



SDOT POLICY MEMORANDUM

Date: March 23, 2016
To: Scott Kubly, SDOT Director
From: SDOT ADA Committee
Subject: SDOT Policy for Curb Ramps at T-Shaped Intersections

Statement of Intent

To establish a policy that memorializes an acceptable approach to curb ramp construction or improvements at T-shaped intersections or intersections with atypical geometric considerations where existing site constraints may make curb ramp construction improbable, impossible, or generally not preferred. This policy applies to the design and construction of new curb ramps within the public right of way and within the jurisdiction of the City of Seattle.

Overview and Purpose

When roadways are constructed or altered and the pedestrian crossing is affected, or when sidewalks are constructed or altered and intersect a roadway, it is required that curb ramps be provided to allow adequate access for pedestrians with mobility disabilities. At times, intersection geometry and existing conditions in the built right-of-way may limit the ability to provide curb ramps at each potential crossing point at an intersection. Many times, for example, T-shaped intersections in the existing built environment may have elements, obstacles, or barriers that preclude the ability to provide an accessible crossing at each leg of the "T." Mature trees, utility structures, and private driveways are examples of existing conditions that may make accessible roadway crossings challenging due to an established built right-of-way.

In addition, the presence of multiple T-shaped intersections along heavily used arterials or roadways or intersections with atypical geometries may require a traffic engineer to determine that a legal crossing may not be preferred or may need to be closed to all pedestrians due to vehicular movements or safety concerns.

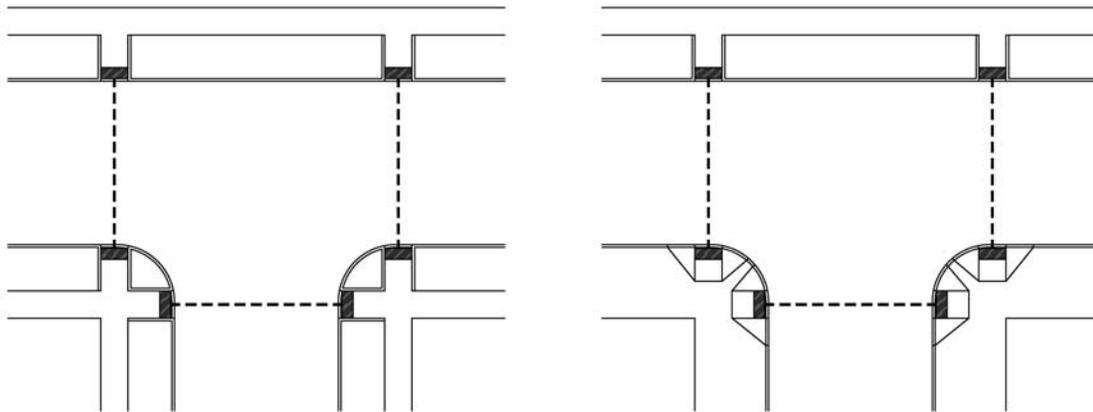
SDOT has reviewed their obligations to provide accessible curb ramps and street crossings, and intends to continue to construct accessible curb ramps at T-shaped intersections at all locations that are possible or reasonable. If it is determined that a crossing is not able to be provided or improved, it will be determined that the available route is no more than a "marginally longer route" as identified in the Title II Technical Assist Manual.



Policy for Curb Ramps at T-Shaped Intersections

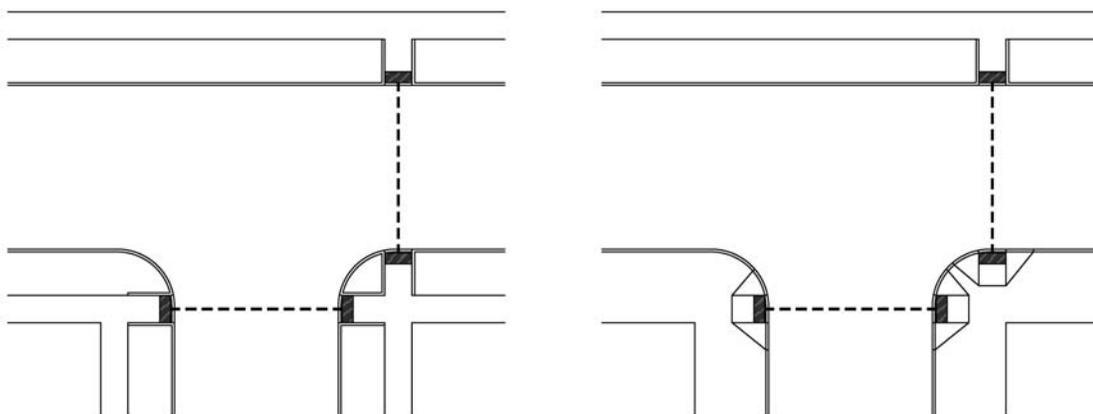
Where alterations occur at roadways within the Seattle public right of way that trigger curb ramp improvement requirements at T-shaped intersections, construct curb ramps in the following order of preference:

- 1) Construct curb ramps for accessible street crossings at each leg of the “T” where alterations occur. This preferred approach will generally yield 6 total curb ramps for 3 accessible street crossings at T-shaped intersections.



Crossings at All Legs of “T”

- 2) If existing site constraints preclude the ability to construct curb ramps, it is acceptable to omit curb ramps for one of the two crossings of the street at the top of the “T.” At a minimum, at least one accessible street crossing must be provided across each street of the “T” unless it is determined by a traffic engineer that a particular crossing is not safe for pedestrian movement.



Provide at Least One Crossing of Each Street

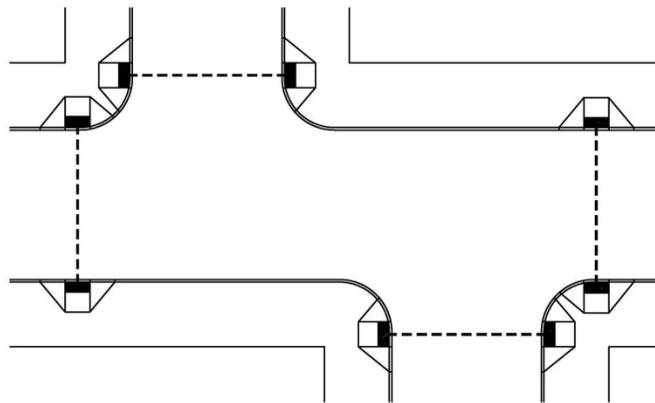
Engineering judgment must be applied to determine whether or not curb ramp construction is feasible.



A traffic engineer must determine locations where pedestrian street crossings may not be safe due to vehicular movement, lines-of-sight, and other considerations on a case-by-case basis. If it is determined that a street crossing cannot be provided, in general the crossing *should* be closed to all pedestrians. Information of said closed crossing must be discernible by pedestrians with visual impairments.

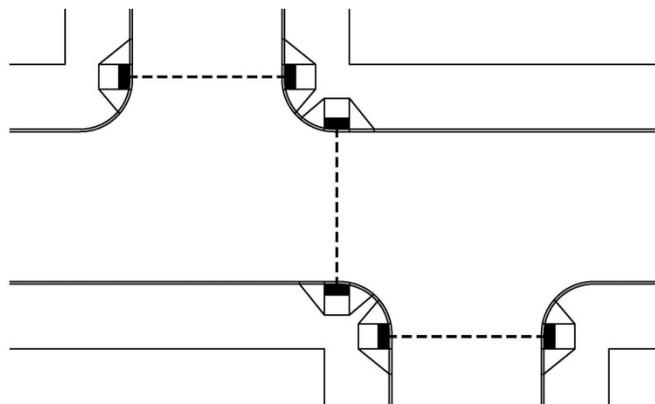
If multiple T-shaped intersections are provided within close proximity or if there are offset intersections (or similar), the engineer should take into consideration the pedestrian travel distance required to access an available crossing to be consistent with the features of the associated corridor. Offset intersections may require additional analysis.

It may be necessary to omit a crossing between offset intersections:



Option: Provide Crossings at Far Ends of Offset Intersection

It is acceptable for offset T-shaped intersections to share one crossing pending engineer approval:



Option: Share One Crossing Between Offset Intersections

Notes: Any existing marked crossing without curb ramps must be prioritized for improvements; placement of crosswalk marking to be determined by a traffic engineer. Providing curb ramps and crossings where sidewalks do not exist on an intersecting street may take a lower priority for construction.





References for Requirements and Guidance

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

(1) Newly constructed or altered streets, roads, and highways must contain curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level pedestrian walkway.

(2) Newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped areas at intersections to streets, roads, or highways.

2) The Americans with Disabilities Act, Title II Technical Assistance Manual

II-5.3000 Curb Ramps. Public entities that have responsibility or authority over streets, roads, or walkways must prepare a schedule for providing curb ramps where pedestrian walkways cross curbs. Public entities must give priority to walkways serving State and local government offices and facilities, transportation, places of public accommodation, and employees, followed by walkways serving other areas. This schedule must be included as part of a transition plan (see II-8.3000).

To promote both efficiency and accessibility, public entities may choose to construct curb ramps at every point where a pedestrian walkway intersects a curb. However, public entities are not necessarily required to construct a curb ramp at every such intersection.

Alternative routes to buildings that make use of existing curb cuts may be acceptable under the concept of program accessibility in the limited circumstances where individuals with disabilities need only travel a marginally longer route. In addition, the fundamental alteration and undue burdens limitations may limit the number of curb ramps required. To achieve or maintain program accessibility, it may be appropriate to establish an ongoing procedure for installing curb ramps upon request in areas frequented by individuals with disabilities as residents, employees, or visitors.

What are walkways? Pedestrian walkways include locations where access is required for use of public transportation, such as bus stops that are not located at intersections or crosswalks.

3) Seattle Municipal Code, 11.14.265 - Intersection

A. "Intersection" means the area enclosed within the projection of lateral curbs, or if no curbs, then the projection of the lateral roadway boundaries of two (2) or more streets which join one another at an angle, whether or not such streets cross each other.

B. Where a highway includes two (2) roadways thirty (30) feet apart or more, then every crossing of each roadway of such divided street by an intersecting street shall be regarded as a separate intersection. In the even such intersecting street also includes two (2) roadways thirty (30) feet or more apart then every crossing of two (2) roadways of such streets shall be regarded as a separate intersection.





4) Revised Code of Washington

RCW 46.160 Crosswalk. “Crosswalk means the portion of the roadway between the intersection area and a prolongation or connection of the farthest sidewalk line or in the event there are no sidewalks then between the intersection area and a line ten feet therefrom, except as modified by a marked crosswalk.

