



SDOT POLICY MEMORANDUM

Date: August 5, 2015
To: Scott Kubly, SDOT Director
From: SDOT ADA Committee
Subject: SDOT Policy for ADA Compliance Assessment of Existing Curb Ramps

Statement of Intent

To establish a policy that acknowledges existing curb ramps that were built to satisfy requirements of the 1991 and the 2010 ADA Standards (and/or 2006 DOT ADA Standards) may be considered compliant and are not required to be removed and replaced. This policy applies to existing curb ramps assessed within the public right of way and within the jurisdiction of the City of Seattle.

Overview and Purpose

Curb ramps designed and constructed within the Seattle public right of way are in accordance with the City of Seattle Standard Plans and Specifications for Municipal Construction. The current City standards are modeled from the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (referred to as PROWAG), created by the U.S. Access Board, as well as the WSDOT Design Manual and the WSDOT Field Guide for Accessible Public Rights of Way. PROWAG is understood to be the current best practice for the provision of accessibility within the public right of way.

Curb ramp construction standards and requirements have evolved slightly over time, and while the PROWAG guidelines offer some design solutions that are better fit for right of way construction, in some cases the requirements under PROWAG are slightly more stringent. At this time, the PROWAG guidelines have not been adopted by the U.S. Department of Justice, and therefore are not yet enforceable standards under Title II of the ADA. The 1991 and the 2010 ADA Standards for Accessible Design, which are intended primarily for building and site construction, are currently the standards that are enforceable by the Department of Justice.

It should be noted that the slope and geometric requirements in the 1991 and the 2010 ADA Standards are essentially the same with only a few minor exceptions that are listed below or are not applicable to this policy. For this policy only the 2010 ADA Standards requirements will be acknowledged as they are the most current enforceable standards. The 2006 DOT ADA Standards are congruent with the 2010 ADA Standards with respect to the elements considered in this policy.

This policy will be reviewed upon the adoption of the PROWAG by the DOJ.





Policy for ADA Compliance Assessment of Existing Curb Ramps

Where an existing curb ramp within the Seattle public right of way complies with the 2010 ADA Standards (and/or 2006 DOT ADA Standards) slope and geometric requirements, it may be considered compliant and is not required to be removed and reconstructed.

In addition, if the existing curb ramp complies as just stated, but does not include a detectable warning surface, it should be retrofitted to include one so that it may be accessible to pedestrians with a visual impairment and must comply with the City of Seattle Standard Plans and Specifications for Municipal Construction. This provision is readily achievable and does not typically require the removal or replacement of an existing ramp. This retrofit application is not considered an alteration that would trigger the provision of a curb ramp that adheres to the standards of new construction, nor does it trigger the requirement of an installation of a companion ramp per the City of Seattle Standard plans and RCW 35.68.075.

To be considered compliant, existing curb ramps must adhere to the following requirements (§406 of the 2010 ADA Standards):

- 8.3% maximum running slope OR;
10.0% maximum running slope for a 6" maximum rise ramp, where slopes are necessary due to space limitations*
- 2.0% maximum cross slope
- 36" minimum curb ramp width
- 36" minimum depth top landing, landing matches ramp width**
- 2.0% maximum landing slope (any direction)
- 5.0% maximum counter slope at gutter or road surface
- 10% maximum side flare (wing) slopes
- ¼" maximum vertical surface discontinuities, or ½" with 1:2 bevel
- Ramp fits within crosswalk striping (where provided)
- Bisector ramp (shared diagonal) includes 3' wide x4' length minimum clear space at base of ramp outside active vehicular lanes

* If it appears that there is adequate available right of way or means to provide a curb ramp with the required 8.3% maximum running slope, this exception is not applicable and the curb ramp cannot be deemed compliant. This provision is allowed under the 2010 ADA Standards, but was not identified in the 1991 ADA Standards.

** The exception under §406.4 of the 2010 ADA Standards allows for a ramp without a landing at the top of the curb ramp, provided the side flare slopes do not exceed 1:12 slope. This exception is not included in this policy, as the top ramp landing is necessary to accommodate high pedestrian volumes within the public right of way wishing to bypass the ramp.

Note: Existing ramps that are determined to comply with the 2010 ADA Standards should be documented within project files for scopes of work that would normally include the removal and replacement of existing noncompliant curb ramps.

