



## **WRITTEN TESTIMONY**

### **DOT Rules Hearing Cargo Bikes**

**9/13/23**

To whom it may concern,

Open Plans, a non-profit dedicated to safe and livable streets, respectfully submits this testimony regarding proposed rules on cargo bikes.

As we look towards more sustainable, safe, and pedestrian-friendly freight options, cargo bikes are a successful solution that helps achieve these goals. Cargo bikes reduce the number of trucks on the street while providing an innovative method for last-mile delivery in our city; it is encouraging that these important devices are being codified.

There are a number of concerns in the current rules as written that we would like to raise. Firstly, §6(p)(5)(iv) states that "A pedal-assist commercial bicycle may not be parked on a sidewalk...except temporarily for the purpose of and while actually engaged commercially in loading and unloading property." While we acknowledge that infrastructure may not always support this, loading and unloading on the sidewalk is not a reasonable solution. Sidewalks are already overburdened with numerous uses, and many are extremely narrow, some measuring less than four feet. A full commercial loading and unloading operation, with a four-foot wide and ten foot long bike and all of the packages laid out on the sidewalk, would take away precious space from pedestrians. Explicitly allowing this behavior in the rules is likely to make it ubiquitous, even with other options, because it would be the easiest.

The Department is creating Commercial Bicycle Loading Zones in these rules, which is an important step. Rolling out enough on-street loading zones to accommodate demand must be a top priority. In addition to these dedicated loading zones specifically for commercial bikes, the Department should further make explicit and encourage commercial cargo bikes to load and unload in existing commercial loading zones. To prevent friction among commercial bikes and commercial

vehicles, signs should be updated to make it clear that commercial bikes can load and unload in those spots. Both commercial bike loading zones and general commercial loading zones must become significantly more widespread than they are today.

Secondly, the current specifications for trailer length are not in line with some existing commercial trailers. Currently, the rules permit for a length of 120 inches (10 feet) despite some current devices being roughly 168 inches (14 feet) in length. As we pursue this policy, we cannot risk alienating the users who have already adopted this sustainable delivery mode. While standardization should be the goal, the Department should explore possible impediments to participation in a permanent program due to this change, as well as the potential for a phase-in period depending on when the rules go into place.

More fundamentally, the city must build wider, two-way bike lanes to accommodate these new uses. Most current protected bike lanes are too narrow for regular bikes and large commercial cargo bikes to use together without serious friction. Current bike lane widths made it difficult and dangerous when cargo bikes pass a regular bike or vice versa. This is especially dangerous when either bike is traveling in the wrong direction. With more cargo bikes using these lanes, these issues will get much worse. Functional infrastructure will be critical to make this important program work.

It is important to note that the implementation of rules for commercial cargo bikes should and will be iterated upon to produce the best version of the policy over time. As the rollout of these important devices is carried out, it will be important to observe the trends that emerge and iterate upon the rules proposed, as well as create new rules to best accommodate them.

Cargo bikes are an important alternative to traditional truck freight, and we look forward to working further with the Department to best implement and iterate upon these important rules.

Sincerely,  
Open Plans

Sara Lind  
Co-Executive Director

[sara@openplans.org](mailto:sara@openplans.org)

Jackson Chabot  
Director of Advocacy and Organizing

[jacksonchabot@openplans.org](mailto:jacksonchabot@openplans.org)

Michael Sutherland  
Policy Analyst

[michael@openplans.org](mailto:michael@openplans.org)