

MEMORANDUM

August 1, 2022

To: Stephanie Grove, City Manager
Edward Erfurt, Assistant City Manager

Organization: City of Ranson

From: Melany Alliston, PE

Re: City Code Requirements for Compliance with the Americans with Disabilities Act and Public Right-of-Way Accessibility Guidelines

Introduction

The purpose of this memo is to clarify the City Code requirements related to compliance with the United States Access Board's [ADA Standards for Accessible Design \(ADA Standards\)](#), and [Public Right-of-Way Accessibility Guidelines \(PROWAG\)](#), including the [Supplemental Notice on Shared Use Paths](#). It also provides a summary of several of the most common non-compliance issues observed in Construction Drawings submissions.

Code Criteria

City Code Section 16-94.(b).1 requires that City streets be designed in accordance with West Virginia Division of Highways (WVDOH) standards and incorporates American Association of State Highway Transportation Officials (AASHTO) and WVDOH standards by reference. (It should also be noted that the City Code uses the prescriptive language "All design criteria for city streets *shall* follow..." meaning that compliance with WVDOH standards is a requirement and not just a recommendation.)

[WVDOH Design Directive DD-811, Accessibility Standards, Curbs and Sidewalks](#) outlines WVDOH design criteria for sidewalks and curb ramps for both retrofit projects and new construction. Design Directive [DD-813, Bicycle/Pedestrian Accommodation](#) describes the design criteria for shared use paths, both when a path follows an adjacent roadway alignment and when it follows an independent alignment. Both Design Directives state that PROWAG should be considered the minimum criteria for design of pedestrian (or shared use) facilities within the public right-of-way. Section 50 of DD-811 directs practitioners to several additional technical guidance documents that provide clarification on how to interpret the ADA and PROWAG Standards. In addition to DD-811, WVDOH provides a series of standard details related to curb ramps in [Standard Details Book Volume 1](#), Section PVT7 and crosswalks in [Standard Details Book Volume 2](#), Section TEM-2. These details apply to both sidewalks and shared use paths. (Additional details on intersection pavement markings and signing can be found in the Federal Highway Administration's [Manual on Uniform Traffic Control Devices](#), which has been adopted by WVDOH.)

In cases where the standards conflict with one another, the more stringent criteria shall apply.

Common Non-Compliance Issues

As part of the City's routine development review for Construction Drawings, the review committee frequently sees several key non-compliance issues. The following paragraphs list non-compliance issues that occur with greatest frequency, provide the Code basis for the City's review comments, and clarify the basis for design of pedestrian and shared use facilities within the City or Ranson. Common non-compliance issues include, but are not limited to:

Sidewalks and Curb Ramps

Depressed corner curb ramps instead of separate directional curb ramps

PROWAG Section R207.1 states that, “*The curb ramp (excluding any flared sides) or blended transition shall be contained wholly within the width of the pedestrian street crossing served,*” meaning that each crossing must have its own curb ramp at each end. Section R207.2 further differentiates between new construction and alterations, stating that, “*In alterations where existing physical constraints prevent compliance with R207.1, a single diagonal curb ramp shall be permitted to serve both pedestrian street crossings.*” *WVDOH Standard Detail Book Volume 1, Section PVT7* further limits the use of diagonal curb ramps, only allowing them where “*bi-directional ramps are unobtainable due to physical constraints.*”

Individual directional curb ramps for each crosswalk must be provided for new construction. For alterations, the City may consider diagonal curb ramps when all options for individual directional curb ramps have been exhausted.

Radial detectable warning surfaces

Guidance provided in PROWAG Advisory R3.05.2.1 indicates that, “*The rows of truncated domes in detectable warning surfaces should be aligned perpendicular to the grade break between the ramp run and the street so pedestrians who use wheelchairs can “track” between the domes.*”

Radial detectable warning installations area not allowed as they can inadvertently steer wheelchair users outside of marked crosswalks.

Landings (turning spaces) that exceed 2% slopes

Sections 304.2.2 and 304.3.2 do not specify an allowable cross slope for landings at the top and bottom of curb ramps, thus the 2% maximum running slope applies in all directions.

Slopes must be measured across landings in all directions, including diagonally, to ensure that slopes are compliant. Designing to the maximum 2% cross slope for sidewalks and ramps will result in landings that exceed 2% on the diagonal. In general, to achieve a maximum 2% slope between the highest and lowest corners of the landing, slopes along the edges of the landing must be between 1.5% and 1.8%.

Intersections

Crosswalks that exceed 2% cross slopes

PROWAG Section R302.6 require that the cross slope of pedestrian access routes not exceed 2%, and associated PROWAG Advisory text notes that crosswalks are considered pedestrian access routes.

The cross slope of any proposed crosswalk may not exceed 2%.

Crosswalks in advance of stop signs and stop lines

WVDOH Standard Detail Book Volume 2, Section TEM-2 requires that stop signs and stop lines be placed 4 feet in advance of the nearest crosswalk line (in the direction of vehicular travel).

Stop lines must be placed to ensure drivers stop prior to entering a crosswalk.

Shared Use Paths

Unpaved surfaces

Section R302.7 of the PROWAG *Supplemental Notice on Shared Use Paths* states that surfaces must be firm, stable, and slip resistant. Advisory R3.02.7.1 clarifies that, “*Pedestrian access route surfaces must be generally planar and smooth. Surfaces should be chosen for easy rollability. Surfaces that are heavily textured, rough, or chamfered and paving systems consisting of individual units that cannot be laid in plane will greatly increase rolling resistance and subject pedestrians who use wheelchairs, scooters, and rolling walkers to the stressful and often painful effects of vibration.*”

Shared use paths must be paved.

Longitudinal slopes that exceed 5% without landings/resting areas

Section R302.5.1 of the PROWAG *Supplemental Notice on Shared Use Paths* indicates that shared use paths within the road right-of-way should not exceed the grade of the adjacent roadway.

For shared use paths on an independent alignment, Section R302.5.2 states that the grade may not exceed 5%. When determined to be “not practicable” due to physical constraints, compliance is required “to the extent practicable.” The legal definition of the phrase “to the extent practicable” means reasonably doable under the circumstances. The conditions for exceptions should be used only after all other design options are thoroughly explored. Where a condition for exception applies to only part of a trail, a beach access route, or an outdoor recreation access route, the rest of the trail or route must comply with all the technical requirements for the trail or route.

The grade of any shared use path within the public right-of-way must be less than 5% or less than the grade of the adjacent roadway, whichever is applicable. The City will not consider exceptions to PROWAG requirements unless the applicant can demonstrate that no other options (such as realigning or relocating the shared use path) exist to meet the criteria.

Paths less than 10 feet wide

The Design Standards section of WVDOH DD-813 states that the minimum width of a share use path is 10 feet with 2-foot graded shoulders, which can be reduced to, “8’ in very rare circumstances or for short distances due to physical constraints.”

Shared use paths must meet WVDOH minimum width requirements. The City will not consider exceptions to minimum requirements unless the applicant can demonstrate that no other options (such as realigning or relocating the shared use path) exist to meet the criteria.