



Questions and Answers for Solving ADA Design Challenges within the Public Right-of-Way

(Dates of webinar: September 21 – 22 and 28 – 29, 2021)

Q: Do the ramp requirements in the California Building Code apply to the Public Right-of-Way?

A: Yes. Whether they receive federal funds, local governments are required to comply with the federal 2010 ADA Standards, Title 24 of the California Code of Regulations (which contain California building regulations), or local codes, whichever provides the greatest access. [Local Assistance Procedure Manual, Chapter 11 Design Guidance](#)

Q: What is the minimum width in an obstruction in the Public Right of Way Accessibility Guidelines (PROWAG)? And what is the maximum?

A: If you're complying with the standards, it's 48 inches; there's no exception or allowance for obstructions similar to the Americans with Disabilities Act Accessibility Guidelines (AADAG). The AADAG allows a narrow spot of two feet in length for 30 inches in width, but only if you're following the AADAG. If you're following the Public Right of Way Guidance (PROWAG), it's 48 inches, no allowance for minimum obstructions.

Q: Any idea on when PROWAG to become effective or adopted?

A: The US Access Board is actively working to finalize the PROWAG, at which time the USDOT and USDOJ will need to issue notices of regulations to adopt it as a standard. While this has been a lengthy process, progress is being made behind the scenes. While I cannot offer a prediction of when these activities will occur, I would hope to see some notices forthcoming in the near future in the Federal Register.

Q: Please clarify if utility maintenance is considered an alteration if it touches a sidewalk or ramp.

A: When a portion of a pedestrian facility is disturbed during construction for whatever purpose, it is considered an alteration and must be replaced in a manner that is consistent with the accessibility requirements within the scope of the project. For example, if a portion of sidewalk is removed to excavate a utility line, then the sidewalk being replaced should meet the width, cross-slope, and longitudinal slope requirements, to the maximum extent feasible. Practitioners will need to consider how to transition from the newly installed portion facility to tie into the undisturbed portion of the facility.

Q: Can you clarify the path of travel width at obstructions? Caltrans guidance allows for a minimum clear width of 36 inches at an obstruction such as a signal pole.

A: That would be a California Department of Transportation (Caltrans) specific guidance. If following the PROWAG (not adopted), as guidance, it's 48 inches. Suppose you're following the Caltrans guidance; it's 36 inches. If you're following AADAG, the minimum is 30 inches. It depends on what is the policy for your agency standard.

Q: How do blended transitions direct low vision pedestrians into the crosswalk?

A: Blended transitions do not direct pedestrians into the crosswalk. Pedestrians are finding the crosswalk location or orienting themselves to cross the street based on the sound of traffic. They're using the detectable edge of the curb and the sounds of traffic to orient where 90-degree crossings will be. The

placement of detectable warnings and curb ramps are going to be a secondary cue for them.

Q: Pedestrian Circulation Path versus Pedestrian Access Route and what are the differences?

Note: Please reference definitions in [Chapter One \(R1\) in the PROWAG](#).

A: Pedestrian Access Route – a continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path. Pedestrian access routes consist of one or more of the following pedestrian facilities: walkways/sidewalks, curb ramps (excluding flares), landings, crosswalks, pedestrian overpasses/underpasses, access ramps, elevators, and platform lifts.

Pedestrian Circulation Path – a prepared exterior or interior surface provided for pedestrian travel in the public right-of-way. Includes independent walkways, shared-use paths, sidewalks, and other types of pedestrian facilities. All pedestrian circulation paths are required to contain a continuous pedestrian access route that connects to all adjacent pedestrian facilities, elements, and spaces that are required to be accessible.

Q: The pedestrian signals in a downtown corridor are being replaced with a new system combining WALK/DONTWALK and count-down signals. Must Accessible Pedestrian Signals (APS) be included in the new system?

A: Yes. The installation of a new system is an alteration that must be accessible to and usable by people with disabilities to the maximum extent feasible. APS is widely available. Controller and push-button improvements that include APS capability can be added when a complete system is upgraded. Providing crossing information in usable formats should be included in the scope of work for a project of this size, complexity, and cost.

Q: Would an alteration (overlay) trigger the requirement to upgrade buttons?

A: No. If resurfacing, this type of work doesn't require you to touch the sidewalk or curb ramps.