



SDOT POLICY MEMORANDUM

Date: May 9, 2018
To: Goran Sparrman, SDOT Interim Director
From: SDOT ADA Committee
Subject: SDOT Policy for Crosswalk Markings and Curb Ramp Obligations

Statement of Intent

To establish a policy that memorializes the SDOT approach to identifying curb ramp improvement or installation obligations when marking crosswalks, also referred to as pedestrian street crossings. This policy applies to the marking of crosswalks and the associated curb ramps within the public right-of-way and within the jurisdiction of the City of Seattle.

Overview and Purpose

SDOT has received inconsistent opinions and guidance from various state and federal agencies with respect to curb ramp obligations when marking existing legal crosswalks. This memorandum identifies the process that will be adhered to when marking or re-marking crosswalks and when this activity triggers curb ramp improvement or installation obligations in the City of Seattle.

This policy has been developed with guidance provided by the Washington Division of the Federal Highway Administration (FHWA) and is supported by the Seattle City Attorney's Office. Additional guidance is available as provided by the DOJ/DOT Joint Technical Assist documents that detail curb ramp obligations when roadway alterations occur, referenced at the end of this memorandum.

Policy for Crosswalk Marking and Curb Ramp Obligations

Marking or re-marking an existing legal crosswalk, as defined by the Seattle Municipal Code and the Revised Code of Washington, is not considered an "alteration" that triggers curb ramp improvement or installation obligations under Title II of the Americans with Disabilities Act (ADA). Marking or re-marking of an existing legal crosswalk is identified as "maintenance," which does not impact pedestrian access.

If a new legal crosswalk is created/introduced, it would be considered an "alteration" that does trigger curb ramp improvement or installation obligations. The installation of a new legal crosswalk would change the use of the road and would be intended to impact and provide pedestrian access, and therefore would trigger curb ramp obligations so that the new crosswalk is readily accessible and usable by persons with disabilities. For example, a new mid-block crosswalk installation, where previously no legal crosswalk existed, whether marked or unmarked, requires that curb ramps be installed in congruence with the new crosswalk.





References for Requirements and Guidance

1) Seattle Municipal Code / Revised Code of Washington

11.14.135 "Crosswalk" means the portion of the roadway between the intersection area and the prolongation or connection of the farthest sidewalk line, or, in the event there are no constructed sidewalks, then between the intersection area and a line ten feet (10') therefrom, except as modified by a marked crosswalk. (RCW 46.04.160)

2) DOJ/ DOT Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads or Highways are Altered through Resurfacing, July 8, 2013

<https://www.ada.gov/doj-fhwa-ta.htm>

3) Supplement to the 2013 DOJ/ DOT Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads or Highways are Altered through Resurfacing, December 1, 2015

<https://www.ada.gov/doj-fhwa-ta-supplement-2015.html>

