



National Association of
City Transportation Officials

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September 20, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590-0001

SUBJECT: Comments on Notice of Proposed Rulemaking for Transportation for Individuals With Disabilities; Adoption of Accessibility Standards for Pedestrian Facilities in the Public Right-of-Way [Docket No. DOT-OST-2024-0090]

Dear Secretary Buttigieg:

On behalf of the National Association of City Transportation Officials (NACTO), we are pleased to provide comments in response to the U.S. DOT's Notice of Proposed Rulemaking (NPRM) for Transportation for Individuals With Disabilities; Adoption of Accessibility Standards for Pedestrian Facilities in the Public Right-of-Way (PROWAG) [Docket No. DOT-OST-2024-0090].

NACTO recommends that U.S. DOT adopt PROWAG fully, without modification. As a membership association of 100 city transportation departments and transit agencies in the U.S. and Canada, NACTO celebrates this move toward a more inclusive and accessible country. This proposed rule is a crucial step forward in ensuring that our streets, sidewalks, and other public transit facilities are designed and constructed with the needs of all individuals in mind, regardless of their physical abilities. It recognizes the decades of advocacy from the disability community to be recognized as users and accommodated appropriately.

PROWAG helps public agencies standardize accessibility features across public rights-of-way, ensuring that people with disabilities can navigate our communities with greater ease and independence. From curb ramps and detectable warning surfaces to accessible pedestrian signals and street furniture, PROWAG will not only improve the daily lives of millions of Americans with disabilities but will also contribute to creating more livable, walkable communities that benefit everyone.

Accessible transit stops are not just a part of the public right-of-way, but a crucial element that complements and enhances the progress that NACTO member cities and agencies are making to promote efficient and reliable transit. U.S. DOT programs grant programs, such as Streets and Roads for All and Small Starts, have enabled much of this important work in recent years. Some agencies have also been able to use Urbanized Area Formula Grants to design and implement accessible transit stops. NACTO appreciates U.S. DOT's work to clarify the many funding sources available to cities and transit agencies to enable these investments toward universal access.

Adopting PROWAG without modification provides important clarity for jurisdictions and agencies responsible for transit stops and for the public right-of-way. Modifications to PROWAG made via a closed-door rulemaking process such as this, will not benefit from the collective knowledge and partnership that informed the best practices included in PROWAG.

NACTO supports U.S. DOT's proposed effective date. As discussed in the notice, public agencies are already required to comply with the Americans with Disabilities Act (ADA). **Though in draft format for over a decade, the guidance in PROWAG has been applied and understood by most agencies building new (or altering existing) transit stops. The proposed effective date should not have any negative impacts on projects underway and, in fact, would provide a rare opportunity for clarity of expectation. However, this effective date would be inappropriate if the U.S. DOT made additional modifications in its rulemaking.** Such modifications could be unexpected and not covered in the guidance jurisdictions are already using to inform the scope and budget of their projects. Modifications would also disrupt and add design costs to projects that have not yet reached final design.

NACTO applauds the U.S. DOT's desire to provide greater accessibility than PROWAG. However, we urge the Department to work collaboratively with researchers, practitioners, and the disability community to recommend best practices via guidance and toolkits—not rulemaking.

In the years since PROWAG was first drafted, researchers and local practitioners have collaborated with the disability community to test new approaches to accessibility needs. This cooperative approach has yielded academic research, local policy approaches, and documented user experience findings that should be used to craft and disseminate detailed best practices for improved accessibility in the right-of-way and at transit stops.

NACTO recommends that U.S. DOT collaborates with other agencies and stakeholders in defining additional types of tactile warning surface indicators (TWSIs) and clarifying how they should be used. In particular, cities and transit agencies need to understand when and how to apply Tactile Direction Indicators (raised, parallel, flat-topped elongated bars) and Tactile Warning Delineators (raised surface shaped like a trapezoid in cross-section). These TWSIs have shown promising results in user testing and experimentation. The National Academies, via the Transit Cooperative Research Program, published [*Tactile Wayfinding in Transportation Settings for Travelers Who Are Blind or Visually Impaired*](#) in February 2024. This research identifies preferences amongst that population of transit users and provides recommended best practices for consistency across transit stops and stations.

In addition, NACTO cautions against defining transit stops to prohibit certain transit stop designs that locate the boarding and alighting area so that it coincides with vehicular lanes, including bicycle facilities. These designs are an emerging area of practice that would benefit from increased coordination and research.

In dense, multimodal environments where street space is at a premium, there are some situations where colocating boarding and alighting areas with bike facilities is necessary. NACTO has found that these designs are not typically the first choice, but one that local practitioners find value in being able to use in appropriate contexts. To that end, cities and transit agencies in the U.S. and Canada have developed design standards for shared boarding areas in collaboration with the local disability community. **Their work shows that**

shared boarding areas can be designed thoughtfully for accessibility, while also achieving safety goals for people riding bikes.

- The City of Portland and TriMet designed and implemented bus stops colocated with bike lanes on SE Division, a high-crash corridor in the city. The design of these facilities was developed with input from the TriMet Committee on Accessible Transit, the Portland Bureau of Transportation (PBOT) Bicycle Advisory Committee, the PBOT Pedestrian Advisory Committee, the Oregon Commission for the Blind, and the Oregon Department of Transportation. A [recently published report](#) (2024) from Portland State University assessed how well the design was working for all users. Their findings include:
 - Bicyclists rarely stop, but more often slow or change direction to avoid passengers. Most passengers feel bicyclists travel at safe speeds (50% agree; 22% disagree) and are careful to avoid passengers (49% agree; 22% disagree).
 - Bicyclists and transit passengers seem to be generally managing their interactions without conflict; only 2 minor conflicts were observed during the study.
 - Additional warnings about when bicyclists are passing would be helpful, particularly for passengers and pedestrians who are blind or have low vision.
 - The design is broadly popular among riders, with most feeling that the design is an improvement over other bus stops in Portland. [Note: Bus stops also included new larger shelters, seating, and lighting as well as a green surface on the bike lane.]
 - The bus-bicycle conflict was almost entirely resolved.
- Montgomery County, MD published [a toolkit for accessible street design](#) (2021) that was informed by robust engagement of the local disability community. The toolkit includes specific recommendations for “floating” bus stops—those where the boarding area is reached by crossing a bike lane at a marked location—in response to concerns raised by the community. Recommendations include TWSIs, clearly detectable edges, markings, signage, ways to make oncoming bicyclists more audible, audible announcements of oncoming transit vehicles, and bus stop signage with raised letters and braille that explains the design of the transit stop.
- Seattle DOT’s [NE 65th Street Redesign report](#) (2020) discusses observations from transit stops colocated with bike lanes. The vast majority of users—bicyclists, pedestrians walking along the street, transit riders boarding the bus, and transit riders alighting the bus—behaved correctly. King County Metro did not receive customer or operator comments related to the shared stop design during the study period.
- In Vancouver, BC, TransLink and the BC Ministry of Transportation and Infrastructure engaged people with a variety of lived experiences, including those with varying disabilities, to inform the design of bus stops adjacent to cycling infrastructure. The resultant [Design Guide for Bus Stops Adjacent to Cycling Infrastructure](#) (2024) describes the extensive engagement and iterative, user-informed process to develop seven core design elements, then applies those treatments to four configurations for transit stops adjacent to separated bike lanes and multi-use paths. The Guide

includes a clear hierarchy for configurations based on user preferences and needs as well as the environment in which the transit stop is located.

- The Canadian National Institute for the Blind developed its [Cycling Infrastructure and People with Sight Loss—Design Challenges and Opportunities at Transit Stops Across Canada](#) report (2023) to inform the TransLink research and guidance mentioned above. This report identified five key challenges for people with sight loss and made recommendations for:
 - Finding the bus stop,
 - Orienting and navigating to and from the island platform,
 - Detecting people cycling who are approaching,
 - Negotiating right-of-way with people cycling who are approaching, and
 - Boarding and alighting.

Over the last decade, state and local design guidance in the U.S. and Canada have included shared boarding areas:

- *Ohio Multimodal Design Guide* (2024), where it is called a [Constrained Floating Bus Stop](#)
- *Massachusetts Separated Bike Lane Planning & Design Guide* (2015), as a [Constrained Bus Stop](#)
- Metro Transit, which serves the Minneapolis, MN area, includes a [Shared Bike-Bus Stop](#) in its *Regular-Route Bus Stop Design Guide* (2023)
- TransLink, which includes the Vancouver, BC area, includes a [Constrained with Shared Landing Pad](#) transit stop in its *Design Guide for Bus Stops Adjacent to Cycling Infrastructure* (2024)
- Austin, TX's *Interim Standard Details* (2024), as a [Step-Out Shared Landing](#)
- Los Angeles, CA's *Supplemental Street Design Guide* (2020) includes details for [Raised Bike Lanes with Shared Boarding and Alighting Area](#)
- NACTO's *Transit Street Design Guide* (2016), then called a [Shared Cycle Track Stop](#)

Research, experience, and design guidance from the U.S. and Canada informed NACTO's forthcoming third edition of the *Urban Bikeway Design Guide*, which will be published in January 2025. This edition discusses the considerations for curbside transit stops, shared boarding areas, and boarding islands. The guide includes detailed specifications for ensuring transit stops are accessible and is aligned with best application practices and the most recent research in North America. NACTO included these details, along with a general increased emphasis on non-visual navigation, in response to the real need for clear and consistent application of transit stop designs and TWSIs in the public right-of-way across the U.S. and Canada.

Additional research is underway for the Transit Cooperative Research Program (TCRP) project B-51 [Floating Transit Stops and Passengers with Vision Disabilities](#). This project intends to produce guidelines for boarding islands and shared boarding areas and will include human factors research. NACTO

To improve transit stop accessibility at a broad scale, **NACTO recommends that U.S. DOT supplement this rulemaking with additional resources and activities.** We would be excited to see the Federal Highway Administration's Every Day Counts program emphasize accessible transit stops and best practices in designing, funding, and building them at scale.

An EDC program for accessible transit stops would help the many Americans with disabilities who rely on transit service on state-owned routes and deepen the accessibility practice in state DOTs and their member jurisdictions.

U.S. DOT should also develop a resource guide for local agencies responsible for ADA transition plans with a specific focus on upgrading the thousands of transit stops that pose significant barriers to accessibility. Such a resource could share information about available funding sources and discuss best practices already being used in North America. The Massachusetts Bay Transportation Authority, for example, has [a comprehensive bus stop accessibility program](#) that evaluated 7,500 bus stops, prioritized them according to how serious the barriers to access were at each stop, and redesigned and reconstructed nearly 120 of those with critical barriers over the course of three years.

NACTO and our member cities applaud U.S. DOT for its leadership in advancing accessibility. Adopting PROWAG completely, without modification, will enable cities to be full partners in designing safe, sustainable, and fully accessible streets. We look forward to collaborating in future research and developing new design standards that bring us closer to universal accessibility.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Russo', written in a cursive style.

Ryan Russo
Executive Director
National Association of City Transportation Officials