure **tailored to the needs of Pittsburgh residents, workers and visitors.**”

Thank you for your time and consideration. Please let us know if you have any questions.

Sincerely,

Paul W. O'Hanlon

Paul O'Hanlon
Co-Chair

James C. Noschese

Chris Noschese
Co-Chair

cc: Mayor William Peduto, City of Pittsburgh Council Members