# San Francisco's Experience with Driverless AVs







# Background

#### **Local Context**

## Many competing uses for available road space

- Population density is 2nd only to NYC
- Limited road space

#### **SF Mobility Priorities**

- Transit First
- Vision Zero
- Equity & Accessibility
- Climate



## **SF Policy for Integrating New Mobility**









# SF Principles for Emerging Mobility & Tech (2017)

- 1. Safety
- 2. Transit
- 3. Sustainability
- 4. Collaboration
- 5. Equitable Access
- 6. Labor
- 7. Congestion
- 8. Financial Impact
- 9. Accountability
- 10. Disabled Access

## **AV Regulatory Framework**

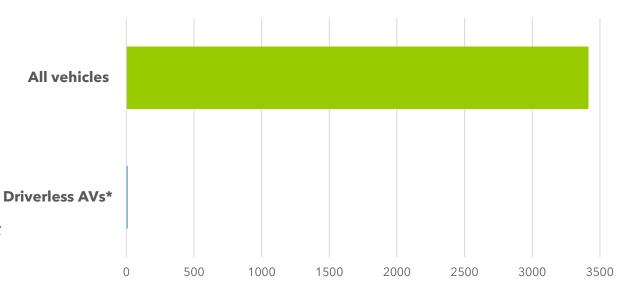
#### **Federal California** Local **SFMTA** U.S. Department STATE OF CALIFORNIA of Transportation San Francisco **County Transportation** © K NHTSA Department of Motor Vehicles NHTSA establishes, **CA DMV permits CPUC** permits No local permitting drivers and vehicles to monitors, enforces commercial passenger authority vehicle safety operate in CA services SFMTA manages ROW, standards 2018 pilot programs for including both roadways roadways 2014 drivered testing drivered & driverless and curbs Issues permits for AV use Requires AV crash regulations passenger service SFCTA is Congestion 2020 drivered & 2018 driverless testing & Management Agency reports Dec 2022 Board of No comprehensive deployment driverless deployment Federal policy/ Supervisors Resolution framework on AVs re SF AV Policy

#### **Evolution of AV Sector**

- CA has a very active AV sector
  - 40 companies testing with or without drivers
  - 4 approved for driverless deployment
  - SF is the locus of driverless AV activity
- In 2022, there were 7M driverless AV miles in SF
  - 0.2% of all VMT in SF in 2022
  - Media reports: 5M miles per company to date in SF
- Sector success requires more mature technology, regulations
  - Leveraging lessons from real-world experience
  - Addressing regulatory gaps

## Estimated San Francisco Vehicle Miles Traveled (millions)

Dec 2021 - November 2022



Sources: SFCTA data for All Vehicle VMT 2022 DMV data for Cruise & Waymo VMT 2022 \*assumed to be driven entirely in SF

# Driverless AV Operations

## Role of AVs in improving street safety?

#### **Reasons for Safety Optimism:**

- Combination of cameras, lidar & radar in good repair should be superior to human perception
- AVs show many good driving practices, including, critically, compliance with posted speed limits
- If AVs lower ambient speed levels on high injury network, this could improve outcomes

#### **Remaining Concerns:**

- AV driving could replace use of safer & > efficient modes (transit, walk, bike)
- Engineering may favor customer preferences over safety in:
  - Pick up & drop off sites
  - Speed / yielding to others
- AVs don't always comply with rules of the road, as regulators expected
- An AV fleet shares a single driver so as fleets grow in size, both good driving & driving errors may multiply on our streets
- Measuring AV safety impacts is complex and results are still uncertain



# Is focus on serious injury crashes enough to measure & predict AV safety now?

Too early for definitive statistical conclusions about AV crashes Safe systems approach requires broader analysis:

that creates new hazards affecting use of safe & > efficient modes

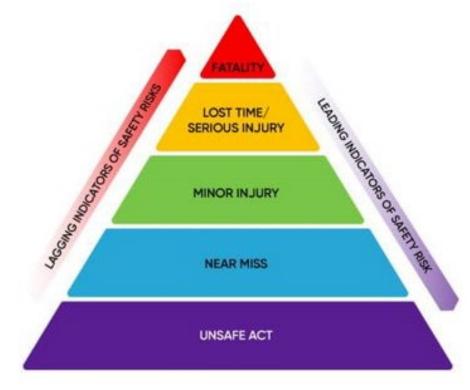
(transit, walking, biking)

that results in less significant crashes

that results in near misses (i.e. no crash)

that interferes with emergency response

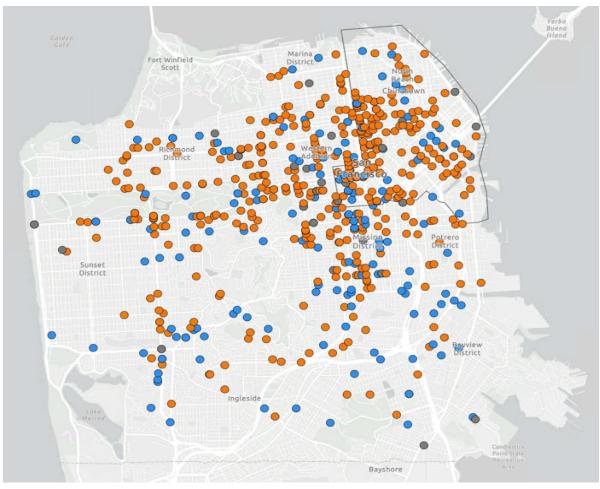
that interferes with essential street work





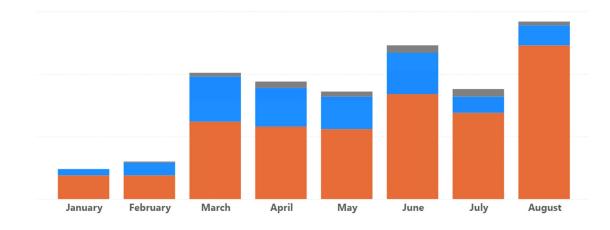
## Reported incidents: which are red flags?

● Cruise • Waymo • Other



January – August 2023. Report Sources: Public calls to 911, City staff reports, media & social media

#### 2023 Incidents by Month



#### **Primary Incident Types:**

- Erratic driving such as failure to yield
- Unplanned stops in travel lanes, including
  - Interference with safer & > efficient modes
  - Interference with street workers
  - Interference with emergency response



# AV interactions with pedestrians\*

\* NHTSA launched preliminary safety investigation of these & other Cruise AV pedestrian interactions on 10-16-2023





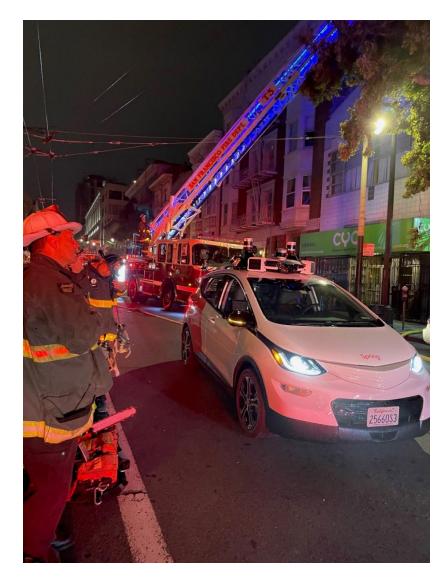
Interactions like these are not captured by state or federal AV safety data collection



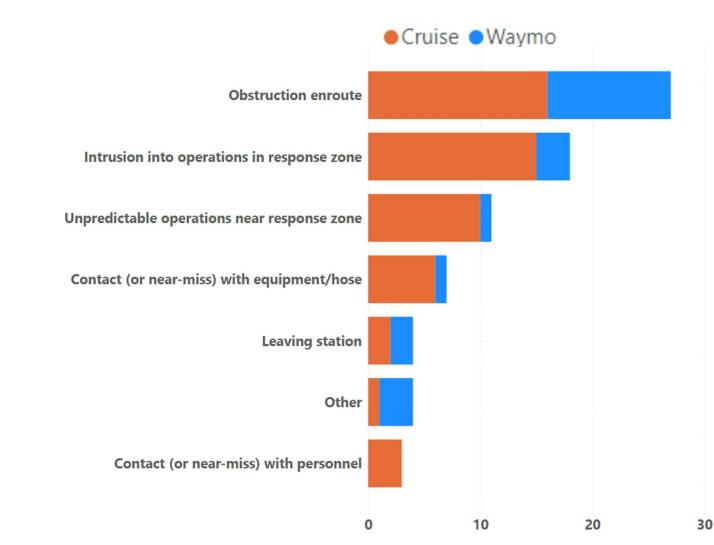
# None of these incidents are captured by state or federal data collection



### AV driving that interferes with emergency response



Emergency Response (SFFD) Impact Incidents by Type (Jan 1 – Sept 27, 2023)





# Recent engagement on driverless AV emergency response interference

#### SFFD-SFPD-SFMTA requests to industry:

- Avoid active emergency scenes
- Avoid interference around SFFD Stations
- Keep greater distance from SFFD personnel
   & equipment
- Move away from active emergency scenes faster
- Enable SFFD personnel to move vehicles
- Improve response to human traffic control
   & immediate on-site communication

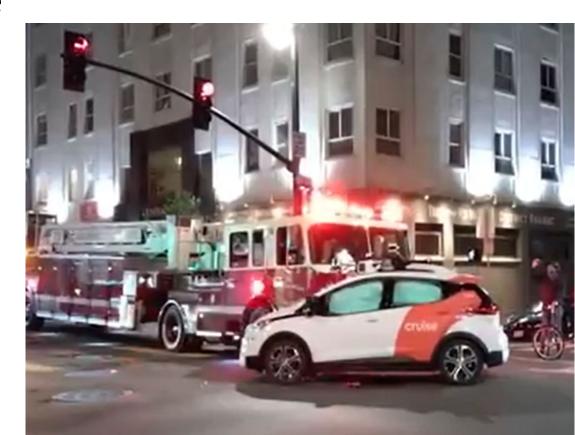




#### Work on Solutions: Results?

- Department of Emergency Management now notifies AV companies electronically of location & stay away distance for active firefighting scenes
- Cruise & Waymo report making software improvements
- Too early to know whether Cruise & Waymo changes will avoid and/or mitigate interference incidents





# Multi-AV events raise concerns about driverless operations during major events & disasters

- Electricity outages affecting traffic signals
- Cellular outages affecting communications between AVs & their human supporters
- Software failures affecting fleet

Multi-AV Reported Incidents (Jan – August 2023)





8/11/2023 (Vallejo @Grant @Columbus)



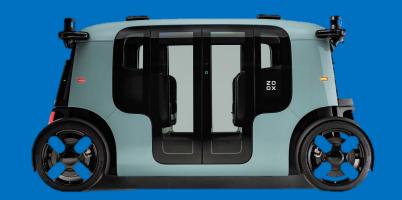
**Today** cruise



# **Coming Soon**









# Advocacy

## San Francisco Input to Regulators

#### Our advocacy has consistently highlighted:

- Regulations should reflect CA transportation goals
- Performance assessment
  - #1 priority is safety
  - Transportation system impacts
  - Access and safety for people with disabilities
- Incremental, performance-based expansion
  - Factors: drivered/driverless, areas of the city, times of day, size of fleet
  - Expand only if performance benchmarks met
  - Data reporting expanded, timely, aligned, transparent

#### **Chronology of Filings**

2018: 2 filings to CPUC on Regulation of AV Pilot Testing

2020: 6 filings to CPUC on Regulation of Commercial AV Passenger Services

2021: Filing to CPUC on Cruise Application for Driverless Deployment Permit

2022: MAY Filing to CPUC on Cruise Application Proposed Decision

2022: SEP Filing to NHTSA re Cruise Origin

2022: DEC Board of Supervisors Resolution Endorsing SEP '22 NHTSA filing

2023: JAN DMV workshop comments on new AV regulations

2023: JAN filings to CPUC re Confidentiality of AVPS Permit Applications

2023: JAN filings protesting Cruise and Waymo Commercial AVPS Applications

2023: MAY filings to CPUC on Proposed Decisions approving Cruise and Waymo Commercial AVPS applications

2023: JUNE filings to CPUC on New Data Reporting Requirements for Commercial AVPS

2023: JUNE workshop presentation on New Data Reporting Requirements for Commercial AVPS

2023: AUG Presentation to CPUC on Safety Issues Regarding Driverless AV Interactions with First Responders

2023: AUG City Attorney Motions to Stay Resolutions Approving Cruise and Waymo Commercial AVPS applications

2023:SEP Update to NHTSA re Cruise Origin

2023: SEP City Attorney Applications to Rehear Cruise and Waymo

Commercial AVPS applications

#### **Recent Developments**

- On August 10, the CPUC awarded permits to Cruise and Waymo for unrestricted driverless commercial operations in SF
  - SF Motion to Stay (Aug 16), Application for Rehearing (Sept 10)
  - DMV and Cruise agree to reduce Cruise's operating fleet in half following mid-Aug incidents
  - NHTSA and CA DMV both investigating Cruise

#### Inquiries from legislators

- Letter from Speaker Emerita Pelosi and Rep. Kevin Mullin to NHTSA
- Letter from CA C&C Chair Boerner and 5 Assemblymembers to CA DMV and CPUC
- Assemblymember Ting engagement with CA DMV in coordination with SF agencies





**Multi-AV outage in North Beach** 



**Crash with firetruck enroute** 

### **Opportunities Ahead**

- Upcoming rulemaking opportunities
  - NHTSA AV STEP (ADS-equipped Vehicle Safety, Transparency and Evaluation Program)
  - DMV Update of CA AV regulations (2 preliminary workshops held in 2023)
  - CPUC Data Reporting (1 preliminary workshop)
- Engagement with CA DMV and CA Legislature
  - Potential legislative updates led by CA DMV
  - SF reaching out to brief Senate and Assembly Committees with jurisdiction over AVs



### **Next Steps**

- Continued San Francisco advocacy priorities:
  - Beyond **self-certification**, how to assess providers' capabilities
  - Ability to issue **moving violations** and related penalties
  - Data reporting requirements (expansion, timeliness, transparency, consistency)
  - Monitoring and evaluation frameworks based on **performance standards**
  - Incrementalism (pace and pathways for expansion)
  - Timeline for incorporating **wheelchair accessible** AVs and other **disability community needs**
  - **Local role** in permit approvals, expansion, and operations management
  - Local impact and cost recovery
- Further technical and policy studies to support San Francisco input
- Strengthen collaborations with:
  - Community of practitioners: industry, researchers, academics
  - Disability leaders, equity and sustainability advocates, NGOs
  - Other cities in California and beyond

#### **Treasure Island AV Shuttle Pilot**

- Piloting key use-cases for SF mobility needs
  - First / last mile access to transit
  - Local access in low density areas
  - Wheelchair accessible service
- Incremental, performance-based features
  - 2 shuttles in low density area
  - Rich data reporting and associated monitoring and evaluation framework





# Thank you.

#### **Jean Paul Velez**

Principal Planner, Technology Policy San Francisco County Transportation Authority

#### **Julia Friedlander**

Senior Manager Automated Driving Policy San Francisco Municipal Transportation Agency

#### **Darius Luttropp**

Deputy Chief of Operations San Francisco Fire Department





