# Written Testimony in Support of Proposed Rule DOT-90

# Rules Relating to Speed Limits for Electric Bicycles and Scooters

**To:** New York City Department of Transportation

Re: Support for Proposed Speed Limit Reductions for E-Bikes and Electric Scooters

**Date:** July 14, 2025

#### Introduction

I am writing to express my strong support for the proposed rule changes that would reduce the speed limit for electric bicycles from 25 mph to 15 mph and establish consistent 15 mph speed limits for electric scooters and pedal-assist commercial bicycles. These changes represent a critical step toward improving safety for all road users in New York City.

As a regular user of both Citi Bikes and Citi E-bikes, I want to be clear that I love this system and the mobility it provides to New Yorkers and visitors alike. Citi Bike has revolutionized urban transportation and made cycling accessible to millions of people who might not otherwise bike in the city. The convenience, reliability, and environmental benefits of the bike-share system are tremendous assets to our city.

However, my support for these safety measures comes precisely because I care about the long-term success and reputation of bike-sharing in New York City. I want all users—whether on traditional bikes, e-bikes, or other mobility devices—to be safe and to coexist responsibly on our streets.

# **Safety Imperative**

The proliferation of e-mobility devices has fundamentally changed our streetscape, bringing both benefits and serious safety challenges. The proposed speed limit reduction addresses a growing public safety crisis that I have witnessed firsthand on countless occasions throughout the city.

E-bikes traveling at 25 mph pose significant dangers to pedestrians, traditional cyclists, motorists, and the riders themselves. The speed differential between human-powered bicycles and electric-assisted vehicles creates hazardous conditions, particularly in bike lanes and mixed-traffic situations. Reducing this differential through the proposed 15 mph limit will create more predictable and safer interactions among all road users.

#### **Specific Concerns About Citi Bike E-Bikes**

The proposed rule must explicitly include Citi Bike e-bikes and all bike-share electric bicycles in its scope. This is essential because Citi Bike e-bikes represent a significant portion of e-bike traffic in Manhattan, Brooklyn, Queens, and the Bronx, yet their riders often demonstrate concerning disregard for traffic safety rules.

As someone who uses Citi Bikes and Citi E-bikes regularly, I am deeply frustrated by the significant number of users who flagrantly disregard traffic laws and endanger others. These irresponsible riders are giving all of us—including law-abiding bike-share users—a bad reputation. Their reckless behavior undermines public support for cycling infrastructure and bike-sharing programs that benefit our entire city.

I have personally witnessed numerous instances where Citi Bike e-bike riders:

- Run red lights at dangerous intersections, including major corridors where pedestrian crossing volumes are highest
- **Ignore stop signs** completely, maintaining speed through intersections without yielding
- Ride against traffic in bike lanes and on streets
- Weave recklessly between pedestrians on sidewalks and in crosswalks
- Speed excessively through crowded areas with high pedestrian activity
- Fail to yield to pedestrians in crosswalks, forcing people to jump out of the way

## **Recent Incident Demonstrating the Problem**

Just today, during a community walkthrough in Williamsburg with the Chair of the Capital Budget Committee and District Manager from Brooklyn Community Board 1, along with members of the Department of City Planning, I witnessed multiple dangerous incidents involving Citi e-bike users. On several occasions, riders operated their e-bikes illegally on sidewalks and rode dangerously toward pedestrians, including our group as we were crossing crosswalks when we had the right of way with the traffic signal.

These incidents occurred during our meeting in Williamsburg, highlighting how pervasive and problematic reckless e-bike behavior has become. The fact that multiple violations occurred in a short timeframe during a single community walk demonstrates that current speed limits and enforcement are inadequate to address the safety risks posed by high-speed e-bikes, particularly in dense urban environments.

### **Benefits of the Proposed Changes**

**Enhanced Pedestrian Safety:** Lower speeds will provide e-bike riders more time to react to pedestrians and reduce the severity of any collisions that do occur.

**Improved Traffic Flow:** Reducing speed differentials between different types of bicycles will create more predictable traffic patterns and reduce dangerous passing maneuvers.

**Consistent Standards:** Aligning e-bike speeds with existing electric scooter limits creates logical, enforceable standards that users can easily understand and follow.

**Reduced Injury Severity:** Physics dictates that lower speeds result in less severe injuries in the event of crashes. This protects both e-bike riders and other road users.

#### Implementation Recommendations

To maximize the effectiveness of these speed limit changes, I recommend:

- 1. **Explicit inclusion** of all bike-share and rental e-bikes, including Citi Bike vehicles, in the rule language
- 2. **Enhanced enforcement** particularly targeting chronic violators and high-risk areas
- 3. **Public education campaigns** specifically targeting Citi Bike users and tourists who may be unfamiliar with local traffic laws
- 4. **Speed limiting technology** requirements for bike-share operators to ensure compliance
- 5. Clear signage in multiple languages in areas with high e-bike traffic

#### Conclusion

The proposed speed limit reductions represent a necessary and overdue response to legitimate public safety concerns. The current 25 mph limit for e-bikes is simply too high for safe operation in New York City's dense, mixed-use environment.

As a regular and enthusiastic user of Citi Bikes and Citi E-bikes, I want these systems to thrive and expand. However, their long-term success depends on all users following traffic laws and demonstrating respect for pedestrians, motorists, and other cyclists. The proposed speed limits will help create a culture of responsible riding that protects everyone and preserves public support for bike-sharing and cycling infrastructure.

I urge the Department of Transportation to adopt these proposed rules with explicit language ensuring that Citi Bike e-bikes and all bike-share electric bicycles are clearly covered by the new speed restrictions. The safety of New Yorkers and visitors to our city depends on swift action to address the dangerous behaviors I have documented and witnessed repeatedly.

Thank you so much for your time and consideration,

Lloyd Feng