



July 16, 2026

The Honorable Toks Omishakin  
California State Transportation Agency  
400 Capitol Mall, Suite 2340  
Sacramento, CA 95814

**RE: Statewide Standards for Autonomous Vehicles During Major Events and Emergencies**

Dear Secretary Omishakin,

California has spent years developing a regulatory framework to determine whether autonomous vehicles can safely navigate city streets. That work has been important and necessary, and the City and County of San Francisco has consistently engaged with state regulators and autonomous vehicle manufacturers to support a safe deployment of this technology. But regulating for typical conditions is no longer enough. Two recent events – a widespread power outage in late December 2025 and the July 4, 2026 Independence Day celebration – demonstrated that California's current regulatory framework does not adequately address how autonomous vehicles operate during major incidents, planned or not. California's challenge now is not just whether autonomous vehicles can operate safely under normal conditions, but also whether they can perform reliably during extraordinary ones.

On December 20, 2025, a power outage affecting approximately 130,000 PG&E customers across large portions of San Francisco left nearly one-third of the city without power or functioning traffic signals. Waymo vehicles became immobilized amid widespread traffic signal outages, blocking major thoroughfares and intersections and compounding congestion across the transportation network.

Ahead of the July 4 celebration, the City requested that autonomous vehicle operators temporarily restrict service along the northern waterfront during the event; Waymo confirmed the request and assigned a representative to the City's Emergency Operations Center. While appreciated, the events that followed demonstrated that voluntary coordination and pre-event planning alone are insufficient. Manufacturers must be able to assess evolving conditions and rapidly adjust fleet operations in real time.

On July 4th, more than 100,000 people gathered along San Francisco's northern waterfront to watch the Golden Gate Bridge fireworks for Independence Day. In anticipation of moving large crowds post-event, San Francisco geo-fenced several blocks where Muni buses were staged to shuttle crowds back to BART, traffic control officers directed vehicles, and emergency responders stood ready. Yet, even before the fireworks began, Waymo vehicles struggled to navigate growing volumes of vehicular traffic and pedestrians. By the end of the fireworks show, autonomous vehicles became immobilized in travel lanes, blocking key streets and ultimately bringing traffic to a standstill. Muni shuttles were trapped in the gridlock. Reports indicated

that public safety manual overrides did not work as designed. And stranded Waymos slowly began to run out of battery power, requiring tow trucks that themselves could not reach the scene. What began as an operational problem for one company's customers quickly became a transportation problem for the entire city, compounding an already challenging transportation environment. It took hours for visitors to get home, with many missing the last BART trains.

Thankfully, no major emergency occurred during either event. Had ambulances, fire engines, or police officers needed to respond to a significant incident, they would have encountered the same gridlock.

The full extent of both disruptions remains unknown. California's current framework does not require autonomous vehicle manufacturers to provide operational information to local agencies, including during major incidents, leaving cities without visibility into how many vehicles are immobilized, where they are located, or how quickly they are being recovered.

Throughout our history, San Francisco has embraced transportation innovation at every turn. We invented the cable car. We adopted a landmark Transit First policy. We have served as the birthplace of rideshare services and autonomous vehicles. San Francisco recognizes that safe, affordable, accessible mobility is essential to a healthy city, and new options are important to providing that mobility.

And each transportation innovation has evolved over time to meet the needs of a dynamic city. Muni adapted to changing travel patterns following the pandemic. San Francisco created the country's first scooter share permit program to embrace and manage new modes of travel. San Franciscans have similarly embraced autonomous vehicles since they began operating here in 2022. We believe now is the time for regulators and autonomous vehicle companies to evolve as well.

These events in San Francisco exposed AV-specific operational challenges that cannot be addressed through ad hoc, voluntary cooperation between individual jurisdictions and autonomous vehicle operators. By establishing clear, statewide operational standards, California can ensure that every community has consistent expectations for how autonomous vehicle fleets perform during major events and emergency incidents. At a minimum, every autonomous vehicle manufacturer should demonstrate four core operational capabilities before operating under these conditions.

1. **Keep People Moving.** Prevent vehicles from remaining immobilized in travel lanes by ensuring that connectivity interruptions, depleted batteries, or other technical failures do not leave vehicles stranded in the public right of way. That will require immediately removing or relocating disabled vehicles from active travel lanes and maintaining staffing levels commensurate with fleet size and operating conditions, including trained field personnel with local knowledge and dedicated remote operational support.
2. **Respond in Real Time.** Adapt operations in real time including updating geofencing, designating pick-up and drop-off locations, restricting particular routes, temporarily suspending service, and making other operational changes in coordination with local agencies, without waiting for existing trips to conclude.



3. **Provide Operational Transparency.** Coordinate directly with local agencies before, during, and after major planned events and emergency incidents by sharing real-time operational information (including vehicle immobilizations, service disruptions, and recovery efforts), integrating into incident command, and complying with operational directives by public officials.
4. **Prove It Before You Deploy It.** Before deploying autonomous vehicles, autonomous vehicle operators must demonstrate major event operational readiness through testing and exercises, rather than relying on live events to test unproven operational capabilities.

These measures will not undermine autonomous vehicles; they will strengthen them.

As autonomous vehicles comprise a larger share of the vehicles on our streets, they become part of the transportation system itself. That carries responsibilities beyond serving individual passengers. It means supporting the critical functions that define life in a major city.

Those expectations are not unique. Airlines, railroads, utilities, and telecommunications providers all operate under regulatory frameworks that recognize their responsibility to maintain reliable operations, coordinate with public agencies, prepare for emergencies, and recover quickly when disruptions occur. Autonomous vehicles should be held to the same standard.

California has led the nation in the deployment of autonomous vehicles. It should now lead the nation in establishing the operational standards that govern how those vehicles function as part of a city's, and our state's, transportation system.

San Francisco remains a center of innovation, and we are committed to working with autonomous vehicle manufacturers, state regulators, and our legislative partners to establish the standards necessary for AVs to serve as an integrated part of the broader transportation network. Doing so will strengthen public trust, improve safety, and help ensure autonomous vehicles become reliable partners in California's transportation future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Lurie', with a stylized flourish at the end.

Daniel Lurie  
Mayor of San Francisco

cc:

Steve Gordon, Director, California Department of Motor Vehicles  
Leuwam Tesfai, Executive Director, California Public Utilities Commission  
Sean Duryee, Commissioner, California Highway Patrol  
Emily Warren, Deputy Secretary for Innovative Mobility Solutions, California State Transportation Agency