

# National Campaign Transit Justice

A project of **just|strategy**

Kristen Clarke  
Assistant Attorney General  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Avenue NW  
Washington DC 20530

October 16, 2024

Dear Assistant Attorney General Clarke:

We write to you today to urge you to adopt the Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), which was [finalized](#) last year by the Architectural and Transportation Barriers and Compliance Board (Access Board). PROWAG does not become an enforceable standard until adopted by the Department of Justice (DOJ) and the Department of Transportation (DOT). The [proposed](#) DOT adoption of PROWAG represents a meaningful step forward to improve accessibility in the public space and to provide an accountability framework. To ensure that all facilities in the public right-of-way are accessible to those with disabilities, DOJ should act quickly to adopt PROWAG into its own regulations.

PROWAG's standards are imperative for equitable access to mobility. All travelers deserve to safely and efficiently navigate their communities, yet too often, people with disabilities are prevented from reaching schools, shops, employment, healthcare, places of worship, and other destinations by inaccessible roads and sidewalks. Now, more than 30 years after passage of the Americans with Disabilities Act, the government must no longer delay taking action.

Enacting improvements to increase the accessibility of our transportation system is fundamental. Everyone in the United States must be able to navigate their communities safely in order to access the resources they need. As it stands, PROWAG adoption solely by the DOT limits enforcement to transit stops and shelters. While important, transit stops are only one component of transportation facilities. Roads, sidewalks, crosswalks, roundabouts, paths, and other features of the public right-of-way must also be addressed. We highly encourage the Department of Justice to also adopt PROWAG to ensure equity in accessibility for all users in the public right of way, as is intended by the ADA.

The current rendition of the Access Board's PROWAG has been more than 30 years in the making, but even then it has its flaws. Changes in mobility technologies are not fully accounted for, nor are the full breadth and depth of disabilities that impact mobility. However, there is an urgent need to establish a baseline standard of streetscape accessibility from which to improve upon, which is why PROWAG should be adopted into DOJ's regulations immediately.

We further urge you to coordinate with DOT to ensure that the regulatory framework on accessibility is clear and easily understood by policymakers, designers, and disability stakeholders. This will secure the ability for these partners to have a seat at the table for future renditions of PROWAG and other guiding documents which can continually improve the state of transportation accessibility around the nation.

In addition to the adoption of PROWAG in full, we urge you to:

- Coordinate with respective federal agencies for their guidance and faithful implementation of PROWAG standards;
- Support USDOT and the US Access Board's research and meaningful stakeholder engagement to solicit improvements to PROWAG that account for today and tomorrow's mobility environment and the breadth and depth of disability community needs; and
- Regularly adopt updated PROWAG regulations, following a similar cycle to the Manual on Uniform Traffic Control Devices' (MUTCD) 4-year update.

Accessible transportation networks are vital to the health, economic development, sustainability, and equity of our nation's communities. That cannot be achieved without the enshrinement of nationally recognized accessibility guidance, such as PROWAG. We cannot afford to wait any longer. Now is the time to ensure that all Americans have access to the transportation networks they deserve.

Sincerely,

Transportation for America

Alliance for a Just Society

America Walks

League of American Bicyclists

League of Conservation Voters (LCV)

National Association of City Transportation Officials (NACTO)

1000 Friends of Oregon

1000 Friends of Wisconsin

Access

ACT-LA

Active Prince William

Aging and Disability Transportation Network

Albuquerque Transit Riders Union

Autistic Women & Nonbinary Network

Better Eugene-Springfield Transportation (BEST)

BetterTransitNOW (Baltimore)

Bike Durham

BikeLA

Boston Center for Independent Living

CALIF-ILC

California IHSS Consumer Alliance (CICA)

CASE Citizens Alliance for a Sustainable Englewood

Cedar Lane UU Environmental Justice Ministry

Center for Independent Living

Center for Neighborhood Technology (CNT)

Central Maryland Transportation Alliance

Circulate San Diego

Coalition for Economic Justice

CultureHouse

DC Transportation Equity Network

Democracy for America Advocacy Fund

Denver Streets Partnership

Detroit Greenways Coalition

Disability Rights California  
Disability Rights Education & Defense Fund  
Disability Rights Maryland  
Downtown Residents Advocacy Network (Baltimore)  
Elevator Action Group (Rise and Resist)  
Elmont Cultural Center  
Farm&City  
GreenLatinos  
Grow Smart RI  
Health by Design  
HollywoodDemocrats.com PAC  
In the Public Interest  
Independent Living Center of Hudson Valley  
Institute for Policy Studies Climate Policy Program  
International Parking & Mobility Institute (IPMI)  
LABAC  
Labor Network for Sustainability  
LivableStreets Alliance  
Los Angeles Walks  
Madison Area Bus Advocates  
Maine People's Alliance  
Malone Complete Streets Advisory Board  
Marin Center for Independent Living  
Massachusetts Action for Justice  
Metropolitan Planning Council

Move LA

Move Minnesota

Move Redmond

New York Communities for Change

Office of Council Member Jenny Brekhus, Reno NV

Paralyzed Veterans of America

Pathway to Wellness Counseling Center

Pittsburghers for Public Transit

Progressive Leadership Alliance of Nevada

Public Advocates

Reconnect Rochester

Riders Action Council

Riders Alliance

Safe Pass Ulster

Safety Accessibility Advocates

Seamless Bay Area

Self-Initiated Living Options, Inc.

Shenandoah Valley Bicycle Coalition

Southwest Energy Efficiency Project

Streets Are For Everyone

Streets For All

Sustain Charlotte

Syracuse United Neighbors (SUN)

TakeltBack.Org

Tampa Downtown Partnership

The Funders Network

The League of American Bicyclists

The Street Trust

The Transit Coalition

Third Act Maine

Together for Brothers

Transbay Coalition

Transform

Transit Alliance Miami

Transit Alliance of Middle Tennessee

Transit Forward Philadelphia

TransitMatters

Transportation Choices Coalition

Transportation for Massachusetts

Union of Concerned Scientists

Unite North Metro Denver

United Spinal Association

WakeUp Wake County

Walk Bike Nashville