

September 23, 2024

Holly Ceasar-Fox
Office of the General Counsel
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: Docket No. DOT-OST-2024-0090 - Adoption of the Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG)

Dear Ms. Ceasar-Fox:

Rails to Trails Conservancy (RTC) appreciates the opportunity to comment on the Department of Transportation's (DOT) proposed rule to adopt the Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG).¹ Since its founding in 1986, RTC has tirelessly worked to bring the power of trails to communities across our nation. With more than 1 million grassroots supporters, over 25,000 miles of rail trails on the ground nationwide, and more than 9,000 miles of rail trails ready to be built, our focus is on linking these corridors and creating trail² and active transportation networks that connect people and places, bringing transformative benefits to communities across the country.

RTC fully supports the DOT's adoption of PROWAG and efforts to ensure that pedestrian facilities, including transit stop boarding and alighting areas, are usable by all individuals, including those with disabilities, and improve overall accessibility. However, improvements should be made going forward regarding the DOT's proposals around co-location and ensuring access to trails and shared paths are expanded for people with disabilities.

Co-Location of Transit Stops and Shared-Use Paths: Enhancing Accessibility and Safety

The issue of co-location and transit stops is important when discussing the public right of way, particularly when shared-use paths³, bike lanes, and trails intersect with public transportation. If not properly planned, co-location could substantially affect safety, accessibility, and equitable transportation options, especially among individuals with disabilities, such as those who are

¹ U.S. Department of Transportation. (2024, August 22). *Transportation for individuals with disabilities: Adoption of accessibility standards for pedestrian facilities in the public right-of-way*. Federal Register.

<https://www.federalregister.gov/documents/2024/08/22/2024-18496/transportation-for-individuals-with-disabilities-adoption-of-accessibility-standards-for-pedestrian>

² According to the Architectural Barriers Act (ABA) Standards, a trail is defined as "a pedestrian route developed primarily for outdoor recreational purposes." Pedestrian routes developed mainly to connect accessible elements, spaces, and buildings within a site are not considered trails. Technical guidance for these facilities can be found in [Chapter 10](#) of the ABA Standards. Additionally, rail-trails and multi-use trails are classified as Shared Use Paths under the Public Rights-of-Way Accessibility Guidelines (PROWAG)

³ Shared use paths refer to multi-use paths designed primarily for bicyclists and pedestrians, including those with disabilities, for both transportation and recreation purposes. These paths typically feature a machined, layered surface (e.g., asphalt, concrete, or bonded materials) and are located in either an independent corridor or public right-of-way. Accessibility guidance for these paths is found in the proposed Public Rights of Way Accessibility Guidelines (PROWAG). Rail-trails and other multiuse trails are considered shared use paths. At Rails-to-Trails Conservancy (RTC), the term "trails" refers to shared use paths

blind/low vision or those using mobility devices. At the same time, transit stops must be designed to ensure that there is no impairment of the ability to use of the trails or shared paths by bicycles.

With so much activity at transit stops, there may be increased dangers such as:

- Collisions with pedestrians, cyclists, or vehicles
- Difficulty accessing boarding platforms
- Challenges with navigating busy transit areas.

Trails are transportation and recreation facilities that offer safe, traffic-free walking, biking, and wheeling routes for people of all ages and abilities. Rail trails typically are flat or with a gentle grade, making them ideal for wheelchairs or other mobility devices. Accessibility is mandated by the Americans with Disabilities Act of 1990 (ADA) and implementing guidance, which includes specific design standards governing trails. However, when trails are co-located with transit stops and vehicular lanes, there may be dangers and barriers for individuals with disabilities.

The DOT should adopt provisions related to the co-location of transit stops with? shared-use paths to ensure that design standards enhance both accessibility for people with disabilities and the safe use of trails. Specifically, RTC recommends the incorporation of best practice design elements and research to continually improve these practices. Current practices that should be employed wherever practicable include::

- **Side boarding islands:** Boarding and alighting areas need to be clearly separated from bike lanes and vehicular traffic to prevent potential conflicts. A clear separation must be established between these areas to minimize the risk of accidents and enhance accessibility. This can be achieved by incorporating side boarding islands separated from the sidewalk by a bike channel, thereby eliminating conflicts between transit vehicles and bikes at stops.⁴
- **Clear and accessible pedestrian access routes (PARs):** Studies have shown that even when safety and accessibility improvements occur, transit stops still may not meet accessibility standards. Construction, poor maintenance, and many other factors have the potential to hinder accessibility and safety.⁵ Transit stop connections with? trails must be designed with clear, unobstructed pedestrian access routes (PARs)—accessible, continuous, and unobstructed paths of travel for use by pedestrians with disabilities within a pedestrian circulation path—that comply with PROWAG standards for width, surface quality, and slope. Compliance will guarantee that individuals with disabilities can move effortlessly from trails or shared-use paths to transit stops.
- **Small transit shelters:** Where transit stops are located along shared-use paths, accessible shelters and seating should be provided to accommodate individuals with disabilities who may need to rest or wait for transportation. These shelters should not obstruct traffic flow on the path and should have ample space for wheelchair users. Shelters should be provided at transfer points, at stops in weather-exposed locations or without nearby

⁴ National Association of City Transportation Officials. (n.d.). *Side-boarding island stop*. In *Transit street design guide*. <https://nacto.org/publication/transit-street-design-guide/stations-stops/stop-configurations/side-boarding-island-stop/>

⁵ National Aging and Disability Transportation Center. (n.d.). *Toolkit for the assessment of bus stop accessibility*. <https://www.nadtc.org/wp-content/uploads/NADTC-Toolkit-for-the-Assessment-of-Bus-Stop-Accessibility.pdf>

potential sheltering locations, and at stops with relatively high use by senior and child passengers.⁶

Support for U.S. DOT's Proposed Effective Date

RTC agrees with the proposed effective date that the DOT recommends for the adoption of PROWAG. Many agencies have implemented the guidance in PROWAG by building or redesigning transit stops. Setting an effective date would increase the confidence of the stakeholders and minimize interference with current and future projects.

Collaboration on Tactile Warning Surface Indicators (TWSIs)

The DOT should collaborate with other agencies and stakeholders to describe other tactile warning surface indicators (TWSIs) and explain how they should be used. Tactile features like Tactile Direction Indicators and Tactile Warning Delineators benefit people with visual impairments. Clear guidance would be helpful for practitioners and users so they have more specific information on how and when these indicators should be applied in various transportation settings. As supported by the current research and testing, these tools should be applied consistently to guarantee safety at transit stops and shared-use paths.

Supplementing the Rulemaking with Additional Resources and Activities

We also recommend that the DOT supplement this NPRM with additional resources and activities, such as funding programs, toolkits, and technical assistance, to improve transit stop accessibility further. These resources could potentially help local and state agencies upgrade thousands of transit stops to meet compliance with PROWAG standards and provide accessible transportation options for individuals with disabilities.

PROWAG and Trails and Shared-Use Paths

Trails and shared-use paths are critical in enhancing mobility and independence for people with disabilities. RTC urges the DOT to apply PROWAG standards consistently to ensure that transit stops along trails and shared-use paths are accessible and usable to persons with disabilities. Applying PROWAG in this way would align with other objectives of equitable access to transportation and promote active transportation for all.

Amending DOT's Definition of "Transit Stop" to include PARs

Additionally, RTC recommends that DOT amend its proposed definition of "transit stop." The proposed PROWAG definition states, "transit stops include if provided, transit shelters and pedestrian circulation connections between transit shelters and bus boarding and alighting areas or boarding platforms they serve." We recommend amending that proposed definition to reference PARs that connect to pedestrian circulation paths. They are as vital to accessibility as the pedestrian connections between shelters and boarding and alighting areas.

⁶ National Association of City Transportation Officials. (n.d.). *Small transit shelter*. In *Transit street design guide*. <https://nacto.org/publication/transit-street-design-guide/station-stop-elements/stop-elements/small-transit-shelter/>

Support for PROWAG adoption

RTC strongly supports adopting the PROWAG standards for pedestrian facilities in the public right-of-way. We encourage the DOT to ensure that pedestrian facilities, including transit stop boarding and alighting areas, are usable by all individuals, including those with disabilities, and improve overall accessibility.

Thank you for considering our comments. We look forward to continued collaboration on this important issue.

Sincerely,

Joseph Reed
Director of Government Relations
Rails-to-Trails Conservancy