



SDOT POLICY MEMORANDUM

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

Statement of Intent

To establish a policy that memorializes the City's approach to curb bulb installations in instances where the available space or established grades of an existing condition are such that curb ramps that comply with the City Standards are not achievable. This policy applies to curb bulbs that alter an existing condition (not new roadway or sidewalk construction) and the associated curb ramps within the public right-of-way and within the jurisdiction of the City of Seattle.

Background

A planned scope of work may include the installation of curb bulbs. A curb bulb's purpose is to shorten the crossing distance for pedestrians and improve visibility at crossing locations. By physically and visually narrowing the street, curb bulbs also have a traffic calming effect.

In many cases, where available right-of-way may be limited or constrained, where existing utilities or other developed infrastructure may limit design options, or where existing, established roadway and sidewalk grades and slopes are significant, curb bulbs may also provide an increased opportunity to design and build curb ramps that comply with the City Standards.

This memorandum serves to clarify under what circumstances a curb bulb is or is not required to be added to a planned scope of work to achieve curb ramps that comply with City Standards within the public right-of-way and within the jurisdiction of the City of Seattle.

Definitions

For the purposes of this policy the following definition of terms is provided.

City Standards: The current version of the City of Seattle Standard Plans for Municipal Construction and the City of Seattle Standard Specifications for Municipal Construction.

MEF: Design or construction of a curb ramp that complies with the City Standards to the Maximum Extent Feasible

ROWORR: SDOT Right-of-Way Opening and Restoration Rules, Director's Rule 01-2017

Curb Bulb: A sidewalk feature which alters an existing condition by relocating a curb into an existing roadway and effectively increases sidewalk space and diminishes roadway area.





Policy for Curb Bulbs and Curb Ramp Obligations

Where alterations occur within the Seattle public right-of-way that include curb ramp construction, the curb ramps shall be designed and constructed in accordance with the City Standards or to the MEF.

If a planned project scope does not already include the installation of curb bulbs, this policy does not require the addition of such. Curb ramps, where required, must be designed and constructed to be either in accordance with the City Standards, within the existing sidewalk and public right-of-way space available, or be designed and built to the MEF.

Refer to the [SDOT Policy for MEF Documentation for Curb Ramps](#) for additional information.





References for Requirements and Guidance

1) The Americans with Disabilities Act, 28 CFR § 35.151(b)(1)

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, if the alteration was commenced after January 26, 1992.

2) 2010 ADA Standards for Accessible Design / 2006 DOT ADA Standards

202.1 General. Additions and *alterations* to existing buildings or facilities shall comply with 202.

202.2 Additions. Each *addition* to an existing building or facility shall comply with the requirements for new construction. Each *addition* that affects or could affect the usability of or access to an area containing a primary function shall comply with 202.4.

202.3 Alterations. Where existing elements or spaces are altered, each altered element or space shall comply with the applicable requirements of Chapter 2.

EXCEPTIONS:

1. Unless required by 202.4, where elements or spaces are altered and the circulation path to the altered element or space is not altered, an *accessible* route shall not be required.
2. In *alterations*, where compliance with applicable requirements is technically infeasible, the *alteration* shall comply with the requirements to the maximum extent feasible.

3) Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (2011)

R202.3 Alterations. Where existing elements, spaces, or facilities are altered, each altered element, space, or facility within the scope of the project shall comply with the applicable requirements for new construction.

R202.3.1 Existing Physical Constraints. Where existing physical constraints make it impracticable for altered elements, spaces, or facilities to fully comply with the requirements for new construction, compliance is required to the extent practicable within the scope of the project. Existing physical constraints include, but are not limited to, underlying terrain, right-of-way availability, underground structures, adjacent developed facilities, drainage, or the presence of a notable natural or historic feature.

