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­August 14, 2024

U.S. Department of Transportation

Secretary Pete Buttigieg

1200 New Jersey Ave. SE

Washington, DC 20590

Dear Secretary Buttigieg:

The American Council of the Blind appreciates the opportunity to provide comments on the Department of Transportation’s (DOT) request for information (RFI) regarding equity in transportation resources in the United Sates ([Docket No. DOT-OST-2024-0072). Below are our responses to the following selected questions.

The American Council of the Blind is the nation’s leading member-driven organization of and for blind and low-vision individuals. Founded in 1961 and comprised of thousands of members and 66 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 blind and low-vision individuals have access to accessible, reliable, and affordable public transportation that enables them to participate in their communities.

1. The Department of Transportation’s (DOT) intention and work to expand access to transportation and better infrastructure is the most meaningful to the blind and low-vision community when seeking to advance equity. The DOT report correctly acknowledged the overwhelming number of barriers that exist that keep the blind community from seeking essential services, such as employment, healthcare, and basic grocery shopping, because accessible transportation is not obtainable. Many Americans live in “transportation deserts” and cannot access needed public transportation. Blind and low-vision people depend on public transit; without public transit options, they are isolated. Inequity in employment is thus a product of such transportation barriers. Many blind and low-vision individuals have reported that one of the major barriers to employment is the inability to get to work. The lack of public transportation also limits the availability of ADA paratransit because of how the service is designed. Paratransit service relies on the availability of fixed-route transportation and will not operate in many communities outside of fixed route transit hours or boundaries, creating additional barriers to employment and other community engagement.

Furthermore, the infrastructure of many communities only exacerbates this problem. Zoning policies separate needed services from many communities, especially when their inhabitants cannot drive or access a personal vehicle. Additionally, many of these car-reliant communities are not walkable. Expanding access can be achieved through the development of new infrastructure models. Inequity for such populations is the byproduct of the development structure of the neighborhoods they live in.

The affordability of transportation remains a barrier for people who are blind or have low vision. Because of lack of access to other forms of public transportation, many blind and low-vision individuals have begun to rely on rideshare companies such as Uber and Lyft. However, the price of such services can become prohibitive. This community is already highly unemployed or underemployed. As a result, the ability to pay for such services becomes difficult. Additionally, even the price for paratransit services, which can be up to two times the cost of the public transit system in one’s community, can be extremely expensive.

What activities can be expanded?

We appreciate DOT’s acknowledgement that transportation needs expand beyond just the transportation vehicle itself; the infrastructure of the community impacts access to public transit. For instance, if proper sidewalks do not exist in a community to lead a blind or low-vision individual to a public bus stop, they cannot safely get to the bus stop to use the public bus system. If a person cannot get to a bus stop safely, the entire use of public transportation becomes useless. We thank DOT for recognizing this need, but we urge DOT to go farther in finding ways to improve city infrastructure. DOT could conduct more research on the impact of infrastructure problems on various communities; ask Congress for greater appropriations for community development projects to improve city development; and work with local communities to amend zoning policies to make communities more walkable.

More research must be done to assess the entire route a pedestrian must make to get from their dwelling to public transportation options. If a clear path with things like accessible sidewalks, working accessible pedestrian signals, or curb cuts are not present, the use of public transportation becomes ineffective. The DOT should carry out more research to find out how many communities include completely accessible paths to get them from their homes to public transportation.

Low-income communities are often disproportionately impacted by such access barriers. The more walkable cities are often seen in more affluent areas. DOT should make efforts to assess lower income communities to determine what kind of infrastructure needs exist. DOT could develop a study that assesses cities and neighborhoods based on their annual income, focusing on those with the lowest incomes and then moving upward. This would require a greater amount of research of communities across the country.

DOT must also explore appropriate possibilities to enhance community development. We are excited that the bipartisan infrastructure plan is providing funding to help begin such projects. However, a steady resource is necessary for ongoing development to occur. Redevelopment to make communities more walkable and accessible will need to take place over time; this requires ongoing funding.

The plan also rightfully proposes reassessing zoning policies that keep infrastructure from building different resources closer together. Blind and low-vision individuals are more independent if they can walk to needed places such as grocery stores. If zoning policies are changed to allow housing options closer to essential services, greater equity will be provided for this population. The plan already looks at this, but we encourage DOT to go further to assess zoning policies across the country. More research should be done to highlight the positive outcome of such communities that push back against traditional neighborhood zoning practices. Additionally, zoning policies are done at a very local level. As a result, efforts should be made to work with and incentivize local governments, not just work at the federal level.

(b) What new activities can DOT consider for the future?

The report did not go into significant detail about accessible crossing options for people who are blind or have low vision. We appreciate that the report acknowledged the need to move forward with the promulgation of regulations for the public right-of-way accessibility guidelines (PROWAG), something that is moving very slowly. DOT stated publicly that a notice of proposed rule-making should come out in the fall of 2024. Our community is excited but unsure if this will happen on time. The new PROWAG should assist in the expansion of accessible pedestrian signals (APS). We are optimistic. However, we believe DOT can always do more to increase the installation and maintenance of APS across the nation.

ACB once again thanks you for the opportunity to respond to this DOT request for information. If you have any questions concerning these comments, please reach out to Claire Stanley at [cstanley@acb.org](mailto:cstanley@acb.org), or (202) 559-2041.

Sincerely,

A signature on a white background

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Claire Stanley, J.D.

Director of Advocacy and Governmental Affairs