PROWAG & MUTCD Update

What do these updates mean for Visually Impaired Pedestrians?

What do these updates mean for local and state agencies?
Big Rock Talk

Interested in the details?

Let’s connect afterwards!
Wherever signals are needed to cross safely, people with vision disabilities need them even more.

Is it safe to cross?
This street crossing
As seen by someone with overall reduced acuity
As seen by someone with peripheral vision loss
As seen by someone with central vision loss
As seen by someone with total blindness
WHAT ARE ACCESSIBLE PEDESTRIAN SIGNALS (APS)?

• Accessible Pedestrian Signals are devices that translate visual pedestrian information into other sensory formats, enabling people with disabilities to navigate cities safely and comfortably.
What is PROWAG?

• The Public Right-of-Way Accessibility Guidelines (PROWAG) are accessibility guidelines for implementing the Americans with Disabilities Act (ADA) with regard to: sidewalks, crosswalks, pedestrian signals, and other public pedestrian facilities, to ensure they are equally accessible to and usable by all pedestrians.
The ADA is a law. PROWAG are accessibility guidelines.

- The ADA and two other laws – the Architectural Barriers Act and the Rehabilitation Act – require federally funded facilities to be accessible.

- PROWAG gives technical specifications for what the legally required accessibility looks like for streets and sidewalks.
PROWAG covers:

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<th>SIDEWALKS</th>
<th>CROSSWALKS</th>
<th>SIGNALS</th>
<th>PARKING</th>
<th>TRANSIT</th>
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<tbody>
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<td>Width, grade, slope, surface, and more</td>
<td>Curb ramps, detectable warning surfaces, and crossings at roundabouts</td>
<td>Audible pedestrian signals are now required at all crosswalks with pedestrian signals and warning devices</td>
<td>The number and dimensions of accessible parking spaces and passenger loading zones</td>
<td>Rail crossings, boarding areas, transit stops, and shelters</td>
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PROWAG REQUIRES ACCESSIBLE PEDESTRIAN SIGNALS (APS)
PROWAG and MUTCD specifications

- Daylight-visible latching LED indicates actuation (§ 4E.08.16)
- High visual contrast raised vibrotactile arrow on the button (§ 4E.11.03, 4E.12.01)

- Integrated speaker for audible tones and messages (§ 4E.09.10, 4E.12.06)
- Repeated locator tone (§ 4E.12.02)
- Audible percussive/speech walk indications (§ 4E.11.07)
- Automatic volume adjustment up to 100 dBA max in response to ambient traffic sound levels (microphone) (§ 4E.11.10)

- MUTCD 2009 ed.; § 4E.8-12
Examples of MUTCD-compliant APS

These have vibrotactile buttons with high-contrast raised arrows, locator tones, and audible WALK signals.
PROWAG becomes mandatory

- once the guidelines are adopted, with or without modifications, as mandatory standards under the ADA by the U.S. Department of Justice (DOJ) and the U.S. Department of Transportation (USDOT).

USDOT will do a separate rulemaking to adopt PROWAG. Once that rulemaking is done, then there will be a rulemaking to revise the MUTCD to reflect the PROWAG requirements. This will likely be Revision 1 of the 11th edition.
ALL levels of government – federal, state, and local – will be required to comply.

• PROWAG’s guidelines will be legally enforceable once adopted by the federal agencies charged with implementing Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and the Architectural Barriers Act.

• PROWAG will carry the full weight of law, defining the legal requirement of equal access for all pedestrians.
Pedestrian signals must be made accessible when:

- They are installed
- When pedestrian signals are added to a crossing, a PROWAG-compliant APS must also be added.
- The existing pedestrian facilities are altered
- Alteration defined: "A change to or an addition of a pedestrian facility in an existing, developed public right-of-way that affects or could affect pedestrian access, circulation, or usability."
- PROWAG R104.3
Scoping: When you need APS

- "Where provided, pedestrian signal heads and pedestrian activated warning devices shall comply with R206. The accessible features required by these guidelines shall be available at all times."

- PROWAG R206.1
Where pedestrian signal heads are provided at crosswalks, the walk indication shall comply with R308. Pedestrian signal heads must have a pedestrian push button complying with R307, except for R307.7, or passive detection or pretimed operation that activates audible and vibrotactile indications complying with R308."

- PROWAG R206.2
What's new and different than proposed PROWAG

- The "shall [have APS]" applies pedestrian hybrid beacons, as well as to regular signals having pedheads.

- Crossings having passive detection or pretimed operation are required to activate audible and vibrotactile walk indications, not just where there is push button activation.
What's new and different than proposed PROWAG

- The "shall" applies not only where there are pedestrian signal heads, but also to pedestrian activated warning devices (e.g. rapid rectangular flashing beacons/RRFBs)
- Pedestrian activated warning devices require audible information devices, not APS
  - Have a pushbutton
  - Have a locator tone
  - Have a speech message "Yellow lights are flashing"
  - Have no audible or vibrotactile walk indication
More scoping: Roundabouts and channelized turn lanes

- Crosswalk Treatments. Each multi-lane segment of the roundabout containing a crosswalk shall provide a crosswalk treatment consisting of one or more of the following: a traffic control signal with a pedestrian signal head; a pedestrian hybrid beacon; a pedestrian actuated rectangular rapid flashing beacon; or a raised crossing.

- PROWAG R306.4.2 (roundabouts)
- R306.5 (channelized turn lanes require the same treatments)
More scoping: Roundabouts and channelized turn lanes

- So options other than pedestrian activated signals are also acceptable at roundabout and channelized turn lane crossings having multiple lanes.
  - Pedestrian activated signals require APS because they have pedestrian signal heads.
  - Pedestrian hybrid beacons require APS because they have pedestrian signal heads.
  - Pedestrian actuated rectangular rapid flashing beacons require audible information devices (AID)—not APS
  - Raised crossings don’t require any audible indication.
- PROWAG 306.4.2 (roundabouts), 306.5 (channelized turn lanes)
Today, cars are largely silent (some engines shut off when stopping at a red light), so one cannot even know it is there. Signal cycles are variable. Cars are always moving, so it is nearly impossible to listen for audible cues. An APS is an absolute necessity today.

~ Sue Crawford
APS “audibles” can help everyone
REMEMBER:

• **PROWAG represents minimum guidelines** and may be strengthened by the USDOT & DOJ when they adopt it.

• USDOT and DOJ may provide further specifics as to alterations triggering installation of APS in their rulemakings adopting these guidelines

• MUTCD will be harmonized with PROWAG after DOT adopts the standards

• But don’t wait to install APS—they’ve actually been required since 1973, though we didn’t have technical specifications
Install APS Because it’s the Right Thing to Do

• Don’t wait for PROWAG to be adopted by DOT/DOJ or 11th edition of MUTCD to be updated to be consistent with PROWAG

• Discrimination against people with disabilities, such as failure to provide accessible and usable information, including pedestrian signal information, has been prohibited by Section 504 of the Rehabilitation Act since 1973 and by the ADA law since 1990—though those laws don’t tell you how to provide it.

• Failure to provide APS cannot be justified by not having scoping and technical specifications for APS published by the DOT

• Since 2020, two major US cities, New York, and Chicago, have been found liable for violating the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act by failing to provide enough APS, and each city has been required to greatly speed up installation of APS. And in 2007 San Francisco negotiated a settlement to provide APS escaping litigation.

• DON’T WAIT. FAILURE TO PROVIDE APS IS AGAINST THE LAW—NOW.