



Transportation Committee Members:

The [Coalition for Clean Transportation](#) (CCT) has concerns and suggestions for [HF 3513](#) / [SF 4010](#). Connected autonomous vehicles (CAVs) have the potential to be an integral part of a safe, clean, and equitable transportation system, and exist cohesively with transit, active transportation, and human-driven zero-emission vehicles. However, the deployment of CAVs also has the potential to have negative impacts for Minnesotans including on the environment, transit service and workforce. We believe these concerns are not sufficiently addressed in the current proposed legislation.

Environmental Impacts & Health Equity

To meet our state climate goals, including our 20% reduction in Vehicle Miles Traveled (VMT) goal, Minnesota must keep building transit options and increasing transit ridership; reduce dependence on automobiles as the primary mode of transportation in more densely populated areas; and transition our vehicles to cleaner and healthier zero-emissions ones.

CAVs can be a part of this future if the proper safeguards and rules are in place. Multiple studies predict that widespread adoption of CAVs without intentional rules and requirements will increase VMT, because CAVs will cruise to avoid parking fees and roam around, looking for riders. Even if steps are taken to manage these effects, CAVs will increase overall VMT by “deadheading” (i.e. operating empty while looking/waiting for passengers). An increase in VMT and corresponding increase in traffic congestion will increase both climate emissions and air pollution. The harm from air pollution and climate emissions affects all of us, but disproportionately impacts low income households and people of color, who often live in communities along high traffic corridors and near industrial facilities.

CCT makes the following recommendation:

- State law should require CAV fleets to be all-electric. This would partially mitigate the damages from increased VMT, and help our state reach its transportation climate emissions reduction goals. We recommend including this requirement in HF 3513 / SF 4010.

Impacts on Transit, Streets & Equity in Mobility

Only a small percentage of transit vehicles in Minnesota operate in dedicated transit lanes. Most buses operate in mixed traffic. This means a large increase in VMT and traffic congestion from unmitigated use of CAVs will also cause a reduction in speed and reliability of transit vehicles. CAVs are likely to pick up and drop off passengers at destinations along major transit corridors, meaning the proliferation of CAVs without guardrails will likely interfere with efficient transit operations.

CAV fleet services also require curb space, staging areas, and pickup zones, which are public areas that are designed with the current transportation system in mind. Given CAV fleets are most likely to be private, major concerns abound on allowing private companies to monopolize available public areas, and interfere with transit, bike lanes, and curbside charging for electric vehicles and electric carshare.

Without proper guidance, CAV fleets could also undercut current investments in and operations of public mass transit. A well-functioning, reliable, and expansive public transit system is a cornerstone of an equitable, climate-friendly transportation future. There may also be opportunities for CAV fleets to contribute to this future, through innovative fee structures that also curb unwanted outcomes.

CCT makes the following recommendations:

- Cities with the most transit service and the most transit dependent riders, like Minneapolis and Saint Paul, should experiment with regulations that efficiently manage curb space. Currently, HF 3513/ SF 4010 explicitly pre-empts cities who best understand their complicated street operations from managing impacts of CAVs. We recommend allowing local governments to retain authority to decide how these vehicles operate on their streets.
- Auto drivers are already required to pull over and yield to emergency vehicles (Police, Fire, Ambulances). CAVs should be required to avoid using transit corridors when driving without passengers and to not interfere with (or yield to) transit vehicles when driving with passengers.
- CAVs should be required to pay taxes or fees on a per mile basis, with a higher charge when driving without passengers, among other potential models that incentivize the most climate-friendly and safe transportation options and decisions. The revenue collected could support transit capital and operations, as well as electric vehicle charging and vehicle incentives. Currently, HF 3513 / SF4010 explicitly prohibits such additional fees or taxes. We recommend removing this prohibition.

Transparency, Data Sharing with Public Agencies

To fully understand the impacts, both positive and negative, of CAV deployment we need transparency and data sharing with public agencies. Traffic safety and usage data useful to public agencies, such as identifying high-use corridors to place new transit or active transportation options is typically not shared.

CCT makes the following recommendation:

- CAV Fleet companies should be required to share anonymized safety data (including on crashes and near crashes) as well as anonymized travel data on VMT origins and destinations with MNDOT, so policy makers can transparently assess the real impact of CAVs. This requirement is not included in HF3513/ SF4010.

CONCLUSION

CAVs are a new frontier for Minnesota's transportation system. Careful design of how CAVs are integrated into this system is important to avoid unintended negative impacts, such as increased VMT and pollution. Recognizing the novelty of CAV regulations, CCT has highlighted several concerns regarding CAV deployment in our state, while offering potential rules to mitigate those impacts. Beyond the concerns listed here, we are also closely monitoring many other impacts: including workers (e.g. rideshare drivers), safe use of CAVs in winter driving conditions, and the potential for expanded private surveillance and consumer data collection. Given that some [studies](#) have indicated that some pedestrian detection systems have lower accuracy for detecting people with darker skin tones, children, and females, state law should require companies selling and operating CAVs to demonstrate that their detection systems have equitable performance to protect all Minnesotans. Current CAV technology struggles to detect, predict, and interact with people bicycling in complex, mixed-traffic scenarios, prompting calls for industry standards that prioritize bicyclist recognition.

CCT urges you to consider our suggestions, which would help ensure that CAVs contribute positively to our shared transportation system and help achieve a future where all Minnesotans, from urban to suburban to rural, have equitable access to clean transportation options that promote health and connection for all.

Sincerely,

The Coalition for Clean Transportation

The Alliance

CURE

Fresh Energy

Health Professionals for a Healthy Climate

MN350

Sierra Club North Star Chapter

* * *

CCT organizes and advocates to eliminate Minnesota's transportation-related climate emissions through the increased adoption and availability of sustainable and equitable electrification options, centering BIPOC and under-resourced communities who disproportionately bear the impact of climate change, air pollution, and experience high rates of mobility injustice.

CCT envisions a future where all Minnesotans, from urban to suburban to rural, have equitable access to clean transportation options that promote health and connection for all.