September 23, 2024

Secretary Pete Buttigieg

U.S. Department of Transportation

1200 New Jersey Avenue SE

Washington D.C. 20590

Dear Secretary Buttigieg:

The American Council of the Blind (ACB) thanks the Department of Transportation (DOT) for the opportunity to provide input on the public right of way accessibility guidelines (PROWAG). Like most of the disability community, ACB waited for years for the U.S. Access Board to publish the guidelines, and we were excited when they put out the guidelines in 2023. However, as the DOT begins to adopt and implement the new guidelines, ACB wants to highlight a few related safety barriers that exist for blind and low vision pedestrians. As we illustrate these hazards, we will propose a few steps that can be taken to lesson the safety risks both I the short and long-term.

The American Council of the Blind is the nation’s leading member-driven non-profit organization of and for people who are blind or have low vision. Founded in 1961 and comprised of more than 65 state and special-interest affiliate organizations, ACB strives to increase the independence, security, equality of opportunity, and to improve the quality of life for all people who are blind or experiencing vision loss. Integral to our mission is ensuring people who are blind or low vision have equitable access to all modes of transportation to be active members of their communities.

People who are blind or low vision depend greatly on public transit; they regularly use public bus systems and other accessible transit systems. However, they need a safe pathway to get to such bus stations. Many cities across are beginning to create what are often referred to as floating bus stops or remote bus stops. These bus stops are not located on a typical sidewalk; instead, they are generally separated from a typical sidewalk by a bicycle lane, sometimes with bicycle traffic going in both directions. As a result, to access the bus stop, a blind or low vision pedestrian has to cross the bicycle lane to get to the bus stop. This presents safety risk for several reasons. First, bicycles are much quieter than a motor vehicle. As a result, blind pedestrians cannot hear the bicycle coming. This makes them more susceptible to being struck by a bike. Next, often times, access to the floating bus stop is placed mid-block. As a result, there are not stop signs or lights for the cyclist to stop at. These cyclists ride quickly down the lane and often fail to yield for pedestrians. This is unsafe for any person on foot but especially for blind or low vision persons. Blind or low vision crossers are at great risk of being struck by a bicycle.

A subcommittee of the Transportation Research Board (TRB) is beginning research on the implications for safety risks for blind pedestrians across the country as these new bus stops are being utilized. The research will assess the likelihood of and frequency of pedestrian injuries by cyclists. ACB urges DOT to cease the installation of new floating bus stops until such research has been completed by TRB and the results can be analyzed to understands the implications for blind pedestrians attempting to use the effected bus stops. Existing research carried out by DOT already exists to demonstrate how bicycle lanes keep cyclists keep bike riders safe on the roads. Therefore, it is pertinent that the next step is taken to analyze safety implications for blind pedestrians. At this time, cities lack necessary data to understand safety implications.

ACB has a few additional suggestions to mitigate safety risks for blind and low vision pedestrians forced to utilize floating bus stops. First, many bicycle lanes include two lanes of traffic so bicycles can travel in both directions. This make it even more dangerous for blind pedestrians because they have to listen for traffic coming from both directions. Bicycle lanes should only be permitted to have traffic running with the application lane of automobile traffic. As a result, pedestrians at least know where to anticipate bicycle traffic is coming from. Second, the equivalent of cross walks across bike lanes to floating bus stops must not be place mid-block. If such a crossing is mid-block, there is no adjacent stop sign or accessible pedestrian signal (APS). If a crossing section over the bike lane is placed at a corner of an intersection, a bicycle is more likely to yield with the presence of a stop sign or stoplight. This would mitigate the risk of a bike collision. Third, in addition to the TRB research project, cameras should be installed widely near floating bike lanes to observe the activities of bicycles. The traffic practices of cyclists should be observed to see how fast they go and if they are yielding for foot traffic. Such data can be used to make future decision to improve the safety of pedestrians. Finally, research should be done on the number of reported bicycle accidents involving pedestrians. A sample of cities should be looked at and statistics on the number of pedestrians struck by a bike should be explored.

ACB asks DOT to cease new installation of floating bus stops until the research is completed and proper analysis can be carried-out. Such analysis can then be used to determine best practices on how to mitigate the explained safety risks. We understand that already existing construction may be difficult to suspend, but, DOT can at least put a pause on future installations until proper analysis is completed. Additionally, ACB asks for the installation of PHB. This technology provides pedestrians another tool to alert bicyclists to their presence and intention to cross the lane.

Thank you for the opportunity to provide our input on the new guidelines and related issues in this area. Please reach out if we can clarify or expand on any of the comments we made. You can contact Claire Stanley, Director of Advocacy and Governmental Affairs, at [cstanley@acb.org](mailto:cstanley@acb.org), or at 202 559-2041. We would be happy to answer any of your questions.

Sincerely:

Scott Thornhill

Executive Director