

Main Issues

- **Systemic Threat:** Pattern: Asian & Latino seniors struck by high-speed unregistered e-vehicles—no plates, no accountability.
- **Not Racist:** Not about race: Latino pedestrians depend heavily on sidewalks and bus/subway access; fatality rates are $\approx 20\%$ higher in Latino neighborhoods—the law protects them, it does not target them.
- **State Law:** Legal mandate: VTL § 401 already requires plates for vehicles > 20 mph; City non-enforcement violates state law, ADA, and NYC Human Rights Law.
- **Caps are Hollow:** 15 MPH cap: meaningless without plates—traceability is prerequisite to enforcement.
- **Bike Lanes:** “traffic-flow” excuses trade death for lack of legal action for special interests however legitimate: inadequate bike lanes need upgrades, not suspension of safety rules.
- **Immigration Irrelevant:** NYC bans using traffic data for immigration matters; registration regulates machines, not people.
- **Safety First:** Safety, not agendas: Vision Zero is for saving lives, not shielding corporate or infrastructure schemes.
- **Moral Duty:** Body-count defense is immoral and anarchist: “less” deaths than cars terrorize elders, children, disabled and expose systemic targeting of the vulnerable.
- **Traceability is a Minimum:** Licenses work in principle: failures elsewhere stem from lax follow-through, not plates; e-bikes kill because $\text{force} = \text{speed} \times \text{mass}$.
- **Legal Integrity:** Using safety laws for special interests destroys the legal integrity of all laws —laws must stand on their own.
- **Blurring Deadly Vehicle Definitions:** Speed limits for e-bikes does not violate Equal Protection; courts allow different rules for distinct vehicle classes when the limit is rationally related to safety (e.g., separate limits already exist for trucks, school buses, and mopeds) much less different venues of travel (e.g. crosswalks near a sidewalk, sidewalks, etc).
- **Bottom line:** vehicles capable of lethal force must be identifiable—pass Priscilla’s Law, restore enforcement, and let other mobility policies proceed separately.

Legal Foundations

- **State Preemption:** VTL § 401 — Motorized vehicles exceeding 20 mph, including many e-bikes, must be registered and display plates; the City's non-enforcement creates a pre-emption conflict and violates state law.
- **Equal Protection:** Unequal treatment of cars and 40+ mph e-bikes undermines NYC Charter § 2903(a), which requires traffic regulation to protect life.
- **Civil Rights:** ADA & NYC Human Rights Law — Allowing untraceable high-speed vehicles on sidewalks disproportionately endangers seniors and disabled pedestrians, violating Title II of the ADA and local civil-rights protections.

Priscilla's Law — City Hearing Statistics

- **Vision Zero:** Vision Zero data shows seniors are the most at-risk pedestrians in NYC.
- **Disproportionate Deaths:** Seniors make up 16 % of the population but account for over 45 % of pedestrian deaths.
- **Highest Risk:** Asian seniors have the highest fatality rate: 9 deaths per 100 000.
- **Neighborhood Gap:** Pedestrian deaths are 20 % higher in Black and Latino neighborhoods.
- **Delivery Volume:** Over 1.3 million deliveries occur daily in NYC, many requiring riders to enter pedestrian-rich zones or sidewalks.
- **40+ Throttle:** Many e-vehicles used in deliveries reach 40+ mph when unlocked.

Power and Importance of Seniors in NYC

- **Reliable Vote:** Seniors are the most reliable voting bloc in every NYC Council district.
- **Turnout Force:** They turn out at 70 %+ in off-year primaries and decide close races.
- **Community Leaders:** They control community boards, co-op boards, block associations, churches, and neighborhood media.
- **Opinion Swing:** One sidewalk crash involving a senior or child can swing press coverage and public opinion citywide.

Legal Duty & Lobbying Protocol

- **Mandated Action:** Vision Zero mandates speed reduction and pedestrian prioritization; DOT is legally obligated to act on known risk patterns.
- **Trace or Fail:** Enforcing a 15 MPH limit or any speed limit without plates is performative—you cannot enforce what you cannot identify.
- **Non-Invasive:** Capturing a vehicle’s plate is routine and collects no personal data; it cannot compromise due process under current city law.
- **Proper Process:** Any exceptions to 15 MPH must follow legislative channels: written amendments, redlined text, stakeholder testimony, and data-backed justification before committee vote.

I submit this comment in support of all NYC pedestrians and their families, including my aunt Priscilla, a respected schoolteacher and lifelong New Yorker, beloved in her community and by the children she cared for. She was killed by an electric bike rider who fled the scene.

Her death is one of many—especially among Asian and Latino seniors—caused by untraceable e-vehicles traveling at high speeds, with no plates, no registration, and no accountability. These vehicles continue to endanger seniors, the disabled, and communities of color who rely on safe public space.

I support Priscilla’s Law because it is morally urgent and legally required. Under VTL § 401, motorized vehicles exceeding 20 mph must be registered and display plates. The City’s refusal to enforce this standard violates state law. Allowing untraceable high-speed vehicles on sidewalks also violates Title II of the ADA and the NYC Human Rights Law.

The proposed 15 MPH speed cap is symbolic and unenforceable without registration. It offers the appearance of safety while functionally protecting untraceable riders. Traceability is the only mechanism that enables real enforcement and protects the people most often injured.

Arguments for exceptions to a speed limit—such as the need to “keep up with traffic”—are infrastructure problems, not justification for erasing enforcement. If bike lanes are inadequate, they must be improved. Do not use the presence of elderly and children to excuse unsafe behavior or override protections owed to them under the law. That is not policy—that is exploitation.

New York City law already prohibits the use of traffic or registration systems to collect or disclose immigration status. Holding riders accountable to traffic laws is a separate legal process. Vehicle registration exists to regulate machines—not people. These systems operate independently of identity enforcement and do not compromise individual protections.

Pedestrian safety laws must not be co-opted to serve corporate goals, environmental, immigration or infrastructure agendas. These are not mutually exclusive or contradictory even under NYC law. Vision Zero was established to save lives, not to deregulate or shield private

actors or even other legally legitimate arguments. If the City or its partners want to expand micromobility or restructure traffic priorities, they must do so through open legislative processes—not by weakening accountability or usurping safety law.

Some argue that only a handful of people are killed by bikes. That logic is immoral. We don't measure justice by body count. The physical domination of public space by untraceable high-speed vehicles is terrorism of the elderly—a form of systemic neglect and tyranny of the majority. It creates daily fear, disables independence, and erodes the public trust in sidewalks and crosswalks.

Some claim licenses “didn't work” in other cities. But that reflects a failure of enforcement—not of principle. Plates work because they enable traceability, otherwise the entire system of law is subjective—a blatant threat to all civil rights. Any vehicle with lethal potential must be subject to baseline rules of accountability, regardless of purpose. Arguments that cars are heavier and therefore more dangerous ignore real-world traffic patterns and physics. E-bikes can and do kill—because force is a function of speed, and other factors, not just mass. Velocity, angle, and pedestrian vulnerability determine fatality, not whether a vehicle is used for work. If enforcement tools are weak, they must be strengthened—not abandoned. We would never discard license plates because some drivers still speed.

At its core, Priscilla's Law is about traceability and justice. If a machine moves fast enough to kill, it must be identifiable. That is a baseline—not a policy experiment. Everything else—traffic design, rider education, delivery incentives—must catch up.

Support Priscilla's Law. Restore enforcement. Let all other policies—whether about infrastructure, worker protections, or mobility—stand on their own merits, as additions, not replacements, to our rights to life, safety, and civil liberties.