



SDOT POLICY MEMORANDUM

Date: October 27, 2017
To: Scott Kubly, SDOT Director
From: SDOT ADA Committee
Subject: SDOT Policy for Accessible Pedestrian Signal (APS) Installation Requirements

Statement of Intent

Under Title II of the Americans with Disabilities Act (ADA), state and local governments are obligated to provide “effective communication” for those using or accessing public programs, services, and activities. For pedestrians living with visual and/or hearing impairments, audible and vibrotactile communication may be provided by means of Accessible Pedestrian Signals (APS) at signalized intersections. These signals can provide information in an “effective” or accessible format to assist in making signalized street crossings easier to use for all pedestrians.

Also under Title II of the ADA, state and local governments are obligated to make public programs, services, and activities accessible to those living with disabilities when existing facilities are altered or when new facilities are constructed.

The purpose of this policy is to define under what circumstances APS devices will be provided when an existing traffic signal is altered or a new traffic signal installed within the Seattle public right-of-way and within the jurisdiction of the City of Seattle.

Note: Referenced guidelines, standards, and guidance for Accessible Pedestrian Signals are available and are outlined in a Technical Memorandum on file that precedes this document.

Aspects of Accessible Pedestrian Signals

There are multiple aspects of a pedestrian signal that make it accessible to pedestrians living with disabilities. These aspects include, but are not limited to: the location of pedestrian pushbuttons with respect to the sidewalk, curb ramps, and the edge of the curb or roadway pavement, the height and orientation of the pushbutton, pedestrian signal head location, auditory indications, and vibrotactile indications.





Policy for Accessible Pedestrian Signal APS Design and Implementation

When a new traffic signal is installed or an existing traffic signal is altered within the Seattle public right-of-way, APS devices with street crossing information in accessible formats shall be provided and located as required in documents referenced in this policy. As traffic signal alterations or new installations are evaluated, the APS Installation Matrix in this document is to be referred to for determining the minimum APS improvements to be included as a part of the project scope of work.

When installing APS devices as a part of significant traffic signal alterations or new installations, the scoping and technical requirements identified in the 2011 PROWAG, with exceptions as noted in this policy, and the 2009 MUTCD must be adhered to as well as the City of Seattle Plans and Specifications for Municipal Construction and any specific instructions provided in the device manufacturer's specifications. The technical criteria established in these referenced documents identify the features that the APS devices must include, the preferred and required locations for devices, the audible and vibrotactile information that must be provided, and speech messaging to be employed, where applicable. The MUTCD also specifies the appropriate time during traffic signal operation when audible and vibrotactile information is to be provided, the duration of such information, the volume necessary for audible information, and other technical criteria.

Where the requirements of this policy are not met, it must be documented how the improvements are accessible to the maximum extent feasible, and approved through the deviation request form process.

Pre-Timed Signals

When altering existing pre-timed traffic signals or installing new traffic signals in pre-timed areas (or similar), the pedestrian signal must be accessible. Audible and vibrotactile messaging aspects of an accessible pedestrian signal are required per this policy as shown in the APS Installation Matrix.

Deviation from the Policy

There are no exceptions allowing for the exemption of APS when installing new or altering existing traffic signals. The audible and vibrotactile features are required to be activated upon the installation of any APS device, also without exception.

If the design engineer cannot provide or install APS devices due to existing site constraints or if APS devices are requested to be omitted by the public or the City, it is required that the Right-of-Way Improvements Manual Deviation Request Form is completed. In this form, rationale for omitting APS devices, placing APS devices in non-preferred locations, or any other deviation from this policy and the identified scoping/technical criteria must be documented. Upon completion of documentation, including thorough justification for the proposed deviation, the Deviation Request Form must be signed by the Engineer of Record (with stamp), the Design Supervisor and/or the City Traffic Engineer, and the SDOT ADA Coordinator.

It should be noted that this policy requires the provision of effective communication through Accessible Pedestrian Signals, as identified in the City of Seattle Plans and Specifications for Municipal Construction. This policy does not discourage the development of technologies or alternative means of providing effective communication, but it does not permit the use of alternative formats in lieu of APS.





APS Installation Matrix:

APS Equipment Minimum Requirements and Project Scope for Local and Federally Funded Improvements

(refer to *Alterations vs. Maintenance* section for additional information)

		Project Scope			
		Sidewalk or Curb Ramp Improvement Requires Existing PPB ² be Relocated	Countdown Signal Provided	Existing Signal Significantly Altered	New or Completely Rebuilt Signal, or APS Customer Service Request
APS Improvement(s)	Pedestrian Countdown Head and Companion		X	X ¹	
	All Pedestrian Heads Countdown at the Intersection			X ¹	X
	PPB ² Located per PROWAG/MUTCD	X		X ³	X ³
	PPB ² per COS Standard Plan 522b for all Crossings of the Intersection			X ¹	X

¹Number of crossings and extent of equipment upgraded to be determined on a project-by-project basis, determined by the scope of modification and type of intersection. At a minimum, arterial crossings shall be upgraded to pedestrian countdown head and pedestrian pushbutton per COS Standard Plan 522b, where applicable.

²Pedestrian Pushbutton.

³If feasible, given existing conditions and site constraints.

Alterations vs. Maintenance of Traffic Signals

The ADA generally requires that altered portions of existing facilities and elements added to existing facilities are accessible to and usable by people living with disabilities. Maintenance activities, however, may not necessarily trigger obligations to upgrade facilities so that they are accessible and comply with the current ADA Standards.

The 2011 PROWAG (proposed) advises that APS is to be installed to existing signals “when the signal controller and software are altered, or the signal head is replaced (per R209.2).” **This policy allows for**





minor exceptions to this guidance and is intended to require the provision of APS devices when the existing signal is *significantly* altered, including improvements that impact pedestrian access and use only. The following activities are examples of improvements that may not trigger APS installation obligations as they are considered maintenance activities or outside of the scope of traffic signal improvements that impact pedestrian use:

- ④ Countdown signals may be provided in existing signal housings without triggering APS installation obligations, given the scope of work for the improvement does not expand to include pedestrian features of the signal.
- ④ Signal controller software or controller modifications that do not impact pedestrian use do not generally require the provision of APS.
- ④ The installation of curb ramps or other civil improvements that do not include modifications to the traffic signal do not trigger APS installation obligations. It should be noted that any civil improvements that include the relocation of existing pedestrian pushbuttons require that pushbuttons are placed in an accessible location as identified in the 2011 PROWAG and the 2009 MUTCD, if feasible given existing conditions and site constraints.
- ④ The relocation of existing pedestrian pushbuttons does not generally trigger APS installation obligations. Relocation of pedestrian pushbuttons may require the installation of new or improvement of existing curb ramps or sections of sidewalk; refer to the [Right-of-Way Opening and Restoration Rule](#) for additional information. The installation of curb ramps or relocation of existing pushbuttons should not preclude compliant APS installation in the future.

This policy will be reviewed and revised, if necessary, when the proposed guidelines (PROWAG) are adopted as an enforceable standard by the DOJ and/or U.S. DOT.

APS Data Maintenance Requirement

All APS devices shall be updated in the Traffic Signal Asset in the Hansen system to enable proper tracking and mapping of available assets to the public. For additional information and instruction on APS data maintenance in Hansen, contact the SDOT ADA Coordinator or the SDOT Asset and Performance Management group.

