

March 11, 2026

Subject: **Ensuring Equitable and Accessible Deployment of Autonomous Vehicles in San Diego**

Dear Mayor Gloria, Council President, Members of the City Council, and Members of the Board and Executive Leadership of the San Diego Metropolitan Transit System,

On behalf of the San Diego Accessibility Advisory Board (AAB), we write to urge the City to take a proactive regulatory roles in ensuring that the introduction of autonomous vehicle services, specifically Waymo, into the San Diego community does not exacerbate existing transportation inequities for people with disabilities and older adults.

As the City evaluates the deployment of autonomous vehicles over the coming years, it is critical to recognize that **new transportation technologies disproportionately impact individuals who cannot independently operate ride-hail services, who require wheelchair accessible vehicles (WAVs), or who rely on human assistance to safely complete a trip.** Without clear policy direction, autonomous vehicle services risk replicating and worsening the accessibility failures already present in San Diego's taxi, Uber, and Lyft systems, where access to wheelchair accessible vehicles remains severely limited and unreliable.

The AAB reminds the City that our government has an affirmative responsibility under the Americans with Disabilities Act (ADA) to ensure equitable access to public transportation and transportation alternatives. As mobility systems evolve, ADA compliance must evolve with them.

Accessibility cannot be treated as an optional feature, a pilot-phase experiment, or a future aspiration; it must be a foundational requirement of any new transportation mechanism operating in the City of San Diego.

If Waymo is permitted to operate in San Diego, the City must require that at the time of launch, the service provides a **fully accessible alternative** for individuals who cannot use a standard autonomous vehicle. This includes, but is not limited to:

- Meaningfully readily available wheelchair accessible vehicles
 - Recommendation: Ten percent minimum fleet operations must be WAVs available 24/7 with wait times equitable to those vehicles that are not WAVs
- Ride options that accommodate passengers who require assistance entering, exiting, or securing mobility devices
 - Recommendation: All ride process options are fully functional and operational for all requested rides
- Service models that do not exclude users based on disability, age, or functional limitations
 - Recommendation: City of San Diego requires service providers adhere to non-discrimination policies as outlined in ADA and other civil rights legislation; disability-related grievances reported annually at the close of each fiscal year (beginning June 2027) to the City Mayor, City Councilmembers, and the City of San Diego's Accessibility Advisory Board via the City's ADA Coordinator

In addition, the AAB has significant concerns regarding the impact of autonomous vehicles on San Diego's senior community. Many older adults face barriers related to digital literacy, reliance on smartphone-based systems, and comfort navigating fully automated transportation. The heavy dependence on technology creates a real risk that seniors could be left stranded, unable to resolve technical failures, or placed in unsafe situations without access to human support. Transportation innovation must not come at the cost of safety, dignity, or independence for older residents.

For these reasons, the Accessibility Advisory Board strongly urges the City Council to:

1. Establish clear regulatory requirements for accessibility and equitable service as a condition of any autonomous vehicle pilot or deployment;
2. Require Waymo to demonstrate compliance with accessibility standards prior to large-scale operation;
3. Require Waymo to proactively establish ADA-specific customer support infrastructure, including clearly identified ADA hotlines and formal grievance

procedures accessible to people with disabilities and seniors, prior to commencing operations in San Diego;

4. Require that ADA complaints, grievances, and reported accessibility barriers related to Waymo's operations be formally documented and reported to the City Council on an annual basis;
5. Commit to regular, transparent audits of Waymo's performance related to equitable mobility, including disability access, service availability, complaint resolution, and safety outcomes for seniors and people with disabilities;
6. Ensure that enforcement mechanisms are in place should accessibility commitments not be met.

San Diego has an opportunity to lead by example. By setting strong, enforceable policies now, the City can ensure that emerging transportation technologies expand access rather than deepen inequity. The AAB stands ready to partner with the City in shaping policies that uphold civil rights, protect vulnerable populations, and reflect San Diego's commitment to inclusive mobility.

Thank you for your attention to this critical issue and for your continued leadership on accessibility and equity.

Respectfully,

San Diego Accessibility Advisory Board

Victor Roosen, Chair

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