



Ann Carlson  
Acting Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
West Building  
Washington, D.C. 20590

August 22, 2022

**Re:** Support of General Motors' petition for Temporary Exemption for the Cruise Origin  
(Docket No. NHTSA-2022-0067)

Dear Administrator Dr. Cliff and Acting Administrator Carlson:

On behalf of EVNoire, I am writing to express our support of Docket No. NHTSA-2022-0067, the General Motors (GM) and Cruise petition to deploy their all-electric, American-made, purpose-built autonomous vehicle, the Cruise Origin. Granting temporary exemption for the Cruise Origin is the right decision at this critical moment in the trajectory of AVs, as it forges a new path for similar technologies and allows for commercial development of transportation solutions that will benefit Frontline Communities.

EVNoire is a nationally recognized organization focused on improving awareness, perception and access to sustainable transportation through electric, connected, shared and autonomous vehicles (AV). Our work centers on two core areas: E-Mobility Best Practice and E-Mobility Diversity, Equity and Inclusion. We collaborate with auto manufacturers, charging infrastructure companies, transit authorities, cities, local and state governments, federal agencies and rideshare and delivery network companies to push for equitable outcomes. Our work centers the lived experience of underserved and frontline communities who have been left behind by transportation policy for far too long.

We are particularly pleased to see NHTSA's attention to sustainability, accessibility, and equity in their notice of receipt in questions 13, 14, and 15 respectively, as these issues often affect communities in intersecting ways and are at the heart of the work we do at EVNoire.

EVNoire has been working with Cruise over the last several years on community-based research around AVs & electric vehicles (EV)<sup>1</sup>. Our research to date has focused on understanding the historical context and systemic inequities of transportation in San Francisco along with residents' attitudes, knowledge, beliefs and experiences with EVs and AVs. We explored transportation patterns, needs, and opportunities while engaging with vulnerable populations in city regions with low mobility access, who are disproportionately exposed to transportation emissions and other environmental pollution sources.

With EVNoire, Cruise engaged San Francisco residents in Districts 5 and 10<sup>2</sup>, two communities in the central and southeastern parts of the city, to 1) understand local residents and their attitudes towards innovative transportation, 2) hear how shared AVs and EVs could address and mitigate disparities in

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<sup>1</sup>EVNoire, *Transforming Transportation: Community Perspectives on E-Mobility Autonomous vehicles, electric vehicles & shared mobility*, (Feb. 2022), <https://drive.google.com/file/d/1g4aFkdCx9SNXDtKydqjIPJJoSM5nKeDN/view>.

<sup>2</sup> See San Francisco district map in Appendix A.

transportation access and public health, and 3) understand how developers can best integrate service to support community goals around cleaner, more inclusive transportation.

Findings from this research revealed that community **residents in Districts 5 and 10 were excited about the opportunities that this technology could bring**, particularly in providing more reliable, safer, and affordable transportation options compared to what currently exists. However, thoughtful and intentional deployment, as well as regular outreach and education will be critical to meeting community needs, particularly as commercial scale grows for autonomous ridesharing<sup>3</sup>. In our report we found that all-electric, shared AVs present significant potential to improve equity in mobility. By granting the GM and Cruise exemption, NHTSA has the opportunity to help improve equity in mobility across a number of following areas from our report:

- Increasing safety, by mitigating the impact of human error on traffic fatalities, which have an outsized impact on historically underserved communities<sup>4,5</sup>;
- Improving public health, by delivering a zero-emission transportation option. Due to historic inequities in transportation design, communities of color in California face significantly more exposure to harmful air pollutants that cause respiratory and other chronic health conditions.
- Connecting residents with fresh food, helping address the pervasive food deserts that challenge many communities<sup>6,7</sup>;
- Reducing congestion through a centrally-managed fleet, giving time back to vulnerable residents who can't afford to miss a shift or an appointment;
- Increasing the autonomy of older or disabled residents, particularly in multi-generational households where transportation options are shared;
- Closing gaps in vehicle access, including for residents without a driver's license who may be unable to maximize personal mobility.

The Origin petition opens the door for NHTSA to increase public access to zero-emission transportation options, and we are confident that, over time, this will lead to increased access to green miles for a much more equitable set of users and communities. This is an opportunity for NHTSA to demonstrate that all-electric, American-made, renewable-powered AVs like the Origin should be the standard in this nascent industry, not the exception. As we are in the preliminary stages of this industry, it is important to grant such exemptions with limited requirements for reporting and without strict implementation guidance.

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<sup>3</sup> See summary figures from our report in Appendix A

<sup>4</sup> The Washington Post, *Traffic deaths increased during the pandemic. The toll fell more heavily on Black residents, report shows*, (Jun. 2021), <https://www.washingtonpost.com/transportation/2021/06/22/black-traffic-deaths-pandemic/>

<sup>5</sup> BMC Public Health, *Racial disparities in pedestrian-related injury hospitalizations in the United States*, (2020), <https://doi.org/10.1186/s12889-020-09513-8>

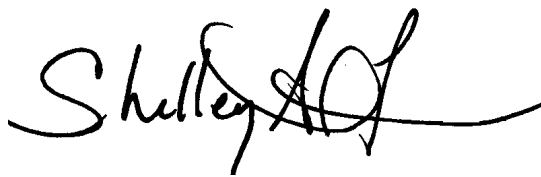
<sup>6</sup> Establishing fixed AV routes in frontline communities could connect families in food deserts with fresh food, especially if these AV services could be offered at free or reduced rates. Cruise has experience with connecting community members to food and prepared meals. Since launching in Spring of 2020 during the pandemic shutdown, Cruise has provided over 1 million meals to San Francisco residents in need. Cruise can continue this crucial service and expand community impact by partnering with additional community based organizations and mission-aligned organizations.

<sup>7</sup> Medium, *Cruise's Self-Driving Fleet Makes 50,000 Contactless Deliveries & Counting*, (Jul. 2020), <https://medium.com/cruise/cruise-self-driving-fleet-deliveries-2f83442cf9f3>

Granting temporary exemption at this scale would allow for the data collection and program development necessary in order to demonstrate how success is defined for future exemptions and market development; and additionally begin to shape & answer the questions surrounding future requirements for companies to provide plans about how they intend to ensure that access to its services is equitable in terms of neighborhood, income levels, race and ethnicity, age (etc.), and/or provide reports of how it achieved those objectives through use of the exempted vehicles.

For the reasons cited above, I urge NHTSA to move to approve GM and Cruise's Petition. Deployment of the Origin will have long-lasting benefits on the success of ambitious electrification and equity goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Shelley Francis". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Dr. Shelley Francis  
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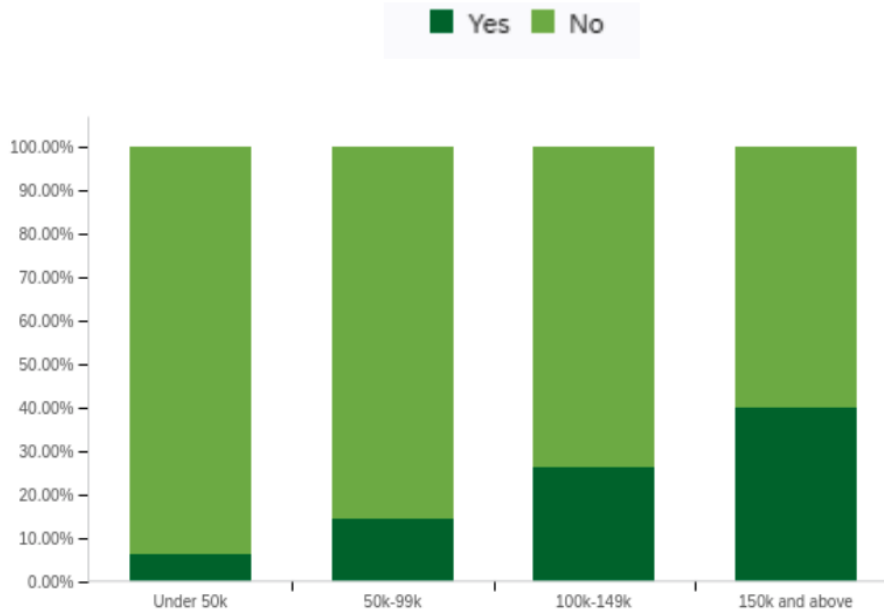
A handwritten signature in black ink, appearing to read "Terry Travis". The signature is in a cursive style with a long horizontal flourish extending to the right.

Terry Travis  
Co-Founder & Managing Partner  
EVNoire Mobility Intelligence Consulting Group  
Work | 888.662.4589  
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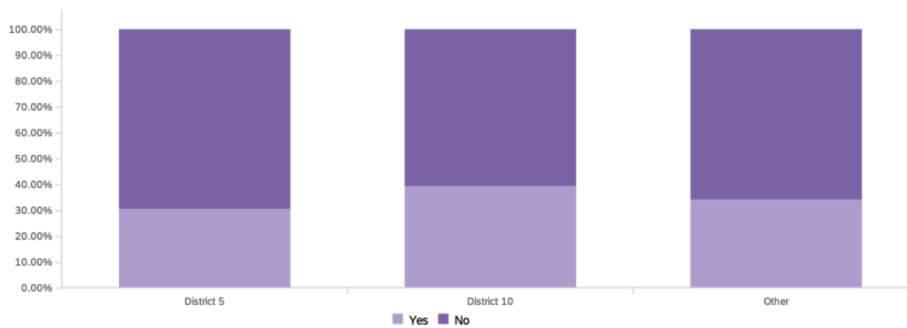
# Appendix A

Below are figures from our *Transforming Transportation: Community Perspectives on E-Mobility Autonomous vehicles, electric vehicles & shared mobility* report.

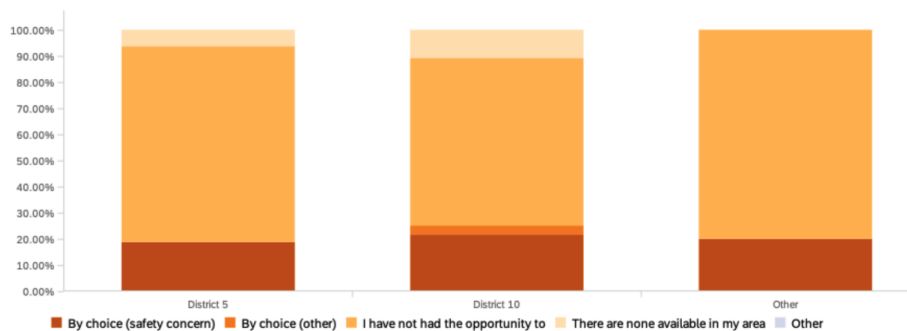
Q14: Have you ever ridden in an AV? - By income



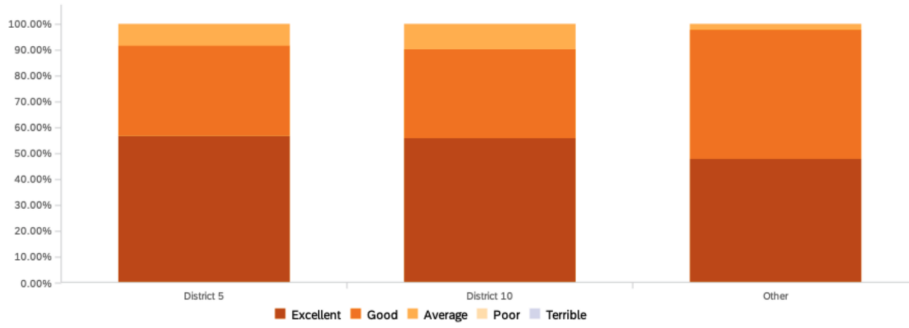
AV experience is highly correlated with income. There was a strong, statistically significant relationship between income and having ridden in an AV. There was a 34% difference in 'yes' responses between the Under 50k group and the 150k and above group (6% compared to 40% respectively).



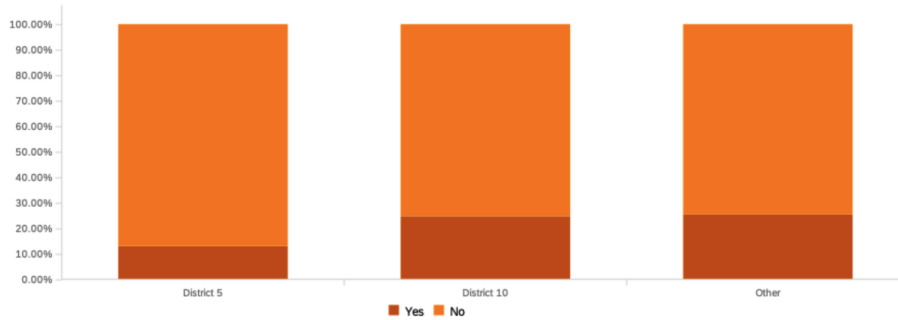
This figure shows responses to the question, "have you ever driven in an EV?". A majority of respondents had not ridden in an EV.



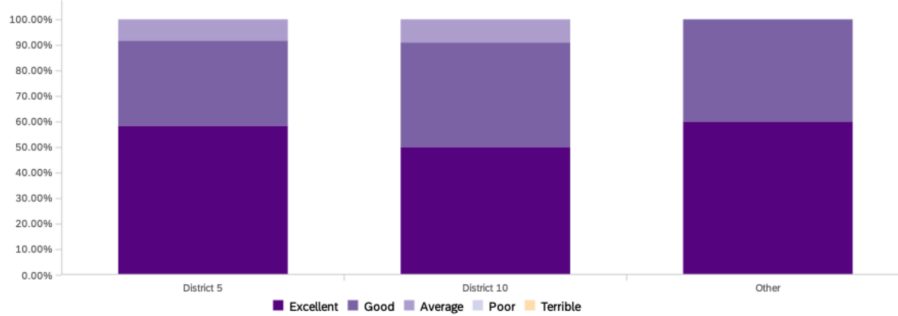
When asked, "why have you never ridden in an EV?" nearly 80% of respondents across neighborhoods answered because they have not had the opportunity to, or there are none available in their area.



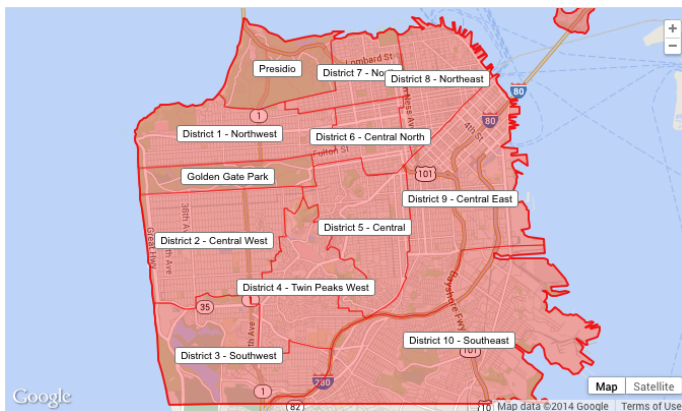
Of those that had ridden in an EV, 90% or more of respondents, across neighborhoods, rated having a positive experience. Rating the experience as good or excellent.



This figure shows responses to the question, “have you ever driven in an AV?” Between 80%-90% of respondents across neighborhoods have never ridden in an AV.



Of those that had ridden in an AV, 90% or more of respondents, across neighborhoods, rated having a positive experience. Rating the experience as good or excellent.



This map shows the districts in San Francisco. **District 5:** Noe Valley, Eureka Valley (Castro, Liberty Hill), Cole Valley, Glen Park, Corona Heights, Clarendon Heights, Ashbury Heights, Buena Vista Park, Haight Ashbury, Duboce Triangle, Twin Peaks, Mission Dolores, Parnassus Heights. **District 10:** Bayview-Hunters Point, Bayview Heights, Excelsior, Portola, Visitacion Valley, Silver Terrace, Mission Terrace, Crocker Amazon, Outer Mission.