THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: May 21st, 2026

TO: Distribution

FROM: Elif Cetin, Chief Deputy City Engineer

SUBJECT: Installation of Accessible Pedestrian Signals in the Public Right of Way

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Under Title II of the ADA, state and local governments must provide effective communication for those using public programs, services, and activities. This memorandum represents the City's good faith effort to establishes a policy providing *Accessible Pedestrian Signals* (*APS*) at signalized intersections in compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. The City will install *APS* at signalized intersections to provide audible and vibrotactile communication for pedestrians with visual and/or hearing impairments.

I. Definitions

Alteration(s): a change to or an addition to a pedestrian facility in an existing developed public right-of-way that affects or could affect pedestrian access, circulation, or usability.[1] For practical implementation *Alteration(s)* include *Major Alteration* and *Major Reconstruction of a Traffic Signal* as defined below.

APS (Accessible Pedestrian Signal(s): a device or devices communicating information about pedestrian signal timing in non-visual formats such as audible tones or speech messages, and vibrating surfaces. [2]

Major Alteration or *Major Reconstruction of a Traffic Signal:* a substantial modification of an existing traffic signal at an intersection. A M*ajor Reconstruction of a Traffic Signal* or M*ajor* A*lteration* involves physical relocation or replacement of traffic signal infrastructure, for example, replacement of any traffic signal pole, mast arm, addition of turn lanes with accompanying protected turn phases. Routine and emergency maintenance or repairs of the equipment do not constitute a M*ajor* A*lteration.*

New Construction of a Traffic Signal: construction of a new signalized roadway, installation of a new traffic signal at a previously non-signalized intersection.

Pedestrian Hybrid Beacon: a special type of hybrid beacon used to warn and control traffic at an unsignalized location to assist pedestrians in crossing a street at a marked crosswalk.[3]

Pedestrian Signal Head: a device installed to direct pedestrian traffic at a crosswalk and contains the walking person symbol (symbolizing "walk") and the upraised hand symbol (symbolizing "don't walk"). [4]

Pushbutton: a button to activate a device or signal timing for pedestrians, bicyclists, or other road users.

Shall: must, mandatory, bound, or legally obligated.

Should: strongly encouraged; if compliance is not achieved, provide a well-documented engineering-related reason.

Traffic Signals: for the intent of this Memorandum this definition includes *Pedestrian Hybrid Beacons* (HAWK) and Rectangular Rapid Flashing Beacons (RRFB).

II. Guiding Regulations

1. *New Construction* and *Alterations*

Pursuant to the implementing regulations of Title II of the ADA, 28 C.F.R. § 35.151(a)(1) mandates, "Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities . . . ." As such, the design and construction of new traffic signals is required to be readily accessible to and usable by individuals with disabilities. Additionally, 28 C.F.R. § 35.151(b)(1) states, "Each facility or part of a facility altered by, on behalf of, or for the use of a public entity in a manner that affects or could affect the usability of the facility or part of the facility shall, to the maximum extent feasible, be altered in such manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities . . . ." Through *APS* installation at traffic signals and at pedestrian crossings, the City ensures the traffic signal and crossings are accessible and usable by people with visual and hearing impairments or other disabilities, thus complying with the ADA.

2. Effective Communication

Section 28 C.F.R. § 35.160(a)(1) states, "A public entity shall take appropriate steps to ensure communications with . . . members of the public . . . with disabilities are as effective as communications with others." Furthermore, 28 C.F.R. § 35.160(b)(1) states, "A public entity shall furnish appropriate auxiliary aids and services where necessary to afford qualified individuals with disabilities . . . an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity of a public entity." The audio cues provided by *APS* devices provide the required effective communication at a signalized intersection in non-visual formats. See The National Cooperative Highway Research Program's Accessible Pedestrian Signals: A Guide to Best Practices. [5]

III. Scope

1. General Requirements

   a. The City will respond to public requests from the public for *APS* at existing signalized intersections. To comply with the current California Manual on Uniform Traffic Control Devices (CAMUTCD) and Public Rights-of-Way Accessibility Guidelines (PROWAG) regarding the placements for accessible pedestrian push buttons (PPB), it may be necessary to install new poles using existing PPB.

   b. If *APS* is installed at a signalized intersection, then it shall be installed at all controlled pedestrian crossings at that intersection.

   c. Installation of Hi-intensity Activated Crosswalk (HAWK), also known as Pedestrian Hybrid Beacon, and Pedestrian-actuated Rectangular Rapid Flashing Beacon (RRFB) devices shall be equipped with *APS* for new pedestrian crossings.

   e. Altering or replacing curb ramps (including changing from a single curb ramp to dual) does not require installation of *APS*. However, installation of new signal poles using existing PPB will be required to meet current CAMUTCD and PROWAG regulations regarding the placements for accessible PPB. Installation of non-pedestrian traffic signal improvement projects such as bicycle signal heads for cycle tracks/separated bikeways, bicycle loop detection systems, and bicycle push buttons at existing signalized intersections does not require *APS* installation. However, if PPB are installed for both pedestrian and bicycle operations, then *APS* shall be installed.

2. Traffic Signal Scope of Work that Triggers Installation of APS

   a. Installation of a new traffic signal at a previously unsignalized location.

   b. *Major alteration* or *major reconstruction* of an existing traffic signal such as removing and relocating one or more traffic signal poles, mast arms or installing a new controlled pedestrian crossing at an existing signalized intersection. (Note: work may also trigger installation of new signal poles for PPB operation/accessibility and new curb ramps or upgrading existing non-compliant curb ramps to current City standards).
   c. Minor modification or *alteration* of an existing traffic signal that installs Leading Pedestrian Interval (LPI), exclusive pedestrian phasing, or pedestrian countdowns that does not involve removing and relocating one or more traffic signal poles or mast arms.

3. Traffic Signal Scope of Work that Does Not Trigger Installation of *APS*

   a. Routine maintenance of pre-existing equipment including but not limited to vehicular detection systems, vehicular signal heads, preemption devices, signal controllers, auxiliary components to the controllers, battery backups, cabinets, communications/interconnect equipment, or pedestrian signal equipment.

   b. Minor modification of an existing traffic signal, such as installing vehicular detection systems, vehicular signal heads, preemption devices, signal controllers, auxiliary

components to the controllers, battery backups, cabinets, communications/interconnect equipment, pedestrian signal equipment, signal timing adjustments (including signal phasing or coordination changes), or video detection or CCTV cameras that do not involve removing and relocating one or more traffic signal poles or mast arms.

c. Installation of traffic control signs, striping, or pavement markings at the signalized intersection.

d. Signal controller and cabinet upgrades and/or repairs that do not alter the operation and display of pedestrian signals.

e. Emergency repairs of traffic signals that have been damaged by a catastrophic event, such as a lightning strike, vehicle collision, high winds or falling tree limbs. Repairs include such as the replacement of a traffic control signal components with a similar in physical appearance and operation.

IV. Effective Dates

1. Future Capital Improvement Projects (CIP): this Memorandum shall be effective for all construction projects issued for advertisement on or after May 21st, 2026.

2. Design-Build contracts: this Memorandum shall be effective for all design-build contracts where the design package is completed for advertisement on or after the date of this memo May 21st, 2026. For current Design-Build contracts that have not been awarded, this Memorandum should be implemented where practical and feasible.

3. Private party or other public agency public improvement permits: this Memorandum shall be effective for all permits where the first draft/preliminary submission signal design has not yet been submitted to Development Services Department and may also be applied to permit work currently under Development Services Department review, if feasible to do so. This Memorandum may also be applied to previously approved permits if mutually agreed to by the Development Services Department and the permittee.

V. *APS* Standards and Guidelines

1. *APS* shall meet CAMUTCD. Section 4E.09-4E.13- *Accessible Pedestrian Signals* and Detectors

2. Operable Parts: accessible pedestrian *pushbuttons* for new signals, traffic signal rebuilds, pedestrian control feature additions, and activities requiring replacement or relocation of a push button support shall meet the applicable standards. Refer to PROWAG R402, R404 and R406.

3. Pedestrian hybrid beacons, per CAMUTCD 4E, and 4F.

4. Rectangular rapid flashing beacons, CAMUTCD 2026 **CHAPTER 4L. RECTANGULAR RAPID FLASHING BEACONS** *APS* will be installed through fulfillment of the City's obligations to complete its ADA PROW Transition Plan and remediate complaints from persons with disabilities.

For technical assistance, contact the Deputy City Engineer assigned to your project or permit.

Elif Cetin, P.E.
Chief Deputy City Engineer

cc:

Honorable Heather Ferbert, City Attorney
Paola Avila, Chief of Staff, Office of the Mayor
Rolando Charvel, Chief Financial Officer
Rania Amen, City Engineer and Chief Community Services Officer
Kris McFadden, Deputy Chief Operating Officer
Bethany Bezak, Deputy Chief Operating Officer
Casey Smith, Deputy Chief Operating Officer
Randy Wilde, Senior Policy Advisor, Office of the Mayor
Scott Wahl, Chief of Police, Police Department
Robert Logan, Fire Chief, Fire-Rescue Department
Elyse Lowe, Director, Development Services Department
Myrna Dayton, Assistant Director, Engineering and Capital Projects Department
CIPRAC Members
Deputy City Engineers

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[1] PROWAG definitions: https://www.access-board.gov/prowag/application.html#r1043-defined-terms,

[2] PROWAG, Definitions: https://www.access-board.gov/prowag/application.html#r1043-defined-terms; CAMUTCD Section 1A.13 Definitions-03-1: https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/ca-mutcd/rev9/2025-camutcd-2014-rev9-part1-a11y.pdf

[3] PROWAG, Definitions: https://www.access-board.gov/prowag/application.html#r1043-defined-terms

[4] CA MUTCD 2026 Edition https://dot.ca.gov/programs/safety-programs/camutcd; PROWAG, Definitions: https://www.access-board.gov/prowag/application.html#r1043-defined-terms

[5] National Cooperative Highway Research Program's Accessible Pedestrian Signals: A Guide to Best Practices http://www.apsguide.org/about.cfm