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May 26, 2023

California Public Utilities Commission  
Public Advisor's Office  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: Comments from City of Santa Monica Department of Transportation in  
Response to CPUC Draft Resolution TL-19144 published on May 12, 2023<sup>1</sup>**

## **INTRODUCTION**

The City of Santa Monica in Los Angeles County attracts more than eight million tourists annually<sup>2</sup>, is home to 91,105 residents, and supports over 6,300 businesses<sup>3</sup>, one of which, Waymo LLC, is currently operating driverless autonomous vehicle (AV) testing and mapping in our city. Looking to the future, Santa Monica Department of Transportation (DOT) staff has followed with interest Waymo's driverless AV operations in San Francisco.

The Santa Monica DOT and neighboring transportation departments in our county are stakeholders in this effort as Waymo and other AV rideshare businesses have advised us they plan to operate driverless AV ride-hailing service in the City of Santa Monica and L.A.'s Westside upon being granted the necessary permits to do so. Santa Monica's DOT, therefore, wishes to comment on the draft resolution TL-19144 approving Waymo LLC's application for Phase 1 Driverless Autonomous Vehicle Passenger Service deployment program in the city of San Francisco, which states:

*"With this authorization, Waymo may offer passenger service in its autonomous vehicles without a safety driver present throughout the city of San Francisco, at all hours of day or night, among other conditions specified in its Operational Design Domain. Waymo is authorized to collect fares for these rides."*<sup>4</sup>

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<sup>1</sup> Although a separate response to [Draft Resolution TL-19145](#) regarding Cruise LLC is not being filed, the comments and suggestions in this letter are also relevant to that resolution as this response reflects the City of Santa Monica Department of Transportation's general position on CPUC authorizations for driverless AV deployments.

<sup>2</sup> [santamonica.gov/about](https://santamonica.gov/about)

<sup>3</sup> U.S. Census Bureau, [census.gov/quickfacts/fact/table/santamoniacitycalifornia/PST045222](https://census.gov/quickfacts/fact/table/santamoniacitycalifornia/PST045222)

<sup>4</sup> [docs.cpuc.ca.gov/PublishedDocs/Published/G000/M508/K661/508661285.PDF](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M508/K661/508661285.PDF)

While Santa Monica DOT staff enthusiastically support the responsible deployment of driverless AV ride-hailing services, the authorization of unlimited expansion of service raises safety concerns. We agree with other California public transportation entities who filed protests or responses to Waymo's advice letter that a commitment to transparency with local stakeholders as well as a more incremental and iterative approach to driverless AV fleet service deployment is in the public interest.

## **BACKGROUND**

The San Francisco Municipal Transportation Agency, San Francisco County Transportation Authority, and the Mayor's Office of Disability (collectively, "San Francisco") filed protests to Waymo's advice letter. Responses from two other public transit stakeholders also expressed concerns: (1) a letter dated January 23, 2023, Reply Comments of the Los Angeles Department of Transportation [LADOT] to Waymo LLC's advice letter 0001-Tier 3, and (2) a letter dated January 23, 2023, from the California Transit Association (CTA).

In their letters, San Francisco "protests Waymo's advice letter on the grounds that the deployment authorization sought is unreasonable due to lack of incrementalism, data transparency, sufficient driverless testing, and adequate reporting and monitoring." Their letters provide documented instances of driverless AVs blocking traffic. San Francisco also recommends that the CPUC create new driverless readiness metrics and make these publicly available before new or expanded driverless deployment services. They suggest the Commission "disallow AV deployment downtown and during peak hours and limit the expansion of fleet size to specified increments. Lastly, San Francisco recommends that the Commission direct CPED to convene a workshop to discuss industry developments, consider further data collection and disclosure, and address disability access issues."

The LADOT's January 23, 2023 response to Waymo's filing expresses concerns about reports of driverless AVs double-parking or blocking traffic lanes. They report AV operators' data lack transparency and that they do not participate in a standardized data reporting platform such as the Mobility Data Specification (MDS), and suggest the expansion of driverless AV service be permitted only after establishing uniform AV metrics and performance standards.

The CTA's January 23, 2023 response to the Waymo advice letter mirrors these concerns, citing "documented incidents where driverless AVs have blocked light rail vehicles and buses, [and] encroached up on transit-only lanes, impacting hundreds of transit riders in San Francisco." The CTA also advocates for incremental approvals for geographic area, hours of operation, and fleet size as well as suggesting a requirement for data reporting to document travel lane obstructions.

The City of Santa Monica's Department of Transportation notes the 38 letters of support for Waymo's advice letter and understands the potential benefits of driverless AVs in improving mobility, enhancing traffic safety, improving equity, affordability, and environmental quality as well as economic development. We appreciate that the Commission conducted a thorough review of Waymo's application and their Passenger Safety Plan and found these to be complete and in sufficient detail to meet requirements for safe driverless AV operations.

We also understand the Commission encourages "continued collaboration between Waymo and stakeholders—including local authorities and transit agencies—to promote thoughtful scaling of driverless AV passenger service and minimize any negative impacts." Santa Monica DOT staff have indeed been in regular communication with Waymo staff regarding their AV deployment plans and

activities in our city, and we have encouraged Waymo staff to perform a thorough public engagement process ahead of driverless deployment. We are awaiting their response to this request.

The City of Santa Monica's Department of Transportation is engaging with other City departments and local jurisdictions as well as stakeholders including business improvement districts and neighborhood organizations to discuss AV-related concerns, safety, expansion, and best practices. In addition, we follow the data on AV operations published by the State of California and [NHTSA](#) as well as local and national news regarding driverless AV deployments and incidents in San Francisco and elsewhere. While we will continue our collaborative efforts with Waymo and local stakeholders and strive to stay informed of developments in the industry, we suggest that "thoughtful scaling of driverless AV passenger service [that will] minimize any negative impacts" is more likely to succeed if the Commission requires iterative rather than unrestricted expansion of driverless service.

In alignment with concerns expressed by San Francisco, the California Transit Association, and the City of Los Angeles' Department of Transportation (LADOT), Santa Monica's DOT urges that the Commission reconsider the authorization of unlimited deployment of driverless ride-hailing and instead require two or more iterative phases of driverless AV ride-hailing service in San Francisco. Instead of unlimited deployment, each deployment phase could include a public engagement, review, and correction process before the next is launched. Further, we suggest that an incremental and iterative approach be a model for future authorizations in California. A Plan-Do-Check-Act approach such as this could more effectively mitigate the safety risks of driverless operation while improving the customer experience for all involved than the single-phase unrestricted launch authorized in the draft resolution TL-19144. In addition, as suggested by LADOT and CTA, we urge that in their final authorization the Commission include a recommendation for data transparency with local jurisdictions in the interest of safety and an improved experience for all.

## SUMMARY

The Santa Monica Department of Transportation is in agreement with San Francisco, LADOT, and CTA's recommendations that the CPUC require incremental driverless AV fleet expansion as well as data sharing standards and transparency in its authorization of Waymo's regarding driverless AV operations in San Francisco. We urge that these recommendations be reconsidered before a final resolution is issued.

Sincerely,

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Edward F. King  
Director  
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