

Testimony on 10/17/24 Department of Transportation Rules Hearing

Open Plans writes today in regard to the proposed microhub pilot program. The expansion of e-commerce has resulted in an influx of delivery vehicles in our city. Microhubs are an important tool to alleviate the stress that large commercial vehicles place on our streets; they create emissions, traffic, and potentially endanger road users. We support sustainable microhubs, and emphasize the importance of expanding micromobility infrastructure to handle an influx of cargo bike usage, requiring the use of micromobility options in on-street microhub zones, and ensuring the pedestrian experience is preserved around sites. More detailed comments on these points and others are below:

- **Accelerate building micromobility infrastructure to accommodate an influx of cargo bikes.** Cargo bikes are an important part of our present and future freight ecosystem and in making sure that companies can deliver more sustainably and safely. However, as we ramp up the use of cargo bikes, we must also make sure our bike infrastructure can accommodate more of these devices. These devices are wider and longer than other forms of micromobility, and often go faster. To address possible conflicts with other micromobility users, the city should build more double-wide bike lanes and explore the possibility of electric micromobility/cargo bike-exclusive lanes (that do not cannibalize existing micromobility lanes).
- **Require on-street microhub zones to use micromobility options, and encourage off-street locations to do so as well.** The current rules as written allow vehicles, such as electric delivery vans, to be used for last mile delivery from on-street microhubs. This is self-defeating; offloading from one vehicle to another on the street not only has the potential to create chaos at the curb, but continues to perpetuate the issue it's trying to solve. Handcart and micromobility options should be the only last-mile methods permitted to be used in on-street microhub zones, and this should be explicitly stated in the rules. In off-street locations, operators should be incentivized (through a decreased/waived permit fee, for example) to primarily or exclusively use these methods.
- **Monitor on and off-street sites to ensure the pedestrian experience is not degraded.** Better freight management should not come at the expense of the pedestrian experience; we can have both. For on-street sites, ensuring that loading and unloading remains in the curb lane is essential, and that operators

aren't using the sidewalk until they are dropping off packages or manning a handcart. For off-street sites that may have a high volume of trucks and vans entering and exiting, pedestrian signals and other infrastructure should be considered. Additionally, we support the passage of Intro 113 to study the impacts of microhubs and other last-mile facilities on the surrounding community.

- **Consider alternative maintenance options for smaller operators.** While it is understandable that the largest, wealthiest operators maintain the space they use, such maintenance may prove to be a burden on small operators. DOT should consider providing weekly maintenance in at least one of the on-street microhub zones to better understand the difficulty and cost to provide some smaller operators with maintenance assistance in a more widespread program.
- **Adequately enforce on-street microhub zones.** Without enforcement of a curb use, it is often relegated back to parking. There must be adequate enforcement to ensure that vehicles that are illegally parked in on-street microhub zones are being consistently towed and fined. Widespread automated enforcement should be considered for all curb uses, including on-street microhub zones.

Respectfully,
Open Plans

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