


CITY OF LOS ANGELES
INTER-DEPARTMENTAL MEMORANDUM

Date: September 22, 2025

To: Honorable City Council
c/o City Clerk, Room 395
Attention: Honorable Heather Hutt, Chair, Transportation Committee

From: Laura Rubio-Cornejo, General Manager 
Department of Transportation

Subject: **LAWS AND REGULATIONS GOVERNING THE USE OF AUTONOMOUS VEHICLES**

SUMMARY

As directed by the Los Angeles City Council in [Council File \(CF\) 23-1177](#), this report provides an update from Los Angeles Department of Transportation (LADOT) regarding Autonomous Vehicle (AV) operations in Los Angeles.

RECOMMENDATION

That the Los Angeles City Council (Council):

1. ADOPT the attached Resolution recommending SUPPORT of legislative positions for the 2025-2026 State Legislative Program and 2025-2026 Federal Legislative Program for bills that prioritize local control in the decision to deploy autonomous vehicles services, with the concurrence of the Mayor.

BACKGROUND

On November 8, 2023, Council directed the Chief Legislative Analyst (CLA) with assistance of LADOT, to report on existing state, federal, and local laws or regulations that govern the use of autonomous vehicles and make recommendations in seeking and/or sponsoring legislation that would authorize the City to regulate autonomous vehicles on local streets. Based on the subsequent report from the CLA, the Council adopted resolutions to support legislation in the 2023-2024 year of the State Legislative session that would expand the City's regulatory authority over AVs.

On June 24, 2024, Council further instructed LADOT to report back on the development of AV legislation, and to provide quarterly updates regarding the deployment of autonomous vehicles in Los Angeles with recommendations to address any issues related to that deployment. This report provides an update on State legislative efforts as well as AV deployment.

DISCUSSION

Substantial advancements in AV technology and policy occurred over the last 20 years. Waymo, a subsidiary of Google's parent company Alphabet Inc., started testing autonomous vehicles in Mountain View, California in 2009. In May 2013, the National Highway Traffic Safety Administration (NHTSA) first defined levels of automation for autonomous vehicles. Tesla's Autopilot technology became available to consumers in 2014. In September 2016, Uber launched its first autonomous vehicle pilot program in Pittsburgh, Pennsylvania. In late 2017, Waymo started running Level 4 autonomous vehicles in Phoenix. Over the last two years autonomous vehicles deployed passenger service in several cities, including Austin, Phoenix, Los Angeles, and San Francisco.

As outlined in the CLA's April 2024 report, the State of California allows a limited number of AV companies to test, research, and pilot this technology on public streets under specified conditions. The California Public Utilities Commission (CPUC) and the California Department of Motor Vehicles (DMV) have dual permitting authority over AV operators. The DMV regulates safety and manufacturing standards for AVs and is responsible for the initial operating permit given to providers which allows those providers to test their vehicles with or without human drivers. The CPUC sets all operating requirements including data sharing, safety, and inspection criteria, and issues the permit that allows companies to carry passengers and offer full fared commercial service. Local jurisdictions do not have vehicle or operational permitting authority over AV companies.

In California 30 companies currently hold permits from the DMV for AV testing with a safety driver present. Six of these manufacturers are authorized to deploy AVs for driverless testing, and three are permitted to provide passenger service without a safety driver. Attachment 1 summarizes the companies that have a DMV permit for driverless testing and for deployment. State regulatory and legislative efforts continue to shape AV testing and deployment, and AV companies continue to operate within the City of Los Angeles. While LADOT participates in ongoing conversations with AV operators as well as through the City's working group, current requirements do not provide sufficient insight into public safety impacts, and do not provide the City necessary local control to ensure deployment supports local policy goals.

California airports have some discretionary authority over passenger services, including AV service, which allows LAWA to create and amend their own Ground Transportation Rules and Regulations for all commercial vehicle operators, including autonomous vehicles, rideshare operators, and taxis. Typically, companies have to apply for a non-exclusive license agreement (NELA) to operate on LAWA property.

Deployment in Los Angeles

In November 2024, Waymo began offering its services to every individual who downloads the Waymo App in Los Angeles. As the demand for Waymo services increased, the fleet has grown to include over 500 vehicles and the service area has increased to cover approximately 120 square miles which currently includes Beverly Hills, Culver City, Inglewood, Los Angeles (e.g. Brentwood, Century City, Chinatown, Downtown LA, Echo Park, Hollywood, Koreatown, Mar Vista, Mid City, Mid-Wilshire, Playa Vista, Sawtelle, Silverlake, University Park, West Adams, West Los Angeles, Westchester, Westlake, and Westwood) and Santa Monica. On January 28, 2025, Waymo started freeway testing with employee passengers. While Waymo is permitted to operate on freeways, in Los Angeles, they are currently only testing on freeways with a safety driver.

To ensure ongoing coordination between the City and Waymo as they expand deployment, Mayor Bass launched an Interdepartmental City Working Group to improve communication and coordination between the City and the AV industry, with an explicit goal to better understand how AVs impact the public right of way and emergency vehicle access. In these meetings, LADOT convenes with Waymo, Mayoral staff, Los Angeles Police Department (LAPD), Los Angeles Fire Department (LAFD), and LAWA to obtain deployment updates, communicate safety concerns, and advocate for the ongoing collaboration through information and data sharing. Through these meetings, LADOT has been able to report incidents with traffic and police officers, and provide information to Waymo on road closures and special events with requests to geofence specific areas during certain events, including during weather events. While LADOT is unable to confirm full compliance, Waymo acknowledged receipt of the information and is expected to work with LADOT on ways to improve the transmission of that information through a future information sharing pilot using the City's digital regulatory tool, the Mobility Data Specification (MDS).

MDS allows regulators and service providers to share mobility information in near real-time, to communicate policies like street closures, time-of-day and parking restrictions, and other information that helps cities better manage transportation services in the public right-of-way. It also allows for historical information exchange for compliance evaluation and service planning. Today, LADOT uses MDS for its on-demand mobility program, taxi permitting, and transit services. AV companies are not subject to local requirements, and therefore not currently required to use MDS.

LADOT staff met with AV operators on several occasions to discuss the City's need to have access to trip level data including:

- Vehicle location, trip origin, trip destination, vehicle telemetry, speed limit compliance, vehicle type, vehicle miles traveled, idle time
- Vehicle ID and vehicle status (i.e., maintenance, out of service, stopped, non contactable, etc.)

This information will help the City understand service levels and more effectively serve the public interest in the following areas:

- **Accessibility:** Better understand which neighborhoods in the City are being served or underserved.
- **Infrastructure:** Assess digital and physical infrastructure needs to inform parking zones or pick-up and drop-off locations, including locations that are more accessible for older adults and individuals with disabilities.
- **Monitoring and Enforcement:** Enable enforcement of operating requirements, making compliance and accountability easier to manage, particularly as it relates to traffic, parking, and vehicular movement.
- **Operations:** Evaluate the safety and design of City streets, assessing the impact on sustainability, ensuring equity outcomes, and facilitating better management of traffic events and emergencies.
- **Planning:** Enable a better understanding of regional travel demand to facilitate targeted infrastructure investments or policies including dedicated travel lanes, or EV charging infrastructure needs and siting.
- **Congestion Management:** Report the number of vehicles and trips occurring in the public right-of-way and reducing vehicle miles traveled on City streets.

In addition to requesting this information from companies directly, LADOT advised LAWA on which data points it could consider collecting. Consistent data sharing requirements ensure that the City's data needs are met, and that AVs are deployed safely and in an equitable manner for all Angelenos. LADOT will continue to collaborate with LAWA staff on potential requirements of the NELA, permit, or other mechanism LAWA staff chooses to allow AV's to access its premises.

As the City prepares for several major events in the coming years, accessing and evaluating this information will become increasingly critical. Los Angeles is preparing to welcome the world for the 2026 FIFA World Cup, the 2026 NBA All Star Weekend, and 2027 Super Bowl LXI. Beginning July 14, 2028, the City will host its third Olympic Games and its first Paralympic Games which will take place in over 80 venues throughout the region. These events will bring millions of visitors to Los Angeles and it will be the City's duty as the steward of the public right-of-way to provide safe, reliable, and efficient transportation throughout the games. Specifically, the Olympic and Paralympic Games will require the creation of various security perimeters around competition and event venues to ensure the safety of the public, athletes, dignitaries, and spectators. Access within the security perimeters will be reserved to accredited vehicles and pedestrians with a ticket for the event. Access points will be closed to motorized vehicles to ensure better flow of the public entering or leaving a competition venue. Certain events such as cycling, marathons, walk races, fan zones, etc. will require street closures.

Managing the public right-of-way will also continue to become increasingly challenging over this period, as more companies plan to deploy in the coming years. LADOT staff is in communication with AV operators who have recently disclosed future deployments in Los Angeles. Zoox, a subsidiary of Amazon, met with City staff to share that they started mapping Santa Monica streets in April 2025 and will start mapping and testing parts of Los Angeles in late summer 2025. Volkswagen Autonomous Driving announced plans to test its all-electric ID.Buzz autonomous vehicle in late 2025. Volkswagen also shared they plan to deploy AVs in partnership with Uber Technologies in 2026.

State Legislation

The CPUC and DMV have dual permitting authority over AV operators. The DMV permits testing of autonomous vehicles and the CPUC permits fare passenger service using autonomous vehicles. As of today, cities in California are unable to permit AV companies within their jurisdictions, or set operational requirements without changes to state law. The four bills in Exhibit A were introduced during the 2023-2024 legislative session.

Exhibit A

Bill	Summary	Outcome
SB 915 (Cortese)	Authorized cities >250K citizens to enact local ordinance for AV operations.	Pulled by author
AB 1777 (Ting)	Compliance with vehicle code requirements and requires DMV and CPUC to publish data	Signed by Governor

AB 2286 (Curry/Friedman/Kalra)	Precludes AVs with gross vehicle weight (GVW) of 10,001 pounds or more from operating on public roads testing purposes, transporting goods, or transporting passengers without a human safety driver	Vetoed by Governor
AB 3061 (Haney)	Required DMV, California Highway Patrol (CHP), CPUC, and any other public entity it deems necessary, publish specified collision data	Vetoed by Governor

The California State Legislature is currently in the first year of its 2025-2026 two-year legislative session. Bills introduced this year that did not pass their House of origin by June 6, 2025 deadline can become two-year bills and carry over into 2026. The second year of the 2025-2026 legislative session will begin on January 5, 2026. Bills that did not pass the house of origin in 2025 will have until the end of January 2026 to do so. The Legislature will also consider new bills introduced in 2026.

As AV companies continue to expand deployment in Los Angeles, and the City prepares for upcoming major events, State legislation that ensures access to critical information in order to effectuate geofences, protect road closures, and enforce public safety requirements will be increasingly critical. It is unclear whether companies will be willing to voluntarily provide or comply with these requirements, this includes even temporary compliance during major events, without changes to State law that would give the City additional permitting authority to require compliance.

FINANCIAL IMPACT

There is no impact to the City's General Fund

LRC:TC:jm:sg

Attachment 1 - DMV Permits

DMV Driverless Testing Permit Holders

AV Manufacturer	Approved Locations	Time of Day Operations	Approved Operational Design Domain Characteristics
Apollo Autonomous Driving USA LLC	San Francisco Sunnyvale	SF: All times of day and night Sunnyvale: Weekdays and weekends 9 AM - 9 PM	Includes clear weather, but also light inclement weather conditions, including light rain and fog · Speed 35 MPH (San Francisco) · Speed 45 MPH (Sunnyvale)
AutoX Technologies, Inc	San Jose	All times of day and night	Mild and clear conditions, as well as light precipitation · Speed 45 MPH
R3 Nuro Robot	Los Altos Menlo Park Mountain View Palo Alto	All times of day and night	Dry or wet pavement or asphalt, including light rain, and light to moderate fog · Speed 45 MPH
Waymo LLC	Santa Clara County San Mateo County San Francisco County Los Angeles County	All times of day and night	· All rain, fog, and other conditions · All Speeds
WeRide Corp DBA WeRide Ai	San Jose Santa Clara	Daytime	Clear or cloudy weather but also light inclement weather conditions, including light rain · Speed 50 MPH
Zoox Inc.	Foster City San Francisco	All times of day and night	Clear conditions, light rain and fog · Speed 40 MPH (Foster City) · Speed 45 MPH (San Francisco)

DMV Deployment Permit Holders

AV Manufacturer	Approved Locations	Time of Day Operations	Approved Operational Design Domain Characteristics
Mercedes-Benz USA	California freeways and highways in: – Bay Area	Daytime	Sufficient weather conditions Excludes: Flooded highways, heavy

	<ul style="list-style-type: none">– Los Angeles– Sacramento– San Diego· Interstate 5· Interstate 15 connecting Los Angeles area to Nevada		<ul style="list-style-type: none">smoke, heavy dust, and heavy fog, snowstorms· Speed 40 mph
Nuro Inc.	<ul style="list-style-type: none">San Mateo CountySanta Clara County	All times of day and night	<ul style="list-style-type: none">Fair weather conditions:– dry or wet pavement/asphalt– light rain– light to moderate fog· Speed 25-35 mph
Waymo LLC	<ul style="list-style-type: none">Santa Clara CountySan Mateo CountySan Francisco CountyLos Angeles County	All times of day and night	<ul style="list-style-type: none">All rain, fog, and other conditions· All Speeds

RESOLUTION

WHEREAS, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies proposed to or pending before a local, state or federal governmental body or agency must have been first adopted in the form of a Resolution by the City Council; and

WHEREAS, autonomous vehicles (AV) have the potential to dramatically change the future of transportation and mobility for people by minimizing human error and improving traffic congestion, environmental issues, equity, and accessibility; and

WHEREAS, the United States Department of Transportation (USDOT) has released an Automated Vehicles Policy that highlights important areas that manufacturers and entities developing AV systems should address as they design, test, and deploy these vehicles; and

WHEREAS, the reality of AV on local roads and freeways is imminent and the City should support this new technology and take an active role in the development of federal and state AV regulations; and

WHEREAS, local jurisdictions, have no authority to require AV compliance with or support of local policy goals related to accessibility, infrastructure, monitoring and enforcement, operations, planning, and congestion management that would benefit residents and visitors to Los Angeles; and

WHEREAS, in order to protect the interests of residents and foster new mobility technology, the City should advocate for the development of AV policy goals in the areas of data sharing, law enforcement interaction plans, signage and signaling, types of vehicles, accessibility, and local retention of local assets; and

WHEREAS, federal and state regulations that include these goals will ensure that AV technology fulfills its great potential to transform personal mobility for Los Angeles residents.

NOW, THEREFORE, BE IT RESOLVED, that upon the adoption of this Resolution, the City of Los Angeles hereby includes in its 2025-26 State Legislative Program and 2025-2026 Federal Legislative Program SUPPORT and/or SPONSORSHIP of legislation and/or administrative action that would prioritize the following policies relative to autonomous vehicles: local government access to data, such as collisions, vehicle immobilizations, and unplanned disengagements, generated by these vehicles to increase public transparency; the need for standardized operating plans for first responders and law enforcement personnel; development and deployment of uniform signage and signaling; equitable regulation of all shared use vehicles, including light-duty and heavy-duty autonomous vehicles; creation of licensing requirements to individuals of varying levels of mobility and disability; and retention of local assets, such as parking and network pricing, by local jurisdictions.