Appendix A: Guidelines for Citywide Access Compliance in the PROW

Guidelines for Citywide Access Compliance in the Public Right of Way

City of San Diego Pedestrian Master Plan

7/25/2012

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This memorandum presents a summary of current regulations, guidelines, and best practices from other jurisdictions related to meeting accessibility standards within the City of San Diego public right-of-way (PROW). This memorandum also documents the City's current PROW accessibility programs, policies, and methods for implementing accessibility improvements within the PROW. Finally, the memorandum presents results from a survey of comparable jurisdictions' accessibility-related PROW databases.

The *Americans with Disabilities Act (ADA) of 1990* affords people with disabilities protections against discrimination in the areas of employment, public services, public accommodation, transportation access and telecommunications. The *Architectural Barriers Act (ABA) of 1968* and *Rehabilitation Act of 1973* preceded the ADA and, along with the ADA, require that pedestrian facilities meet certain accessibility requirements. The ABA ensures that all facilities designed, altered, and built with Federal funds or leased by a Federal agency meet Federal accessibility standards. Section 504 of the *Rehabilitation Act of 1973* establishes accessibility standards for each Federal agency and prohibits disability-based discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Federal Executive agency or by the United States Postal Service. Ensuring newly constructed and altered facilities are accessible is a common agency requirement under Section 504. The ADA extends accessibility-related civil rights protections to include all public facilities regardless of Federal assistance.

Title II of the ADA prohibits state and local governments from discriminating against persons with disabilities by excluding participation in or denying benefits of programs, services, or activities to persons with disabilities. In 1991 the Department of Justice issued regulations that detail ADA compliance requirements. These regulations compel local governments to conduct self-evaluations of their services, programs, policies and activities to determine if they are in compliance with the ADA's nondiscrimination requirements. Local governments are also required to prepare transition plans to document problems and physical barriers to access and to describe the methods and schedule for making structural or physical changes needed to make public programs accessible.

The public right-of-way (PROW) may be considered a public service in two ways:

- Streets, sidewalks, and curb ramps may be part of a continuous path of travel between programs, at various public and private facilities located on adjacent properties, such as public offices, schools, parks and recreational facilities, public service agencies, hospitals and health clinics, police facilities, and public housing.
- Streets, sidewalks, and curb ramps may be considered public infrastructure that are essential to the usage of the City's built environment.

Correspondingly, public agencies with authority over roadways and walkways must include in their transition plans a schedule for installing curb ramps or other sloped areas where pedestrian paths cross curbs as well as other improvements necessary to achieve programmatic accessibility for persons with disabilities.

II. PROW Accessibility Policies and Programs

This section summarizes existing federal and state accessibility laws, regulations and guidelines with emphasis on PROW relevance; reviews the policies of jurisdictions comparable to San Diego; and describes the City of San Diego's current PROW accessibility policies and programs.

Federal and State Accessibility Regulations and Guidelines

The following subsections outline current federal and state regulatory documents, guidelines, and case laws that relate to PROW accessibility. These include design standards for physical improvements as well as requirements for programs. Where Federal and State standards deviate, both are listed in this memorandum and the more stringent standards should apply. Where current standards are not defined, this memorandum lists standards that should ensure compliance with Federal and State accessibility requirement and regulations.

Overview of Federal and State Accessibility Documents

Table 2.1 summarizes key federal and state regulatory documents and guidelines related to achieving access compliance as well as the web address of each respective document. The first three documents listed, the ADA of 1990, ADA U.S. DOJ Title II Final Rules and Regulations, 28 CFR Part 35, and ADA Accessibility Guidelines (ADAAG), are fully enforceable under Federal law. The remaining eight national documents serve as tools for complying with the intent of Federal law. Table 2.1 also lists State of California Building Code, Title 24 reference materials. Since the ADA specifically states that it does not override other state and local requirements that are more restrictive, the State of California Building Code access regulations must be applied if actual construction is undertaken. The ADA and Title 24 differ in their technical applications and also in how they are enforced. Whereas ADA requirements are enforced through litigation, Title 24 compliance is enforced through the building review, approval, and inspection process. City initiated construction work is evaluated based on the most stringent requirements of the ADAAG or Title 24, 2007 edition.

Table 2.1: Accessibility-Related Regulatory Documents and Guidelines

Federal References		
Title	**Description**	**Web Address**
Americans with Disabilities Act of 1990 (ADA)	The complete ADA text.	www.ada.gov/pubs/ada.htm
ADA, U.S. DOJ approved Title II Final Rules and Regulations, 28 CFR Part 35 (1991)	Final, binding rules and regulations on the requirements of transition plans and the inclusion of curb ramps.	www.usdoj.gov/crt/ada/reg2.html
ADA Standards for Accessible Design (2010)	Current, binding version (as approved by U.S.D.O.J.) of the federal ADA Accessibility Guidelines, including requirements for curb ramps, sidewalks, street loading zones, etc.	www.access-board.gov/adaag/html/adaag.htm
ADA Amendments Act of 2008	The ADA Amendments Act of 2008 was signed into law on September 25, 2008 and took effect as law on January 1, 2009.	http://www.access-board.gov/about/laws/ada-amendments.htm
ADA, U.S.D.O.J. Title II Technical Assistance Manual (1993)	U.S.D.O.J.'s interpretations of applicability of the ADA to curb ramps under local jurisdiction.	www.usdoj.gov/crt/ada/taman2.html

Federal References *(continued)*		
Title	**Description**	**Web Address**
Manual on Uniform Traffic Control Devices	FHWA publishes the MUTCD to provide uniform standards and specifications for all traffic control devices.	**mutcd**.fhwa.dot.gov/
Special Report: Accessible Public Rights-of-Way Planning and Design for Alterations (2007)	Technical report prepared by a subcommittee of the Public Rights-of-Way Access Advisory Committee (PROWAAC) to provide guidance on making alternations to public rights-of-way.	http://www.access-board.gov/prowac/alterations/guide.htm#1
Revised Draft Guidelines for Accessible Public Rights-of-Way (2005)	Pending, non-binding version (not approved by U.S.D.O.J.) of the federal ADA Accessibility Guidelines for Public Rights-of-Way, including requirements for curb ramps, sidewalks, street loading zones, etc.	www.access-board.gov/prowac/draft.htm
Proposed ADA / ABA Accessibility Guidelines (2004)	Pending, non-binding version (not approved by U.S.D.O.J.) of the federal ADA Accessibility Guidelines for all facilities.	www.access-board.gov/ada-aba/index.htm
ADA U.S. DOJ Regulation for the Suspension of Detectable Warnings (1998)	U.S.D.O.J. regulation describing the extent of suspension of detectable warning requirements (expired on July 26, 2001)	www.access-board.gov/adaag/dws/DWs.htm
Technical Bulletin: Ground and Floor Surfaces (2003)	Non-binding research and guidance (not approved by U.S.D.O.J.) on the selection and slip-resistance of various ground and floor surfaces.	www.access-board.gov/adaag/about/bulletins/surfaces.htm
ADAAG Requirements for Detectable Warnings (2007)	Description of current federal detectable warning requirements.	www.access-board.gov/adaag/dws/update.htm
Visual Detection of Detectable Warning Materials by Pedestrians with Visual Impairments (2006)	Non-binding research and guidance (not approved by U.S.D.O.J.) on the selection and use of detectable warnings in the public right-of-way.	www.access-board.gov/research/dw-fhwa/report.htm
Final Report, Regulatory Committee on Accessibility, Guidelines for Outdoor Developed Areas (1999)	Non-binding, advisory guidelines for accessible design of trails and outdoor facilities.	www.access-board.gov/outdoor/outdoor-rec-rpt.htm
State of California References		
Title	**Description**	**Web Address**
California State Building Code - Part 2 of Title 24 of the California Code of Regulation, Chapter 11B, 2001 edition (2004)	Current, binding version State of California accessibility requirements, including requirements for curb ramps, sidewalks, street loading zones, street parking, etc. (see primarily Sections 1127B & 1133B).	www.documents.dgs.ca.gov/dsa/pubs/access-manual _6-16-06.pdf
California Building Code - Title 24 Design Checklists, by Division of the State Architect (2006)	Clarifying design checklists as prepared by the California Division of the State Architect	www.documents.dgs.ca.gov/dsa/pubs/checklists_6-16-06.pdf
California Building Code - Title 24 / ADAAG Code Comparison Chart (2004)	U.S. DOJ / DSA prepared a chart showing a side-by-side comparison of federal vs. state requirements	www.documents.dgs.ca.gov/dsa/other/casbs_20%doj_comments.pdf
California Manual on Uniform Traffic Control Devices (2010)	State of California MUTCD is published by Caltrans and is issued to adopt uniform standards and specifications for all traffic control devices	http://www.dot.ca.gov/hq/traffops/signtech/mutcdsupp/ca_mutcd2010.htm

PROW, including the Federal ADAAG and State of California Building Code, Title 24 which currently define legal accessibility standards, and the Revised Draft Guidelines for Accessible Public Rights-of-Way which were drafted to replace the ADAAG for accessibility compliance specifically within the PROW. Following brief guideline descriptions, a comparison table of the current Federal and State and draft Federal PROW standards is presented. Other relevant guidelines that assist with implementing the standards are briefly described.

ADA Accessibility Guidelines (ADAAG)

The ADAAG for accessible buildings and facilities was developed and is maintained by the U.S. Access Board. These guidelines were adopted by the Department of Transportation and published as the 1991 ADA Standards for Accessible Design and are enforceable under the ADA. "The implementing regulations for Titles II and III of the ADA require curb ramps to be provided in all existing facilities and for new construction and alterations"[1] With the exception of curb ramps, federal accessibility standards have not yet been developed for sidewalks and trails. Despite the current lack of enforceable federal standards, "public and private entities who design and construct sidewalks and trails are obligated under ADA to make them accessible to and usable by people with disabilities. Until specific standards are adopted as part of ADAAG, some of the existing technical provisions for new construction and alterations in these guidelines can be applied to the design of pedestrian facilities, such as"[2]:

- Accessible Routes (ADAAG 4.3)
- Parking and Passenger Loading Zones (ADAAG 4.6)
- Curb Ramps (ADAAG 4.7)
- Ramps (ADAAG 4.8)

Under the Architectural Barriers Act (ABA) the U.S. Access Board is also responsible for accessibility guidelines for newly constructed or altered facilities that have been constructed, altered, designed or leased using federal funds.[3]

Revised Draft Guidelines for Accessible Public Rights-of-Way

These draft guidelines are currently under public review. Although these guidelines have not been formally adopted, they represent the most current state-of-the-art with respect to accessibility in the PROW. The guidelines were also written to apply to new construction. The extent to which they should be applied to major alterations and retrofits is still under review by the Access Board and Department of Justice (DOJ). These guidelines specifically pertain to the PROW, whereas the ADAAG and ABA apply primarily to buildings and facilities standards. According to the Access Board, "While [the ADAAG and ABA] address certain features common to public sidewalks, such as curb ramps, accessible routes, ground and floor surfaces, and bus stop shelters, further guidance

[1] Federal Highway Administration, U.S. Department of Transportation. "Designing Sidewalks and Trails for Access, Part I of II: Review of Existing Guidelines and Practices" Barbara McMillen, Program Manager; Beneficial Designs, Inc. Author. Clay Butler, Illustrations. September 2001. http://www.fhwa.dot.gov/environment/sidewalk2/

[2] *ibid*

[3] U.S. Access Board. "Revised Draft Guidelines for Accessible Public Rights-of-Way," November 25, 2005.

don't include applicable provisions, the November 23, 2005 Revised Draft Guidelines for Accessible Public Rights-of-Way should be referenced as a best practices manual. The draft guidelines address the following:

- Pedestrian Access Route
- Alternate Circulation Path
- Curb Ramps and Blended Transitions
- Detectable Warning Surfaces
- Pedestrian Crossings
- Accessible Pedestrian Signals
- Street Furniture
- On-Street Parking
- Call Boxes

Changes to the Guidelines for Accessible Rights of Way will be enforceable when they are finalized and adopted by the Department of Justice and Department of Transportation.

California State Building Code, Title 24

Accessibility codes are contained within the California State Building Code, Title 24, Part 2, of the California Code of Regulation. **Table 2.2** provides a comparison of the accessibility standards established by the ADAAG, the proposed Revised Draft Guidelines for Accessible Public Rights-of-Way and the California State Building Code, Title 24.

Table 2.2: Comparison of Federal and State Standards

Paths of Travel			
Accessibility Element	**Current ADAAG Standards**	**Draft Guidelines for Accessible PROW Standards**	**Current State Title 24 Codes and Standards**
Changes in levels	Up to 1/4" may be vertical and without edge treatment, up to 1/2" must be beveled with a slope no greater than 50%. No greater than 1/2" unless designed as a ramp, except up to 6" height may be at a slope of 8.33%.	Maximum 1/4" vertical level change allowed, up to 1/2" shall be beveled with a slope no greater than 50%, greater than 1/2" must meet ramp criteria. Changes exceeding 1/4" should have 30" minimum horizontal separation.	Continuous surface with no change in level over 1/2". If change is between 1/4" and 1/2", it needs to be beveled at a 50% slope. No greater than 1/2" unless designed as a ramp.
Running slope, maximum	5%; except if designed as a ramp, 8.33%.	Not to exceed grade of adjacent roadway, unless less than 5% or meeting ramp criteria.	5%; except if designed as a ramp, 8.33%.
Level areas on continuous slopes	None	None	Level areas (2% max. slope) at least 5'-0" in length at intervals of every 400'.
Cross-slope, Maximum	2% (1:50)	1:48	2%. If deemed to create unreasonable hardship 2.5% gradient is permitted
Width, minimum	36", except wider if required to turn around an obstruction.	48", not including curb width	48"

Table 2.2: Comparison of Federal and State Standards (continued)

Paths of Travel *(continued)*			
Accessibility Element	**Current ADAAG Standards**	**Draft Guidelines for Accessible PROW Standards**	**Current State Title 24 Codes and Standards**
Passing space	60" x 60" passing spaces at least every 200'.	None	None
Edge conditions	None	None	If drop-off greater than 4", a 6" high curb is required.
Gratings	Openings no greater than 1/2" wide in one direction. Elongated openings should be perpendicular to dominant direction of travel.	Openings no greater than 1/2" wide in one direction, with elongated openings perpendicular to the dominant direction of travel.	Path shall be free of gratings whenever possible. Openings limited to 1/2" in the direction of traffic flow.
Overhead clearance	80", unless barrier to warn visually-impaired persons is provided.	80", unless 27" high barrier to warn visually-impaired persons is provided.	80", unless 27" high barrier to warn visually-impaired persons is provided.
Protruding objects	Shall not reduce the clear width. If 27-80" high, can protrude no more than 4". Below 27" may protrude any amount. Free standing objects mounted on posts or pylons 27"-80" above the ground may overhang 12".	Shall not reduce the clear width. If 27"-80" high, can protrude no more than 4". Post-mounted objects 27"-80" above the ground may overhang no more than 4". Signs mounted between two posts greater than 12" apart must have bottom edge below 27" or above 80".	Shall not reduce the clear width. If 27"-80" high, can protrude no more than 4". Below 27" may protrude any amount. Free standing objects mounted on posts or pylons 27"-80" above the ground may overhang 12".
Surface texture	Stable, firm, and slip-resistant.	Stable, firm, and slip-resistant.	Slip-resistant if over 6% slope; if under, at least as slip resistant as medium salted finish.
Slopes at driveway approaches	None	2% minimum for 48" minimum clear width, 8.33% elsewhere	Any appreciable warping shall not exceed 8.33% in any direction.
Curb Ramps			
Accessibility Element	**Current ADAAG Standards**	**Draft Guidelines for Accessible PROW Standards**	**Current State Title 24 Codes and Standards**
Location	Wherever an accessible route crosses a curb.	Curb ramp or blended curb within the width of crosswalk wherever pedestrian access route crosses a street.	At each corner of street intersections wherever an accessible route crosses a curb.
Number and arrangement	One per corner required, two per corner optional	One per corner required, two per corner recommended	One per corner required, two per corner recommended.
Slope of street gutter/transition, max.	5%	5%	5%
Changes in level at street (lip)	No change in level, flush transition required	No change in level, flush transition required	1/2" beveled at 45 degrees at bottom edge or curb ramp.
Surface texture	Stable firm and slip-resistant.	Stable, firm, and slip-resistant	Stable, firm, and slip-resistant and of contrasting finish from the sidewalk.
Gratings, utility boxes, other appurtenances	None	No gratings, pull boxes, utility vault, manhole, or other appurtenances located on ramp slope or at bottom common landing.	No gratings, pull boxes, utility vault, manhole, or other appurtenances located on ramp slope or at bottom common landing.

Table 2.2: Comparison of Federal and State Standards (continued)

Curb Ramps *(continued)*			
Accessibility Element	**Current ADAAG Standards**	**Draft Guidelines for Accessible PROW Standards**	**Current State Title 24 Codes and Standards**
Parallel curb ramps	Acceptable as alternate to flared curb ramp	Acceptable for all locations	Acceptable as alternate to flared curb ramp
Parallel curb ramps - *Main ramp slopes, maximum*	8.33%	8.33%, except greater slope OK if ramp is required to be 15'	8.33%
Parallel curb ramps – *Cross-slope on ramp & landing (pan), maximum*	2%	2%	2%
Parallel curb ramps - *Width, minimum*	36"	48"	48"
Parallel curb ramps - *Bottom landing (pan) size*	None	Minimum 48" x 48" for parallel curb ramps	Minimum 48" x 48" for parallel curb ramps
Parallel curb ramps - *Grooved border*	None	None	12" wide at top, 3/4" on center.
Parallel curb ramps - *Top landing size*	None	48" x 48"	48" x 48"
Parallel curb ramps - *Top landing (transition) slope, max.*	5%	None	5% within 4' of curb ramp
Parallel curb ramps - *Detectable warnings*	Main slope of curb ramp shall have truncated domes extending the full width and depth of the ramp surface.	Truncated domes required on main slope of curb ramp for 24" in direction of travel, 6"-8" from curb line.	Detectable warnings shall extend full width and depth inside grooved border where main slope is less than 6.66%.
Perpendicular curb ramps	Acceptable for all locations.	Acceptable for all locations.	Acceptable for all locations.
Perpendicular curb ramps - *Main ramp slope, maximum*	8.33%	8.33%	8.33%
Perpendicular curb ramps - *Cross-slope on ramp, maximum*	2%	2%	2%
Perpendicular curb ramps - *Side slope(s), maximum*	If pedestrians are forced to cross curb ramp, side flares of maximum 10% slope required. If landing is less than 48", max. slope is 8.33%.	10%, if pedestrians are forced to cross curb ramp.	10%
Perpendicular curb ramps - *Width, minimum*	36"	48"	48"
Perpendicular curb ramps - *Grooved border*	None	None	12" wide at rear and sides, 3/4" on center.
Perpendicular curb ramps - *Adjacent slope, maximum*	5%	2% max. at 48" x 48" top landing	5% within 4' of ramp.
Perpendicular curb ramps - *Top landing side, minimum*	48" minimum depth, unless side slope is less than 8.33%	48" x 48", unless side slope is less than 8.33%	48" minimum depth at full width unless side slope is less than 8.33%.
Perpendicular curb ramps - *Detectable warnings*	Main slope of curb ramp shall have truncated domes extending the full width and depth of the ramp surface.	Truncated domes required on main slope of curb ramp for 24" in direction of travel, 6"-8" from curb line.	Detectable warnings shall extend full width and depth inside grooved border where main slope is less than 6.66%.
Flush (blended) transition	None	Allowed where sidewalk is at same level as street	Acceptable for all locations.

Table 2.2: Comparison of Federal and State Standards (continued)

Curb Ramps *(continued)*			
Accessibility Element	**Current ADAAG Standards**	**Draft Guidelines for Accessible PROW Standards**	**Current State Title 24 Codes and Standards**
Flush transition - *Main slope perpendicular to street, maximum*	None	2%	8.33%
Flush transition - *Cross-slope, maximum*	None	2%	2%
Flush transition - *Width, minimum*	None	48"	48"
Flush transition - *Grooved border*	None	None	None
Flush transition - *Adjacent slope, maximum*	5%	2% at landing	5% within 4' of ramp.
Flush transition -*Detectable warnings*	None	Truncated domes required on main slope of curb ramp for 24" in direction of travel, 6"-8" from curb line.	Detectable warnings shall extend full width and depth inside grooved border where main slope is less than 6.66%.
Flush (blended) transition - Obstructions by vehicles (parked or stopped)	Located so as not to be obstructed by parked vehicles.	None	Located so as not to be obstructed by parked vehicles.
Pedestrian Crosswalks			
Accessibility Element	**Current ADAAG Standards**	**Draft Guidelines for Accessible PROW Standards**	**Current State Title 24 Codes and Standards**
Required	None	If provided, must meet accessibility standards	None
Location	With terminal ends located so that lowered portion of curb ramp is within crosswalk.	With terminal ends located so that lowered portion of curb ramp is within crosswalk.	With terminal ends located so that lowered portion of curb ramp is within crosswalk.
Cross-slope (street grade)	None	2% maximum, except at mid-block crossings.	None
Running slope	None	5% maximum	None
Width	None	96" minimum	None
Medians and islands	Cut through level with street or with 2 curb ramps separated by 48" long level area.	Cut through level with street or with 2 curb ramps separated by 48" long level area, with detectable warnings separated by at least 24".	None
Detectable Warning Surfaces			
Accessibility Element	**Current ADAAG Standards**	**Draft Guidelines for Accessible PROW Standards**	**Current State Title 24 Codes and Standards**
Specifications	Truncated domes 0.2" high with 0.9"diameter, spacing of 2.35", and of contrasting finish, integral with the walking surface. (Requirement was suspended in 1994, but suspension expired.)	Truncated domes 0.2" high with 0.9" to 1.4" diameter at bottom, 50-65% of base diameter at top, spacing center to center between 1.6" and 2.4", and of contrasting color.	Truncated domes 0.2" high with 0.9"diameter, spacing of 2.35". Contrasting color and finish from that of sidewalk.

Table 2.2: Comparison of Federal and State Standards (continued)

Detectable Warning Surfaces *(continued)*			
Accessibility Element	**Current ADAAG Standards**	**Draft Guidelines for Accessible PROW Standards**	**Current State Title 24 Codes and Standards**
Locations	At curb ramps and flush transitions and transit boarding platforms.	At curb ramps and flush transitions and transit boarding platforms.	At curb ramps and flush transitions; rail crossings not shared with vehicles; transit boarding platforms; and other locations where the pedestrian access route not separated by curbs, barriers, railings, or other elements crosses a vehicular way.
Dimensions	36" width along length of boundary.	24" in direction of run for full width of curb ramp, landing, or flush transition	24" width along length of boundary.

Other PROW-Relevant Guidelines

This section provides a summary of other key guidelines for accessible pedestrian facility design.

Federal Highway Administration (FHWA)

In an effort to highlight when ADAAG provisions apply to sidewalks and trails, and how to bridge the remaining gaps, the Federal Highway Administration released Designing Sidewalks and Trails for Access as a two-part guidebook – Part I: Review of Existing Guidelines and Practices and Part II: Best Practices Design Guide. Part I is a compilation of data, designs, and guidelines collected from literature reviews and site visits. Part II focuses on the design process and identifying best practices for designing sidewalks and trails for access by all users.

American Association of State Highway and Transportation Officials' (AASHTO)

AASHTO has published two books, the Guide for the Planning, Design, and Operation of Pedestrian Facilities (2004) and Guide for the Development of Bicycle Facilities (1999) that are intended to provide guidance on the planning, design, and development of bicycle and pedestrian facilities to ensure a safe accommodation for all modes of travel on public rights-of-way.

Manual on Uniform Traffic Control Devices (MUTCD)

The FHWA, with the active assistance from the National Committee on Uniform Traffic Control Devices, adopted a new manual in 2009. Pedestrian and bicycle provisions in the MUTCD are located in a number of the parts of the manual. In general, the manual provides directives for traffic control devices that are to be used as standards, including warrants and design of pedestrian markings, signs, and signals. Access-relevant sections include:

- Section 3B.17 Crosswalk Markings
- Section 4C.05. Warrant 4. Pedestrian Volume
- Section 4D.03. Provisions for Pedestrians
- Section 4E.03 Application of Pedestrian Signal Heads
- Section 4E.06 Accessible Pedestrian Signals
- Section 4E.09 Accessible Pedestrian Signal Detectors

Likewise, the updated California MUTCD (2010) includes design standards for devices that enable communication with persons with disabilities within the PROW.

Other California Guidelines

The California Division of State Architect (DSA) has developed a 2008 California Access Compliance Reference Manual to assist projects under the review jurisdiction of DSA in complying with State mandated accessibility responsibilities. The guide is organized into five sections related to accessibility:

- Section 1 Statutes
- Section 2 Regulations
- Section 3 Policies
- Section 4 Interpretations of Regulations

- Section 5 Official Comments (construction project checklists)

The regulations discussed in Section 2 of the manual consist of excerpts from the California Code of Regulation, Title 24.

Topic 105.3 of the California Department of Transportation (Caltrans) Highway Design Manual delineates procedures for compliance with ADA and California Code Regulations. Those procedures state that Project Initiation Documents must consider pedestrian accessibility; pedestrian facilities must be documented and submitted as a part of all projects; and facilities must be designed in accordance with the Pedestrian Accessibility Guidelines for Highway Projects, Design Information Bulletin 82-03. The information bulletin provides guidance for pedestrian facility standards, including facility placement, relating to different forms of development, such as new construction and alterations. Design topics covered in the guidelines include:

- Surface
- Vertical Clearance
- Clear Width
- Grade
- Slope
- Grates and Railroad Tracks
- Ramps
- Curb Ramps
- Medians and Islands
- Handrails
- Objects
- Warning Curb and Guardrail
- Wheel Guides
- Landings
- Detectable Warning Surfaces
- Grooves
- Bus Stops
- Parking
- Trails
- Protrusions

Relevant Court Cases

This section synopsizes key court cases related to access in the PROW whose outcomes have reinforced or helped clarify cities' legal obligations to pursue PROW accessibility.

Kinney v. Yerusalim, filed in Philadelphia in 1993, was a class action law suit filed on behalf of disabled community members that sought to oblige the City to provide curb ramps when resurfacing streets. The court ruled that street resurfacing constitutes an alteration because resurfacing affects the usability of the roadway and therefore is subject to ADA requirements, including curb ramps. The district court determined that undue burden defense only applies to existing facilities, not new construction or alterations.

Tyler v. City of Manhattan, decided in 1994, resulted in the court ruling that the City of Manhattan complete a self-evaluation of its current services, policies and practices consistent with Federal law and adopt a schedule for installing curb ramps.

Schonfeld v. City of Carlsbad of 1997 established that in rare instances a project may be exempt from fully meeting ADA standards if construction or alterations to meet standards are deemed technically infeasible due to physical terrain or site conditions. Under such circumstances, projects are not completely exempt from complying with accessibility requirements, but rather, must be accessible up to the maximum extent possible.

Barden v. City of Sacramento, filed in 1999, charged that the City of Sacramento failed to comply with the ADA because it did not improve sidewalks to ADA standards when making public roadway alterations. A result of the case was a determination by the 9th Circuit Court of Appeals that sidewalks are a program under ADA and therefore must be accessible to persons with disabilities.

In *Deck v. City of Toledo* of 1999, the court ruled that the City of Toledo breached its duty under Title II of the ADA by neglecting to oversee the City's contractors' construction of curb ramps.

In *California Council for the Blind and Californians for Disability Rights vs. California Department of Transportation (Caltrans)* in 2009, resulted in a settlement under which Caltrans agreed to spend over $1 billion over the next 30 years to modify sidewalks and walkways to improve pedestrian accessibility. This includes 2,500 miles of sidewalk, 10,000 new curb ramps and upgrading 50,000 existing curb ramps.

Review of Comparable Jurisdictions' Local Policies

This section outlines the elements of comparable cities' policies and procedures related to PROW accessibility. The items listed in **Table 2.3** highlight local government best practices related to accessibility policy. Transition plans and policy documents that address updated PROW regulations were reviewed in detail, including the County and City of San Francisco ADA Transition Plan for Curb Ramps and Sidewalk (2008) and Sacramento County ADA Transition Plan (2005).

Table 2.3: ADA and Accessibility "Best Practices" of other Local Governments

City	ADA Transition Plan	PROW in Transition Plan	Conduct Detailed Sidewalk Survey	Required Sidewalk Width	Basic Curb Ramp Survey	Detail Curb Ramp Survey	Curb Ramp Width	Type of Detect. Warning	Curb Ramps in C.I.P.	Audible Ped Signals
Sacramento	yes	yes	partial	48"	yes	yes	48"	36" x 48", yellow	yes	all new
San Francisco	yes	yes	partial	48"	yes	yes	48"	24" x 48", yellow	no	by request
Oakland	yes	unknown	partial	48"	yes	no	48"	36" x 48", various	unknown	all new
Fremont	yes	unknown	partial	unknown	yes	partial	48"	pending	pending	by request
Stockton	yes	unknown	unknown	unknown	yes	no	unknown	unknown	yes	unknown
Fresno	yes	yes	unknown	48"	yes	unknown	48"	24" x 48", yellow	yes	by request
Long Beach	yes	yes	unknown	48"	yes	unknown	48"	unknown	yes	by request
Honolulu	yes	yes	unknown	36"	yes	yes	36"	24" x 48", yellow	yes	not included
Nashville	yes	yes	unknown	36"	yes	no	36"	24" x 48", yellow	yes	not included
Portland	yes	in PMP	partial	48"	yes	unknown	48"	24" x 48", various	yes	by request
Austin	yes	unknown	unknown	48"	yes	unknown	36"	24" x 48", various	yes	by request

The City of San Diego's design standards are consistent with the majority of the cities' best practices outlined in Table 2.3 (48" sidewalk width; 48" curb ramp width; 36" x full width yellow detectable warning). In terms of plans, the City has an adopted ADA Transition Plan (1997) with a section

devoted to the PROW. However, the PROW section focuses exclusively on curb ramps, public stairways, and transit stops. Also, the City conducted a detailed curb ramp and barrier survey of street corners in 2000. Another curb ramp inventory by the Transportation Department began in the Spring of 2012 utilizing aerial photography.

City of San Diego PROW Accessibility Policies and Programs

This section summarizes the City's current policies and programs effecting access compliance in the PROW. Documenting existing policies and programs serves as a precursory step to establishing a consistent citywide approach to access compliance.

Current Access Compliance Policies & Regulations

As noted in a previous section, the City adopted its current ADA Transition Plan in 1997. In addition to the Transition Plan, the City has produced numerous council policies, access memos, council reports, and informational bulletins pertaining to access compliance. Of these documents, the following are the most relevant to access compliance in the PROW:

- Policy No. 200-16 – Audible Pedestrian Traffic Signals (1985)
- Policy No. 200-07 – Comprehensive Pedestrian Crossing Policy (1990)
- Policy No. 600-32 – Standards for Centre City Streets, Enhanced Pedestrian Access (1994)
- Policy No. 500-08 – Disabled Persons Parking Zones on City Streets (1996)
- City Manager's Report 01-188 – Traffic Calming and ADA Issues (2001)
- City Manager's Report 02-156 – Access Barrier Removal Pedestrian Curb Ramps (2002)
- Street Design Manual (2002)
- Access Memo 2003-01 – Maximizing Pedestrian Safety (2003)
- Access Memo 2004-04 – Accessible Standards on Cross Slope, Running Slope,and Pedestrian Ramp Design (2004)
- Access Memo 2004-03 – Implementation of Truncated Domes on Curb Ramps (2004)
- City Manager's Report 04-116 – Implementation of Truncated Domes (2004)
- Standard Drawings
- Municipal Code
- General Plan

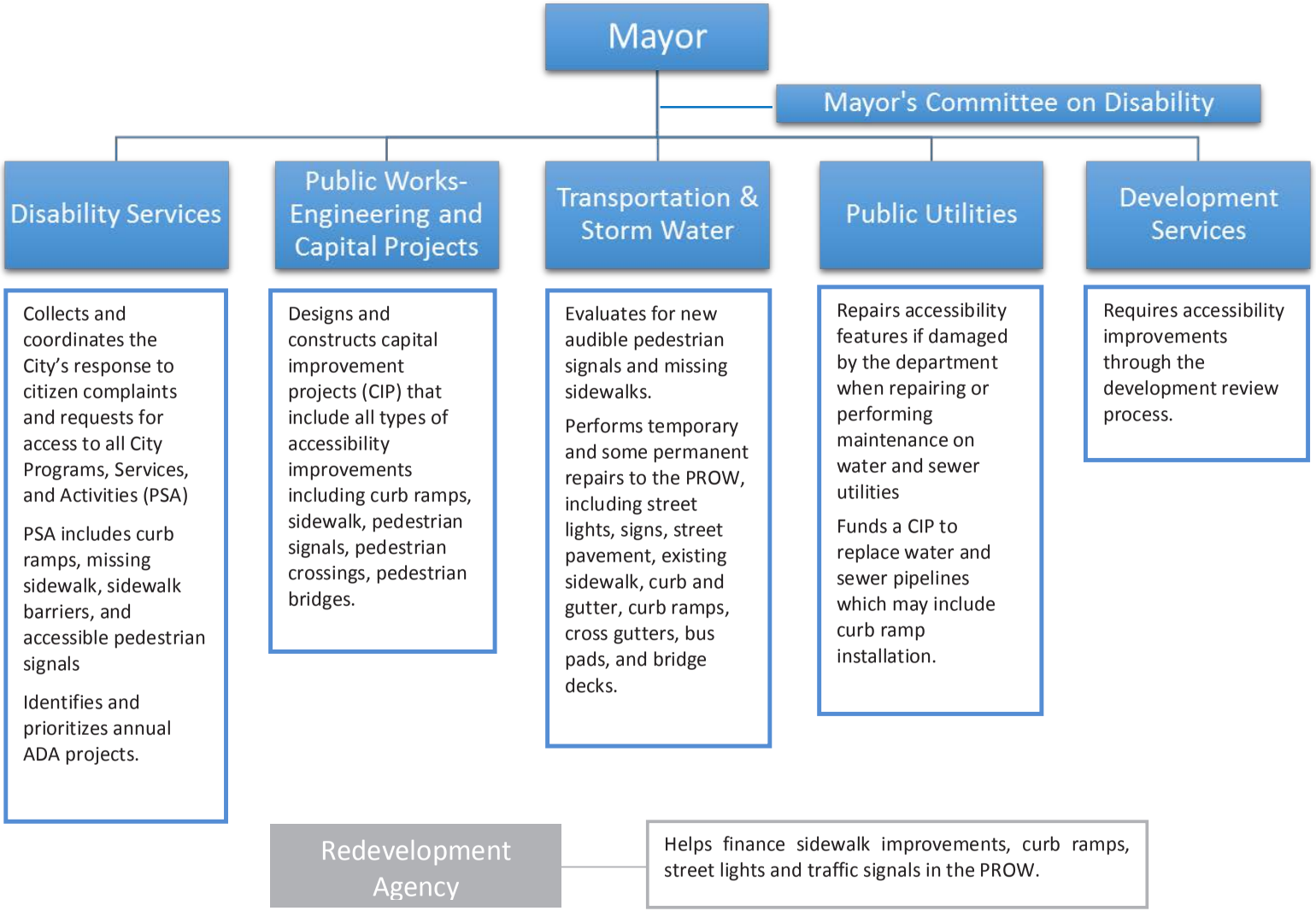
These policies and memos establish standards and practices to guide the City's ongoing efforts to ensure PROW compliance with the State and Federal accessibility laws. A complete list of the City's accessibility policies and regulatory memorandums is available for download on the City's Disability Services web page (http://www.sandiego.gov/disabilityservices/policies/index.shtml).

In 2004, the City also published construction details and curb ramp specifications for a variety of public right-of-way improvements, representing current City "best practices," in addition to the policy statements regarding truncated domes on curb ramps, and slopes and cross-slopes on sidewalks and ramps.

Access Compliance Programs and Activities

Because multiple City of San Diego departments are involved in implementing access compliance policies within the PROW, it is useful to document existing City programs and implementing departments. Clarifying the existing structure and processes serves as an initial stage in developing a consistent citywide process for achieving access compliance in the PROW. The following subsections summarize the current roles and processes of various City departments that have a part in achieving accessibility in the public right-of-way. **Figure 2-1** highlights the function of each department in achieving access compliance. The summaries following Figure 2-1 elaborate upon the accessibility-related practices of each department.

Figure 2-1
City Departments and Programs that Effect Accessibility in the PROW



Disability Services

Disability Services works to ensure that all facilities, activities, benefits, programs, and services operated or funded by the City are accessible to people with disabilities, which includes the PROW. Disability Services coordinates the City's Request/Complaint database of all City Programs, Services, and Activities (PSA). The department receives disability complaints regarding the City's PROW and leads the effort to resolve each issue through coordination with the City department that owns the asset involved in the complaint or request. The Transportation and Storm Water Department is the asset owner of missing sidewalks, barriers, and curb ramps. Disability Services works with the responsible department to ensure that issues are resolved through regular maintenance or construction projects but does not independently construct improvements.

Disability Services also manages the annual ADA project budget which fluctuates and is anticipated to be $12.9 million for Fiscal Year 2013. This includes facilities as well as PROW projects. Many of the public requests and complaints received by Disability Services are funded by this annual allocation. Other departments and divisions, such as Transportation Engineering, submit unfunded ADA needs to Disability Services for inclusion in the ADA project list.

Public Works - Engineering and Capital Projects Department

The Public Works - Engineering and Capital Projects Department (E&CP) performs a spectrum of engineering services including: improvement project planning, design, project and construction management; overseeing and inspecting private construction activities permitted within the public right-of-way; and surveying and testing materials..

E&CP is comprised of the following four divisions:

- Architectural Engineering and Parks
- Field Engineering
- Project Implementation & Technical Services
- Right of Way Design

Of these divisions**,** Project Implementation & Technical Services and Right of Way Design have integral roles in achieving accessibility with the public right-of-way.

The Project Implementation & Technical Services Division supports E&CP and other departments by providing technical, operational, and project services including preliminary engineering and assessment as well as ADA compliance review of CIP projects. The ADA Project Review and Technical Report section of the division reviews plans and conducts field reviews with staff outside of the section to evaluate project impacts on pedestrian accessibility and to ensure accessibility compliance standards are met. If existing curb ramps or sidewalk are identified as potentially non-compliant, the group may also evaluate existing facilities by request.

The Right of Way Design Division manages the implementation of right-of-way and related capital improvement projects including the design and management of transportation and street related projects, pedestrian features, and traffic signals. When accessibility-related improvements are identified and submitted to Right of Way Design, the division designs the right-of-way improvements, may solicit private bids to construct, and oversees the implementation of the plans.

Transportation and Storm Water Department

The Transportation and Storm Water Department (T&SW) was formed via restructure in January 2011. The new department consolidates the operation and maintenance of streets, sidewalks, and storm drains; leads efforts to protect and improve the water quality of rivers, creeks, bays, and the ocean; performs traffic and transportation system engineering; manages the Utilities Undergrounding program; and plans and coordinates work in the right-of-way.

T&SW is comprised of the following four divisions:

- Administration and Right-of-Way Coordination
- Storm Water
- Street
- Transportation Engineering Operations (TEO)

Of these divisions, Street and Transportation Engineering Operations have integral roles in achieving accessibility with the public right-of-way.

The Street Division performs temporary and some permanent repairs to the City's existing sidewalks, street lights, signs, curb, gutter, and pavement. Through their duties, the division may repair the following accessibility features: sidewalk, curb ramps, cross gutters, bus pads, street paving and some bridge decks. Deficient locations are reported to the Streets Division by citizens and other City staff. When reported, the division creates a Service Notification in the SAP software system and assigns the request to the appropriate area supervisor for evaluation, prioritization, and completion. The City is currently developing an Enterprise Asset Management System (EAM) to manage city assets throughout their lifecycle.

The Transportation Engineering Operations Division (TEO) manages the operation of the City's transportation system. Some of the Division's activities include coordinating and evaluating public requests for accessibility improvements. The Traffic Signal Operations section responds to public requests for audible pedestrian signals at intersections. Upon receipt of the request, staff conduct a site visit to verify that the location is a signalized intersection and able to accommodate audible pedestrian signals. Staff then notifies Disability Services about the request. Next, an independent accessibility analyst evaluates the site to determine if an audible signal and any other accessibility improvements are required at the location. When TEO receives the accessibility analyst's report, they develop a cost estimate and submits that cost estimate to Disability Services for inclusion in the unfunded ADA needs list that is considered for annual ADA project funding.

The Traffic Operations section addresses public requests for missing sidewalk installation. When requests are received, staff field check the location to verify that sidewalk is missing. If confirmed to be deficient the location is incorporated into the unfunded needs list. All missing sidewalk sites are eligible for funding and are prioritized based upon Council Policy 800-14: Prioritizing CIP Projects. There are currently about 400 locations on the unfunded needs list. Locations on the prioritized list are implemented in order when funding is identified. Some of this funding is received through the annual ADA project budget managed by Disability Services and some through TransNet funding. Once funding is established, TEO may package locations into a project and submit the project to PW-E&CP to design and implement the improvements.

Public Utilities

The Public Utilities Department is responsible for the maintenance and repair of water and sewer utilities located within the public right-of-way. Performing these duties sometimes requires the department to temporarily divert traffic and prohibit pedestrian access to safely complete work tasks.

Public Utilities Department also funds a substantial Capital Improvement Program (CIP) to replace water and sewer pipelines. These CIP projects trigger curb ramp installation if the project involves trenching or if the project entails street resurfacing with 1.5 inch overlay. Curb ramp installation is required at all intersections along the extent of the project where curb ramps do not already exist. If curb ramps exist but are non-complaint per current accessibility standards they must be replaced. The E&CP Department manages this CIP on behalf of the Public Utilities Department. Public Utilities does not itself make accessibility improvements. However, if the department damages existing accessibility facilities while performing maintenance and repair to utilities, it will repair the impacted pedestrian facilities.

Development Services

Development Services identifies and mandates accessibility requirements through the development review process. Public and private development within the PROW must adhere to accessibility standards identified during plan development and the development review process.

Redevelopment Agency

The Redevelopment Agency of the City of San Diego (Agency) was dissolved as of February 1, 2012. The City of San Diego, serving as the successor agency, has assumed the former Agency's assets, rights, and obligations, and is winding down the former Agency's affairs. Prior to its dissolution, the Redevelopment Agency's role in achieving accessibility within the PROW entailed funding accessibility improvements within its jurisdiction, principally through capital improvement projects. These projects were managed from design through implementation by E&CP. The Redevelopment Agency also entered into public/private partnerships with private property owners or developers to help fund accessibility improvements. Improvements were identified in the Redevelopment Plan and 5 Year Implementation Plan of adopted redevelopment project areas, Community Plans, existing City CIP unfunded needs list, input through Project Area Committee meetings, and through specific public/private development projects. The types of improvements financed were primarily sidewalk improvements, curb ramps, and traffic signals.

Mayor's Committee on Disability

The Mayor's Committee on Disability was established to advise the Mayor and City on disability issues and compliance under the ADA, including issues of access to City building, programs, services and activities. The voluntary advisory committee receives information and advises staff on the City's annual ADA projects and the ongoing work of Disability Services.

Table 3.1 on pages 20 and 21 provides additional detail on the departments' roles in identifying, prioritizing, implementing, and documenting accessibility improvements with the PROW.

Potential Limitations in Current Practices

City departments' procedures for addressing accessibility issues within the PROW vary significantly. Due to the diversity of departments and the variety of ways accessibility issues emerge, this is in large part necessary. However, there may be opportunities to improve consistency between approaches such as ensuring a single protocol is used to address citizens' requests or complaints regardless of which department, division, or group receives the report. A related issue is that staff is not consistently informed about the practices of departments, divisions, or groups outside of their sphere of work.

The City also lacks a single location, such as a database, where accessibility-related activities are documented. This later limitation should be addressed by the City's current effort to initiate an Enterprise Asset Management System (EAM) to manage city assets throughout their lifecycle. The database should have individual layers for departments, so that departments can record their activities and view other departments' activities. This system would allow individual departments to access all information in the database but not allow them to alter information within other departments' layers.

III. PROW Accessibility Project Prioritization

This section describes methods used by the City of San Diego and other major U.S. cities to prioritize access-related improvement projects in the PROW. This summary can be used to inform future modifications to the City's accessibility project prioritization process.

Background to Accessibility Project Prioritization

Relatively little guidance is provided by federal and state laws and guidelines for establishing implementation priorities, although some ADA requirements and guidelines for setting priorities are contained in 28 CFR Part 35, Section 35.150 (c), (d) and 35.151 (e), and in the Accessibility Policy Statement of the U. S. Department of Transportation, dated July, 1999. Court cases have clarified priorities by requiring local agencies to prioritize specific types of facilities (such as ADA-compliant sidewalks/ramps within 250 feet of transit stops). Significant court cases include:

Nystrom v. City of Vacaville established that specific requests from the public for barrier removal projects will receive the highest priority, followed by barrier removal along pedestrian rights-of-way serving (1) state and local government offices and facilities; (2) important transportation corridors; (3) commercial and business zones; (4) facilities containing employers; and (5) residential neighborhoods.

The *Barden v. City of Sacramento* settlement determined that for up to 30 years, the City of Sacramento will allocate 20% of its annual Transportation Fund to make the City's pedestrian rights-of-way accessible to individuals with vision and/or mobility disabilities. This includes installation of compliant-driven curb ramps at intersections, removal of barriers that obstruct the sidewalk, including narrow pathways, abrupt changes in level, excessive cross slopes, and overhanging obstructions, and improvements in crosswalk access.

City of San Diego Accessibility Project Prioritization Systems

The following subsections summarize the City of San Diego's current policies and methods for prioritizing and implementing PROW accessibility improvements.

City of San Diego ADA Transition Plan

The 1997 City of San Diego ADA Transition Plan focuses on public facilities (buildings, sites, parking, building entrances, restrooms, stairs, etc) and facilities in the PROW. Primary PROW-specific improvements include curb ramps, sidewalk, public stairways, and transit stops.

The City's top priority for construction of curb ramps is addressing complaints. The Transition Plan also lists the following priorities:

- Public Buildings
- Transportation Routes
- Places of Accommodation
- Schools
- Shopping Centers
- Employers
- Residential Areas

The Plan also includes a policy supporting "the opportunity for the disability community and other interested parties to participate in the development of the Transition Plan." The Plan refers to a 13-member Citizens Review Committee on ADA and Disability Issues (CRC) appointed in 1991 to advise the City on developing policies with regard to ADA implementation. The CRC assisted the City in establishing priorities for removal of barriers from public facilities during the next fiscal year. A CRC sub-committee, the Subcommittee for the Removal of Access Barriers (SCRAB), focused on projects within the City public right-of-way (PROW), including curb ramp locations, prioritizing curb ramp selections, and audible signal installations.

The Transition Plan itself focuses on public facilities (sites, parking, building entrances, stairs, etc) and facilities in the PROW. Those specific improvements include curb ramps, public stairways, and transit stops. The priorities specifically guiding curb ramp installation were updated by Disability Services on December 18, 2007. The following synopsis describes the updated criteria currently employed by Disability Services.

City of San Diego CIP Prioritization

Council Policy 800-14: Prioritizing CIP Projects establishes a process for analyzing the relative costs and benefits of implementing capital improvement projects and allows the City to rank the implementation of projects based upon their relative value. Under the system, CIP projects are assessed by category according to their principal asset type. Accessibility improvement projects are therefore categorized and evaluated under the "Transportation" category and various subcategories, including "Pedestrian Accessibility Improvements including curb ramps" and "Pedestrian Facilities including sidewalks but not curb ramps." Transportation projects are prioritized based on the following factors. The specific criterion by which each of the factors is evaluated is different for each project type. These factors are:

1. Health & Safety (25% of the project's score)
2. Capacity & Service (Mobility) (20% of the project's score)
3. Project Cost and Grant Funding Opportunity (20% of the project's score)
4. Revitalization, Community Support & Community Plan Compliance (15% of a project's score)
5. Multiple Category Benefit (10% of a project's score)
6. Annual recurring cost or increased longevity of the capital asset (5% of a project's score)
7. Project Readiness (5% of a project's score)

The complete CIP prioritization policy is available to view and download on the City's website (http://docs.sandiego.gov/councilpolicies/cpd_800-14.pdf).

Implementation of Accessibility Improvements

Accessibility project identification, prioritization, implementation, and documentation occur in various ways depending upon the department or division. **Table 3.1** is intended to clarify departmental and divisional processes for implementing accessibility improvements.

Disability Services	• Utilize citywide public complaints/requests list • Factors other departments' unfunded ADA needs into annual project list	• Public complaints/requests receive priority above other unfunded ADA needs • Apply the citywide curb ramp prioritization criteria for curb ramp projects • Projects are prioritized and grouped using the CIP prioritization process once they move into the implementation stage	• Submits the ADA project list to E&CP for implementation	• Completed projects funded by the annual ADA project budget are listed in Disability Service's annual report and are also posted on the website: www.sandiego.gov/disabilityservices • Compliant database tracks all complaints by number received, type of complaint (curb ramp, sidewalk, etc), location, date issued and date completed • Information on complaints is provided in Disability Services annual report and quarterly reports
Public Works - Engineering & Capital Projects Department	• For general maintenance and improvements, Transportation & Storm Water Department and/or the asset team identify required improvements • For accessibility improvements on existing facilities, Disability Services Program identifies the necessary improvements (via the Transition Plan or complaints)	• Utilizes the CIP project prioritization process	• Right of Way Design Division manages implementation of accessibility-related capital projects • Right of Way Design Division oversees construction by private companies or City staff	• Documented via: plans, project managers' personal filing system, tracking system (CIPRES), Project Controls, citywide plan check, CIP Tracking System, etc.
Transportation & Storm Water Department - Street Division	• Current backlog of deficiency locations that have been reported by the public as well as by city staff, such as the ADA group • Deficiencies reported to the Street Division Maintenance "Hotline" at 619-527-7500 or online at http://apps.sandiego.gov/streetdiv/ • A "Service Notification" is created in SAP and assigned to the proper area supervisor for evaluation and prioritization	• Several factors are considered such as the severity of the damage, the amount of pedestrian/vehicular usage, the proximity to a public facility, the age of the Service Notification request, and the availability of funding	• Repairs sidewalk, curb ramps, cross gutters, bus pads, street paving, and some bridge decks on an individual basis through the Service Notification process	• Each repair has a Service Notification associated with it; the work is documented and the Service Notification is "closed out" in SAP when the work is completed

Transportation & Storm Water Department - Transportation Engineering Operations Division	• Requests such as installing new audible pedestrian signals and missing sidewalk are submitted to TEOps at 619-533-3126 or online at http://www.sandiego.gov/engineering-cip/services/public/request.shtml • A "Traffic Request" is created and assigned to the proper section for evaluation	•CIP Project Prioritization Process	• Submitted to E&CP for implementation	• Traffic Request evaluation and recommendations are documented
Development Services Department	• Identifies accessibility-related requirements through the development review process	N/A	• Ensures implementation through the development review process	• Plans and documents show improvements
Public Utilities Department – Water and Wastewater	• Need repairs are identified if damaged through the departments duties • Needed curb ramps are identified if Public Utilities-funded CIP project requires street resurfacing	N/A	• Repairs damaged facilities as needed • E&CP implements CIP related improvements	• N/A
Redevelopment Agency * Dissolved, February 2012.	• Relied on the Redevelopment Plan and 5 Year Implementation Plan of adopted redevelopment project areas, Community Plans, existing City Capital Improvement Projects unfunded needs lists, and input through Project Area Committee meetings • Also identified through specific public/private development projects	• Relied on the Redevelopment Plan and 5 Year Implementation Plan of adopted redevelopment project areas and input from the Project Area Committees • Identified and considered funding for particular projects, with the preparation of an annual work plan that accompanies the annual agency budget	• E&CP implemented CIP projects • Private developers managed implementation if the project was a public/private partnership	• Listed in the Redevelopment Agency's Annual Report and work program that accompanied the annual budget • Completion of improvements associated with a public/private development partnership, took the form of a certificate of completion or release of construction covenants • Completed capital improvement projects, administered by the City, would include a certificate of completion and/or the closing of the capital improvement project fund

Source: City of San Diego staff interviews, March-August 2010 with updates to reflect 2011-2012 reorganizations

This section presents the results from a survey that was completed of comparable jurisdictions' access databases for the public rights-of-way, including sidewalks and curb ramps, to determine the most efficient and useful database design. The survey was developed to better understand the database methods being utilized by comparable jurisdictions and to develop a list of best practices being utilized by other cities to track their ADA PROW improvements.

ADA PROW Database Survey

An email/phone survey was completed of comparable jurisdictions to San Diego or jurisdictions that are utilizing innovative best practices in their ADA PROW database design and development. The survey contained several questions regarding the characteristics of each jurisdiction's PROW access databases, including the following issues:

- The extent of integration between the access database and other city databases,
- The degree to which the access database is directly linked to field inventory procedures through GPS/handheld software,
- The procedures for addressing public requests with the access database,
- Integration between the access database and CIPs of other city departments so that capital investment plans trigger appropriate ADA improvements.

Responses were received from the following cities:

- Bellevue, WA
- Colorado Springs, CO
- Oakland, CA
- San Francisco, CA
- San Jose, CA

Table 4.1 summarizes the survey results from the ADA PROW survey and provides contact information for the city staff responsible for each city's ADA PROW database.

Bellevue, WA	The database, called the ADA Viewer, includes a comprehensive list of all PROW barriers and is consulted during new development, annual installation, repair and maintenance programs, street-related capital improvement projects, overlay construction projects, and sidewalk maintenance and repair programs.	No	Yes	Yes	Yes	Franz Loewenherz, Senio Transportation Planner Transportation Department 425/452-4077, FLoewenherz@bellevuewa.gov
Colorado Springs, CO	The geodatabase includes all existing sidewalks, missing sidewalk segments, existing ramps designated with truncated domes or any other kinds of ramp, and "no ramp" locations.	No	No	No	No	Kristin Bennett, Senio Transportation Planner Transportation Department 719/385-5622, KBennett@springsgov.com
Oakland, CA	The ADA database includes all PROW barriers and a GIS shapefile has been created to show all remaining ADA PROW barriers. The shapefile is updated regularly and is utilized to identify necessary ADA improvements as the city completes CIPs, such as streetscape projects.	No	No, but city has piloted using GPS enabled laptops in the field for data collection.	Yes	Yes	Marcel Uzegbu, Supervising Civil Engineer, Engineering Design and Right of Way Management, 510/238-6257 MUzegbu@oaklandnet.com

	PROW Database	System?	procedures?	database?	departments?	
San Francisco, CA	The database, known as the San Francisco Curb Ramp Information System (CRIS) database, was first developed in 2000 and includes an inventory of all curb ramps in the city.	Not currently, however, the city is undertaking a project to consolidate all city databases.	No, city uses paper inventory sheets in the field.	Yes, public requests are entered into the database with relevant information, investigation findings, and recommendations. The request locations are scheduled for construction by applying the prioritization process in the city's ADA Transition Plan.	Not currently, but the city is developing the link interface with its 5 Year Plan which includes all city and utility construction projects in the PROW.	Ken Spielman, Project Manager, San Francisco Department of Public Works, 415/558-4541, Kenneth.spielman@sfdpw.org
San Jose, CA	The database includes requests for ramps (data requested, data installed and location), ramps installed via Pavement Maintenance program (location and date installed) and all other existing ramps.	No	Partially - one manual inventory was completed in 2004, which was when this database was first established.	Yes	No	John Brazil, Bicycle Coordinator, Department of Transportation, 408/975-3206, john.brazil@sanjoseca.gov

Source: Email/Phone Survey conducted by Alta Planning + Design

practices gleaned from this survey effort:

- **Barrier prioritization of ADA improvements:** Bellevue, WA has developed a robust barrier prioritization methodology that greatly assists the City in prioritizing its ADA PROW barriers for improvement. The City uses GIS to calculate an impedance score which reflects the barriers to accessibility of a particular PROW segment and then adds that score to an activity score, which reflects the expected amount of disabled activity on that PROW segment based upon adjacent land uses, census data and the overall connectivity of the PROW segment. This barrier prioritization approach allows the city to strategically and objectively evaluate and rank its ADA PROW improvements.

- **Database consolidation:** San Francisco, CA is in the midst of a city-wide effort to consolidate all databases into one single database. While this effort is still pending, it is expected that this consolidated database will yield huge benefits in terms of providing different city departments with access to previously unknown or difficult to obtain information. From an ADA PROW compliance perspective, a single city database will provide improved transparency regarding pending capital projects which will allow for improved coordination on ADA related improvements.

- **Database connection with CIP:** Bellevue's access database, ADA Viewer, is linked to all future projects, including the city's CIP list, so that appropriate ADA PROW improvements can be planned and programmed as various city projects are completed. For instance, the City's schedule for all street overlay projects are included in ADA Viewer and these projects prompt accessibility improvements along the project corridor during project construction.

- **Field inventory procedures:** Bellevue, WA has developed some extremely innovative field inventory practices and procedures that have streamlined the process for collecting an extensive amount of field data and updating their access database to reflect the most recent field conditions. City staff utilize GPS handhelds for collecting all field data which ties all data collected to the exact latitude and longitude coordinates and allows for a one-step data upload to the City's access database.

- **Funding practices:** The City of Oakland, CA utilizes Alameda County Measure B sales tax revenue to complete ADA PROW improvements every year. 50% of this funding is allocated annually to ADA improvements along prioritized key corridors based upon high pedestrian activity, 40% is allocated to residential areas, and 10% is allocated to liability reduction or responding to special requests that are submitted by applicants with disabilities. The City has also been very successful in holding property owners responsible for paying for necessary ADA sidewalk improvements along their property frontage as long as it was not caused by a city planted tree. If the homeowner refuses to pay for the ADA improvement, the City will use funding from their revolving fund to complete the necessary ADA improvement and will place a lien on the homeowner's property until homeowner reimburses the city for ADA improvement expense.

workplaces, and other essential facilities for people with disabilities. The applicant must certify that he/she is a qualified person of disability as defined by the ADA and that the request is based upon personal need. Each applicant can request repairs at up to three locations where damage has been caused by City street trees. The City will investigate the request, respond to the applicant within ten working days of the request submittal, and complete the sidewalk repair in 90 to 180 days if the sidewalk is found to be ADA non-compliant.

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