



- CITY OF CLOVIS - ADA CODE INTERPRETATION MEMO

FROM: Planning and Development Services Department
Engineering Division

DATE: January 9, 2012

SUBJECT: ADA Code Interpretation Memo No. 2012-01

CODE SECTION/DESIGN ELEMENT

Crosswalk Striping at Curb Ramps within Public Rights-of-Way

BACKGROUND

City staff has researched the criteria of crosswalk striping at curb ramps located within the public rights-of-way. Research included the 2010 California Building Code (CBC), 2010 ADA Standards for Accessible Design (for Title III), Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (for Title II), July 26, 2011, 2009 MUTCD, and phone conversations with the Department of Justice, the U.S. Access Board, and a local CASp consultant.

The Americans with Disabilities Act, in short, recognized discrimination against persons with disabilities and provided accessibility requirements for publicly owned properties and places of public accommodation in Titles II and III, respectively. Adopted Title III Standards, thus mandatory requirements, by the Department of Justice and Department of the State Architect can be found in The 2010 ADA Standards and 2010 CBC, respectively. Unlike Title III, Title II Guidelines are currently being developed by the U.S. Access Board for future adoption by the Department of Justice for enforcement of accessibility within public rights-of-way. In the meantime, the designer is to utilize their knowledge of accessibility from known standards and related publications.

The 2010 ADA Standards and 2010 CBC require diagonal curb ramps with flared sides to have a segment of curb 24 inches long minimum located on each side of the curb ramp and within the marked crossing. As stated above, these Standards deal with accessibility in Title III. Title II does not get in to the specifics of curb ramps, but only requires, in general, public entities to provide curb ramps where pedestrian walkways cross curbs. The Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way for Title II is silent on this requirement; and, in discussions with the U.S. Access Board, if the Guidelines are silent, there could be a purpose for leaving this requirement out. In other words, the U.S. Access Board could have found a conflict with the "segment of curb" being employed within the public rights-of-way.

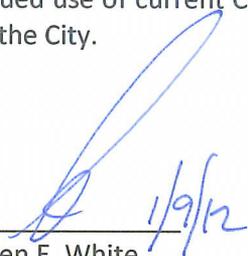
The Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way do require pedestrian access routes (sidewalks, pedestrian street crossings and other pedestrian circulation paths) to be connected by a curb ramp, blended transition, or a combination of curb ramps and blended transitions. Furthermore, the curb ramp or blended transition shall be contained wholly within the width of the pedestrian street crossing served, and excludes the flared sides of the curb ramp. For this issue, the "pedestrian street crossing" shall be the area bounded by the inside strip of the crosswalk markings. Additionally, under an "advisory" note, the flared sides are part of the pedestrian circulation path, but are not part of the pedestrian access route. For example, a 10' wide sidewalk is part of the pedestrian circulation path, but the Guidelines only require a minimum 4' wide pedestrian access route within this 10' wide sidewalk. Similarly, the curb ramp elements/components are part of the pedestrian circulation path, but only the ramped surface component of the curb ramp is the pedestrian access route.

The Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way refer to the 2009 MUTCD Standards for additional administration of accessibility requirements. The 2009 MUTCD Standards provides some guidance, more or less, that crosswalks should be not less than 6' wide and the markings should be located so that the curb ramps are within the extension of the crosswalk markings.

INTERPRETATION

It is City Staff's conclusion that the U.S. Access Board has intentionally remained silent on the "segment of curb" for perhaps the same findings that the City of Clovis has unveiled (a resulting 19' wide crosswalk with the inclusion of the "segment of curb" beyond the flared sides). Therefore, until adoption of Standards by the Department of Justice for Accessibility Standards within public rights-of-way, the continued use of current City of Clovis Standards for crosswalk markings shall be employed on projects within the City.

Approved _____


Steven E. White
City Engineer

1/9/12