

Public Comment reg. Public Hearing about Coastal Development Permit 3-20 (CDP 3-20)
item 6a Planning Commission 4-14-2021

Dear Commissioners,

In my letter to know I mentioned a few points I think they are crucial and I sure hope that Ranu Aggarwal (who wrote the staff report and I assume looked at all the attachments) will be able and willing to answer the questions and concerns expressed in the public comments in regards to the 3-24-2021 hearing and today's hearing. Why has this not happened already? As I did not see any new documents this project can not be voted on during today's hearing.

The city hired (contracted with) M-Group when the City had no planners. Ranu Aggarwal is a planner of theirs. Her services were basically a rental agreement with a company based in San Jose, even if she would be working at the Santa Rosa business. What does she know about Caltrans District 1? Other than a brief visit to Fort Bragg has she studied how the close to 150 land owners (some might be the same) would be affected by this project and any other issues mentioned in the Caltrans proposal? How many of the 30 temporary construction easements have been obtained so far? If you do not have all of them, what is the rush all about? What information were or are the individual land owners given?

Caltrans District 1 is not transparent and does have a bad record as far as supervising independent contractors is concerned.

I am opposed to this project as it is proposed due to many reasons stated above and below and in my letter from 3-24-2021.

I still do not agree with the environmental determination that as it stands the project should be exempt from CEQA Categorical Exemption, Class 1(c), Existing Facilities; NEPA Categorical Exclusion under 23 USC 327. I believe that a CEQA review is necessary for this project for the reasons/objections I made in my letter from 3-24-2021 in regards to the vaguely listed retaining walls, widening of the Highway (Main Street), and new sidewalk segments. These proposed aspect of the project are new and do not constitute existing facilities covered by the Class 1 categorical exemption.

None of the information from Caltrans or the staff report indicate why the retaining walls are proposed or how they fulfill the ADA requirement. The fact that these retaining walls have an approximate height indicates that this project is not ready to be evaluated. The public deserves to know exactly how tall these retaining walls would be for any given point. If these could be covered by bushes and plants that would maybe be acceptable, but not only on top of it. These retaining walls will have a significant impact (aesthetically and otherwise) to our southern gateway and also northern gateway. Offering context-sensitive architectural designs is not a mitigation that would reduce their significance.

As Main Street/Hwy1 is a scenic highway mentioned in the documents and is the first road parallel to the ocean it is not acceptable to create such an eye soar. Our town survives from tourists and they do not come to stare at retaining walls, no matter how you want to dress them up with context-sensitive architectural designs. Where is a photo of how these walls would look like and these context-sensitive architectural designs? Caltrans staff in their offices in Sacramento or wherever they design these context-sensitive architectural designs have no

sensitivity as far as what ecotourists and locals like to look at. No matter what they come up with nothing can hide these walls that can be up to 10 feet unless they are completely covered and maintained with mature plants.

Ecotourists and locals alike do not want to be stuck in traffic for months on end. Ukiah's businesses have suffered tremendously for many, many months and some have closed down for good as Covid and street projects are dragging on and accidents are happening. No one wants to listen for months on end to the noise created by this major project! Missing is a noise study. Also missing is information about how much grading will happen and where and how that affects the environment. The project needs a traffic study that is accurate, not like the one for the Hare Creek mall, AutoZone, Grocery Outlet, and Avalon Hotel & Conference Center. Special Condition #1 indicates that there should be a smooth flow of traffic, which will not be possible. The work can not happen during tourist season, bird nesting season, or rainy season.

The various project work locations would total approximately 2.3 miles of construction. How many months would it take? What would be the working schedule (hours per day, per week or at night with bright lights (from when to when and what days)? How will the businesses suffer who already suffered so much with Covid?

I read that there is currently one alternative for the proposed project. This is not an alternative, this is the project.

Where is the Landscape Plan?

Caltrans is using Covid to push this through. The first non virtual hearing will be May 10. There is no reason why this project considering that preliminary work (boring location plans) were done in 2011 could not wait until the May meeting. It is interesting to note that Caltrans probably pulled it from the agenda from the 3-24-2021 hearing as some of the documents got added after that date and also got added in the 3-24-2021 documents.

I mentioned in my letter from 3-24-2021 that dealing with a project within the coastal zone just 2 months shy of in-person hearings (now less than 1 month) is not what the PUBLIC RESOURCES CODE – DIVISION 20 of the CALIFORNIA COASTAL ACT was designed to protect. There is no "widest opportunity for public participation." Neither does Caltrans abide by what Section 65033 of the State Planning, Zoning, and Development Law (Government Code) protects. There are still no "clearly defined alternative objectives, policies, and actions" proposed. Neither are the CEQA Guidelines, at Title 14, California Code of Regulations section 15201 about PUBLIC PARTICIPATION, or any of the CEQA (Public Resources Code section 21000 and after) that contain many specific provisions about required notice of environmental documents, and opportunities for public comments on them relate to the current project proposal. Each public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency's activities. This is truly not the case.

The public that is signed up to get notifications from the City about Planning Commission meetings received information about this public hearing on 4-11-2021.

The City's web page <https://city.fortbragg.com/786/Active-Planning-Reports-and-Studies> no longer has information about this Caltrans project. Only the Initial Study about the Grocery Outlet and the Avalon Hotel are available. Not even information about a possible future Dollar Store. NO TRANSPARENCY!

The public needs to be able to see the project plans (large size) as a power point presentation on site, not virtually. It is not acceptable that plans that the public and the Planning Commission are shown "Preliminary for Design Study Only" plans, plans not drawn to scale, and plans that have icons that are not explained in the legend.

Based on the current project description Caltrans has determined this action would not affect special-status taxa, sensitive natural communities, wetlands, jurisdictional waters, essential fish habitat or federally designated critical habitat (Appendix D). I disagree with this statement. See attachment 3 Environmentally Sensitive Habitat Area Assessment pages 25 & 26 Environmental Study Limits and 100 foot buffer Zones @ Fort Bragg ADA Study Limits (south & north). <https://cityfortbragg.legistar.com/View.ashx?M=F&ID=9305363&GUID=78B162A0-5B6D-43F0-AA3D-A980C027262C>

Do migrating birds care about a 100ft. Buffer zone for example?

Just because a survey was done and none of the animals and plants were found in this general area does not mean that they are not there or at least not there some of the time. We are not told what day, month, year the survey/s was done/were done and what time of the day. How busy and noisy was it when it was done? Did the survey for bats include a survey at dusk? For example there have been more Bald eagles seen in the area. Their territory covers easily north of Fort Bragg to Navarro River where they have been found lately. See

<https://ebird.org/home> and Audubon Survey Area 3 & 4
<https://www.google.com/maps/d/viewer?msa=0&ie=UTF8&t=p&vpsrc=6&ll=39.456872651798236%2C-123.77162886767579&spn=0.212238%2C0.274658&z=12&source=embed&mid=1kIQG6bcyJ0aAfrV32n7w7-Dv-FA>

and last survey from 2018:

<https://www.mendocinocoastaudubon.org/downloads/118%20CAFB%20Tally.pdf>

The documents point out the relocation of underground utilities and adjustment of utilities to grade. Will small cell wireless devices be installed or will it be prepared to do so? We deserve to know! Are these retaining walls installed to facilitate the places to allow Comcast, AT&T and PG&E to co-locate? What are joint poles?

The Visual Impact Assessment, dated January 17, 2020 does not evaluate the true impacts of the proposed project.

The project as is, is not acceptable. Please deny it. The City needs to do a Mitigated Negative Declaration before this project can be approved or at least start with an Initial Study.

Sincerely, Annemarie Weibel
4-14-2021

PUBLIC COMMENTS RE: LCP CONSISTENCY OF CDP 3-20

March 24, 2021

Introduction:

The following policies from the Coastal General Plan (CGP), which is one half of the City of Fort Bragg's Certified Local Coastal Program (LCP) along with the Coastal Land Use and Development Code (CLUDC), are relevant to this project and apply to Coastal Development Permit (CDP) 3-20. (There may be other applicable CGP policies, including those discussed in the staff report but not discussed here.) The City's LCP mandates that all projects proposed within the Coastal Zone, including those requiring a CDP, are consistent with all applicable CGP policies.¹ This is different than normal general plan consistency analysis, which only requires a proposed project be consistent with the applicable general plan overall rather than requiring consistency with all applicable policies. The staff report omits numerous applicable CGP policies (see below) and the project is not consistent with many of the applicable policies that have been omitted from the analysis.

Because the project is not consistent with applicable CGP policies, the City must add additional special conditions to CDP 3-20 before potentially approving it, in order to make the project consistent with all applicable provisions of the CGP and CLUDC and to make the required findings. Luckily, that should be possible with only a few additional special conditions. (Specific recommendations for additional special conditions relating to particular CGP policies are discussed below.) It is also appropriate that Caltrans fund these additional improvements as part of the scope of this project rather than leaving them to future development along SR1 because of their mandate to provide adequate infrastructure that complies with the ADA as part of their 2010 legal settlement.

Consistency & Conformity Analysis:

3. PUBLIC FACILITIES ELEMENT

Goal PF-1 Ensure that new development is served by adequate public services and infrastructure.

Policy PF-1.1: All new development proposals shall be reviewed and conditioned to ensure that adequate public services and infrastructure can be provided to the development without substantially reducing the services provided to existing residents and businesses.

¹ See, e.g., General Finding No. 1, "The proposed project is consistent with ... all other provisions of the Coastal General Plan, [and] Coastal Land Use and Development Code (CLUDC)"

Program PF-1.1.1: New development shall be responsible for any improvements or extensions of infrastructure or the service capacity necessary to serve the development.

Consistency: This project involves new development, as defined in the Coastal Act and the City's LCP, in the form of new sidewalk segments and associated retaining walls and drainage infrastructure as well as repair and replacement of existing pedestrian infrastructure. However, this new development is disconnected from missing or deficient sections of similar infrastructure within the project area, including missing sidewalk segments and substandard conditions for some existing sidewalk sections along the west side of SR1. In order for the project to become consistent with Policy PF-1.1, it must be conditioned to ensure that additional connecting sidewalk infrastructure is added to the remaining segments of the right-of-way that do not contain a complete sidewalk system or which contain existing sidewalks with substandard conditions.

4. CONSERVATION, OPEN SPACE, ENERGY, AND PARKS ELEMENT

Goal OS-1 Preserve and Enhance the City's Environmentally Sensitive Habitat Areas

Policy OS-1.7: Development in areas adjacent to Environmentally Sensitive Habitat Areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

Consistency: This project appears to be consistent with Policy OS-1.7 for many of the reasons discussed in the staff report concerning other CGP policies (see, e.g., Staff report pp. 6-9 discussing Policies C-2.12, OS-5.1, OS-9.1, and OS-9.2).

Policy OS-1.12: Drainage and Erosion Control Plan. Permissible development on all properties containing environmentally sensitive habitat, including but not limited to those areas identified as ESHA Habitat Areas on Map OS-1, shall prepare a drainage and erosion control plan for approval by the City. The plan shall include measures to minimize erosion during project construction, and to minimize erosive runoff from the site after the project is completed. Any changes in runoff volume, velocity, or duration that may affect sensitive plant and animal populations, habitats, or buffer areas for those populations or habitats, shall be reviewed by a qualified biologist to ensure that there will not be adverse hydrologic or, erosion, or sedimentation impacts on sensitive species or habitats. Mitigation measures shall be identified and adopted to minimize potential adverse runoff impacts. All projects resulting in new runoff to any streams in the City or to the ocean shall be designed to minimize the transport of pollutants from roads, parking lots, and other impermeable surfaces of the project.

Consistency: This project appears consistent with Policy OS-1.12 as described in the staff report.

Policy OS-1.16: Biological Report Required.

- a) Permit applications for development within or adjacent to Environmentally Sensitive Habitat Areas including areas identified in Map OS-1 or other sites identified by City staff which have the possibility of containing environmentally sensitive habitat shall include a biological report prepared by a qualified biologist which identifies the resources and provides recommended measures to ensure that the requirements of the Coastal Act and the City of Fort Bragg's Local Coastal Program are fully met. The required content of the biological report is specified in the Coastal Land Use and Development Code.
- b) Submittal of Biological Reports. These biological reports shall be reviewed by the City and approving agencies. The biological reports described above shall be submitted prior to filing as complete a coastal development permit application and may also be submitted as a part of any environmental documentation required pursuant to CEQA. The selection of the professional preparing the report shall be made or approved by the City or the agency approving the permit and paid for by the applicant.
- c) Biological reports shall contain mitigating measures meeting the following minimum standards:
 - i. They are specific, implementable, and, wherever feasible, quantifiable.
 - ii. They result in the maximum feasible protection, habitat restoration and enhancement of sensitive environmental resources. Habitat restoration and enhancement shall be required wherever feasible, in addition to the applicable baseline standard of either avoiding or minimizing significant habitat disruption.
 - iii. They are incorporated into a Mitigation Monitoring Program; and
 - iv. They include substantial information and analysis to support a finding that there is no feasible, less environmentally damaging alternative.

Consistency: This project appears consistent with Policy OS-1.16 because a biological report meeting these content requirements was prepared and included in the application materials.

Goal OS-2 **Preserve and enhance the City's other natural resources.**

Policy OS-2.1: Riparian Habitat: Prevent development from destroying riparian habitat to the maximum feasible extent. Preserve, enhance, and restore existing riparian habitat in new development unless the preservation will prevent the establishment of all permitted uses on the property.

Consistency: This project appears to be consistent with Policy OS-2.1 for many of the reasons discussed in the staff report concerning Policy C-2.12. However, the project likely needs to be conditioned to require additional sidewalk or other pedestrian improvements adjacent to the riparian habitat ESHA that was identified in the Environmentally Sensitive Habitat Area Assessment for the Fort Bragg Americans with Disabilities Act Improvement project, dated October 2020 and prepared by Caltrans so the project's consistency with Policy C-2.12 may need to be reevaluated concerning any additional project components that may impact the riparian habitat. However, such impacts are unlikely because all additional work and improvements would occur within the SR1 right-of-way and outside the fenced area that provides an ESHA buffer area protecting the riparian habitat.

Goal OS-9 Improve water quality.

Policy OS-9.1²: Minimize Introduction of Pollutants. Development shall be designed and managed to minimize the introduction of pollutants into coastal waters (including the ocean, estuaries, wetlands, rivers, streams, and lakes) to the extent feasible.

Consistency: This project appears consistent with Policy OS-9.1 as described in the staff report.

Policy OS-9.2³: Minimize Increases in Stormwater Runoff. Development shall be designed and managed to minimize post-project increases in stormwater runoff volume and peak runoff rate, to the extent feasible, to avoid adverse impacts to coastal waters.

Consistency: This project appears consistent with Policy OS-9.2 as described in the staff report.

Policy OS-9.3: Maintain Biological Productivity and Quality of Coastal Waters. Development shall be designed and managed to maintain, and restore where feasible, the biological productivity and quality of coastal waters, consistent with sections 30230, 30231, and other relevant sections of the California Coastal Act. The Coastal Act sections set forth below [sic] are incorporated herein as policies of the Land Use Plan.

Consistency: This project appears to be consistent with Policy OS-9.3 for many of the reasons discussed in the staff report concerning other Policies OS-9.1 and OS-9.2.

²The staff report identified this policy as applicable to the project and recommended that the Planning Commission find that the project is consistent in part by requiring Special Condition 5. (See Staff report pp. 8-9.)

³The staff report identified this policy as applicable to the project and recommended that the Planning Commission find that the project is consistent in part by requiring Special Condition 5. (See Staff report p. 9.)

Goal OS-10 Improve water quality through the Selection and Design of Appropriate Best Management Practices (BMPs)

Policy OS-10.1: Construction-phase Stormwater Runoff Plan. All development that requires a grading permit shall submit a construction-phase erosion, sedimentation, and polluted runoff control plan. This plan shall evaluate potential construction-phase impacts to water quality and coastal waters, and shall specify temporary Best Management Practices (BMPs) that will be implemented to minimize erosion and sedimentation during construction, and prevent contamination of runoff by construction chemicals and materials.

Consistency: This project appears to be consistent with Policy OS-10.1 because the application materials include the necessary stormwater plans and BMPs.

Policy OS-10.2: Post-Construction Stormwater Runoff Plan. All development that has the potential to adversely affect water quality shall submit a post-construction polluted runoff control plan (“Runoff Mitigation Plan”). This plan shall specify long-term Site Design, Source Control, and, if necessary, Treatment Control BMPs that will be implemented to minimize stormwater pollution and erosive runoff after construction, and shall include the monitoring and maintenance plans for these BMPs.

Consistency: This project appears to be consistent with Policy OS-10.2 because the application materials include the necessary stormwater plans and BMPs.

Goal OS-11 Improve water quality through Site Design and Source Control BMPs

Development shall be sited and designed to protect water quality and minimize impacts to coastal waters by incorporating BMPs designed to ensure the following:

Policy OS-11.1: Use Integrated Management Practices in Site Design. The city shall require, where appropriate and feasible, the use of small-scale integrated management practices (e.g., Low Impact Development techniques) designed to maintain the site’s natural hydrology by minimizing impervious surfaces and infiltrating stormwater close to its source (e.g., vegetated swales, permeable pavements, and infiltration of rooftop runoff).

Consistency: This project does not appear to be consistent with Policy OS-11.1 because the project does not include low-impact development techniques that would be appropriate and feasible in some areas. For example, the project does not minimize impervious surfaces for new or replacement sidewalk segments by incorporating permeable paving materials or vegetated swales for stormwater drainage. Instead, the project appears to propose impermeable sidewalk materials will direct runoff into the City’s storm drain system that drains into Coastal Waters rather than being infiltrated within or adjacent to the SR1 right-of-way. A special condition should be added to require permeable pavement materials for all new or reconstructed sidewalk segments as well as installation of bioretention swales in or adjacent to the SR1 right-of-way rather than new connections to the City’s storm drain infrastructure.

Policy OS-11.2: Preserve Functions of Natural Drainage Systems. Development shall be sited and designed to preserve the infiltration, purification, detention, and retention functions of natural drainage systems that exist on the site, where appropriate and feasible. Drainage shall be conveyed from the developed area of the site in a non-erosive manner.

Consistency: This project does not appear to be consistent with Policy OS-11.2 for the same reasons it is not consistent with Policy OS-11.1 (above). A special condition should be added to require installation of bioretention swales in or adjacent to the SR1 right-of-way rather than new connections to the City's storm drain infrastructure.

Policy OS-11.5: Divert Stormwater Runoff into Permeable Areas. Development that creates new impervious surfaces shall divert stormwater runoff flowing from these surfaces into permeable areas, where appropriate and feasible, to enhance on-site stormwater infiltration capacity.

Consistency: This project does not appear to be consistent with Policy OS-11.5 for the same reasons it is not consistent with Policies OS-11.1 and OS-11.2 (above). A special condition should be added to require permeable pavement materials for all new or reconstructed sidewalk segments as well as installation of bioretention swales in or adjacent to the SR1 right-of-way rather than new connections to the City's storm drain infrastructure.

Policy OS-11.6: Use Permeable Pavement Materials. To enhance stormwater infiltration capacity, development shall use permeable pavement materials and techniques (e.g., paving blocks, porous asphalt, permeable concrete, and reinforced grass or gravel), where appropriate and feasible. Permeable pavements shall be designed so that stormwater infiltrates into the underlying soil, to enhance groundwater recharge and provide filtration of pollutants. All permeable pavement that is not effective in infiltrating as designed will be replaced with effective stormwater detention and infiltration methods.

Consistency: This project does not appear to be consistent with Policy OS-11.6 for the same reasons it is not consistent with Policy OS-11.1 (above). A special condition should be added to require the use of permeable pavement materials for all new or reconstructed sidewalk segments.

Policy OS-11.9: Provide Storm Drain Inlet Markers. Markers or stenciling shall be required for all storm drain inlets constructed or modified by development, to discourage dumping and other illicit discharges into the storm drain system.

Consistency: This project does not appear to be consistent with Policy OS-11.9 unless it is conditioned to require storm drain inlet markers at all storm drains (unless this is incorporated into other requirements that are referenced). A special condition should be added to require storm drain inlet markers for all existing and new storm drains within the project area.

Goal OS-19 Provide a comprehensive trail system in Fort Bragg.

Policy OS-19.3: Require new development to provide direct pedestrian connections, such as sidewalks, trails, and other rights-of-way to the existing and planned network of parks and trails wherever feasible.

Program OS-19.3.1: Consider the access needs of a variety of users, including school-age children, the elderly, and those with handicaps or disabilities when developing trails and recreation facilities.

Program OS-19.3.2: Support efforts to extend the existing trail from the end of Cypress Street east adjacent to the Georgia-Pacific haul road.

Consistency: This project does not appear to be consistent with Policy OS-19.3 because the project does not include direct pedestrian connections to the City's Coastal Trail and park in the form of ADA-compliant sidewalks in all locations along SR1 between Noyo Point Road and Elm Street. The City has access points to the Coastal Trail at Noyo Point Road, W. Cypress Street, W. Alder Street, and W. Elm Street. There are direct pedestrian connections in some but not all of these access points. In particular, there are no direct pedestrian connections, let alone ADA-compliant pedestrian connections to Noyo Point Road and W. Cypress Street connections because there are no existing or proposed sidewalks along the west side of the SR1 right-of-way between Noyo Point Road and Maple Street. (The existing sidewalk between Maple and Oak Streets is not proposed to be replaced even though it is not ADA-compliant.) A special condition should be added to require direct pedestrian connections from SR1 to the City's Coastal Trail access points at Noyo Point Road and W. Cypress Street in the form of additional sidewalk segments and replacement of the substandard sidewalk section between Maple and Oak Streets.

5. CIRCULATION ELEMENT

Goal C-2 Develop and manage a roadway system that accommodates future growth and maintains acceptable Levels of Service while considering the other policies and programs of the Coastal General Plan.

Policy C-2.2⁴: Improvements to major road intersections for public safety or increased vehicle capacity shall be permitted, as necessary, in existing developed areas and where such improvements are sited and designed to be consistent with all policies of the LCP.

Consistency: This project appears consistent with Policy C-2.2 as described in the staff report.

⁴The staff report identified this policy as applicable to the project and recommended that the Planning Commission find that the project is consistent. (See Staff report p. 5.)

Policy C-2.8: Continuation of Streets: Require the continuation of streets and bicycle and pedestrian paths through new developments wherever possible.

Consistency: This project does not appear to be consistent with Policy C-2.8 for similar reasons it is not consistent with Policy OS-19.3 (above), including lacking continuous ADA-compliant sidewalks along the entire west side of the SR1 right-of-way between Noyo Point Road and Oak Street. A special condition should be added to require continuous pedestrian paths in the form of additional sidewalk segments on the west side of SR1 between Noyo Point Road and Maple Street, and replacement of the substandard sidewalk section between Maple and Oak Streets (or installation of crosswalks and a traffic-control signal at the intersection of SR1 and Maple Street).

9. Pedestrian Facilities

Most areas of Fort Bragg have sidewalks for pedestrians. There are, however, a number of residential streets which lack sidewalks, and substandard sidewalk facilities exist throughout the City. Better pedestrian access across Fort Bragg's bridges and along Main Street from the Noyo Bridge to the southern City limits and from Elm Street north is needed. New development must be served by adequate pedestrian facilities. In addition to the policies and programs listed below, see the Conservation, Open Space, and Parks Element regarding policies and programs recommended for increasing and improving the trail system within the Planning Area.

Goal C-9 Make it easier and safer for people to walk in Fort Bragg.

Policy C-9.1⁵: Provide Continuous Sidewalks: Provide a continuous system of sidewalks throughout the City.

Consistency: This project does not appear to be consistent with Policy C-9.1 for the same reasons it is not consistent with Policy C-2.8 (above). A special condition should be added to require continuous system of sidewalks along SR1 in the form of additional sidewalk segments on the west side of SR1 between Noyo Point Road and Maple Street, and replacement of the substandard sidewalk section between Maple and Oak Streets.

Policy C-9.2: Require Sidewalks. Require a sidewalk on both sides of all collector and arterial streets and on at least one side of local streets as a condition of approval for new development.

Program C-9.2.1: Consider implementing the following funding sources for the purpose of installing sidewalks in existing developed areas of the City:

- a) special benefit assessment districts; and/or

⁵The staff report identified this policy as applicable to the project and recommended that the Planning Commission find that the project is consistent because the project "would contribute toward building a continuous system of sidewalks throughout the City." (See Staff report p. 7.) However, Policy C-9.1 does not require projects to merely contribute to a continuous system of sidewalks, it requires the City and relevant projects to "provide a continuous system of sidewalks throughout the City."

b) a low-interest revolving loan fund.

Consistency: This project does not appear to be consistent with Policy C-9.2 for the same reasons it is not consistent with Policies C-2.8 and C-9.1 (above). A special condition should be added to require continuous system of sidewalks along both sides of SR1, which is the City's major arterial street, in the form of additional sidewalk segments on the west side of SR1 between Noyo Point Road and Maple Street.

Policy C-9.3: Where feasible, incorporate pedestrian facilities into the design and construction of all road improvements.

Consistency: This project appears consistent with Policy C-9.3 as described in the staff report for other CGP policies and because it almost entirely consists of constructing pedestrian facilities.

Policy C-9.5: Pedestrian Paths: Develop a series of continuous pedestrian walkways throughout the commercial districts and residential neighborhoods.

Consistency: This project does not appear to be consistent with Policy C-9.5 for similar reasons it is not consistent with Policies OS-19.3 and C-9.1 (above), including lacking continuous ADA-compliant sidewalks along the entire west side of the SR1 right-of-way between Noyo Point Road and Oak Street. A special condition should be added to require continuous pedestrian paths in the form of additional sidewalk segments on the west side of SR1 between Noyo Point Road and Maple Street, and replacement of the substandard sidewalk section between Maple and Oak Streets (or installation of crosswalks and a traffic-control signal at the intersection of SR1 and Maple Street).

Policy C-9.6⁶: Ensure that pedestrian paths are sited to avoid wetlands and other environmentally sensitive areas.

Consistency: (See consistency analysis for Policy OS-2.1, above.)

11. Access for the Mobility Impaired

Providing transportation facilities accessible to persons who are mobility-impaired is essential. Approximately three percent of the population in Fort Bragg cannot use conventional public transit due to a disability. The Federal Americans with Disabilities Act of 1990 contains many requirements regarding removal of barriers for persons with disabilities.

⁶The staff report identified this policy as applicable to the project and recommended that the Planning Commission find that the project is consistent. (See Staff report p. 7.) However, other CGP policies (e.g., Policy C-9.2, which is omitted from the analysis in the staff report and draft resolution) require this project to provide sidewalks along both sides of SR1 because it is an arterial street per the City's Circulation Element and the Coastal Act and LCP's definition of "development" is broad enough to include the other project activities. Adding sidewalks along the west side of SR1 adjacent to the identified ESHA to comply with the requirements of Policy C-9.2 may require further analysis concerning the consistency of those additional activities with Policy C-9.6.

Goal C-11 Provide mobility-impaired persons with access to transportation.

Policy C-11.2⁷:Handicapped Access. In conformance with State and Federal regulations, continue to review all projects for handicapped access and require the installation of curb cuts, ramps, and other improvements facilitating handicapped access.

Consistency: Although the purpose of this project is to improve pedestrian facilities along SR1 to bring it up to current applicable accessibility regulations, this project does not appear to be fully consistent with Policy C-11.2 for similar reasons it is not consistent with Policy OS-19.3 (above), including lacking continuous ADA-compliant sidewalks along the entire west side of the SR1 right-of-way between Noyo Point Road and Oak Street. A special condition should be added to require continuous pedestrian paths in the form of additional sidewalk segments on the west side of SR1 between Noyo Point Road and Maple Street, and replacement of the substandard sidewalk section between Maple and Oak Streets (or installation of crosswalks and a traffic-control signal at the intersection of SR1 and Maple Street).

⁷The staff report identified this policy as applicable to the project and recommended that the Planning Commission find that the project is consistent because “The project proposes improvements to upgrade the subject location of SR 1 to current American with Disabilities Act (ADA) standards.” (See Staff report p. 7.) However, this project omits numerous improvements along the west side of SR1 that are necessary to fully comply with the requirements of the ADA as well as corollary California regulations, including sidewalk improvements along the west side of SR1 between Noyo Point Road and Oak Street.

ACCESS FORT BRAGG

MAR 24 2021

Memo

To: Fort Bragg Planning Commission

From: Access Fort Bragg

Date: March 24, 2021

Re: CDP 3-20, Caltrans ADA Improvement Project

Access Fort Bragg was formed to promote full and equal access to all programs, facilities, and services for all residents and visitors in our town and the surrounding areas, including those with differing levels of mobility and abilities. Access Fort Bragg is excited that the Caltrans ADA improvement project for Main Street will enhance and replace our current infrastructure. The scope and purpose of the project is to improve accessibility to Main Street (aka State Route One or SRI) between Highway 20 and Elm Street. Access Fort Bragg is also excited by the pending Caltrans project north of Elm Street that will similarly improve the Pudding Creek Bridge and looks forward to equivalent improvements to the Hare Creek Bridge south of town.

Access Fort Bragg supports the project under review tonight but we believe that it falls short of the project objectives of bringing the Main Street corridor up to current ADA standards and is not fully consistent with Fort Bragg's Local Coastal Program (LCP). That being said, Access Fort Bragg does not believe the Planning Commission should deny CDP 3-20. Instead, we encourage you to approve CDP 3-20 with additional special conditions that will actually bring the full Main Street corridor up to current ADA standards and bring the project into compliance with our LCP, including the Coastal General Plan. Access Fort Bragg recommends the following special conditions and encourages the Planning Commission to work with staff and develop specific language for these additional special conditions.

1. Require Caltrans to remove all existing impediments to a fully accessible and ADA compliant pedestrian path within the full length of the right-of-way between Highway 20 and Elm Street. This includes not just replacing existing non-compliant curb cuts with new curb cuts but also removing or relocating all obstructions within the right-of-way like signs and utility poles, which currently prevent pedestrians using wheelchairs or scooters from travelling along all of the sidewalk segments along Main Street.

- 2, Require Caltrans to add sidewalks to all portions of Main Street that do not currently have sidewalks on both sides of the street, which Fort Bragg classifies as an arterial street,
3. If it is not feasible to add sidewalks on both sides of Main Street for the entire length between Highway 20 and Elm Street (e.g., the west side between the Noya Bridge and Maple Street), then require Caltrans to add crosswalks and signalized intersections to facilitate safe pedestrian crossings of Main Street so all pedestrians can access the existing and improved sidewalks that will exist on the east side of Main Street. This would include:
 - a. Adding a crosswalk across Main Street and signalized intersection at Maple Street with a connection to the existing or replaced sidewalk that runs along a portion of the right-of-way between Maple Street and Oak Street on the west side of Main Street.
 - b. The existing signalized intersection at Cypress Street needs, at a minimum, a connection to the sidewalk in front of the North Cliff Motel by constructing a new sidewalk segment along the west side of Main Street between the Noya Bridge and the Cypress Street intersection.
 - c. Improving all existing curb cuts and driveways along the west side of Main Street between the Noya Bridge and Oak Street.

Thank you for your consideration of this important project that will improve accessibility and allow safe pedestrian access for all people no matter their means of travel.

PUBLIC COMMENT RE CDP 3-20

March 24, 2021

The 24 enclosed photos taken this morning show the current conditions of the Caltrans right-of-way along the west side of Highway One starting at Oak Street and heading south towards Maple Street.

These conditions do not meet current ADA standards due to curb cuts and driveway mouths lacking aprons providing flat routes of travel around the sloped curb cuts and driveways as well as numerous obstructions in the sidewalks (e.g., poles for signs) that prevent an uninterrupted adequate width of travel along the existing sidewalks due to their narrow width compared to the sidewalks along the east side of Highway One.

In addition, the sidewalks along the west side of Highway One only extend as far south as the Maple Street intersection, with no sidewalks along the west side of Highway One south of Maple Street or North of Noya Point Road.

There are no crosswalks across Highway One at its intersection with Maple Street (as there are at its intersection with Cypress Street), inhibiting safe pedestrian crossings of Main Street to access the sidewalks along the east side of Highway One south of Oak Street and north of Cypress Street.

There are also no traffic-control signals at the intersection of Highway One and Maple Street to stop traffic on Highway One and allow for pedestrians to safely cross from the western sidewalk segment that dead-ends at the Maple Street intersection.

The intersection of Highway One and Oak Street is signalized and has crosswalks across Highway One but it is quite far from the Maple Street intersection where the western sidewalk segment ends.

There is no signage on the west side of Highway One at its intersection with Oak Street indicating that the western sidewalks end at Maple Street and that pedestrians should consider crossing to the east side of Highway One to access sidewalks that continue south to other protected crossing opportunities at the intersection of Highway One and Cypress Street.

The City of Fort Bragg's Coastal Trail and park provide direct coastal access to the west of Highway One can be accessed via entrances at Noya Point Road, Cypress Street, Alder Street, and Elm Street. There are no sidewalks along W. Cypress Street providing a safe pedestrian access point to the Coastal Trail and park (part of the City's trail system). Sidewalks should be added along at least one side of W. Cypress Street to provide a fully accessible and ADA-compliant pedestrian connection from Highway One to the Coastal Trail and park for all users.





SPEED
LIMIT
35

PACIFIC
TELEPHONE



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ANY
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HOME CENTER & LUMBER CO.

NO
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NO PARKING
ANY TIME

HOME
CENTER
LUMBER CO.

MIENDO TUNDRA



HOME CENTE


**KEEP
DOWNTOWN
SIDEWALKS
SAFE**
Do NOT Ride Bicycles,
Skateboards, or Horses
on Sidewalks
VIOLATORS WILL BE CITED
F.B.M.C. 954.170.153.899

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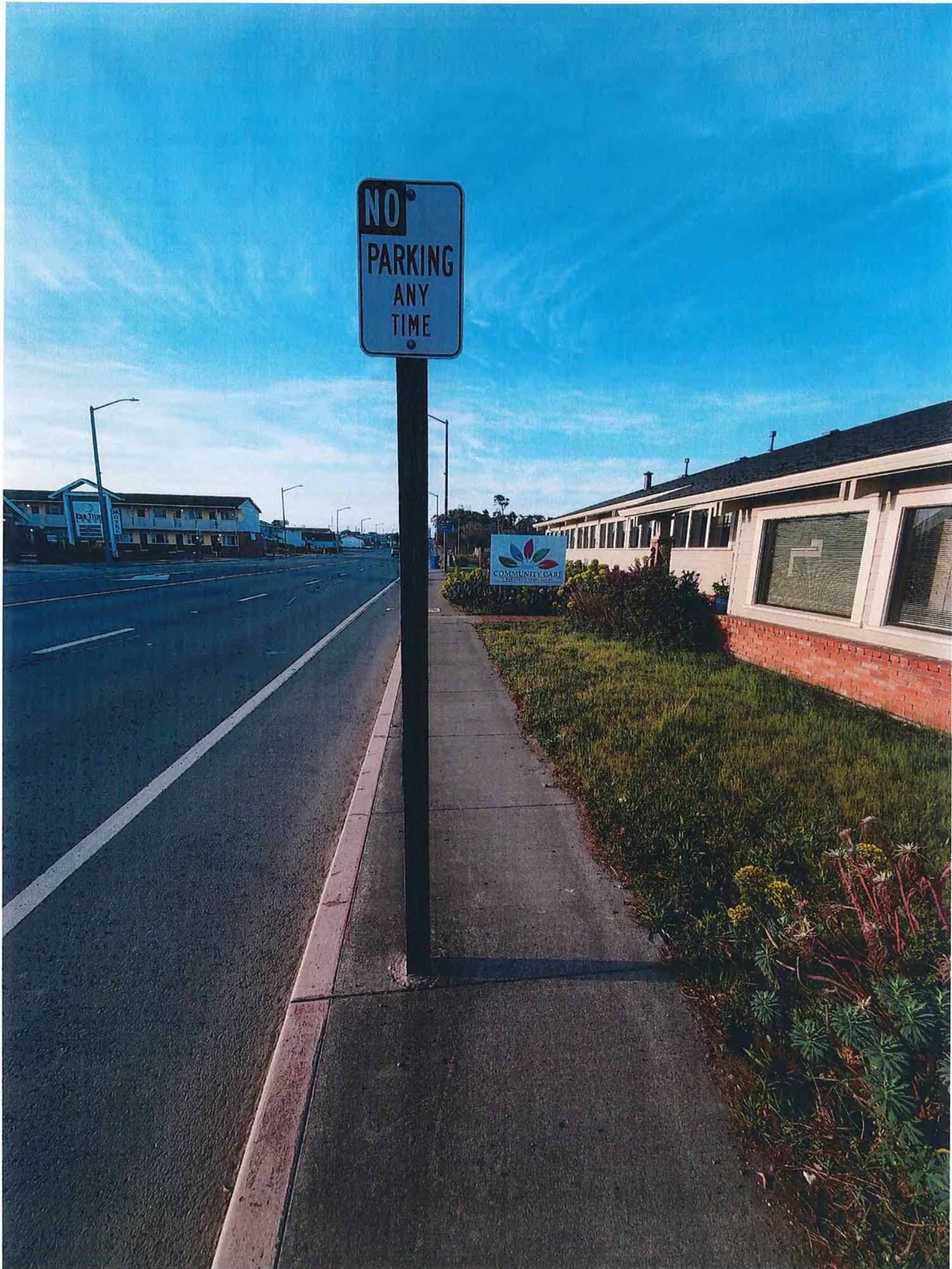






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OF THE STATE OF TEXAS





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40



STATE PROPERTY
NO DUMPING
NO PARKING
NO TRESPASSING
VIOLATORS WILL BE PROSECUTED



SPEED LIMIT 40



Re: Caltrans ADA project (CDP 3-20) comment

Jacob Patterson <jacob.patterson.esq@gmail.com>



Reply all



Wed 3/17/2021 10:36 AM

To: CDD User

Cc: O'Neal, Chantell; Miller, Tabatha

Inbox

Pages from Chapter 5 Ci...

214 KB

Show all 1 attachments (214 KB) Download

I am also forwarding an excerpt of the Circulation Element of the Coastal General Plan that includes the policies I mentioned. As discussed in my prior comment, the Caltrans project does not go far enough in addressing existing deficiencies in order to be consistent with the attached CGP policies because it fails to (a) add complete sidewalks to both sides of Highway One despite including the entire segment of Highway One (minus Noyo Bridge, which is already improved) with the project scope; and (b) remove existing obstacles that obstruct a clear path of travel in all segments of existing sidewalk along both sides of the Highway One right-of-way.

On Wed, Mar 17, 2021 at 10:23 AM Jacob Patterson
<jacob.patterson.esq@gmail.com> wrote:

Community Development Department,

some preliminary comments.

First, this information should have been posted the City's website so the public can review it easily. It had been posted on the City's Active Permits subpage but that page was removed by staff for whatever reason--perhaps limiting public oversight and reducing transparency--and I had to request access to be able to review the materials. That should be corrected because other people will not be able to review these materials without making a special request for access. Taking the action of limiting public access to project information is contrary to applicable Coastal General Plan policies.

Second, the project documents are somewhat unclear as to the scope of what is being proposed but it appears that a good portion of the Highway One right-of-way is going to be left as is. The purpose of this project is to improve ADA access conditions and this project does not appear to go far enough to accomplish that objective. For example, the project does not propose adding new sidewalks or altering the existing sidewalks along the west side of Highway One south of Redwood Street and north of Cypress Street. That portion of the Highway One right-of-way includes a large section without existing sidewalks. Our Coastal General Plan indicates that we should work diligently to add in sidewalks where they do not currently exist and yet this project fails to do that for a large portion of the right-of-way that currently does not have sidewalks and is covered by the project.

Moreover, a significant portion of the right-of-way that does include sidewalks does not meet current ADA standards because of numerous sign poles within the sidewalk that block the sidewalk in such a way that there is not adequate clearance for wheelchairs or other mobility

aids. These sections of the sidewalk should be replaced with

is the sidewalk along the western side of Highway One south of Oak Street and north of Maple streets where numerous signs are in the middle of the sidewalk and far less than 48" inches of clearance is available. In the least, the signs in the sidewalk should be relocated to the curb itself and holes for the relocated poles should be patched so the sidewalks provide the required width of travel free from obstructions.

The existing conditions are quite dangerous and require numerous crossings of Highway One in order for people with mobility impairments to be able to use the travel paths without having to operate wheelchairs or scooters in the parking lanes of the street. The conditions after the project are improved in many places but the lack of relocation of the existing signs blocking fully accessible widths of sidewalk segments does not correct the existing deficiencies even after the proposed project will be implemented. The existing intersections allowing safer access to the sidewalks on the eastern side of the Highway One right-of-way are too far from some of these sidewalk segments and there is no signage at those intersections offering crossing opportunities to alert mobility-impaired people they should cross now rather than continuing on their existing travel path, which will be obstructed by the sign poles and deficient driveway aprons and curb cuts. In order to meet ADA requirements and to be consistent with applicable general plan policies, the project should be expanded to include removing or relocating all existing obstructions that prevent a full 48" of accessible travel paths along both sides of the Highway One right-of-way.

Regards,

--Jacob

MTA has a fixed-route weekday bus service (the "5 BraggAbout") in Fort Bragg with seven fixed stops that connect the College of the Redwoods, shopping centers, the Central Business District, and the hospital. Local trips within the Fort Bragg area are also provided by MTA's dial-a-ride service where riders can call to be picked up and delivered to their destination Monday through Saturday. In addition, the Redwood Senior Center provides transportation services for seniors in the community.

Goal C-8 Provide better public transportation.

Policy C-8.1: Encourage Transit Use.

Program C-8.1.1: Continue to support the expansion of transit services provided by MTA and other public transit providers.

Policy C-8.2: Bus Shelters: Encourage attractive, well-lighted, and comfortable bus shelters placed in convenient locations.

Program C-8.2.1: Continue to require the provision of bus stops, bus shelters, benches, turnouts, and related facilities in all major new commercial, industrial, residential, and institutional developments, and identify, in collaboration with MTA, additional locations for bus stops and shelters.

Policy C-8.3: Transit Facilities in New Development. Continue to require the provision of bus stops, bus shelters, benches, turnouts, and related facilities in all major new commercial, industrial, residential, and institutional developments.

9. Pedestrian Facilities

Most areas of Fort Bragg have sidewalks for pedestrians. There are, however, a number of residential streets which lack sidewalks, and substandard sidewalk facilities exist throughout the City. Better pedestrian access across Fort Bragg's bridges and along Main Street from the Noyo Bridge to the southern City limits and from Elm Street north is needed. New development must be served by adequate pedestrian facilities. In addition to the policies and programs listed below, see the Conservation, Open Space, and Parks Element regarding policies and programs recommended for increasing and improving the trail system within the Planning Area.

Goal C-9 Make it easier and safer for people to walk in Fort Bragg.

Policy C-9.1: Provide Continuous Sidewalks: Provide a continuous system of sidewalks throughout the City.

Policy C-9.2: Require Sidewalks. Require a sidewalk on both sides of all collector and arterial streets and on at least one side of local streets as a condition of approval for new development.

Program C-9.2.1: Consider implementing the following funding sources for the purpose of installing sidewalks in existing developed areas of the City:

- a) special benefit assessment districts; and/or
- b) a low-interest revolving loan fund.

Program C-9.2.2: Work with the Mendocino Council of Governments and Caltrans to construct pedestrian walkways over the Hare Creek and Pudding Creek Bridges. These facilities may qualify for Transportation Enhancement Activities (TEA) funding available through Mendocino Council of Governments (MCOG).

Policy C-9.3: Where feasible, incorporate pedestrian facilities into the design and construction of all road improvements.

Program C-9.3.1: Incorporate additional sidewalks from the Noyo Bridge to Ocean View Drive in the Capital Improvement Program.



Policy C-9.4: Sidewalk Maintenance: Ensure that property owners maintain sidewalks in a safe manner.

Program C-9.4.1: Continue to implement City regulations that require sidewalks to be maintained by property owners. Carry out regular inspections, notification, and enforcement of this requirement.

Program C-9.4.2: Financial Concerns: Consider the financial ability of property owners when establishing proposed sidewalk assessment districts.

Program C-9.4.3: Seek available funding from grants and other funding sources for the construction of sidewalks in existing developed areas.

Program C-9.4.4: Consider deferring payment for sidewalk installations for property owners with low incomes and/or on fixed incomes.

Policy C-9.5 Pedestrian Paths: Develop a series of continuous pedestrian walkways throughout the commercial districts and residential neighborhoods.

Program C-9.5.1: Allow asphalt or other approved surface pedestrian paths in very low density single-family residential areas where sidewalks are not required.

Program C-9.5.2: Revise the Subdivision and Coastal Program to allow approved surface pedestrian paths within developments to create pedestrian connections to nearby streets, community facilities, and adjacent developments as a part of on- and off-site improvements.

Policy C-9.6: Ensure that pedestrian paths are sited to avoid wetlands and other environmentally sensitive areas.



Policy C-9.7: Improve Pedestrian Safety.

Program C-9.7.1: Continue to provide traffic controls and well-lit intersections in areas with a high volume of pedestrian movement.

Program C-9.7.2: Consider expanded use of illuminated crosswalks.

10. Bikeways

With better facilities and trails, bicycling can become a more significant part of the transportation system and an alternative to automobile use. Fort Bragg has few constraints to bicycling: most of the City is flat, the weather is mild, and the City is compact with relatively short distances between residential areas, schools, parks, and commercial centers.

The California Street and Highway Code has established three categories of bicycle trails based on the physical conditions of the right-of-way.

Class 1 Bikeway - Bike Path or Bike Trail: These facilities are constructed on a separate right-of-way, are completely separated from street traffic, and have minimal cross flows of automobile traffic. The State standard for minimum paved width of a two-way bike trail is eight feet.

Class 2 Bikeway - Bike Lane: A restricted right-of-way for the exclusive use of bicycles with vehicle parking and cross flow by pedestrians and motorists permitted. Bike lanes are normally striped within paved areas of highways and are one-directional with a minimum standard width of five feet.

Class 3 Bikeway - Bike Route: A route for bicyclists designated by signs or other markings and shared with pedestrians and motorists. Bike routes are typically designated to provide linkages to the bikeway system where Class 1 or 2 Bikeways cannot be provided.

The following local bikeway projects are identified as high priority by Mendocino County's *2000 Regional Bikeway Plan*. A full description of recommended improvements is included in that Plan.

- The Pudding Creek Trestle to Otis Johnson Park Bikeway would provide a link between a park in northeast Fort Bragg and the beach at the mouth of Pudding Creek. It would also connect with the Old Haul Road, which travels north through MacKerricher State Park. As indicated on Map C-2, this path would serve Fort Bragg Middle School and neighborhoods in the northwest area of the City through a combination of Class 2 and 3 Bikeways. New Class 3 segments would be required from the Pudding Creek Trestle to Elm Street. Class 3 improvements would be constructed on Elm Street, Franklin Street, and Laurel Street.
- The Otis Johnson Park/Dana Street Bikeway would provide a north-south link within central Fort Bragg. This bicycle route would connect Fort Bragg Middle School and Fort Bragg High School. The proposed bike route would use existing bikeways and a section of the proposed bikeway improvement listed above for Laurel Street. It would consist of Class 3 Bikeway improvements on Oak Street and Class 1 Bikeway improvements on Dana Street.
- The Dana Gray School to Maple Street Bikeway would provide east-west access between Dana Gray School and an existing bikeway on Maple Street. Class 3 Bikeways would be constructed on S. Sanderson Way, Willow Street, and Lincoln Street.

Goal C-10 Make it easier and safer for people to travel by bicycle.

Policy C-10.1 Comprehensive Bikeway System: Establish a comprehensive and safe system of bikeways connecting all parts of Fort Bragg.

Program C-10.1.1: Complete the bikeway system as indicated in Map C-2: Bicycle Paths. Make the completion of the Pudding Creek Trestle/Glass Beach to Otis Johnson Park a high priority.

Program C-10.1.2: Incorporate bicycle and pedestrian facilities into the design and construction of all road improvements as feasible.

Program C-10.1.3: Continue to participate in MCOG's *Regional Bikeway Plan* to qualify for State Bicycle Lane Account funds.

Program C-10.1.4: Utilize parking-in-lieu funds, dedications, grant funding, traffic impact fees, and other means, as appropriate, to acquire rights-of-way needed for a comprehensive bikeway system as indicated in Map C-2.

Program C-10.1.5: Maintain bikeways to ensure that they are free of debris and other obstacles. Consider increasing the number of trash receptacles, solar-powered emergency telephones, and increased lighting along bicycle trails.

Policy C-10.2: Require Bikeways. Require new development to provide on-site connections to existing and proposed bikeways, as appropriate.

Policy C-10.3: Require that streets linking residential areas with school facilities be designed to include bikeways.

Policy C-10.4: Consider bicycle operating characteristics in the design of intersections and traffic control systems.

Policy C-10.5 Bicycle Parking: Provide adequate and secure bicycle parking at public transit facilities, park and ride lots, schools, the library, parks, City offices, and commercial areas.

Program C-10.5.1: Revise the Coastal LUDC parking standards to require larger commercial and multi-family residential projects, public buildings, and transit facilities to provide secure bicycle parking.

Program C-10.5.2: Continue the bicycle safety program conducted by the Police Department.

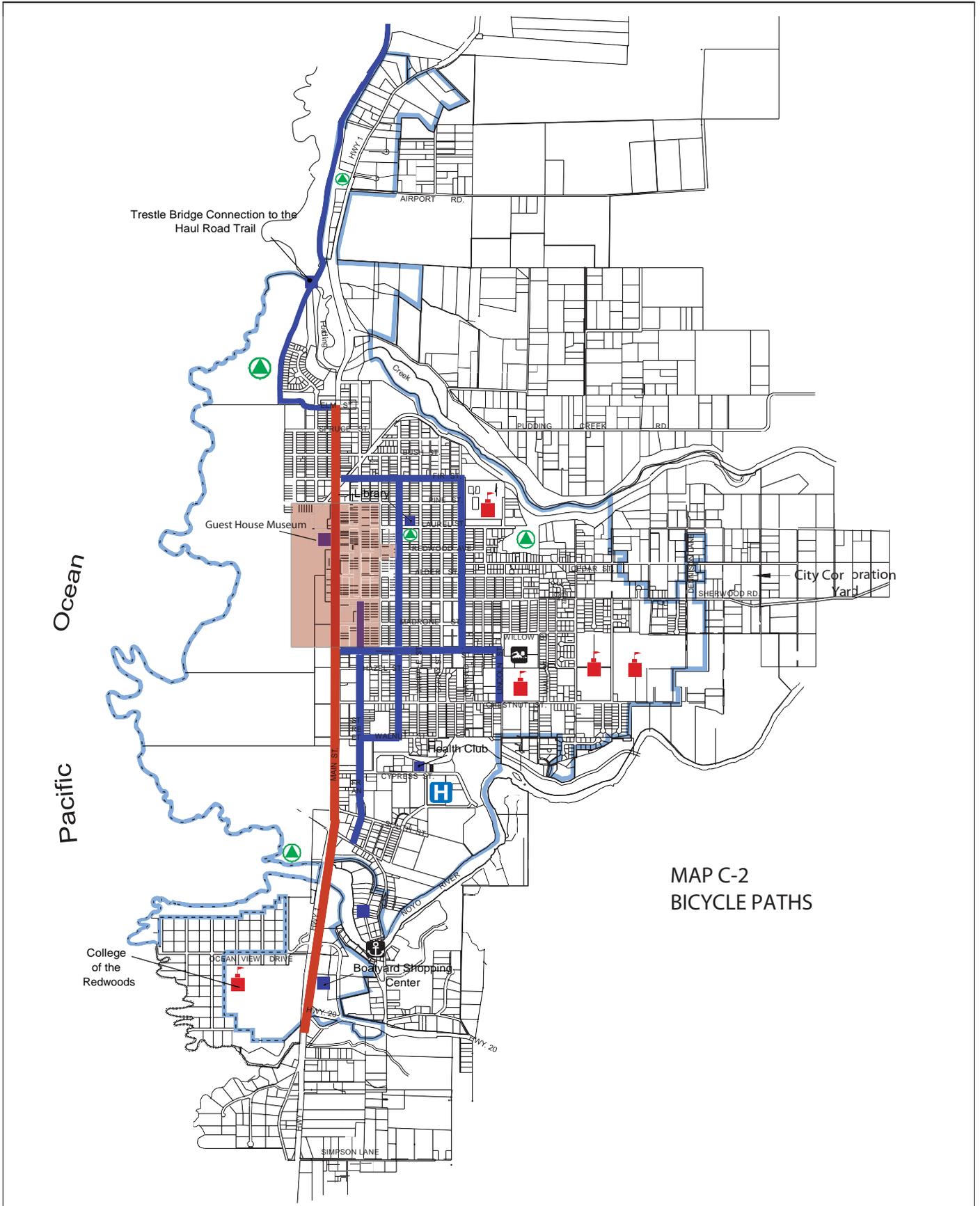
11. Access for the Mobility Impaired

Providing transportation facilities accessible to persons who are mobility-impaired is essential. Approximately three percent of the population in Fort Bragg cannot use conventional public transit due to a disability. The Federal Americans with Disabilities Act of 1990 contains many requirements regarding removal of barriers for persons with disabilities.

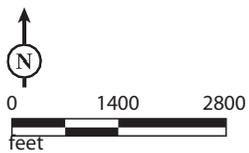
Goal C-11 Provide mobility-impaired persons with access to transportation.



Policy C-11.1: Regulations for Disabled Persons: Enforce Federal and State regulations regarding access for persons with disabilities.



MAP C-2
BICYCLE PATHS



Legend

- City Boundary
- Central Business District
- School
- Parks
- Hospital
- Harbor/Marina
- Aquatic Center
- Points of Interest
- Proposed Hwy 1 Bike Lanes
- Existing Bikeways

Policy C-11.2: Handicapped Access. In conformance with State and Federal regulations, continue to review all projects for handicapped access and require the installation of curb cuts, ramps, and other improvements facilitating handicapped access.

Program C-11.2.1: Assist organizations, such as the Senior Center, which provide transit service to the elderly and the mobility-impaired, in identifying and obtaining funding.



Policy C-11.3 Support Improved Access: Support improved access to public transportation and pedestrian facilities for people with disabilities.

Program C-11.3.1: Continue to apply for grants for ADA-related projects from MCOG and other sources.

Program C-11.3.2: Consider funding to implement the City's ADA Access and Transportation Plan through the City's Capital Improvement Plan (CIP), grants, and State and Federal transportation funds.

12. Train Service

The Sierra Railroad, known as the Skunk Line, operates a rail system between Willits and Fort Bragg. It is the only railroad in the region that has maintained passenger service on a regular basis since its founding. Train service is offered daily (approximately eleven months per year), and handles approximately 80,000 passengers annually. Freight service is provided on request.

The Skunk Depot, located at Laurel Street in the Central Business District, has been recently renovated, including additional parking facilities. It provides access to MTA's local and regional buses. The railroad not only benefits from the extensive tourist traffic on the Mendocino Coast, it is also a major generator of visitors to the Willits and Fort Bragg areas.

Although the use of the Skunk Line for freight transportation has decreased in recent years, it continues to provide freight service. If the rail lines were upgraded to carry heavier loads, it could serve as an incentive to increase freight loads.

Goal C-12 Increase use of the Skunk Line for transportation of people and freight.



Policy C-12.1 Skunk Train: Encourage increased use of the Skunk Train.

Program C-12.1.1: Continue to work with the Skunk Train Company to improve and expand facilities at the Skunk Depot.

Program C-12.1.2: Work with the Mendocino Council of Governments to facilitate increased use of the Skunk Line as an alternative to automobile transportation between Fort Bragg and Willits.

13. Coordinate Regional Transportation Planning

Traffic congestion along Fort Bragg's Main Street is connected to development in unincorporated areas to the north and south of the City. Main Street is Highway One which is the primary north-south route for all communities on the coast. Land use decisions made by the County of Mendocino have a significant impact on transportation in the Fort Bragg area. The City works closely with the regional agencies described below:

- County of Mendocino: maintains and plans the county road system.
- Mendocino Council of Governments (MCOG): prepares and carries out a Regional Transportation Plan, establishes priorities for Federal and State funding, and funds studies of transportation corridors.
- Mendocino Transit Authority, (MTA): operates several transit routes serving the City and the region. It is a county-wide authority created through a joint powers agreement among cities and the County.

Goal C-13 Coordinate regional traffic planning.



Policy C-13.1 Regional Transportation Efforts: Participate in regional transportation planning efforts.

Program C-13.1.1: Continue to provide City Council and staff representation on regional transportation planning agencies.

Program C-13.1.2: Work with the MCOG and Caltrans to coordinate transportation planning and to identify funding for necessary transportation improvements.

Program C-13.1.3: Continue to ensure that MCOG's Regional Transportation Plan (RTP), the State Transportation Improvement Program (STIP) and the State Highway Systems Operation and Protection Plan (SHOPP) include needed improvements to Highway One and Highway 20 in the Fort Bragg Planning area. Such improvements shall be designed to ensure that Highway One in rural areas outside the Mendocino County urban/rural boundary remains a scenic two-lane road consistent with Section 30254 of the Coastal Act.

14. Funding Transportation Improvements

Funding transportation improvements is predominantly a Federal, State, and regional responsibility. For many years the road system has received the largest proportion of public expenditures for transportation. Although increased funding for alternative modes of transportation has significant environmental and social benefits, roadway funding will continue to receive the highest priority. Fort Bragg remains a relatively isolated coastal community and depends on the road system for the majority of its transportation needs.

A significant amount of the traffic in Fort Bragg is through-traffic (trips that originate or have destinations outside of the City). The logging industry, tourist travel, and people coming to Fort Bragg from around the region for shopping, educational, medical, and other services generate much of the traffic.

It is necessary that funding mechanisms be expanded to ensure effective coordination among different government jurisdictions. The goals, policies, and programs below complement those

in the Land Use and Public Facilities Elements requiring new development to pay for its fair share of maintaining the City's infrastructure and service levels.

Goal C-14 Promote balanced funding for transportation.



Policy C-14.1 Development to Pay Its Fair Share: Require new development to pay its fair share of transportation improvements to maintain levels of service and traffic safety in the City.

Program C-14.1.1: Develop a City-wide Traffic Mitigation Fee Program.

Program C-14.1.2: Work with the County of Mendocino and MCOG to develop traffic mitigation fees for the Fort Bragg Sphere of Influence. Consider adopting a memorandum of understanding between the City of Fort Bragg and the County regarding traffic mitigation fees.

Program C-14.1.3: Work with MCOG to ensure that the standards and requirements contained in the joint City and County Traffic Mitigation Program between Fort Bragg and the County are incorporated into the Regional Transportation Plan.

Program C-14.1.4: Include in the Traffic Mitigation Fee Program mitigation fees for new development with primary access to Highway One and Highway 20. Utilize the funds collected as a local match to encourage Caltrans to raise the priority of Highway One and Highway 20 improvements.

Program C-14.1.5: Ensure that the City's Pavement Management System obtains funding from the Traffic Mitigation Fee Program, as deemed appropriate by the traffic impact fee nexus study and applicable State law.

Program C-14.1.6: Carry out an ongoing inventory of transportation system needs to be included in the City's Capital Improvement Plan.

Gonzalez, Joanna

From: Jenny Shattuck <jenxvann@yahoo.com>
Sent: Wednesday, March 24, 2021 5:45 PM
To: Gonzalez, Joanna
Cc: Morsell-Haye, Jessica
Subject: caltrans project 6A

Last year while driving on South Main st by the intersection of Main and Cypress there was an elderly man pushing his wife in a wheelchair west across the crosswalk towards the coastal trail access point at West Cypress st. After making it through the crosswalk, on to the curb, he then went straight into mud and she was stuck in her wheelchair. People assisted to get her chair freed from the mud. The sidewalk at this intersection on the west side of the hwy does not exist. Only a curb to dirt, mud and grass. For someone in a wheelchair to enter the coastal trail access they would have to go into oncoming traffic that is exiting the Mill site or South Trail access. The same goes for exiting this intersection. I contacted a council member within 5 min of this happening and was informed that this would be part of the upcoming Caltrans project. This was confirmed with city staff. However the only thing in this section being redone is on the east side of this intersection. This is clearly visible on their presentation page marked L8 I do hope that this highly used intersection is made safe for all. It was heartbreaking to see an elderly man trying to bring his wife out to see the sunset, to be in such a helpless situation. Thank goodness for the kindness of strangers, who stopped in traffic on Main st to assist. This is a highly traveled intersection for people of all ages and abilities.. Please make this a top priority before someone is hurt or killed trying to navigate this as a pedestrian. It is shocking that a Caltrans project that is supposed to be addressing ADA compliance issues is not proposed to fix anything on the west side of the intersection of West Cypress and Main where this unfortunate and dangerous situation occurred. Being

that this is the access point for pedestrians, and those living at the senior developments off of East Cypress and near the hospital this seems a priority. Please make sure this project remedies all of these issues.

Thank you,
Jenny Shattuck
Fort Bragg

Gonzalez, Joanna

From: Annemarie <aweibel@mcn.org>
Sent: Wednesday, March 24, 2021 5:00 PM
To: Gonzalez, Joanna; Miller, Tabatha
Subject: Public Comment reg. Public Hearing about Coastal Development Permit 3-20 (CDP 3-20) item 6a Planning Commission 3-24-2021

Public Comment reg. Public Hearing about Coastal Development Permit 3-20 (CDP 3-20) item 6a Planning Commission 3-24-2021

Dear Commissioners,

Glancing at the information in the agenda it looks like what is happening is basically a necessary job to accommodate the public due to ADA laws.

I am opposed to this project as it is proposed due to many reasons.

It is not that benign. While I am in favor of adding sidewalks where non exist, having curb ramps, and gutters I am opposed to this huge environmentally damaging project and do not agree with the environmental determination that as it stands should be exempt from CEQA Categorical Exemption, Class 1(c), Existing Facilities; NEPA Categorical Exclusion under 23 USC 327.

In addition, trying to hold this public hearing dealing with a project within the coastal zone just 2 months shy of in-person hearings is not what the PUBLIC RESOURCES CODE – DIVISION 20 of the CALIFORNIA COASTAL ACT was designed to protect. According to 30006 The Legislature further finds and declares that the public has a right to fully participate in decisions affecting coastal planning, conservation, and development; that achievement of sound coastal conservation and development is dependent upon public understanding and support; and that the continuing planning and implementation of programs for coastal conservation and development should include the widest opportunity for public participation.

In addition Section 65033 of the State Planning, Zoning, and Development Law (Government Code) reads: The Legislature recognizes the importance of public participation at every level of the planning process. It is therefore the policy of the state and the intent of the Legislature that each state, regional, and local agency concerned in the planning process involve the public through public hearings, informative meetings, publicity and other means available to them, and that at such hearings and other public forums, the public be afforded the opportunity to respond to clearly defined alternative objectives, policies, and actions.

In addition CEQA Guidelines, at Title 14, California Code of Regulations section 15201 reads:
15201. PUBLIC PARTICIPATION

Public participation is an essential part of the CEQA process. Each public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency's activities. Such procedures should include, whenever possible, making environmental information available in electronic format on the Internet, on a web site maintained or utilized by the public agency.

Also CEQA (Public Resources Code section 21000 and after) contains many specific provisions about required notice of environmental documents, and opportunities for public comments on them.

In addition this web page

<https://city.fortbragg.com/786/Active-Planning-Reports-and-Studies>

no longer has information about this Caltrans project. Only the initial study about the Grocery Outlet and the Avalon Hotel are available. Not even information about a possible future Dollar Store.

It seems hard for the public to deal with virtual meetings and not see for example these project plans (large size) as a power point presentation. It is not acceptable that plans that the public and the Planning Commission are shown "Preliminary for Design Study Only" plans, plans not drawn to scale, and plans that have icons that are not explained in the legend.

Why were the attachments not included? Yes, they might be visible for people who want to spend hours searching for them.

I am against the installation of two retaining walls at two separate locations. None of the information from Caltrans or the staff report indicate why this is proposed or how it ties in to fulfilling the ADA requirement. Also reading that these retaining walls have an approximate height makes me believe that this project is not ready to be evaluated. Even more so when in the Environmentally Sensitive Habitat Area (ESHA) Assessment

According to the staff report there would be retaining walls adjacent to the sidewalk between the intersection of SR 1 and SR 20 and the intersection of SR 1 and Boatyard Drive. The retaining wall would be located on the east side of the proposed sidewalk and extend north from the intersection of SR 1 and SR 20 for a distance of 741 linear-feet. This wall would vary in height measuring approximately six (6) feet tall at its highest point near SR 20 and would reduce in height moving north to approximately four (4) feet. Adjacent to the west of the proposed new sidewalk, between Spruce Street and Elm Street. This retaining wall would be 59 linear-feet long and measure approximately four (4) feet tall (from lower grade on the west side of the wall). It is mentioned in the ESHA Assessment that the proposed retaining wall would be approximately 10 feet tall at its highest point near SR 20 and would reduce in height moving north. We deserve to know exactly how tall these retaining walls would be for any given point. If these could be covered by bushes and plants that would maybe be acceptable, but not only on top of it. As Main Street/Hwy1 is a scenic highway mentioned in the documents and is the first road parallel to the ocean it is not acceptable to create such an eyesoar. Our town survives from tourists and they do not come to stare at retaining walls, no matter how you want to dress them up with context-sensitive architectural designs. They do not want to be stuck in traffic and surrounded by noise. Also, the work can not happen during tourist season and bird nesting season or rainy season.

Where is a photo of how these walls would look like and these context-sensitive architectural designs?

Where is the Landscape plan?

The various project work locations would total approximately 2.3 miles of construction. How many months would it take? What would be the working schedule (hours per day, per week or at night with bright lights? How will the businesses suffer who already suffered so much with Covid? Do you have all the permits from the individual land owners? How many are missing?

I read that there is currently one alternative for the proposed project. This is not an alternative, this is the project.

Based on the current project description Caltrans has determined this action would not affect special-status taxa, sensitive natural communities, wetlands, jurisdictional waters, essential fish habitat or federally designated critical habitat (Appendix D). I disagree with this statement. Just because a survey was done and none of the animals and plants were found in this general area does not mean that they are not there or at least not there some of the time. We are not told what day, month, year the survey/s was done/were done and what time of the day. How busy and noisy was it when it was done?

Did the survey for bats include a survey at dusk? For example there have been more Bald eagles seen in the area. Their territory covers easily north of Fort Bragg to Navarro River where they have been found lately. See

<https://ebird.org/home> and Audubon Survey Area 3 & 4

<https://www.google.com/maps/d/viewer?msa=0&ie=UTF8&t=p&vpsrc=6&ll=39.456872651798236%2C-123.77162886767579&spn=0.212238%2C0.274658&z=12&source=embed&mid=1klQG6bcyJ0aAfrV32n7w7-Dv-FA>

and last survey from 2018:

<https://www.mendocinocoastaudubon.org/downloads/118%20CAFB%20Tally.pdf>

Missing is a noise study and a study dealing with how much grading will happen and where and how that affects the environment.

The documents point out the relocation of underground utilities and adjustment of utilities to grade. Will small cell wireless devices be installed or will it be prepared to do so? We deserve to know. Are these retaining walls installed to facilitate the places to allow Comcast, AT&T and PG&E to co-locate? What are joint poles.

The Visual Impact Assessment, dated January 17, 2020 does not evaluate the true impacts of the proposed project.

This project will require Temporary Construction Easements (TCEs) for 30 properties.

As of August 2020, Caltrans has obtained 15 TCEs and will be working toward obtaining the remaining 15 TCEs. How many do you have now?

The project is not acceptable.

Sincerely, Annemarie Weibel

3-24-2021

--

This email has been checked for viruses by Avast antivirus software.

<https://www.avast.com/antivirus>

From: [Jacob Patterson](#)
To: [O'Neal, Chantell](#); [Miller, Tabatha](#)
Subject: Caltrans ADA project follow-up comment
Date: Friday, April 2, 2021 9:40:01 AM

Chantell,

First, this may be based on a false assumption about the identity of the author of the staff report so if it is, please disregard. I did not recognize the name on the March 24th staff report but it might be one of the City's planning consultants rather than a Caltrans planner.

I want to make a suggestion regarding the continued public hearing on April 14th for the Caltrans CDP. It appeared that the City permitted Caltrans to prepare their own staff report rather than independently reviewing the project with our own staff or consultants. Caltrans is not objective and is obviously self-interested in their recommendations and how they chose to interpret our local planning documents. I think that including a self-authored staff report is fine as a form of written public comment by the applicant but the City should probably have at least a brief objective report for this item. (If we attempted to do that through one of our planning consultants, then my suggestions do not apply, although I think the consultant needs to review our planning documents in more detail as well as the additional evidence and information contained in the public comments that were submitted for the March 24th public hearing.)

In particular, the City may wish to impose numerous additional special conditions to make sure that Caltrans has to fund and provide all improvements that are necessary to achieve the applicable goals in the Coastal General Plan. Why wouldn't we do that to the greatest extent permissible rather than deferring the additional improvements to other projects and possibly leaving the City itself responsible for correcting existing deficiencies within Caltrans r-o-w with our own limited funding? For example, the last major Caltrans project resulted in a brand new Noyo Bridge but also their purchase and creation of the Noyo Bluffs Park to mitigate for the view-blocking impacts on the bridge widening. Based on the original staff report, we aren't asking them to do anything beyond what their initial proposal involved, which doesn't even address many deficiencies and effectively ignores numerous applicable policies in the Coastal General Plan, at least in my opinion.

None of this email is intended as a criticism of City staff concerning this permit application; I am only trying to make sure the City doesn't miss an opportunity to provide much-needed infrastructure improvements without having to rely on our limited local financial resources to do so and by allocating those costs to the agency that is the most appropriate responsible party.

Best regards,

--Jacob

From: [O'Neal, Chantell](#)
To: [Gonzalez, Joanna](#)
Subject: FW: Public Comment -- 4/14/21 PC meeting, Item No. 6A, CDP 3-20
Date: Tuesday, April 13, 2021 12:16:22 PM
Attachments: [permanent-pedestrian-facilities-ada-compliance-handbook-a11y.pdf](#)

Joanna,

Did you forward this one along to Commission already as well? I don't recall seeing it. It was from Sunday. Disregard if you already did.

-C

From: Jacob Patterson [mailto:jacob.patterson.esq@gmail.com]
Sent: Sunday, April 11, 2021 3:35 PM
To: Gonzalez, Joanna <JGonzalez@fortbragg.com>
Cc: Miller, Tabatha <TMiller@fortbragg.com>; Lemos, June <Jlemos@fortbragg.com>; O'Neal, Chantell <COneal@fortbragg.com>
Subject: Public Comment -- 4/14/21 PC meeting, Item No. 6A, CDP 3-20

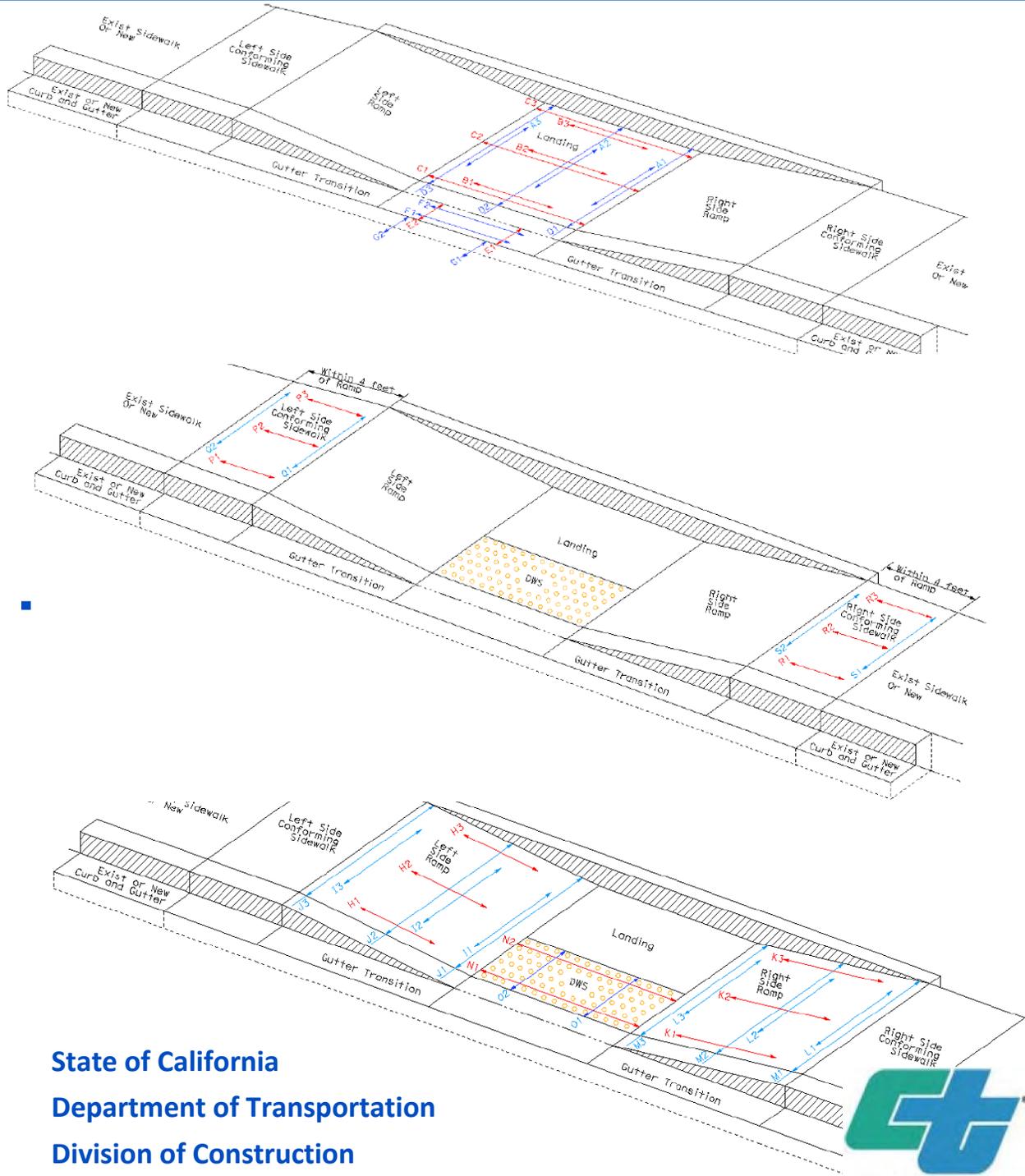
Joanna,

Please include this email and attached Caltrans Permanent Pedestrian Facilities ADA Compliance Handbook as a public comment for their ADA improvement project to SR1 between Highway 20 and Elm Street. The handbook includes the applicable ADA requirements for the various pedestrian facilities. When the project plans and existing conditions are compared to this handbook, it is quite clear that the project fails to improve all facilities to existing ADA guidelines as reflected in Caltrans own ADA compliance handbook, particularly those shown in the General Sidewalk / Path of Travel Checklist that starts on page 8 of the handbook. This is in direct conflict with the erroneous assertion on page 8 of the staff report concerning the project's compliance with Coastal General Plan Policy C-11.2 that "The project proposes improvements to upgrade the subject location of SR 1 to current American with Disabilities Act (ADA) standards." This statement is patently false because the project does not propose improvements that upgrade SR1 within the project area to current ADA standards, including but not limited to failing to address deficient conditions along the west side of SR1 between Noyo Point Road and Oak Street that do not currently provide an unobstructed and ADA-compliant path of travel that is at least 48" in width or which includes short segments of no more than 24" of sidewalk with a narrower width of no less than 32". These deficient conditions are shown in photos submitted as part of the public comments for the March 24, 2021 meeting and which are included in the agenda packet for this continued public hearing.

Regards,

--Jacob

PERMANENT PEDESTRIAN FACILITIES ADA COMPLIANCE HANDBOOK



State of California
 Department of Transportation
 Division of Construction
 March 2018



PERMANENT PEDESTRIAN FACILITIES ADA COMPLIANCE HANDBOOK

State of California Department of Transportation
Division of Construction

Prepared by

Office of Contract Administration

1120 N Street, MS 44

Sacramento, CA 95814

MARCH 2018



Cover images: Curb Ramp Inspection Forms

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About the
PERMANENT PEDESTRIAN FACILITIES
ADA COMPLIANCE HANDBOOK

This handbook provides information for inspection of permanent pedestrian facilities for compliance with the Americans with Disabilities Act (ADA) standards based primarily on Design Information Bulletin (DIB) 82-06, "Pedestrian Accessibility Guidelines for Highway Projects," for the California Department of Transportation (Caltrans).

Caltrans Division of Construction will revise and update this manual to keep current with revisions to DIB, other standards and guidance concerning ADA compliance. Employees should forward suggestions for improving this manual, to the office responsible for maintaining this document, which can be found on the Division of Construction website, at:

<http://www.dot.ca.gov/construction/index.html>

Responsible office:

HQ Office of Contract Administration
Division of Construction
1120 N Street, MS 44
Sacramento, CA 95814

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Introduction

The California Department of Transportation (Caltrans) developed this handbook for construction field staff who inspect permanent pedestrian facilities in consideration of American with Disabilities Act (ADA) requirements. Not unlike other facilities on Caltrans projects, staff help ensure the constructed facilities comply with the contractual requirements of the plans and specifications. However, unlike other facilities, there are absolute ADA compliance measurement requirements for permanent pedestrian facility features. Designers are to provide project details for these facilities that comply with ADA requirements pursuant to Design Information Bulletin (DIB) 82-06, “Pedestrian Accessibility Guidelines for Highway Projects,” while accommodating project constraints. While field staff are not expected to be experts in ADA codes and regulations, there is a need to have a basic understanding of ADA compliance when inspecting these facilities. Field conditions or contractor’s construction methods may affect compliant construction of these facilities, and field staff need to be cognizant of how potential changes in these facilities may affect contract compliance, as well as ADA compliance. When questions arise, staff should not hesitate to contact their project engineer to obtain assistance.

Standard Measurement Tools and Practices

For assessing compliance of dimensions of permanent pedestrian facilities, use a measuring tape with minimum 1/8-inch increments. For each facility's dimensional feature (for example, width of curb ramp) take three measurements equally dispersed across the feature in question. Evaluate each measurement individually for compliance; do not average the individual measurements. Due to the accuracy of the instrument, any individual measurement within 1/4-inch of the compliance dimensional value is deemed acceptable.

For assessing compliance of slopes of permanent pedestrian facilities, use a smart level with a minimum sensor accuracy of 0.1 degrees. Calibrate the smart level in accordance with the manufacturer's instructions each day before taking measurements. Slope measurements are to be taken parallel and perpendicular to the pedestrian path of travel. If the pedestrian facility feature will accommodate, use a 4-foot smart level for taking measurements. Where the feature will not accommodate the 4-foot smart level, a 2-foot smart level may be used for taking measurements. If the feature will not accommodate a direct measurement with a 2-foot smart level, uniform blocking may be used. Verify the measured surface is free of grit and other substances prior to placing the smart level. For each facility's slope feature, take three measurements equally dispersed across the feature in question. Evaluate each measurement individually for compliance; do not average the individual measurements. Due to the accuracy of the instrument, any individual measurement within 0.2 percent of the compliance slope value is deemed acceptable.

For example, plans show a maximum slope requirement of 1.5 percent and the maximum ADA compliance value of the slope is known to be 2.0 percent. If all three of the measured slopes are 1.7 percent (1.5 percent + 0.2 percent [tool accuracy]) or less, contract and ADA compliance have been achieved. In the event the measurement falls outside contract compliance but within ADA compliance, no corrective work may be necessary; however, a credit may be due to the State. In the event the measurement falls outside both contract compliance and ADA compliance, corrective work will be required.

Latitude and longitude measurements for each permanent pedestrian facility will be used to identify and differentiate the permanent pedestrian facilities as part of an asset management system. Currently, there are multiple free GPS applications available for smart phones, tablets and desktop computers that will report latitudes and longitudes to a minimum of six decimal degrees. Evaluation of these applications indicate that they provide accurate horizontal positioning to ± 4 feet (approximately 5 decimal degrees) for most unobstructed locations, which is sufficient for differentiation of these assets. Locate these measurements at the center of the constructed permanent pedestrian facility such as the center of the curb ramp or midpoint of a sidewalk segment.

Documentation and Certification

Document inspection of permanent pedestrian facilities using the following forms:

Form Number	Pedestrian Facility
CEM-5773ADE	Curb Ramp (Case A, D or E)
CEM-5773B	Curb Ramp (Case B)
CEM-5773C	Curb Ramp (Case C)
CEM-5773CH	Curb Ramp (Case CH)
CEM-5773CM	Curb Ramp (Case CM)
CEM-5773DW	Sidewalk at Driveway
CEM-5773FG	Curb Ramp (Case F or G)
CEM-5773P	Parking
CEM-5773PW	Passageway
CEM-5773SW	Sidewalk
CEM-5773NSPL	Non-Standard Plan Parallel Curb Ramp
CEM-5773NSPP	Non-Standard Plan Perpendicular Curb Ramp

File the completed forms in Category 57, “Permanent Pedestrian Facilities,” of the project records. Remember to document changes to these pedestrian facilities on as-built plans.

Use Form CEM-5773, “Americans with Disabilities Act (ADA) Project Compliance Certification,” to summarize and certify ADA construction compliance of pedestrian facilities constructed under the contract. Transmit a copy of this form with required attachments to the ADA Infrastructure group at ADA.Compliance.Office@dot.ca.gov and file the original in Category 57 of the project records. This information will assist Caltrans in asset management of these facilities and managing the ADA transition plan.

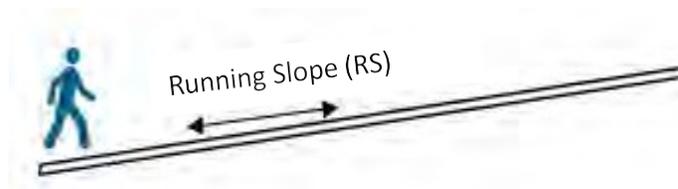
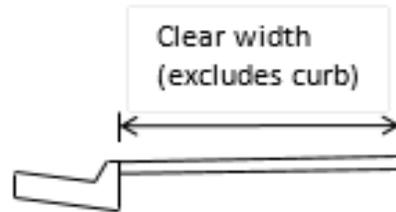
Checklist Usage

The checklists contained herein are based on ADA compliance requirements for permanent pedestrian facilities. The checklists are a tool for personnel to use in determining compliance of pedestrian facility features. Personnel must verify that contract compliance of pedestrian facilities has been obtained. Generally, contractual requirements will be more conservative than the ADA compliance requirements. In the event verification inspection shows noncompliance with contractual requirements, notify the contractor of the noncompliant work in accordance with Section 5-1.30, “Noncompliant and Unauthorized Work,” of the *Standard Specifications*, and determine if the pedestrian facility is ADA compliant. Pedestrian facilities constructed under the contract that are noncompliant with ADA requirements must be corrected. If ADA compliance is achieved, but contractual compliance is not, the pedestrian facilities may remain in place subject to a credit to the Department through an approved change order.

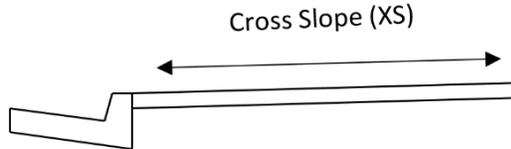
Checklists

General Sidewalk / Path of Travel Checklist

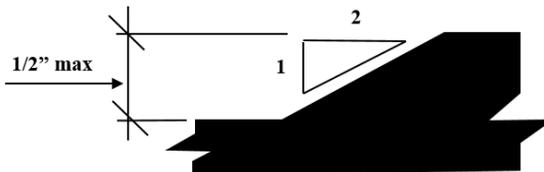
- Firm, stable, and slip resistant – Sidewalks constructed with concrete materials with broom finish applied perpendicular to primary path of travel. [Inspection Report – Field Verify] {DIB 82-06 4.3.1(1)}
- Minimum clear width is 48 inches* exclusive of curb width**. [Inspection Report – Field Measurement] {DIB 82-06 4.3.3(2)}
 - ***Exception** – The clear width may be reduced to 32 inches minimum for a length of 24 inches maximum provided that reduced width segments are separated by segments that are 48 inches long minimum and 48 inches wide minimum. {DIB 82-06 4.3.3(3)}
 - ****Exception** – The clear width measurement may include the curb if constructed monolithically with the sidewalk where there is no joint at the back of curb. Common examples are those placed on bridge structures.
- Maximum running slope for pedestrian access route nonadjacent to roadway, for example, a meandering pathway, is 5.0 percent. [Inspection Report – Field Measurement] {DIB 82-06 4.3.4(2)}



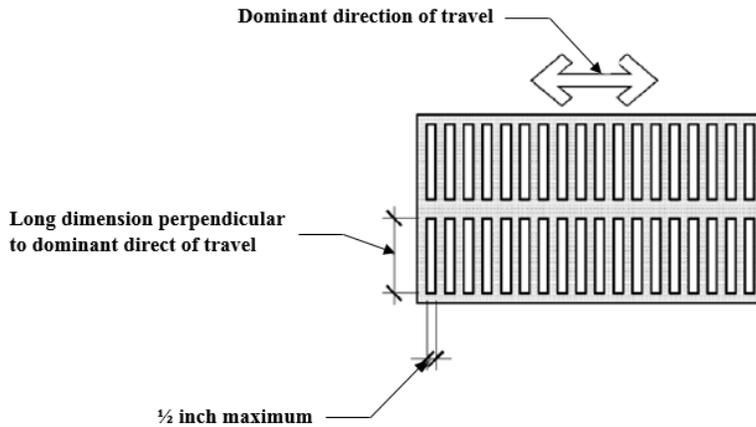
- Maximum running slope for sidewalks adjacent to an existing roadway may not exceed the roadway’s general profile grade. [Inspection Report – Field Measurement] {DIB 82-06 4.3.4(2)}
- Special consideration for maximum running slope of sidewalks at driveways is 8.3 percent. [Inspection Report – Field Measurement {DIB 82-06 4.3.8(1)}] (see Standard Plan A87A)
- Maximum cross slope for sidewalks/pedestrian access routes is 2.0 percent.* [Inspection Report – Field Measurement] {DIB 82-06 4.3.5(1)}



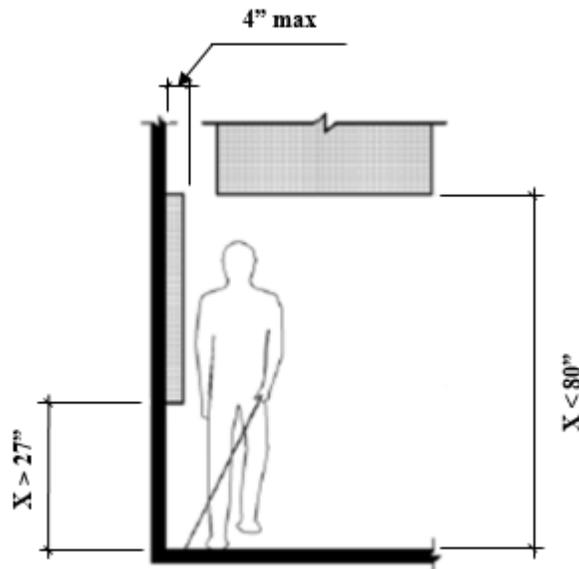
- ***Exceptions** – Pedestrian access routes within pedestrian street crossing and without yield or stop control may have a 5.0 percent maximum cross slope. Pedestrian access routes contained within midblock pedestrian street crossings may have a maximum cross slope equal to the street or highway grade. [Inspection Report – Field Measurement] {DIB 82-06 4.3.5(2) & (3)}
- Changes in surface level may be a maximum of 1/4-inch vertically without edge treatment. Changes in surface level 1/4-inch through 1/2-inch vertically must be beveled with a slope no greater than 1V:2H. Changes in level greater than 1/2-inch must be accomplished by means of a ramp. Note that Section 73-3.03, “Construction,” of the *Standard Specifications*, also contains a maximum 0.02 foot (1/4-inch) allowance from a 10-foot straightedge requirement, so there should be no cases of new pedestrian facility construction work exceeding a 1/4-inch change in level within these paths of travel. [Inspection Report – Field Verify] {DIB 82-06 4.3.1(2), (3) & (4)}



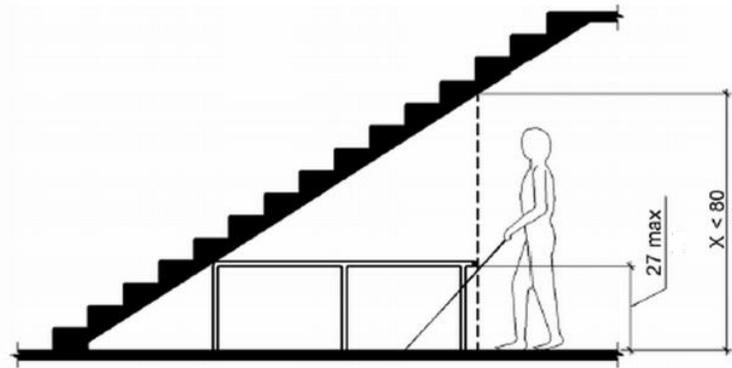
- Where openings or grates are in the path of travel, they shall have spaces no greater than 1/2-inch in one direction. If openings or grates have elongated openings, they shall be placed so the long dimension is perpendicular to the dominant direction of travel. [Inspection Report – Field Verify] {DIB 82-06 4.3.6(1)}



- Objects with leading edges from 27 inches to 80 inches from the surface can protrude as much as 4 inches horizontally, except for handrails, which may protrude up to 4.5 inches. Protruding objects must not reduce the minimum clear width required for an accessible route. [Inspection Report – Field Verify] {DIB 82-06 4.3.19(1) & (4)}

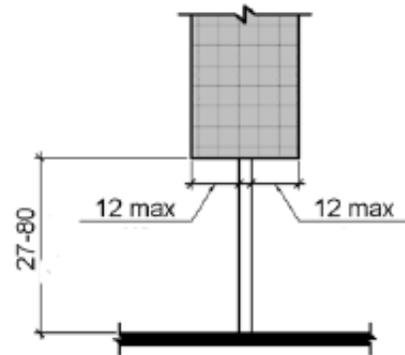


□ Provide guardrails or other barriers if vertical clearance is less than 80 inches. Guardrail or barrier must be a maximum of 27 inches above the finished surface. For example, if a guy wire is parallel to the sidewalk, it may not encroach upon the minimum clear width, and while it may be cane detectable in one direction

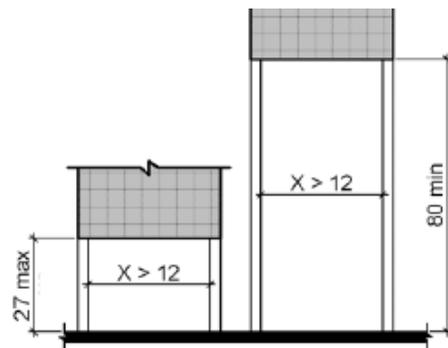


(obtuse angle approach), it is not cane detectable in the opposite direction (acute angle approach) and needs a barrier such as a guy brace, sidewalk guy or similar device for protection from an overhanging obstruction. Discuss these types of situations with your designer. [Inspection Report – Field Verify] {DIB 82-06 4.3.19(2)}

□ Free-standing objects mounted on single posts or pylons may overhang circulation paths a maximum of 12 inches when located from 27 to 80 inches from the surface. [Inspection Report – Field Verify] {DIB 82-06 4.3.19(3)}



□ If a sign or other obstruction is mounted between posts or pylons and the clear distance between posts or pylons is greater than 12 inches, the lowest edge of such sign or obstruction shall be either 27 inches or less or 80 inches or more from the surface. [Inspection Report – Field Verify] {DIB 82-06 4.3.19(3)}

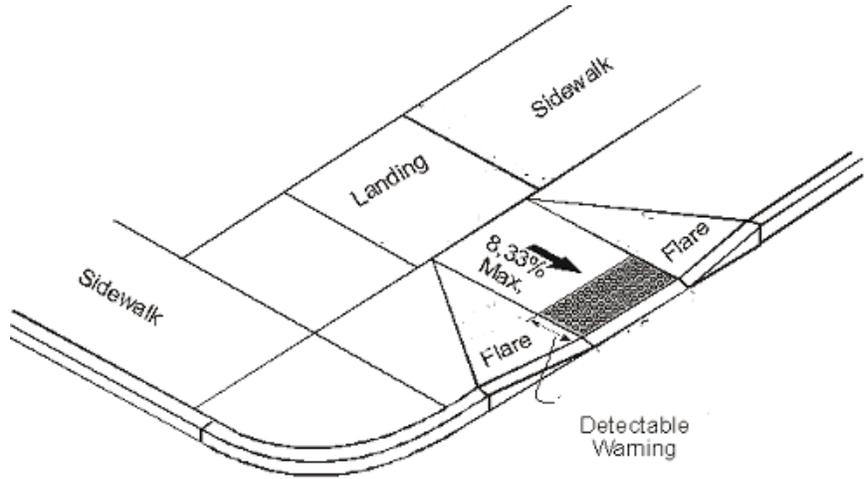


□ Backfill against sidewalk to prevent a falling hazard. Areas with more than a 4 inch drop-off will require correction or a preventive barrier. [Inspection Report – Field Verify] {DIB 82-06 4.3.11}

Curb Ramp Checklist

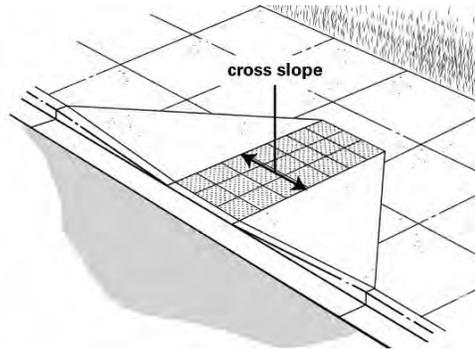
- Ramp running slope not to exceed 8.3 percent.* [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(1)}

- ***Exceptions** – Where ramp length would need to be longer than 15 feet to meet running slope requirement, the 8.3 percent maximum may be exceeded. At blended transitions, the running slope may not exceed 5.0 percent. Discuss these situations with your designer. {DIB 82-06 4.3.8(1)}

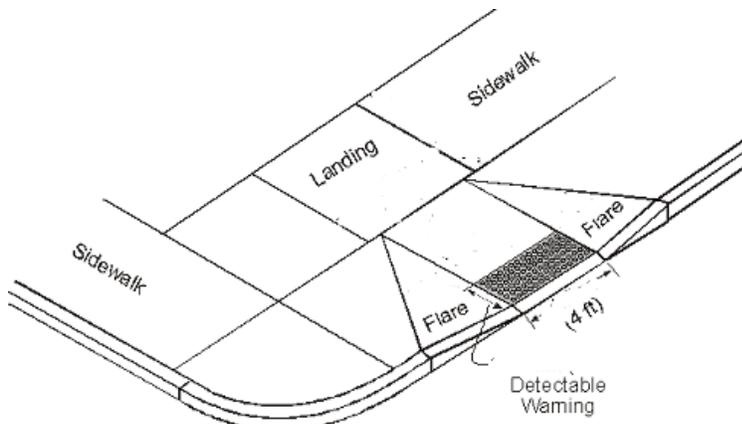


- Ramp cross slope not to exceed 2.0 percent.* [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(8)}

- ***Exception** - where the curb ramp is at an intersection without yield or stop control and at midblock pedestrian street crossings, the cross slope may not exceed the general street or highway grade or 2.0 percent, whichever is greater. {DIB 82-06 4.3.8(8)}



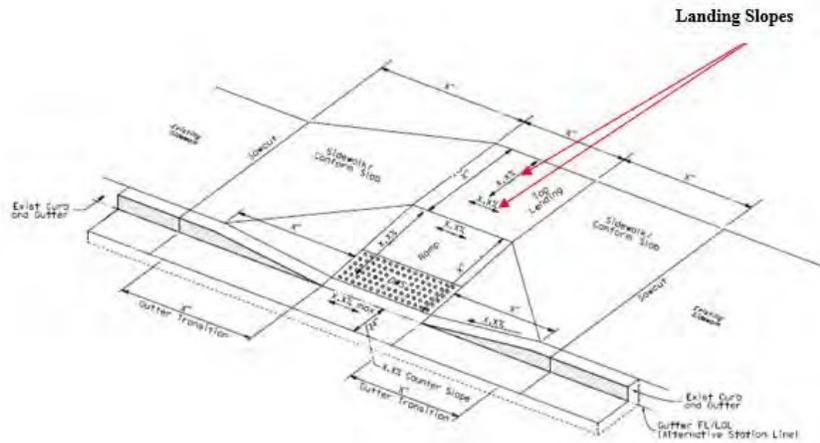
- Ramp clear width not less than 48 inches.* [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(2)}



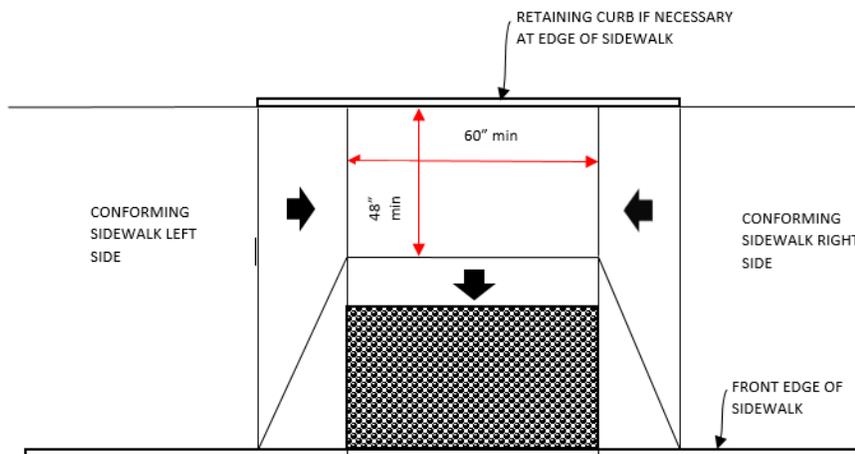
- ***Exception** – Case B and Case C curb ramps require a wider ramp clear width (60 inches minimum) as these widths are based on landing requirements. [Inspection Report – Field Measurement] (see Standard Plan A88A)

PERMANENT PEDESTRIAN FACILITIES ADA COMPLIANCE HANDBOOK

- Landing/turning space slopes (see below) not to exceed 2.0 percent* [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(8)}
 - ***Exception** - where the curb ramp is at an intersection without yield or stop control and at midblock pedestrian street crossings, the cross slope may not exceed the general street or highway grade or 2.0 percent, whichever is greater. {DIB 82-06 4.3.8(8)}



- Top landing/turning space clear length and width not less than 48 inches. Note that parallel curb ramps such as a Case C do not require a top landing. [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(3)}
- Case C or Case B (Standard Plan A88A) bottom or intermediate landing/turning space minimum clear length (60 inches) and minimum clear width (48 inches), Case B shown below. [Inspection Report – Field Measurement {DIB 82-06 4.3.13}] (see Standard Plan A88A)

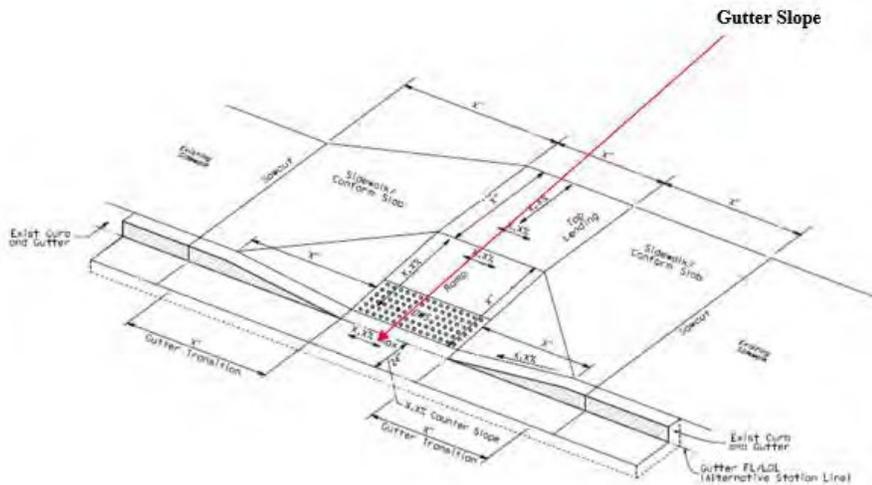


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- Gutter/roadway counter slopes (parallel with predominate pedestrian travel) within 24 inches of the curb ramp not to exceed 5.0 percent (see below). [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(4)}

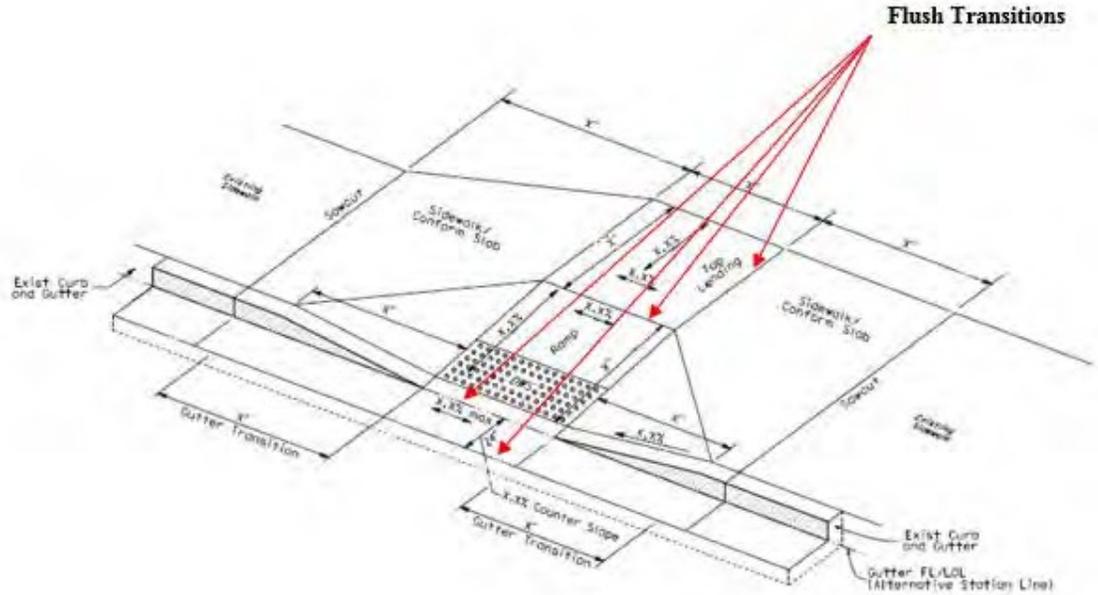


- Gutter slope (flow line slope – see below) over the width of curb ramp, not to exceed those for the curb ramp cross slopes, generally a maximum of 2.0 percent.* Note that generally this will require the warping of the gutter pan in transition areas on both sides of the gutter segment immediately adjacent to the curb ramp. RSP A88A identifies these 3-foot transition areas in the “Gutter Pan Transition” detail. [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(8)}
- ***Exception** - for an intersection without yield or stop control and at midblock pedestrian street crossings, the gutter slope may not exceed the general street or highway grade or 2.0 percent, whichever is greater.

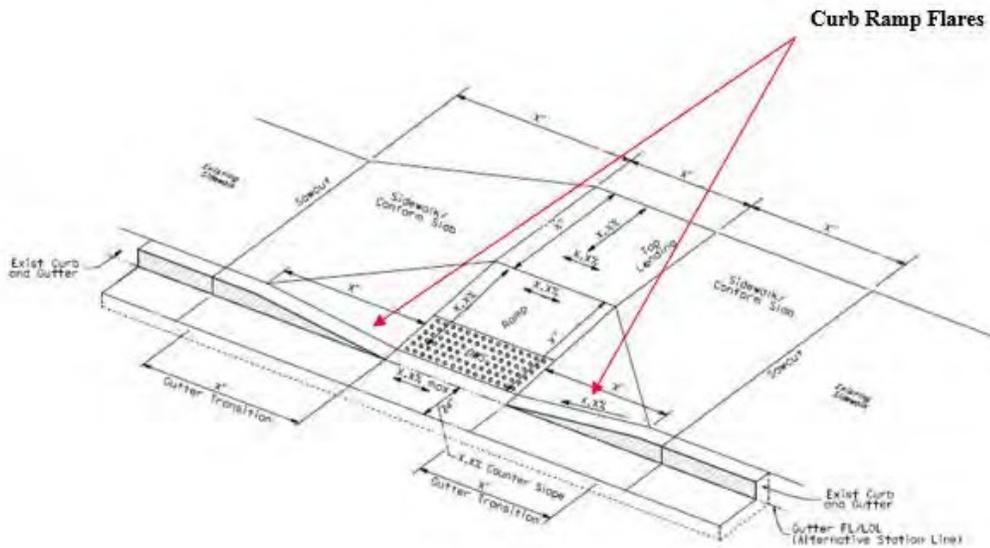


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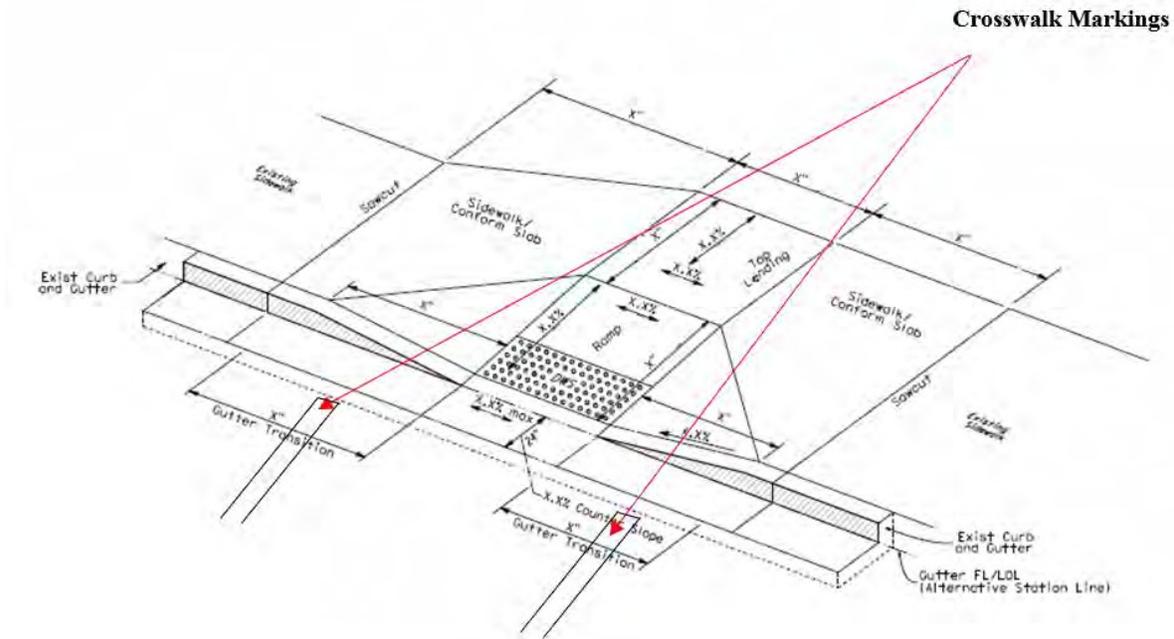
- Flush transitions at curb ramps to walks, gutters and streets are required (see below). No lips are allowed (1/4-inch change in surface level allowance does not apply here). [Inspection Report – Field Verify] {DIB 82-06 4.3.1& 4.3.8(4)}



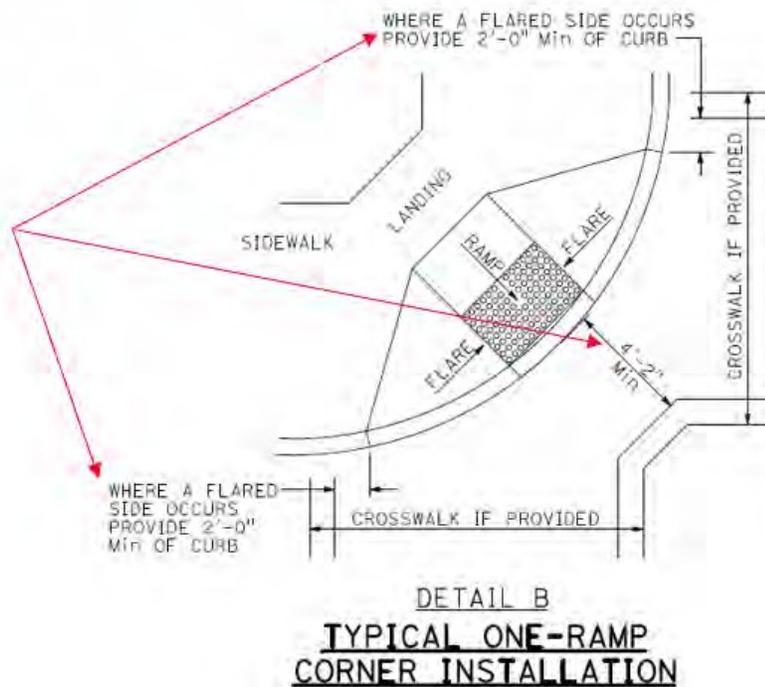
- Curb ramp flare slope not to exceed 10.0 percent, measured at back of curb (see below). [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(5)}



- Curb ramps without flares (for example, Case C curb ramps) at marked crossings are to be wholly contained within the markings, as shown below. Curb ramps with flares (for example, Case A curb ramps) at marked crossings must be contained within the same markings. [Inspection Report –Field Verify] (see Standard Plan A88A)

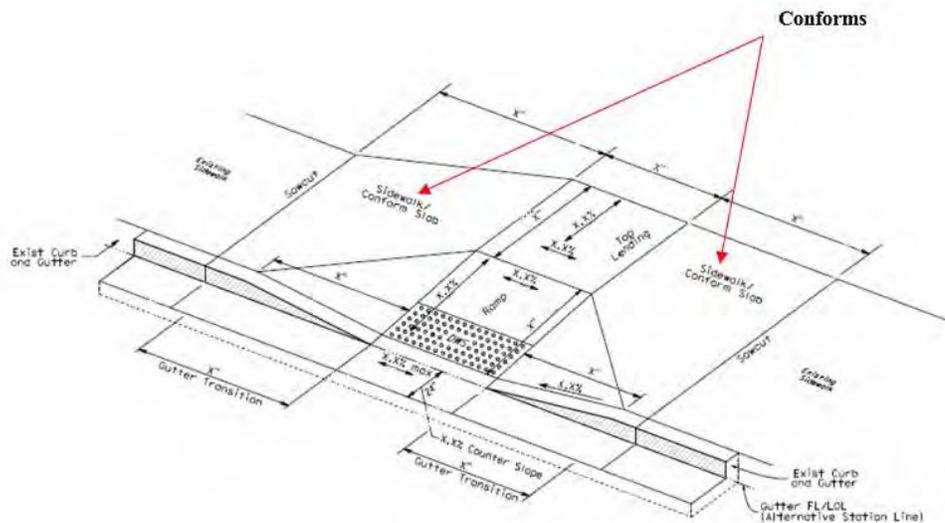


- Diagonal curb ramps with flared sides such as those shown on RSP A88A – Detail B “Typical One-Ramp Corner Installation” must provide a minimum of 2 feet of curb on each side of curb ramp within the limits of crosswalk if provided. Diagonal curb ramps must also provide a 48 inch minimum clear space within the markings of a marked crossing. Note that the standard plan shows a conservative 50 inch dimension (see next page). [Inspection Report – Field Verify] {DIB 82-06 4.3.8(6) & (7)}



- Retaining curb placed as shown on applicable Standard Plan A88A details. [Inspection Report – Field Verify] {DIB 82-064.3.11(1)}
- Surfaces of utility pull boxes, manholes or vaults within the curb ramp must be flush with the curb ramp surface. [Inspection Report – Field Verify] (see Revised Standard Plan A88A – Note 12)
- Sign posts, lighting standards, power/telephone poles or mailboxes should be outside the boundary for curb ramp construction. [Inspection Report – Field Verify] (see Revised Standard Plan A88A – Note 12)

- Conforms used to transition from new compliant curb ramps to existing sidewalks should be ADA compliant; however, this is not an absolute. Project plans/construction details for transitions should be provided where new curb ramps are to be tied into existing sidewalk locations. If details were not provided, discuss with your designer (see below). [Inspection Report – Field Measurement] {DIB 82-06 Appendix – 1 }



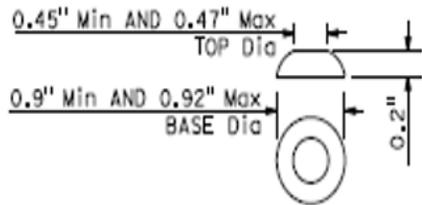
- Suitable roadway surface within the pedestrian street crossing a Caltrans right-of-way. If not, discuss with your project engineer and determine corrective action, for example a change order, transition plan, or maintenance work. [Inspection Report – Field Verify]
- Suitable existing sidewalk condition within a Caltrans right-of-way. If not, discuss with your project engineer and determine corrective action, for example a change order, transition plan, or maintenance work. [Inspection Report – Field Verify]

Detectable Warning Surface Checklist

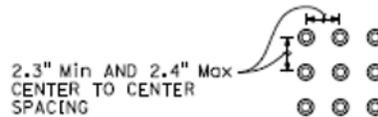
- Detectable warning surface (DWS) products must be on the Authorized Material List (AML) in accordance with Section 73-1.02B, “Detectable Warning Surfaces,” of the *Standard Specifications*. The following link provides access to the AML for DWS products [Inspection Report – Field Verify] {DIB 82-06 4.3.14}:

<http://www.dot.ca.gov/aml>

- DWS locations will be shown on the plans.
- DWSs must be yellow color no. 33538 of FED-STD-595 unless the special provisions have identified another color for aesthetics. Designers will have had to go through a nonstandard special provision exception approval process to use an alternate color that provides a minimum 70 percent color contrast. [Inspection Report – Field Verify] {DIB 82-06 4.3.14}
- DWS Authorized Material List products were included based on meeting numerous requirements, including raised truncated dome heights (0.18 inches minimum and 0.22 inches maximum), diameters (top – 0.45 inches through 0.47 inches, base – 0.90 inches through 0.92 inches) and center to center spacing (2.3 inches through 2.4 inches). These acceptable physical parameters are shown on Revised Standard Plan RSP A88A and can be spot-checked for compliance in the field. [Inspection Report – Field Verify]



RAISED TRUNCATED DOME

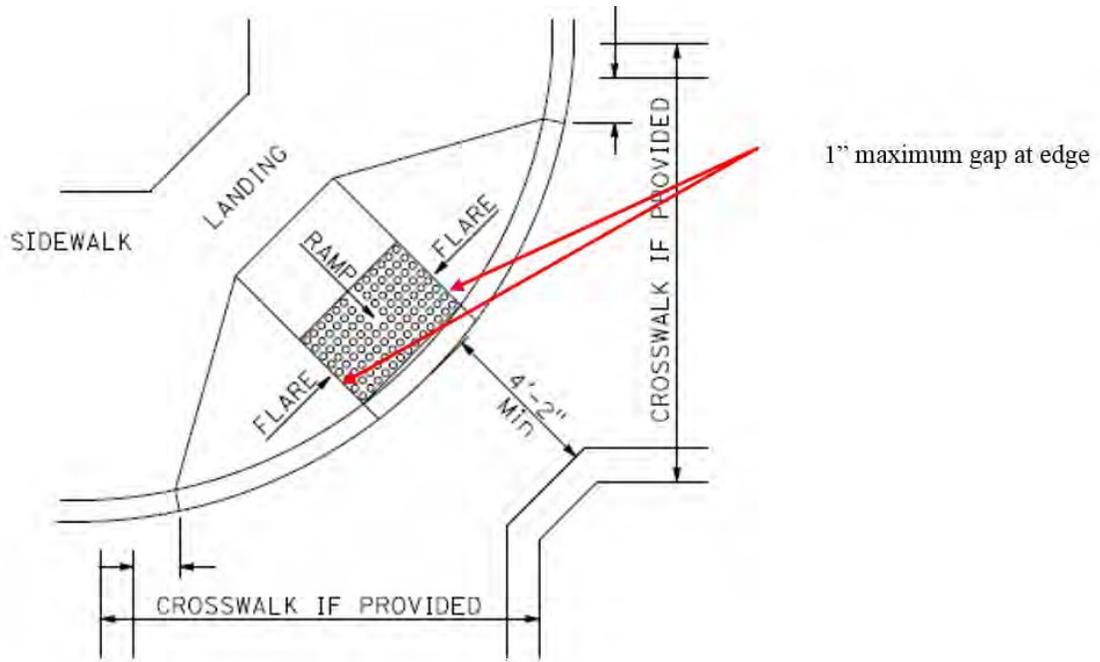


RAISED TRUNCATED DOME PATTERN (IN-LINE)
DETECTABLE WARNING SURFACE

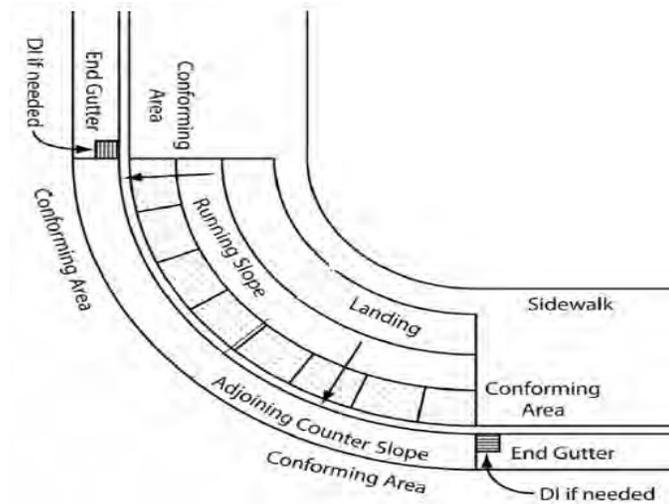
- DWSs must be 36 inches in depth (along the curb ramp slope) for most applications*. See note 10 on Revised Standard Plan RSP A88A. [Inspection Report – Field Measurement] {DIB 82-06 4.3.14(1)}

□ ***Exception** – For passageway applications, such as those shown on Revised Standard Plan RSP A88B, alternate DWS depths are required based on passageway lengths. Note that for passageway lengths less than 6 feet at street level, a DWS is not required.

- DWSs must be the “full” width of the curb ramp or passageway. DWS products generally come in full foot widths. Placement of a 4-foot width DWS on a 4-foot, 2-inch curb ramp width meets the “full” width intent. This same guideline is to be used for other curb ramp widths, allowing a maximum gap of 1 inch on each side of the DWS. This requirement may necessitate cutting the DWS. Discuss with your designer if you encounter this situation. [Inspection Report – Field Measurement] {DIB 82-064.3.14}

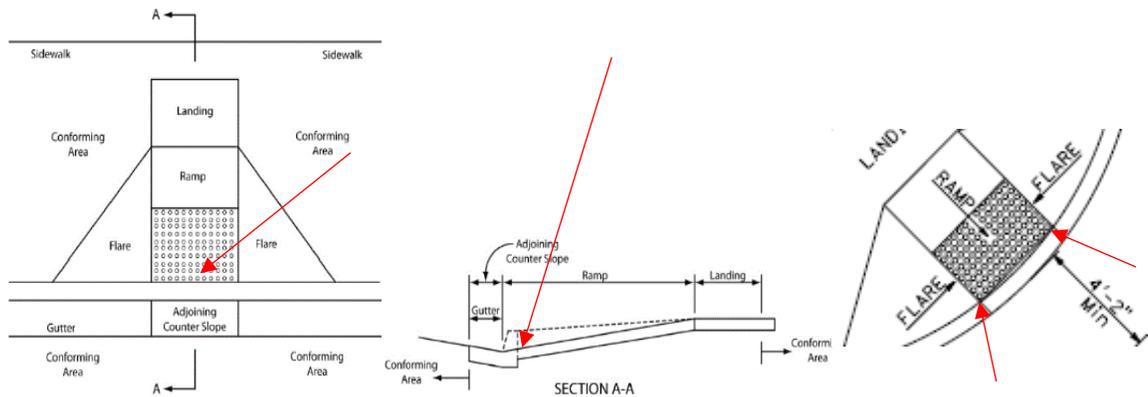


- Placement of DWS on radial curb ramps such as a blended transition should be addressed with a construction detail in the project plans. If not provided, discuss with your designer.

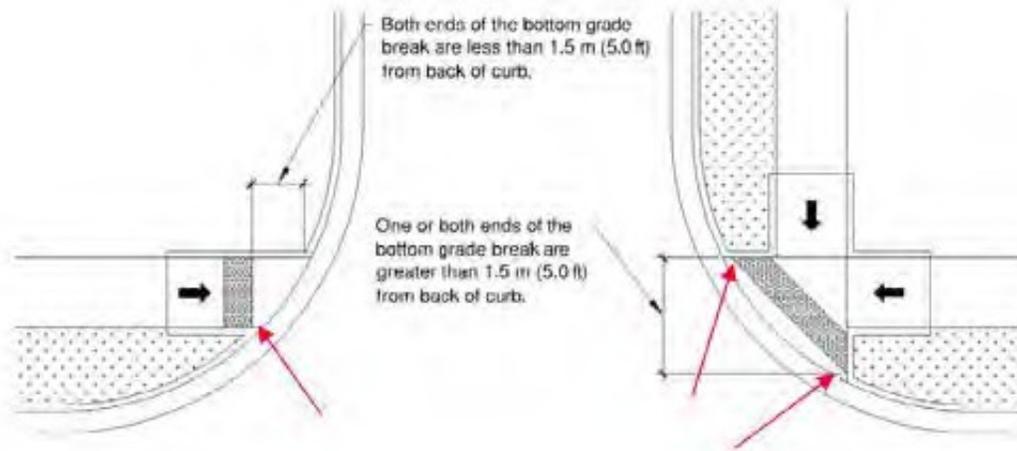


□ DWS are typically* placed at the projection of the back of curb line in standard curb ramp applications as shown below and on Revised Standard Plan RSP A88A. For diagonal or corner applications, the front corners of the DWS should generally be placed at the radially projected back of curb line. The project plans/construction details may show other acceptable DWS configurations for nonstandard applications. [Inspection Report – Field Verify] {DIB 82-06 4.3.14(3a)}

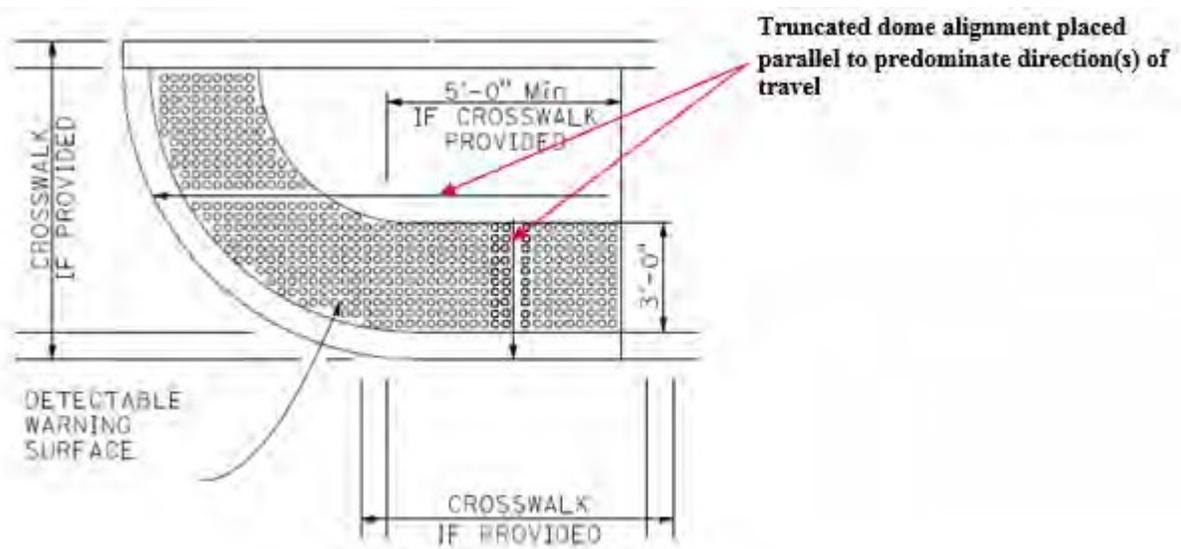
□ ***Exception** – Note that projects using Standard Plans/Revised Standard Plans A88A sheets dated March 21, 2014, or earlier included a note requiring that “the edge of the detectable warning surface nearest the street shall be from 6 inches to 8 inches from the gutter flowline.” Where practical, these projects should revise the note by change order to make sure the front edge/corners of the DWS will be placed at the projected back of curb line. Projects with A88A sheets dated after March 21, 2014, do not include the note; the details show the front edge/corners at the projected back of curb line, and no change order is necessary to ensure proper placement.



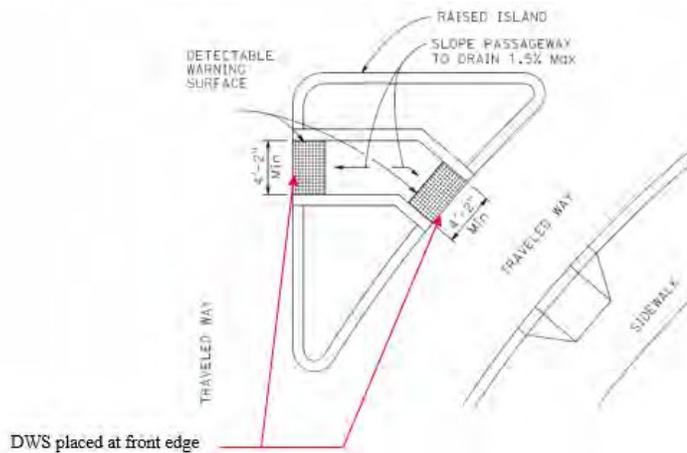
□ Special construction details may be in the project plans that provide alternative DWS placement such as those shown on the next page. If the ends of the bottom curb ramp grade break are in front of the back of curb projection, DWS shall be placed at the back of the curb projection. Where the ends of the bottom grade break are behind the back of curb projection and the distance from either end of the bottom grade break to back of curb projection is 60 inches or less, DWS shall be placed on the ramp run within one dome spacing of the bottom grade break. Where the ends of the bottom grade break are behind the back of curb projection and the distance from either end of the bottom grade break to the back of curb projection is more than 60 inches, DWS shall be placed on the lower landing at the back of curb projection. Bottom grade break line is to be perpendicular to the pedestrian path of travel and area between the grade break and projected curb line should be level. These situations should be accompanied by project details in the project plans and can be discussed with the project engineer. [Inspection Report – Field Verify] {DIB 82-06 4.3.14(3b) & (3c)}



□ For nonrectangular DWS locations such as case CM curb ramps, rectangular sheets will need to be cut to the required shape and placed with the alignment of the truncated domes parallel to the predominate direction(s) of pedestrian travel while maintaining the required 2.3- to 2.4-inch spacing (see below). Contractors should not cut through the truncated dome as it may create an abrupt vertical difference in height from the top of truncated dome to the surrounding surface that exceeds the ¼-inch maximum allowance. Note that some DWS manufacturers may have products that anticipate placement of truncated domes on a radial alignment. It is unlikely that these products meet the required 2.3- to 2.4-inch spacing requirement and therefore cannot be used.



- DWS at island passageways are typically placed at front of curb face or raised island as shown on Revised Standard Plan RSP A88B (Type A, B and C Passageways). [Inspection Report – Field Verify] {DIB 82-06 4.3.9}



- DWS may be cut and reapplied to allow removal of utility covers while maintaining full width and depth requirements (see note 12 on Revised Standard Plan RSP A88A).
- Obtain the prefabricated DWS 5-year manufacturer’s replacement warranty from the contractor. This warranty starts at contract acceptance and should be provided to Maintenance as part of the project closeout procedures. [Inspection Report – Field Verify] {Section 73-3.01D(2), “Warranties,” of the *Standard Specifications*.}

Ramps, Stairs, Handrails, and Guards Checklist

Ramps:

- Ramp maximum running slope is 8.3 percent. {DIB 82-06 4.3.7(2)}
- Ramp maximum cross slope is 2.0 percent. {DIB 82-06 4.3.7(3)}

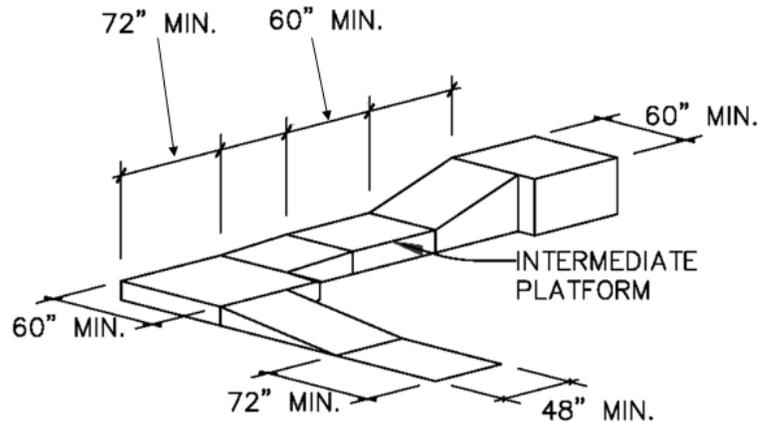


- There are special allowances for ramp running slopes at a historic property/historical resource with an approved design exception. Discuss these cases with your designer. {DIB 82-06 4.3.7(4)}
- Curved ramps must conform to the same running and cross slope requirements as straight ramps. Alternative methods to smart levels must be used for verification of running slopes on such features. {DIB 82-064.3.7}

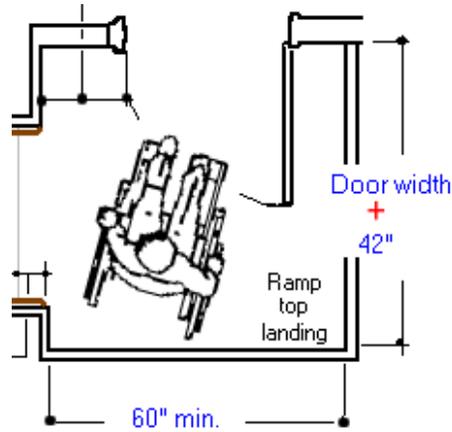


PERMANENT PEDESTRIAN FACILITIES ADA COMPLIANCE HANDBOOK

- Ramps with greater than 5.0 percent running slope and a minimum of 30-inch rise must have landings at the top and bottom of each ramp run (see schematic below).* {DIB 82-06 4.3.7(1)}
 - ***Exception** – Landings are not required when the ramp is within a sidewalk which is adjacent to existing street or roadway.
- Ramp landings must not exceed a maximum 2.0 percent slope in either direction (see schematic below). {DIB 82-06 4.3.13}
- Ramp landing width must be at least as wide as the widest ramp leading to the landing. Ramp's top landing width must be a minimum of 60 inches (see schematic below). {DIB 82-06 4.3.13(2) & (4)}
- Ramp landing clear length must be a minimum of 60 inches in general. Ramp's bottom landing clear length must be a minimum of 72 inches (see schematic below). {DIB 82-06 4.3.13(3)}
- Changes in direction ramp landings shall be a minimum of 60 inches by 72 inches with the longer dimension oriented parallel to the top ramp run (see schematic below). {DIB 82-06 4.3.13(5)}



- If a door swings onto a ramp landing, the landing depth must be a minimum of the door width plus 42 inches.



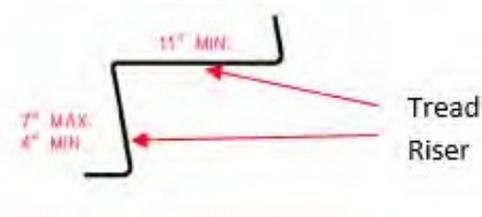
- A 2 inch minimum curb or barrier is required along the ramp length.* {DIB 82-06 4.3.12}



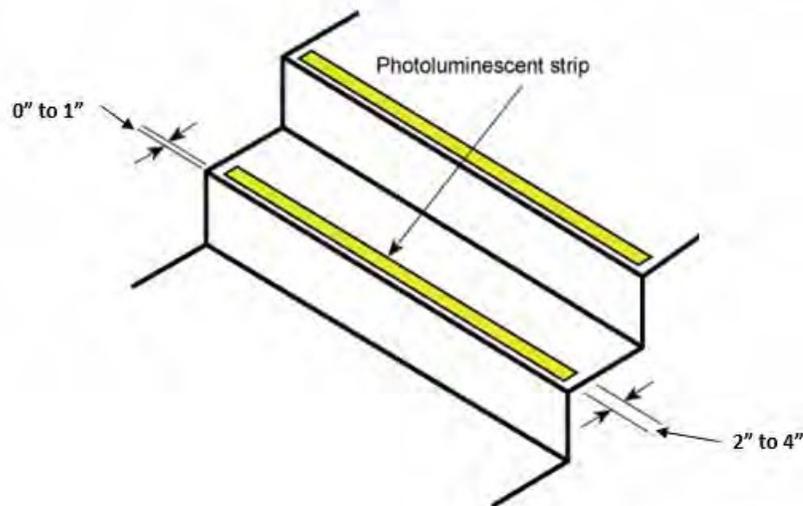
- ***Exception** – A curb or barrier is not required where a guard or handrail is provided with a guide rail centered 2 inches minimum and 4 inches maximum above the surface of the ramp.

Stairs:

□ Stair steps should have uniform riser height and tread depth. Risers should be 4 to 7 inches in height. Treads should be a minimum of 11 inches deep. Open risers should not be used.



□ Visual contrast strips should be placed on stair treads. Strip to be 2 to 4 inches in depth and be placed no more than 1 inch from nosing. Strip to be full width of the step. Exterior locations require strips on all stair treads. Interior locations require strips on the lowest tread and the edge of the upper approach.



Handrails:

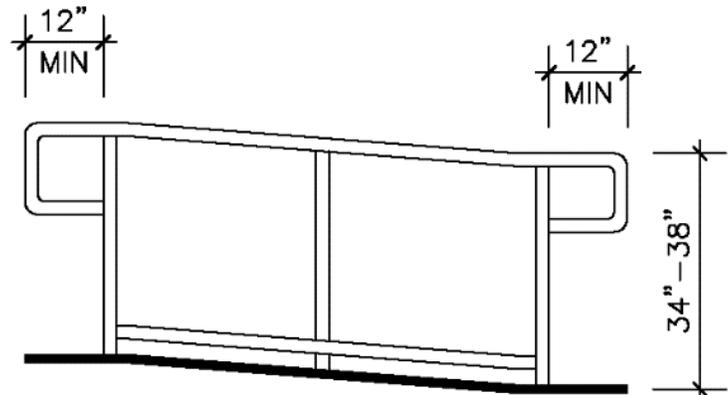
□ Handrails are required at ramp runs and stairs with rises greater than 6 inches. Handrails are not required on curb ramps or along sidewalks. {DIB 82-06 4.3.10(1)}

□ Handrails must be continuous and the full length of each stair flight or ramp run. Inside handrails on switchback or dogleg stairs or ramps shall be continuous between flights and runs. {DIB 82-06 4.3.10(2)}



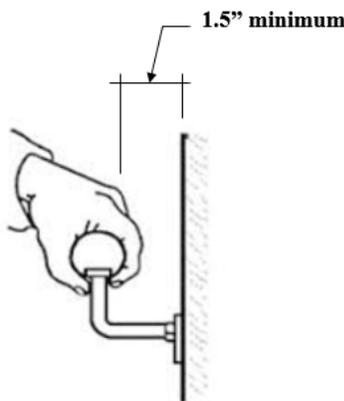
□ Handrails must extend a minimum of 12 inches beyond the ramp run or stairs. {DIB 82-06 4.3.10(8)}

□ Top of handrail gripping surface shall be mounted 34 inches through 38 inches above the ramp, stair or walking surface. {DIB 82-06 4.3.10(5)}



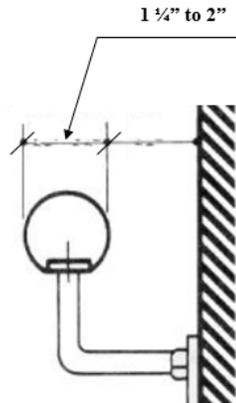
□ Handrail gripping surface shall be continuous. {DIB 82-064.3.10(4)}

□ Clearance between handrail gripping surfaces and adjacent surfaces shall be a minimum of 1.5 inches. {DIB 82-064.3.10(3)}

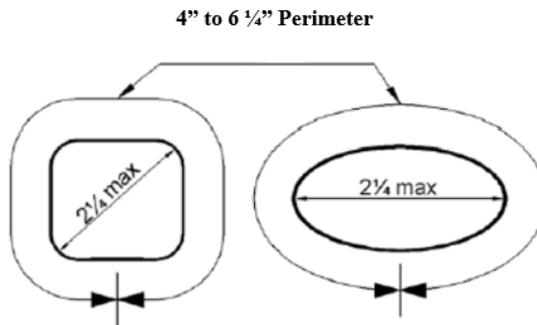


□ Handrails shall not rotate within their fittings. {DIB 82-06 4.3.10(6)}

- Handrail gripping surfaces with a circular cross section shall have an outside diameter of 1.25 inches minimum and 2.0 inches maximum. {DIB 82-06 4.3.10(7)}

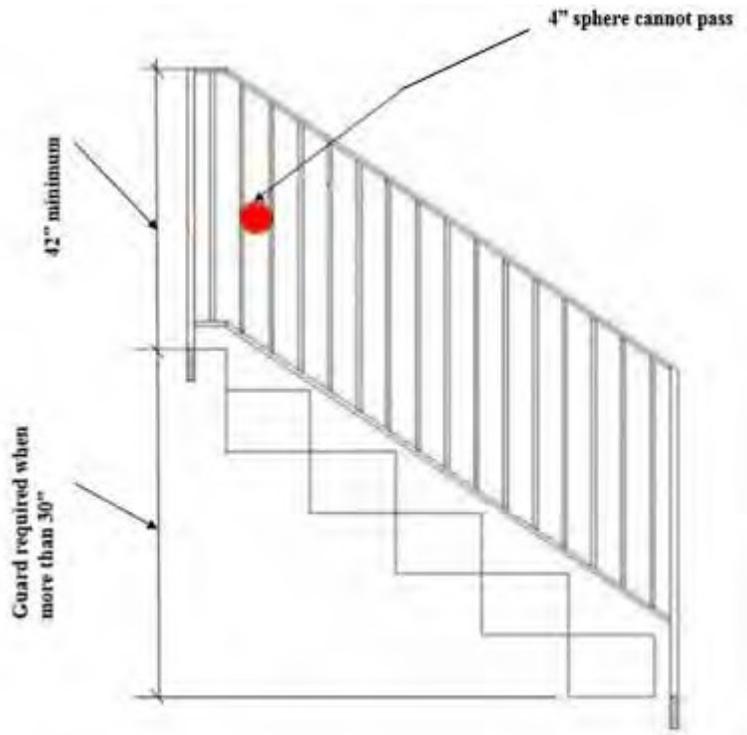


- Handrail gripping surfaces with a non-circular section shall have perimeter dimensional constraints of 4.0 inches minimum and 6.25 inches maximum, as well as a maximum cross-section dimension of 2.25 inches. {DIB 82-06 4.3.10(7)}



Guards:

- Guards are required along open-sided walking surfaces, including mezzanines, equipment platforms, stairs, ramps and landings that are more than 30 inches vertically from the floor or grade and within 36 inches horizontally to the edge of the open side. {DIB 82-06 4.3.11(3)}
- Guard height is a minimum of 42 inches measured from the walking or ramp surface (on stairs measured from the leading edges of the tread nosing). {DIB 82-06 4.3.11(4)}
- Guards shall not have openings that allow passage of a 4-inch diameter sphere from bottom to the top of the guard. {DIB 82-06 4.3.11(5)}



Pedestrian Push Buttons and Accessible Pedestrian Signals Checklist

□ Pedestrian push button (PPB) should be unobstructed and adjacent to a level (2.0 percent maximum)*, all-weather surface to provide access from a wheelchair. [Inspection Report – Field Verify] { *California Manual on Uniform Traffic Control Devices* [CA-MUTCD] – Section 4E.08 04-A }

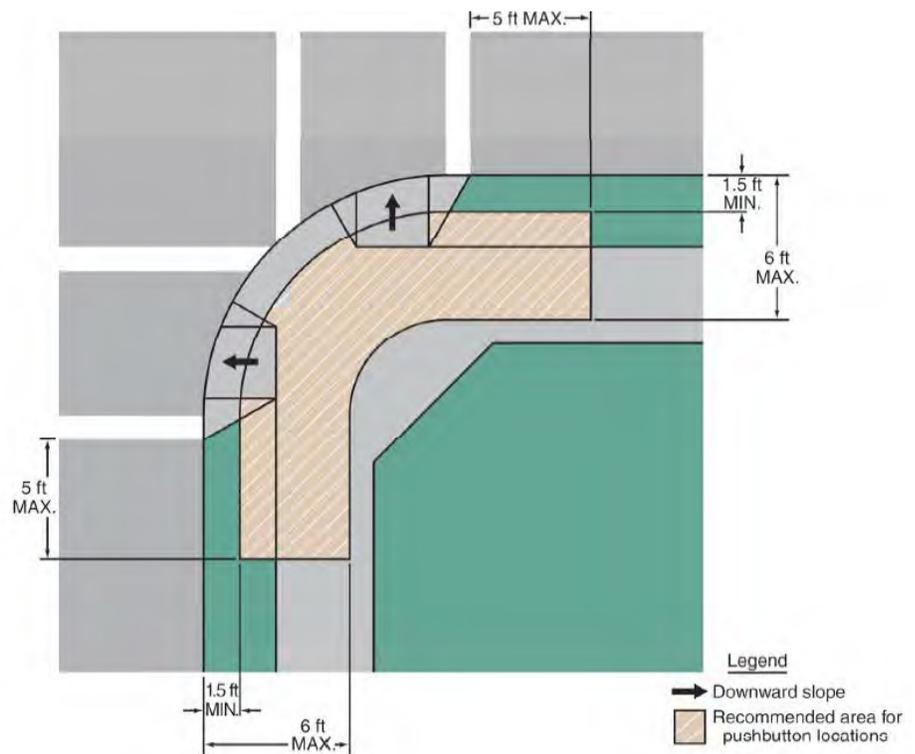
□ ***Exception** – If impractical to place the PPB adjacent to a level all-weather surface, the surface should be as level as feasible. { *CA-MUTCD* – Section 4E.08 05 }

□ Where there is an all-weather surface, provide a wheelchair accessible route from the push button to the ramp. { *CA-MUTCD* – Section 4E.08 04-B }

□ PPB located between the edge of the crosswalk line (extended), farthest from the center of the intersection and the side of a curb ramp (if present), but not greater than 5 feet from said crosswalk line (Refer to Figure 4E-3 of the *California MUTCD* in the absence of project details). { *CA-MUTCD* – Section 4E.08 04-C }

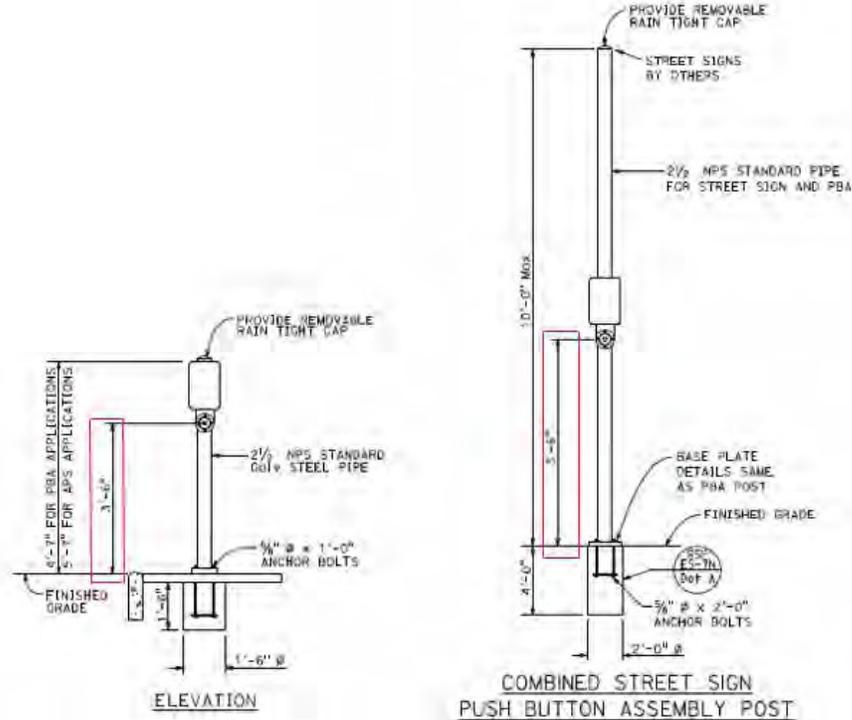
□ PPB is located from 1.5 feet to 6 feet* from the edge of the curb, shoulder, or pavement (see right or refer to Figure 4E-4 of the *California MUTCD* in the absence of project details). { *CA-MUTCD* – Section 4E.08 04-D }

□ ***Exception** – If impractical to meet these distances, it should not be farther than 10 feet from the edge of curb, shoulder or pavement (discuss these situations with your designer). { *CA-MUTCD* – Section 4E.08 06 }



PERMANENT PEDESTRIAN FACILITIES ADA COMPLIANCE HANDBOOK

- PPB mounting height approximately 3 feet 6 inches, but no more than 4 feet above the sidewalk/all-weather surface. [Inspection Report – Field Verify] {CA-MUTCD – Section 4E.08 04-F and Revised Standard Plan ES7A }



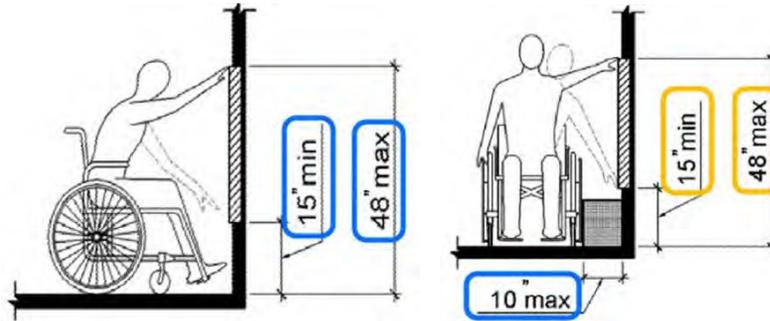
- Face of the PPB is to be mounted parallel to the crosswalk direction it serves. {CA-MUTCD – Section 4E.08 04-E }



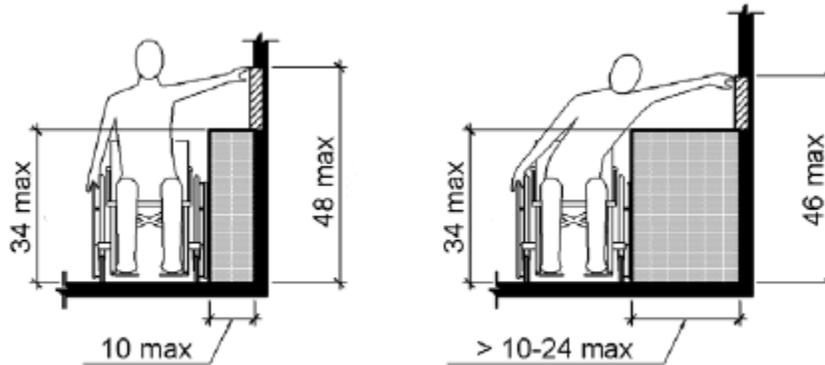
- Where two PPB are provided on the same corner of a signalized locations, the push buttons should be separated by at least 10 feet.* {CA-MUTCD – Section 4E.08 07 }
 - ***Exception** – If impractical to provide the 10 feet minimum separation, PBBs may be placed closer together or at the same pole location (discuss this situation

with your designer as there will be additional requirements). {CA-MUTCD – Section 4E.08 08}

- Unobstructed forward and side reaches should be 15 inches minimum and 48 inches maximum. A side reach obstruction is allowable if it does not exceed 10 inches maximum in either height or width. [Inspection Report – Field Verify] {DIB 82-06 4.3.15(1) & (2)}



- Obstructed high side reach – Where a clear floor or ground space allows a parallel approach to an element and the high side reach over an obstruction, the height of the obstruction shall be 34 inches maximum and the depth of the obstruction shall be 24 inches maximum. The high side reach shall be 48 inches maximum for a depth of 10 inches maximum. Where the depth exceeds 10 inches, the high side reach shall be 46 inches maximum for a reach depth of 24 inches maximum. {DIB 82-06 4.3.15(3)}



Parking Facilities

General:

- Accessible parking spaces that serve a particular building or facility shall be on the shortest accessible route from adjacent parking to an accessible entrance. [Inspection Report – Field Verify] {DIB 82-06 4.3.17}
- Accessible parking spaces that serve more than one accessible entrance shall be dispersed and located on the shortest accessible route to the accessible entrances. {DIB 82-06 4.3.17}
- In parking facilities that do not serve a particular building or facility, accessible parking spaces shall be on the shortest accessible route to an accessible pedestrian entrance of the parking facility. [Inspection Report – Field Verify] {DIB 82-06 4.3.17}

Off-Street Parking:

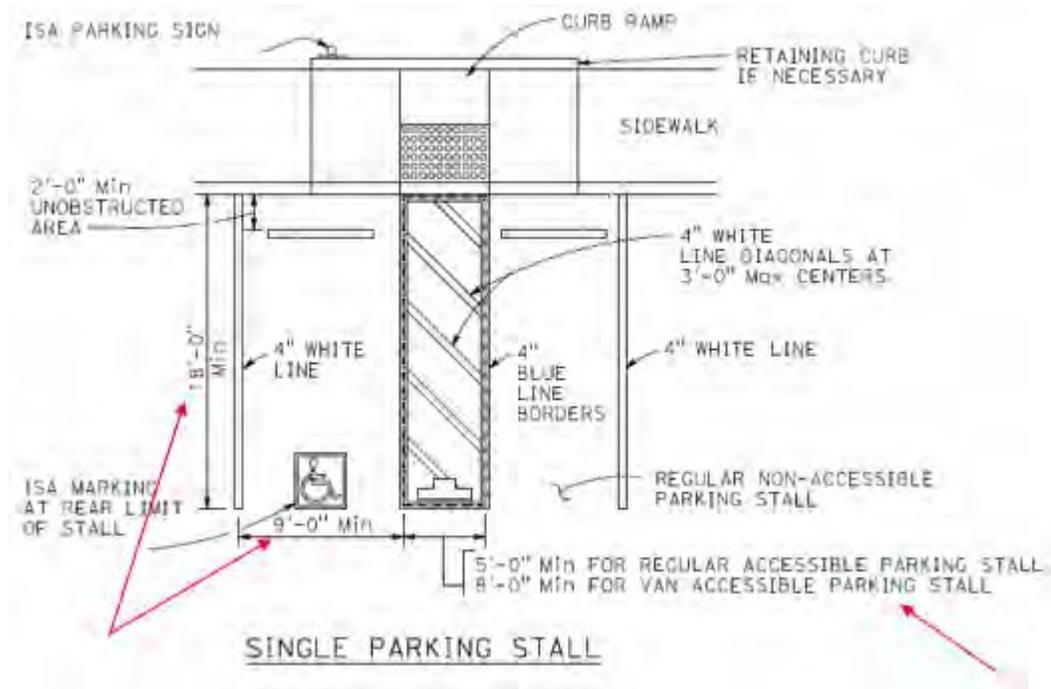
- For off-street accessible parking spaces, there is a minimum number of required accessible parking spaces based on the total number of parking spaces provided in the parking facility. [Inspection Report – Field Verify] {DIB 82-06 4.3.17 (1)}

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1-25	1
26-50	2
51-75	3
76-100	4
101-150	5
151-200	6
201-300	7
301-400	8
401-500	9
501-1,000	See Note 1
1,001 and over	See Note 2

Notes:

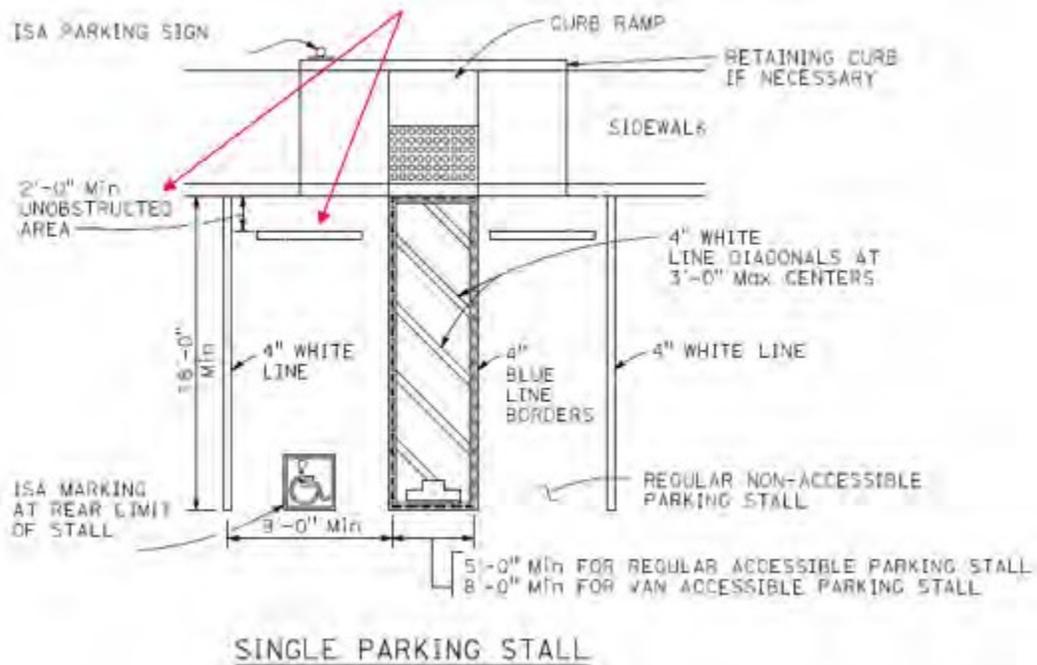
1. Two percent of total.
2. Twenty plus one for each 100, or fraction thereof, over 1,000.

- For off-street accessible parking spaces, one of every six accessible parking spaces must be a van accessible parking space. If there is only one accessible parking space provided, it needs to be a van accessible parking space. [Inspection Report – Field Verify] {DIB 82-06 4.3.17 (2)}
- For off-street accessible parking, the minimum parking space length is 216 inches measured from the front of the parking stall to the end of the stall marking stripe for straight parking stalls (see next page). For diagonal parking stalls, refer to Standard Plan A90A detail for “Diagonal Double Parking Stalls.” [Inspection Report – Field Measurement] {DIB 82-06 4.3.17 (3)}



- For off-street accessible parking, the minimum parking space width is 108 inches for cars (see above). The same 108-inch minimum width is allowed for van accessible parking spaces when a minimum 96 inch wide accessibility aisle is provided to the right (vehicle facing forward) of the van accessible parking space. If the minimum 96-inch wide accessibility aisle is not met, the minimum width of a van accessible space is 144 inches. [Inspection Report – Field Measurement] {DIB 82-06 4.3.17(3)}
- For off-street accessible parking a 60-inch minimum width accessibility aisle is required for cars and a 96-inch minimum width accessibility aisle is standard for vans unless a wider parking space is provided (see above). [Inspection Report – Field Measurement] {DIB 82-06 4.3.17(4)}

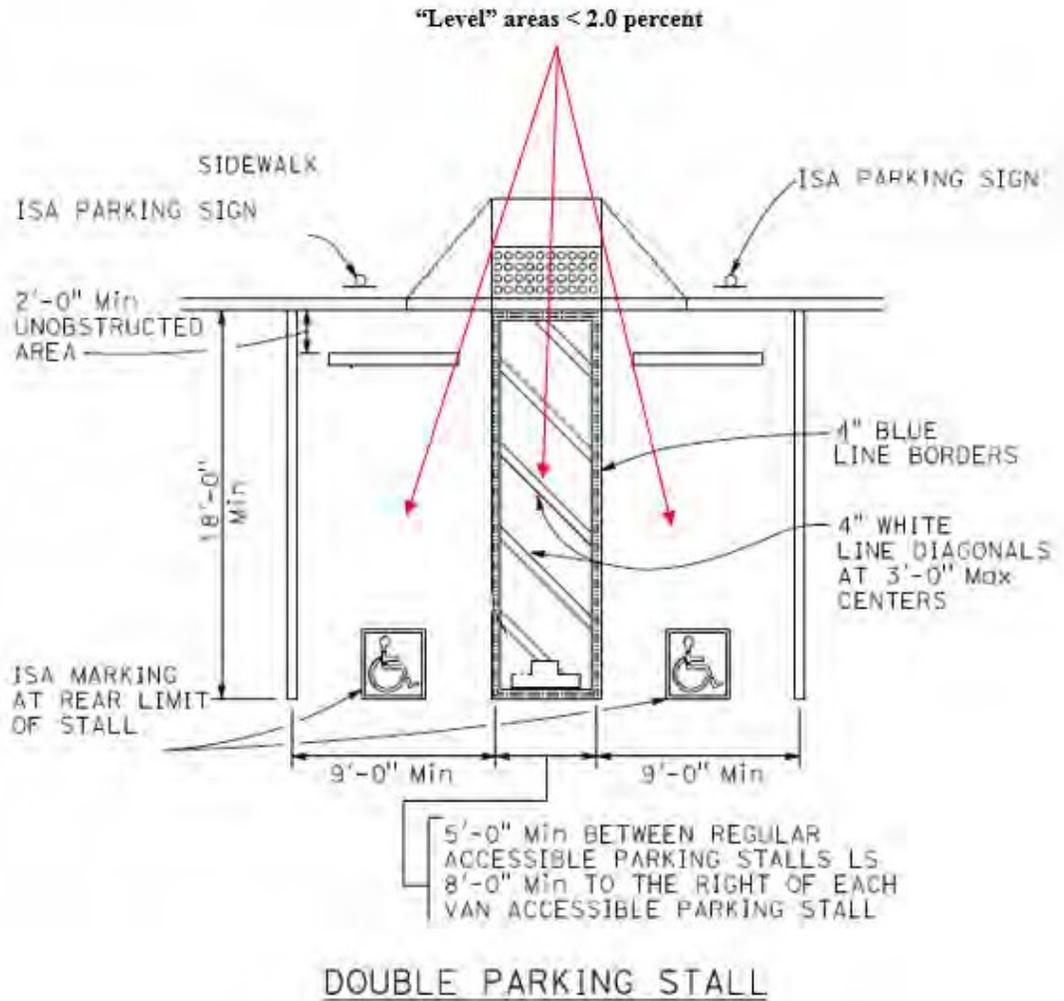
- For off-street accessible parking, each parking stall shall provide a curb or parking bumper if required to prevent encroachment of vehicles over the required clear width of walkways. Where bumpers are used, a minimum of 2 feet unobstructed area is required between the curb and the bumper (see below). [Inspection Report – Verify] {DIB 82-06 4.3.17}



- For off-street accessible parking, stalls shall be located so that persons with disabilities are not compelled to wheel or walk behind parked vehicles other than their own. [Inspection Report – Verify] {DIB 82-06 4.3.17}

PERMANENT PEDESTRIAN FACILITIES ADA COMPLIANCE HANDBOOK

- For off-street accessible parking, spaces and accessibility aisles shall be level with surface slopes less than 2.0 percent maximum (see below). [Inspection Report – Verify] {DIB 82-06 4.3.17 (5)}



□ Off-street parking signs shall include sign R100B (CA) posted at a conspicuous place at each entrance to the parking facility or immediately adjacent to and visible from each accessible stall. The sign shall include the address where the towed vehicle may be reclaimed and the telephone number of the local traffic law enforcement agency. [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90A}



SIGN R100B (CA)

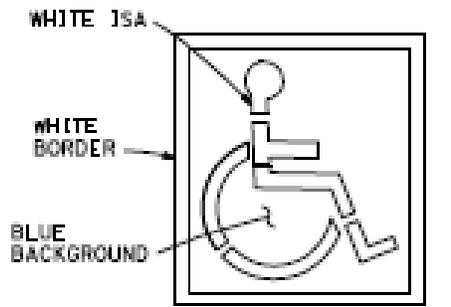
□ Off-street parking signs shall include sign R99C (CA) or R99 (CA) with Plaque R99B (CA) at each accessible stall. For van-accessible spaces, sign R7-8b shall be added. Regardless of sign configuration, the lowest sign edge at each stall shall provide a minimum of 84 inches clearance from the highest surrounding surface. [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90A}



SIGN R99C (CA)

SIGN R99 (CA)

PLAQUE R99B (CA)

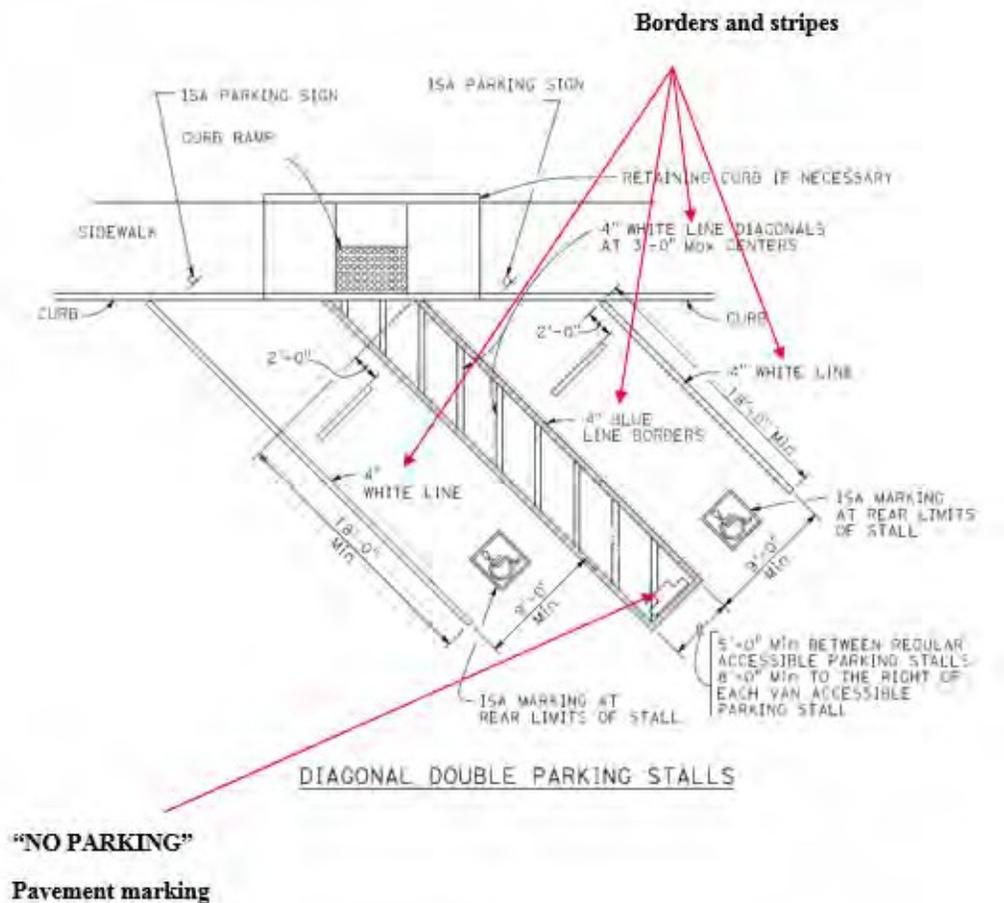


[ISA MARKING
See Standard Plan A24C

DETAIL A

□ For off-street accessible parking stalls, include the International Symbol of Accessibility (ISA) marking (see Standard Plans A90A and A24C) with white border, blue background and white ISA. Place in each accessible parking stall at the rear limit and centered in the width of the stall. [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90A}

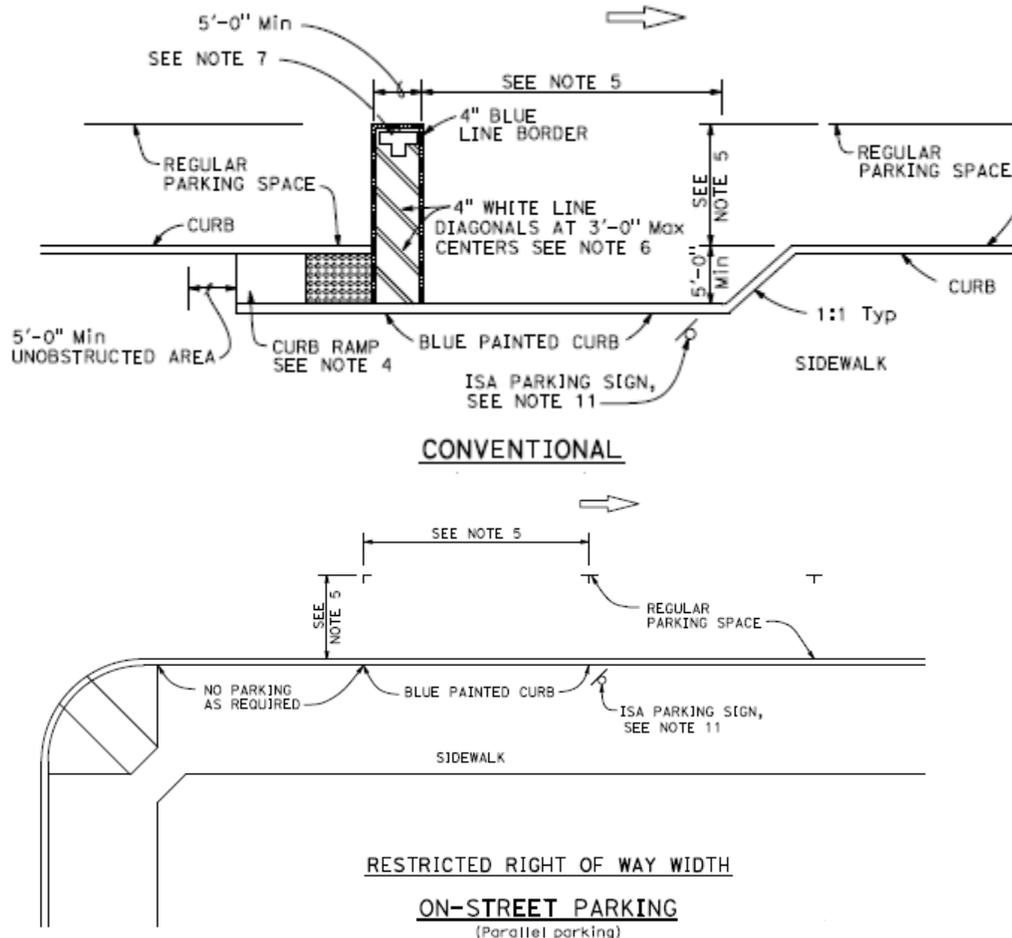
□ For off-street accessible parking stalls, include 4 inch white lines on stall edges, excluding those edges at accessibility aisles (see below). [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90A}



- For accessibility aisles, include 4-inch blue line borders and 4-inch white* line diagonals at 36 inch maximum centers. *Blue paint, instead of white paint diagonals may be used for marking accessibility aisles in areas where snow may cause white marking visibility concerns (see previous page). Include the words “NO PARKING” in white letters no less than 12 inches high within and at the traffic end of accessibility aisles (see Standard Plan A90A for location and A90B and A24E for pavement marking details). [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90A}
- Curb ramps and DWS are compliant and do not to encroach into accessible parking spaces or accessibility aisles. [Inspection Report – Verify] {DIB 82-06 4.3.17}

On-Street Parking:

- Accessible parking spaces shall be located so that persons with disabilities are not compelled to wheel or walk behind parked vehicles other than their own (see Standard Plan A90B for “conventional” or “restricted right-of-way width” cases). [Inspection Report – Verify] {DIB 82-06 4.3.17}



- Surface slopes of accessible parking spaces shall be the minimum feasible. [Inspection Report – Verify]
- Installation of required ISA signage, R99 (CA) and R99B (CA) or R99C (CA), must provide a minimum of 84 inches of clearance from the lowest edge of sign to the highest surrounding surface. [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90B }
- Accessible spaces must be a minimum of 240 inches in length and 96 inches in width unless the local jurisdiction calls for larger minimums. [Inspection Report – Measurement] {Standard Plan A90B }
- Curbs at accessible spaces shall be painted blue. [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90B }
- Accessibility aisles shall be a minimum of 60 inches in width and shall be marked with 4-inch blue line borders and 4-inch white line diagonals at 36-inch maximum centers. Blue paint, instead of white paint diagonals may be used for marking accessibility aisles in areas where snow may cause visibility issues. Include the words “NO PARKING” in white letters no less than 12 inches high within and at the traffic end of accessibility aisles (see Standard Plans A90B and A24E for location and pavement marking details). [Inspection Report – Measurement/Verify]{DIB 82-06 4.3.17 and Standard Plan A90B }
- There shall be no obstructions on the sidewalk adjacent to and for the full length of the accessible parking space, except for the ISA parking sign. {Standard Plan A90B }
- If the “restricted right-of-way width” detail is used and it conflicts with a bus stop or other uses, the detail may be applied to the other end of the block. Discuss this situation with your designer. {Standard Plan A90B }

Special Locations

Bus Stops:

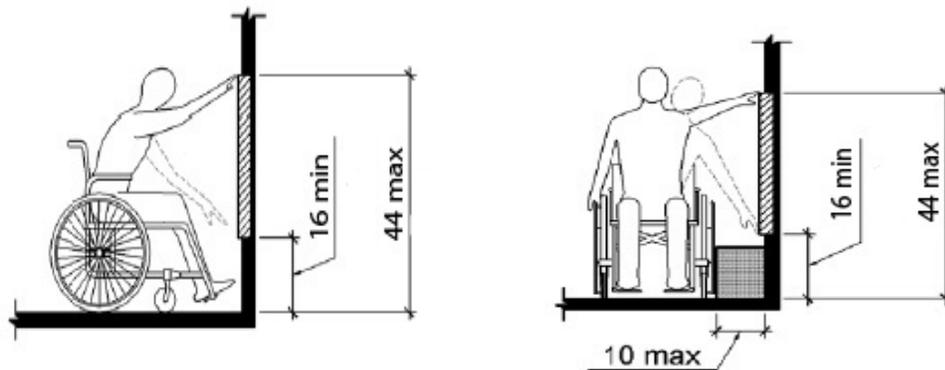
- Boarding and alighting areas shall provide a clear length of 96 inches minimum, measured perpendicular to the curb or vehicle roadway edge, and a clear width of 60 inches minimum, measured parallel to the vehicle roadway. {DIB 82-06 4.3.16(1)}
- Where provided, new or replaced bus shelters shall be installed or positioned to permit a wheelchair or mobility aid user to enter from the public way and to reach a location, having a minimum clear floor area of 30 inches by 48 inches, entirely within the perimeter of the shelter. {DIB 82-06 4.3.16 (2)}
- Boarding and alighting areas shall be connected to streets, sidewalks, or pedestrian paths by an accessible route. Newly constructed bus stop pads shall provide a square curb transition between the pad and roadway elevations or detectable warnings. Caltrans Type A or B curb will satisfy the square curb requirement (See Standard Plan A87A). {DIB 82-06 4.3.16 (3)}
- Parallel to the roadway, the slope of the boarding and alighting area shall be the same as the roadway, to the maximum extent practicable. Perpendicular to the roadway, the slope of the boarding and alighting area shall not be steeper than 2.0 percent. {DIB 82-06 4.3.16 (4)}

Railroads:

- Where an accessible path crosses railroad tracks, the openings for wheel flanges shall be permitted to be 2.5 inches maximum. [Inspection Report – Field Verify] {DIB 82-06 4.3.6(2)}

Exhibits:

- Pedestrian facilities that are part of non-motorized transportation facilities may include vertical exhibit panels, wayside exhibit panels, and touchable exhibits. These exhibits have special forward and side reach requirements in DIB 82-06. Unobstructed forward reach for exhibits shall not exceed a maximum high forward reach of 44 inches or a minimum low forward reach of 16 inches above the finished surface. Unobstructed side reach for exhibits shall not exceed a maximum high side reach of 44 inches or a minimum low side reach of 16 inches above the finished surface. {DIB 82-06 4.3.15(4) & (5)}



Special Considerations

Pre- Postconstruction Surveys:

□ Projects may include a pre-postconstruction survey bid item for certain permanent pedestrian facilities, such as non-standard plan curb ramps. When used, the summary of quantities plan sheet will identify which individual facilities will require the surveys. These surveys must be performed by a California licensed surveyor or California registered engineer.

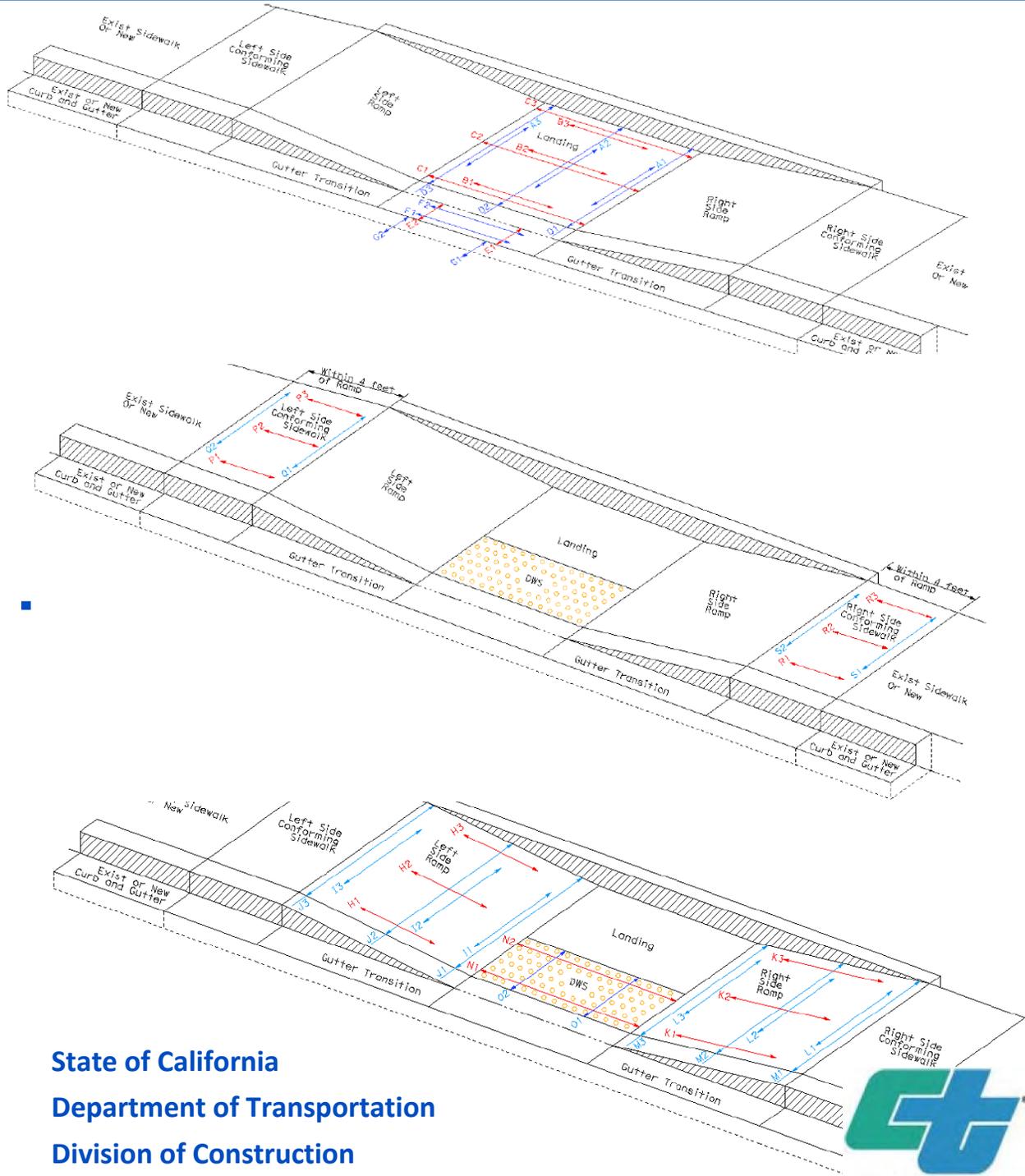
The required documentation for the postconstruction survey needs to capture the slopes and dimensions for each element of the facility. A minimum of three measurements are to be recorded for slopes and dimensions of each element. These may be captured and submitted in any format as determined by the surveyor/engineer and include their professional stamp. Specification changes are planned that would require that this information be placed on a corresponding inspection report for the corresponding facility. Regardless, these facilities will still require spot verification by Caltrans field staff to ensure that contract and ADA compliance has been attained. The contractor's submitted postconstruction survey can be used to supplement verification inspection, but cannot replace verification inspection and certification by Caltrans.

Intersections Without Yield or Stop Control:

□ Intersections without yield or stop control receive special consideration as vehicular traffic may not always reduce speed at such locations. Common signalized intersections with three-phase control (red, yellow, green) are considered to be an intersection without yield or stop control as vehicles travelling through the intersection with a "green" signal may not reduce speed. In contrast, signalized intersections with either flashing yellow or flashing red are considered intersections with yield or stop control respectively, the same is true for intersections signed with yield or stop signs.

It may also be possible that an intersection contains yield or stop control in one direction, but does not have yield or stop control in another direction (for example, at rural road crossing of highway). This will affect the ADA compliance requirements for the pedestrian facility traversing the intersection. {see DIB 82-06 4.3.5, Figure 4.3.5 – Cross Slope Examples }

PERMANENT PEDESTRIAN FACILITIES ADA COMPLIANCE HANDBOOK



State of California
 Department of Transportation
 Division of Construction
 March 2018



PERMANENT PEDESTRIAN FACILITIES ADA COMPLIANCE HANDBOOK

State of California Department of Transportation
Division of Construction

Prepared by

Office of Contract Administration

1120 N Street, MS 44

Sacramento, CA 95814

MARCH 2018



Cover images: Curb Ramp Inspection Forms

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About the
PERMANENT PEDESTRIAN FACILITIES
ADA COMPLIANCE HANDBOOK

This handbook provides information for inspection of permanent pedestrian facilities for compliance with the Americans with Disabilities Act (ADA) standards based primarily on Design Information Bulletin (DIB) 82-06, "Pedestrian Accessibility Guidelines for Highway Projects," for the California Department of Transportation (Caltrans).

Caltrans Division of Construction will revise and update this manual to keep current with revisions to DIB, other standards and guidance concerning ADA compliance. Employees should forward suggestions for improving this manual, to the office responsible for maintaining this document, which can be found on the Division of Construction website, at:

<http://www.dot.ca.gov/construction/index.html>

Responsible office:

HQ Office of Contract Administration
Division of Construction
1120 N Street, MS 44
Sacramento, CA 95814

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Introduction

The California Department of Transportation (Caltrans) developed this handbook for construction field staff who inspect permanent pedestrian facilities in consideration of American with Disabilities Act (ADA) requirements. Not unlike other facilities on Caltrans projects, staff help ensure the constructed facilities comply with the contractual requirements of the plans and specifications. However, unlike other facilities, there are absolute ADA compliance measurement requirements for permanent pedestrian facility features. Designers are to provide project details for these facilities that comply with ADA requirements pursuant to Design Information Bulletin (DIB) 82-06, "Pedestrian Accessibility Guidelines for Highway Projects," while accommodating project constraints. While field staff are not expected to be experts in ADA codes and regulations, there is a need to have a basic understanding of ADA compliance when inspecting these facilities. Field conditions or contractor's construction methods may affect compliant construction of these facilities, and field staff need to be cognizant of how potential changes in these facilities may affect contract compliance, as well as ADA compliance. When questions arise, staff should not hesitate to contact their project engineer to obtain assistance.

Standard Measurement Tools and Practices

For assessing compliance of dimensions of permanent pedestrian facilities, use a measuring tape with minimum 1/8-inch increments. For each facility's dimensional feature (for example, width of curb ramp) take three measurements equally dispersed across the feature in question. Evaluate each measurement individually for compliance; do not average the individual measurements. Due to the accuracy of the instrument, any individual measurement within 1/4-inch of the compliance dimensional value is deemed acceptable.

For assessing compliance of slopes of permanent pedestrian facilities, use a smart level with a minimum sensor accuracy of 0.1 degrees. Calibrate the smart level in accordance with the manufacturer's instructions each day before taking measurements. Slope measurements are to be taken parallel and perpendicular to the pedestrian path of travel. If the pedestrian facility feature will accommodate, use a 4-foot smart level for taking measurements. Where the feature will not accommodate the 4-foot smart level, a 2-foot smart level may be used for taking measurements. If the feature will not accommodate a direct measurement with a 2-foot smart level, uniform blocking may be used. Verify the measured surface is free of grit and other substances prior to placing the smart level. For each facility's slope feature, take three measurements equally dispersed across the feature in question. Evaluate each measurement individually for compliance; do not average the individual measurements. Due to the accuracy of the instrument, any individual measurement within 0.2 percent of the compliance slope value is deemed acceptable.

For example, plans show a maximum slope requirement of 1.5 percent and the maximum ADA compliance value of the slope is known to be 2.0 percent. If all three of the measured slopes are 1.7 percent (1.5 percent + 0.2 percent [tool accuracy]) or less, contract and ADA compliance have been achieved. In the event the measurement falls outside contract compliance but within ADA compliance, no corrective work may be necessary; however, a credit may be due to the State. In the event the measurement falls outside both contract compliance and ADA compliance, corrective work will be required.

Latitude and longitude measurements for each permanent pedestrian facility will be used to identify and differentiate the permanent pedestrian facilities as part of an asset management system. Currently, there are multiple free GPS applications available for smart phones, tablets and desktop computers that will report latitudes and longitudes to a minimum of six decimal degrees. Evaluation of these applications indicate that they provide accurate horizontal positioning to ± 4 feet (approximately 5 decimal degrees) for most unobstructed locations, which is sufficient for differentiation of these assets. Locate these measurements at the center of the constructed permanent pedestrian facility such as the center of the curb ramp or midpoint of a sidewalk segment.

Documentation and Certification

Document inspection of permanent pedestrian facilities using the following forms:

Form Number	Pedestrian Facility
CEM-5773ADE	Curb Ramp (Case A, D or E)
CEM-5773B	Curb Ramp (Case B)
CEM-5773C	Curb Ramp (Case C)
CEM-5773CH	Curb Ramp (Case CH)
CEM-5773CM	Curb Ramp (Case CM)
CEM-5773DW	Sidewalk at Driveway
CEM-5773FG	Curb Ramp (Case F or G)
CEM-5773P	Parking
CEM-5773PW	Passageway
CEM-5773SW	Sidewalk
CEM-5773NSPL	Non-Standard Plan Parallel Curb Ramp
CEM-5773NSPP	Non-Standard Plan Perpendicular Curb Ramp

File the completed forms in Category 57, “Permanent Pedestrian Facilities,” of the project records. Remember to document changes to these pedestrian facilities on as-built plans.

Use Form CEM-5773, “Americans with Disabilities Act (ADA) Project Compliance Certification,” to summarize and certify ADA construction compliance of pedestrian facilities constructed under the contract. Transmit a copy of this form with required attachments to the ADA Infrastructure group at ADA.Compliance.Office@dot.ca.gov and file the original in Category 57 of the project records. This information will assist Caltrans in asset management of these facilities and managing the ADA transition plan.

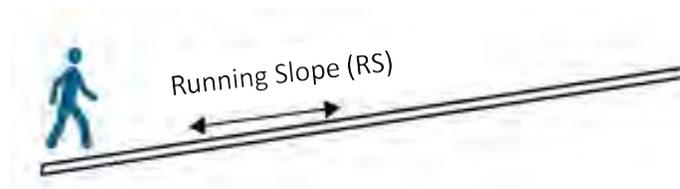
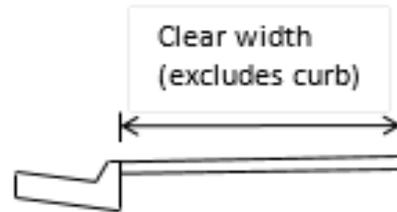
Checklist Usage

The checklists contained herein are based on ADA compliance requirements for permanent pedestrian facilities. The checklists are a tool for personnel to use in determining compliance of pedestrian facility features. Personnel must verify that contract compliance of pedestrian facilities has been obtained. Generally, contractual requirements will be more conservative than the ADA compliance requirements. In the event verification inspection shows noncompliance with contractual requirements, notify the contractor of the noncompliant work in accordance with Section 5-1.30, “Noncompliant and Unauthorized Work,” of the *Standard Specifications*, and determine if the pedestrian facility is ADA compliant. Pedestrian facilities constructed under the contract that are noncompliant with ADA requirements must be corrected. If ADA compliance is achieved, but contractual compliance is not, the pedestrian facilities may remain in place subject to a credit to the Department through an approved change order.

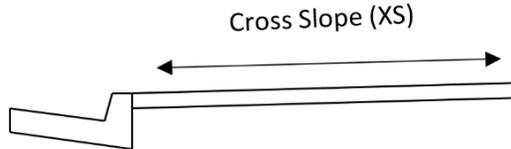
Checklists

General Sidewalk / Path of Travel Checklist

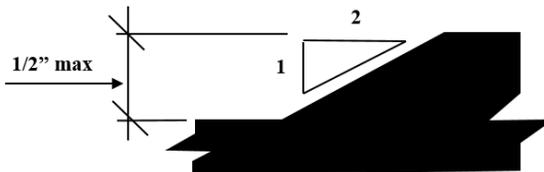
- Firm, stable, and slip resistant – Sidewalks constructed with concrete materials with broom finish applied perpendicular to primary path of travel. [Inspection Report – Field Verify] {DIB 82-06 4.3.1(1)}
- Minimum clear width is 48 inches* exclusive of curb width**. [Inspection Report – Field Measurement] {DIB 82-06 4.3.3(2)}
 - ***Exception** – The clear width may be reduced to 32 inches minimum for a length of 24 inches maximum provided that reduced width segments are separated by segments that are 48 inches long minimum and 48 inches wide minimum. {DIB 82-06 4.3.3(3)}
 - ****Exception** – The clear width measurement may include the curb if constructed monolithically with the sidewalk where there is no joint at the back of curb. Common examples are those placed on bridge structures.
- Maximum running slope for pedestrian access route nonadjacent to roadway, for example, a meandering pathway, is 5.0 percent. [Inspection Report – Field Measurement] {DIB 82-06 4.3.4(2)}



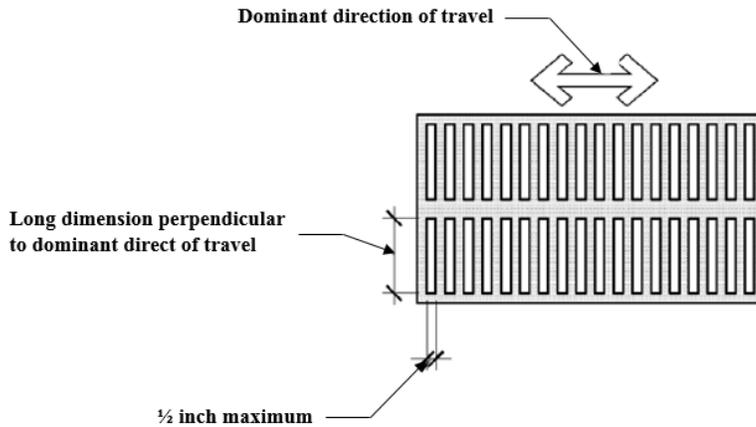
- Maximum running slope for sidewalks adjacent to an existing roadway may not exceed the roadway’s general profile grade. [Inspection Report – Field Measurement] {DIB 82-06 4.3.4(2)}
- Special consideration for maximum running slope of sidewalks at driveways is 8.3 percent. [Inspection Report – Field Measurement {DIB 82-06 4.3.8(1)}] (see Standard Plan A87A)
- Maximum cross slope for sidewalks/pedestrian access routes is 2.0 percent.* [Inspection Report – Field Measurement] {DIB 82-06 4.3.5(1)}



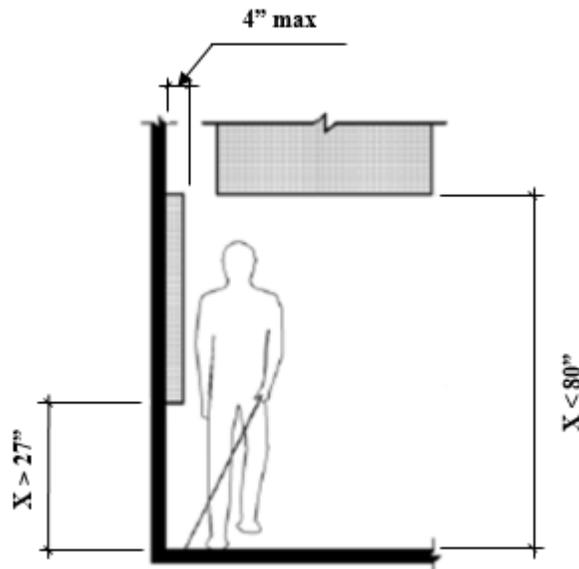
- ***Exceptions** – Pedestrian access routes within pedestrian street crossing and without yield or stop control may have a 5.0 percent maximum cross slope. Pedestrian access routes contained within midblock pedestrian street crossings may have a maximum cross slope equal to the street or highway grade. [Inspection Report – Field Measurement] {DIB 82-06 4.3.5(2) & (3)}
- Changes in surface level may be a maximum of 1/4-inch vertically without edge treatment. Changes in surface level 1/4-inch through 1/2-inch vertically must be beveled with a slope no greater than 1V:2H. Changes in level greater than 1/2-inch must be accomplished by means of a ramp. Note that Section 73-3.03, “Construction,” of the *Standard Specifications*, also contains a maximum 0.02 foot (1/4-inch) allowance from a 10-foot straightedge requirement, so there should be no cases of new pedestrian facility construction work exceeding a 1/4-inch change in level within these paths of travel. [Inspection Report – Field Verify] {DIB 82-06 4.3.1(2), (3) & (4)}



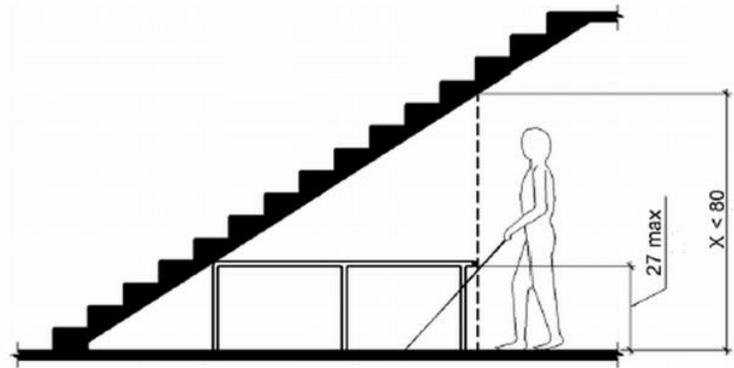
- Where openings or grates are in the path of travel, they shall have spaces no greater than 1/2-inch in one direction. If openings or grates have elongated openings, they shall be placed so the long dimension is perpendicular to the dominant direction of travel. [Inspection Report – Field Verify] {DIB 82-06 4.3.6(1)}



- Objects with leading edges from 27 inches to 80 inches from the surface can protrude as much as 4 inches horizontally, except for handrails, which may protrude up to 4.5 inches. Protruding objects must not reduce the minimum clear width required for an accessible route. [Inspection Report – Field Verify] {DIB 82-06 4.3.19(1) & (4)}

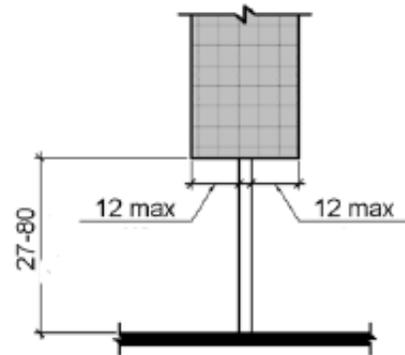


□ Provide guardrails or other barriers if vertical clearance is less than 80 inches. Guardrail or barrier must be a maximum of 27 inches above the finished surface. For example, if a guy wire is parallel to the sidewalk, it may not encroach upon the minimum clear width, and while it may be cane detectable in one direction

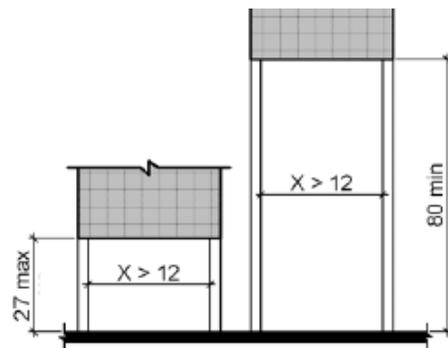


(obtuse angle approach), it is not cane detectable in the opposite direction (acute angle approach) and needs a barrier such as a guy brace, sidewalk guy or similar device for protection from an overhanging obstruction. Discuss these types of situations with your designer. [Inspection Report – Field Verify] {DIB 82-06 4.3.19(2)}

□ Free-standing objects mounted on single posts or pylons may overhang circulation paths a maximum of 12 inches when located from 27 to 80 inches from the surface. [Inspection Report – Field Verify] {DIB 82-06 4.3.19(3)}



□ If a sign or other obstruction is mounted between posts or pylons and the clear distance between posts or pylons is greater than 12 inches, the lowest edge of such sign or obstruction shall be either 27 inches or less or 80 inches or more from the surface. [Inspection Report – Field Verify] {DIB 82-06 4.3.19(3)}

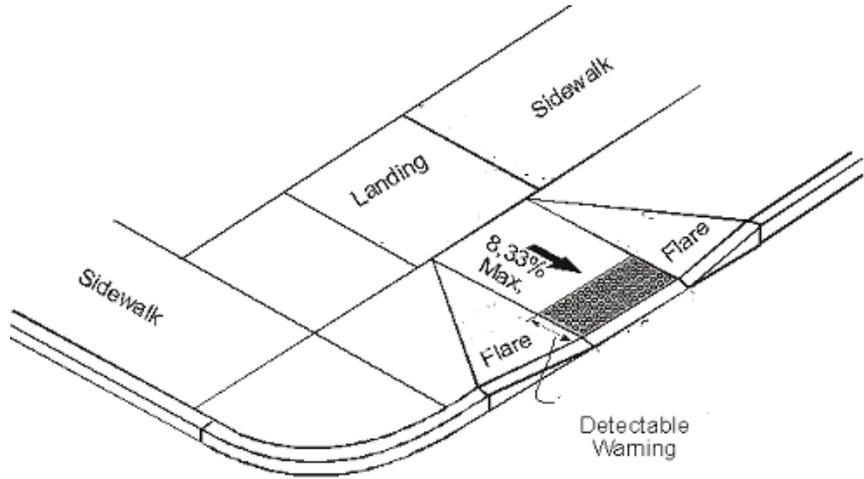


□ Backfill against sidewalk to prevent a falling hazard. Areas with more than a 4 inch drop-off will require correction or a preventive barrier. [Inspection Report – Field Verify] {DIB 82-06 4.3.11}

Curb Ramp Checklist

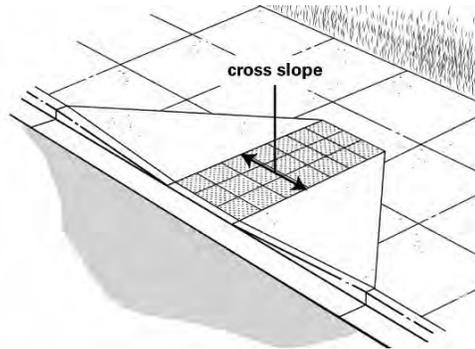
- Ramp running slope not to exceed 8.3 percent.* [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(1)}

- ***Exceptions** – Where ramp length would need to be longer than 15 feet to meet running slope requirement, the 8.3 percent maximum may be exceeded. At blended transitions, the running slope may not exceed 5.0 percent. Discuss these situations with your designer. {DIB 82-06 4.3.8(1)}

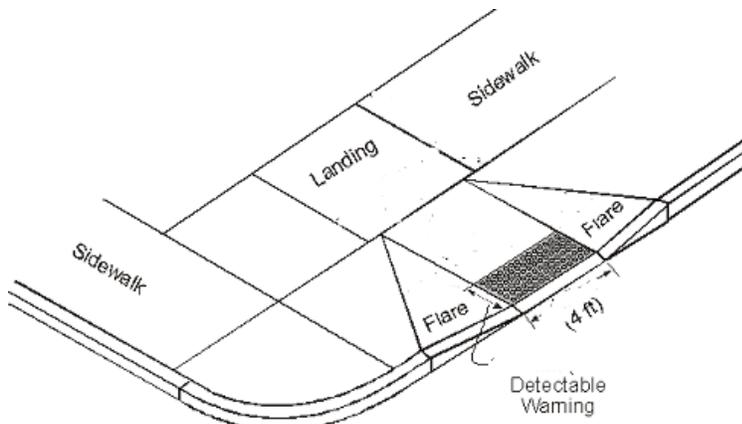


- Ramp cross slope not to exceed 2.0 percent.* [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(8)}

- ***Exception** - where the curb ramp is at an intersection without yield or stop control and at midblock pedestrian street crossings, the cross slope may not exceed the general street or highway grade or 2.0 percent, whichever is greater. {DIB 82-06 4.3.8(8)}



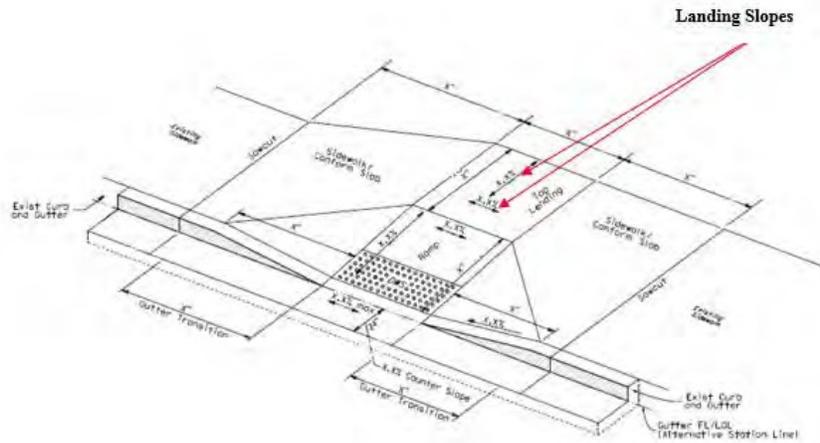
- Ramp clear width not less than 48 inches.* [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(2)}



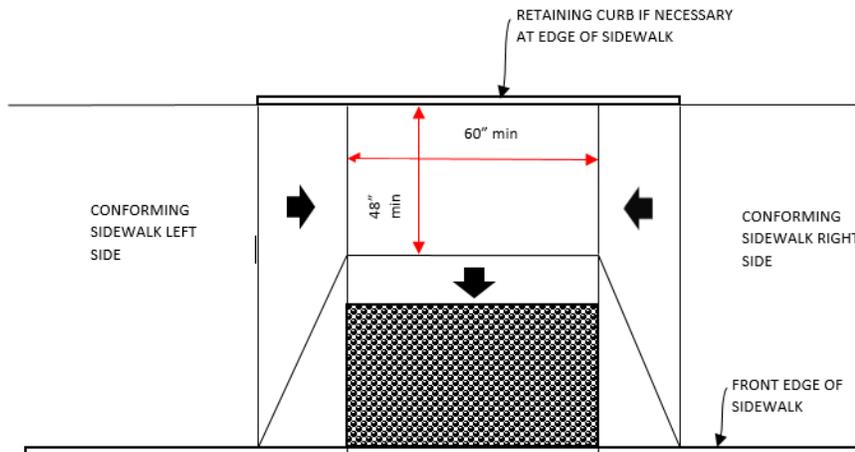
- ***Exception** – Case B and Case C curb ramps require a wider ramp clear width (60 inches minimum) as these widths are based on landing requirements. [Inspection Report – Field Measurement] (see Standard Plan A88A)

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- Landing/turning space slopes (see below) not to exceed 2.0 percent* [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(8)}
 - ***Exception** - where the curb ramp is at an intersection without yield or stop control and at midblock pedestrian street crossings, the cross slope may not exceed the general street or highway grade or 2.0 percent, whichever is greater. {DIB 82-06 4.3.8(8)}

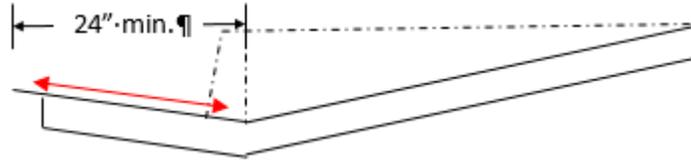


- Top landing/turning space clear length and width not less than 48 inches. Note that parallel curb ramps such as a Case C do not require a top landing. [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(3)}
- Case C or Case B (Standard Plan A88A) bottom or intermediate landing/turning space minimum clear length (60 inches) and minimum clear width (48 inches), Case B shown below. [Inspection Report – Field Measurement {DIB 82-06 4.3.13}] (see Standard Plan A88A)

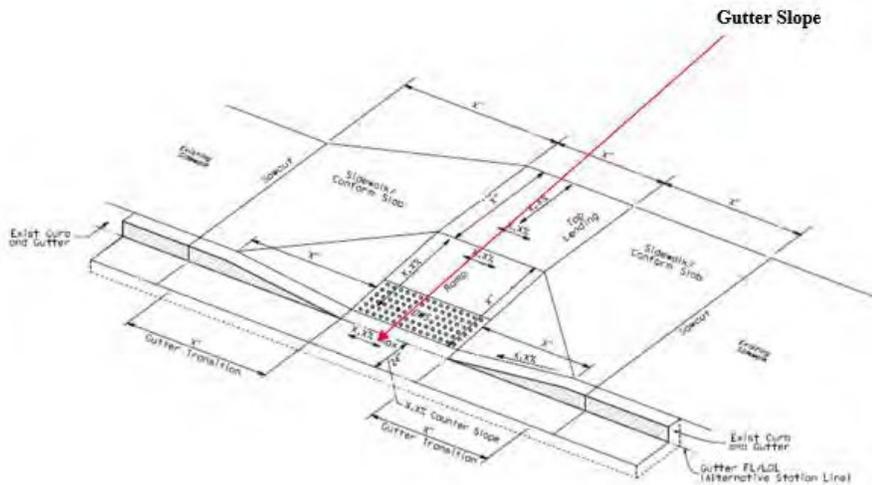


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- Gutter/roadway counter slopes (parallel with predominate pedestrian travel) within 24 inches of the curb ramp not to exceed 5.0 percent (see below). [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(4)}

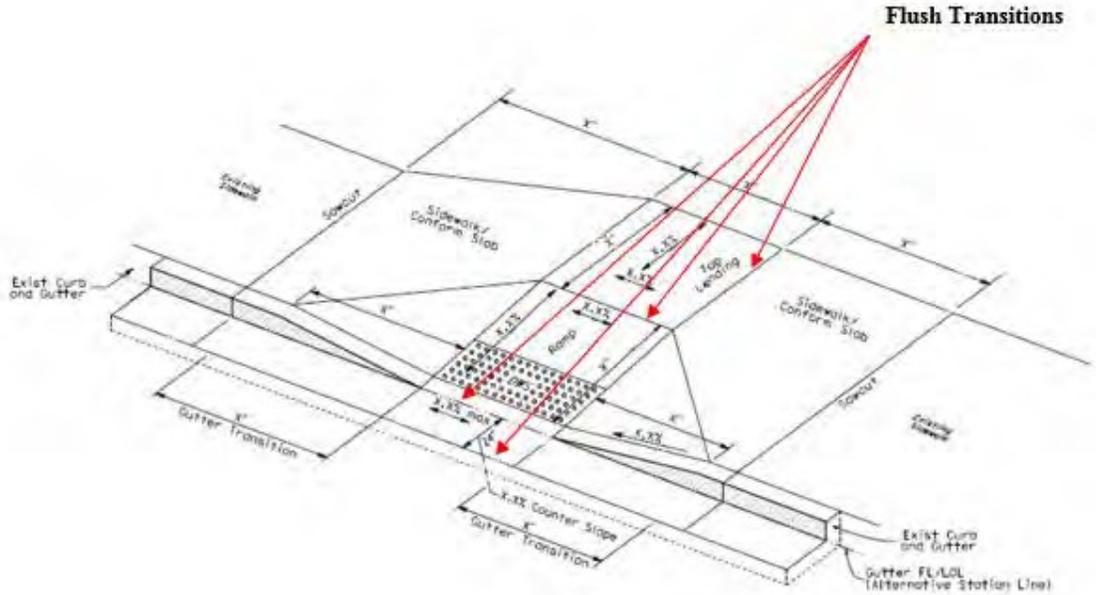


- Gutter slope (flow line slope – see below) over the width of curb ramp, not to exceed those for the curb ramp cross slopes, generally a maximum of 2.0 percent.* Note that generally this will require the warping of the gutter pan in transition areas on both sides of the gutter segment immediately adjacent to the curb ramp. RSP A88A identifies these 3-foot transition areas in the “Gutter Pan Transition” detail. [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(8)}
- ***Exception** - for an intersection without yield or stop control and at midblock pedestrian street crossings, the gutter slope may not exceed the general street or highway grade or 2.0 percent, whichever is greater.

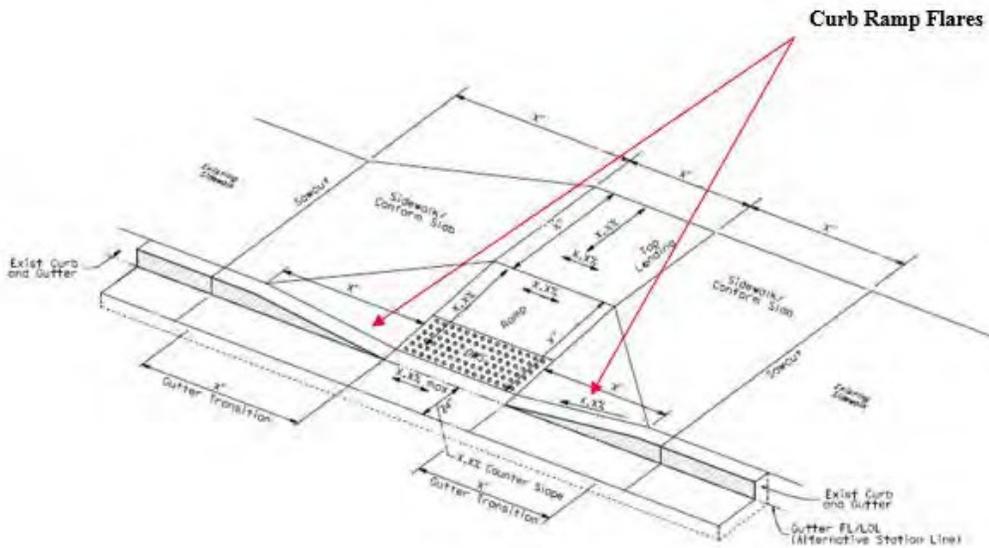


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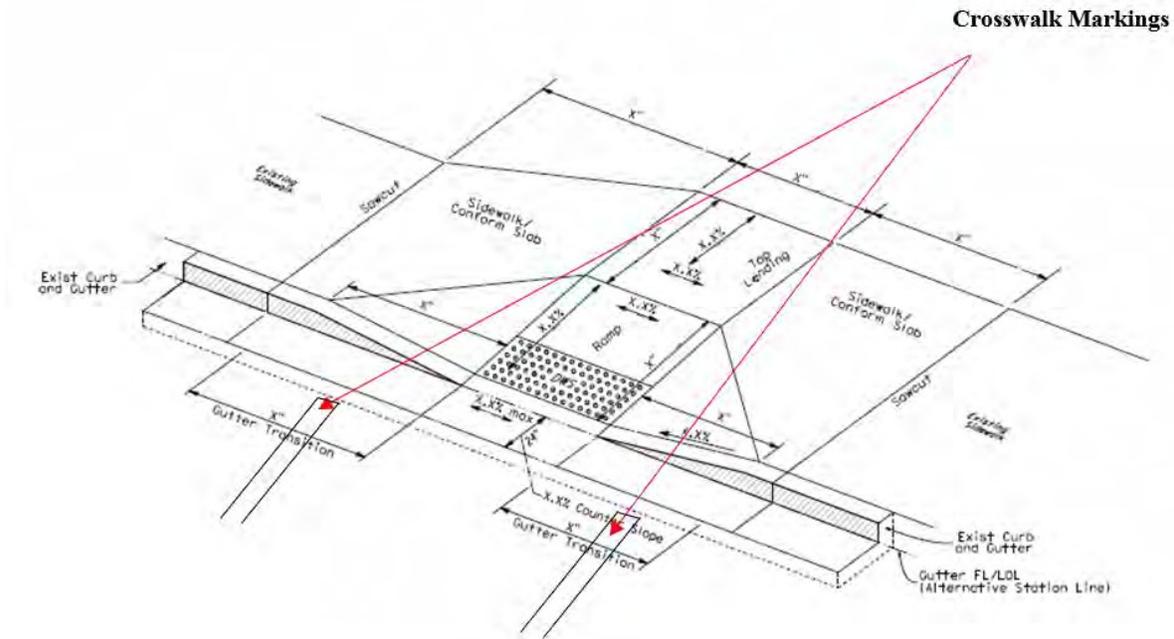
- Flush transitions at curb ramps to walks, gutters and streets are required (see below). No lips are allowed (1/4-inch change in surface level allowance does not apply here). [Inspection Report – Field Verify] {DIB 82-06 4.3.1& 4.3.8(4)}



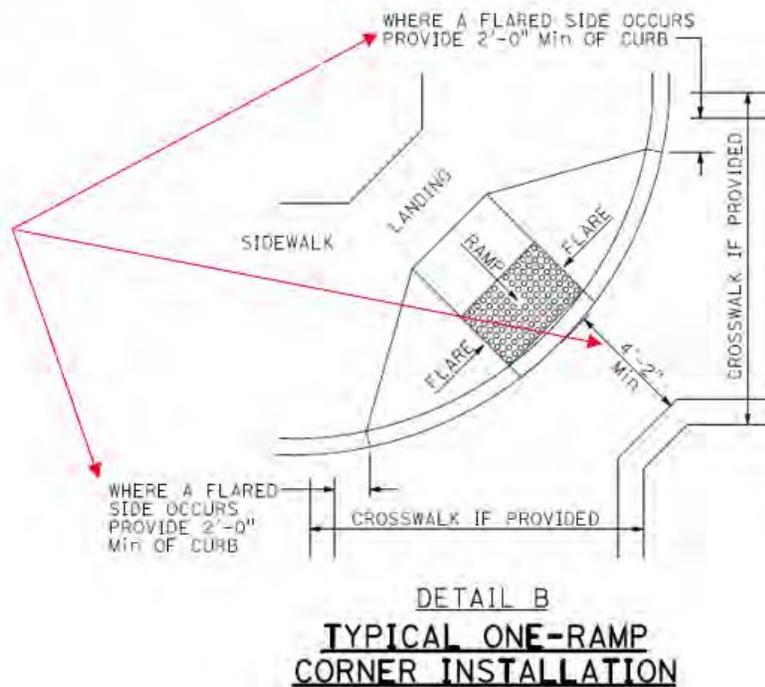
- Curb ramp flare slope not to exceed 10.0 percent, measured at back of curb (see below). [Inspection Report – Field Measurement] {DIB 82-06 4.3.8(5)}



- Curb ramps without flares (for example, Case C curb ramps) at marked crossings are to be wholly contained within the markings, as shown below. Curb ramps with flares (for example, Case A curb ramps) at marked crossings must be contained within the same markings. [Inspection Report –Field Verify] (see Standard Plan A88A)

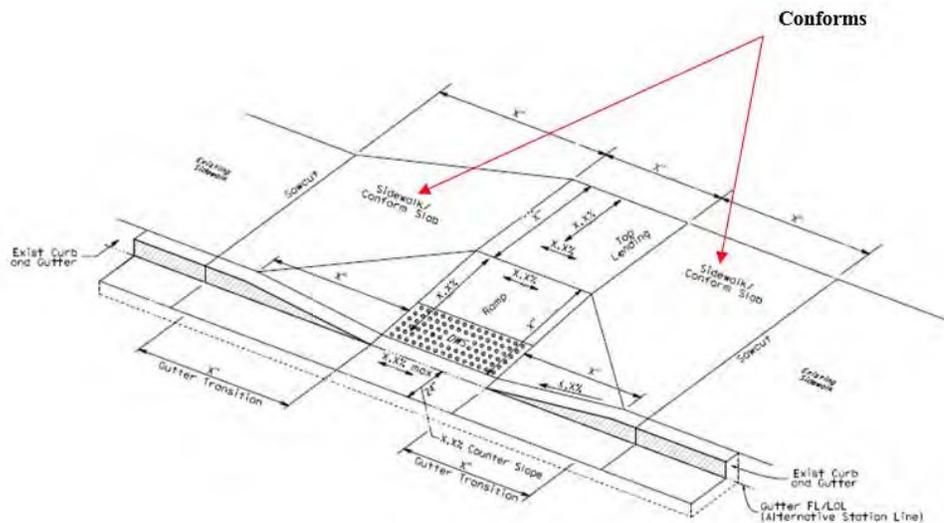


- Diagonal curb ramps with flared sides such as those shown on RSP A88A – Detail B “Typical One-Ramp Corner Installation” must provide a minimum of 2 feet of curb on each side of curb ramp within the limits of crosswalk if provided. Diagonal curb ramps must also provide a 48 inch minimum clear space within the markings of a marked crossing. Note that the standard plan shows a conservative 50 inch dimension (see next page). [Inspection Report – Field Verify] {DIB 82-06 4.3.8(6) & (7)}



- Retaining curb placed as shown on applicable Standard Plan A88A details. [Inspection Report – Field Verify] {DIB 82-064.3.11(1)}
- Surfaces of utility pull boxes, manholes or vaults within the curb ramp must be flush with the curb ramp surface. [Inspection Report – Field Verify] (see Revised Standard Plan A88A – Note 12)
- Sign posts, lighting standards, power/telephone poles or mailboxes should be outside the boundary for curb ramp construction. [Inspection Report – Field Verify] (see Revised Standard Plan A88A – Note 12)

- Conforms used to transition from new compliant curb ramps to existing sidewalks should be ADA compliant; however, this is not an absolute. Project plans/construction details for transitions should be provided where new curb ramps are to be tied into existing sidewalk locations. If details were not provided, discuss with your designer (see below). [Inspection Report – Field Measurement] {DIB 82-06 Appendix – 1 }



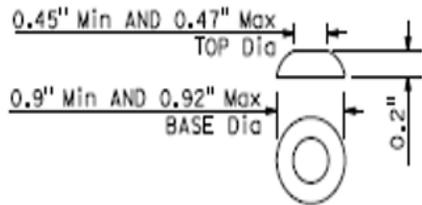
- Suitable roadway surface within the pedestrian street crossing a Caltrans right-of-way. If not, discuss with your project engineer and determine corrective action, for example a change order, transition plan, or maintenance work. [Inspection Report – Field Verify]
- Suitable existing sidewalk condition within a Caltrans right-of-way. If not, discuss with your project engineer and determine corrective action, for example a change order, transition plan, or maintenance work. [Inspection Report – Field Verify]

Detectable Warning Surface Checklist

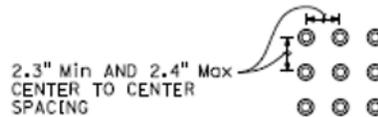
- Detectable warning surface (DWS) products must be on the Authorized Material List (AML) in accordance with Section 73-1.02B, “Detectable Warning Surfaces,” of the *Standard Specifications*. The following link provides access to the AML for DWS products [Inspection Report – Field Verify] {DIB 82-06 4.3.14}:

<http://www.dot.ca.gov/aml>

- DWS locations will be shown on the plans.
- DWSs must be yellow color no. 33538 of FED-STD-595 unless the special provisions have identified another color for aesthetics. Designers will have had to go through a nonstandard special provision exception approval process to use an alternate color that provides a minimum 70 percent color contrast. [Inspection Report – Field Verify] {DIB 82-06 4.3.14}
- DWS Authorized Material List products were included based on meeting numerous requirements, including raised truncated dome heights (0.18 inches minimum and 0.22 inches maximum), diameters (top – 0.45 inches through 0.47 inches, base – 0.90 inches through 0.92 inches) and center to center spacing (2.3 inches through 2.4 inches). These acceptable physical parameters are shown on Revised Standard Plan RSP A88A and can be spot-checked for compliance in the field. [Inspection Report – Field Verify]



RAISED TRUNCATED DOME

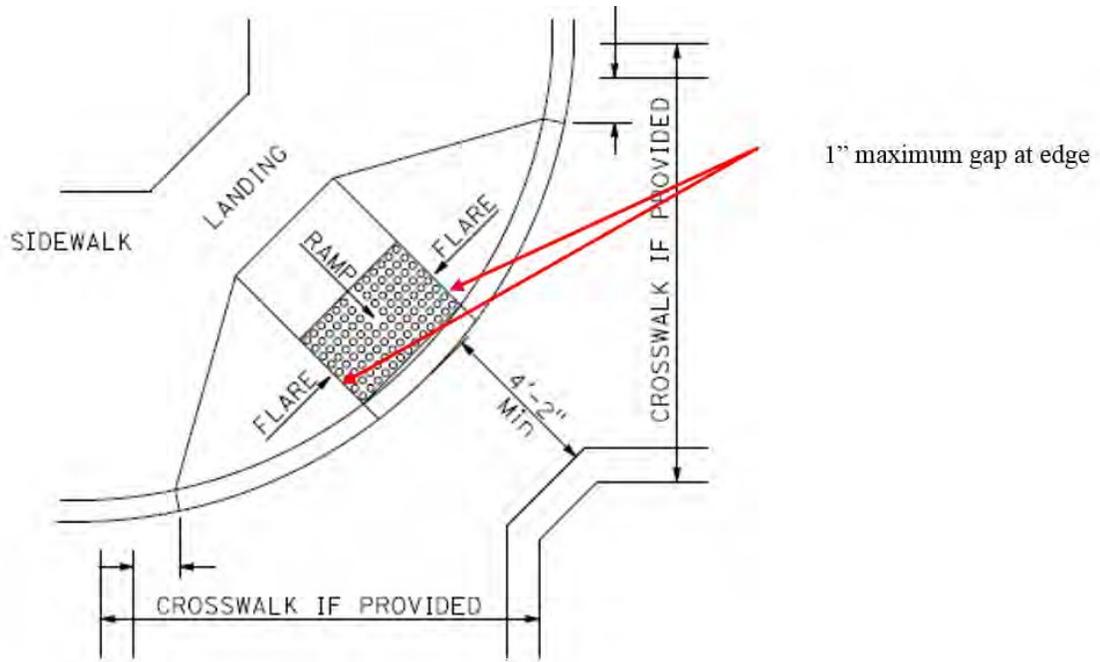


RAISED TRUNCATED DOME PATTERN (IN-LINE)
DETECTABLE WARNING SURFACE

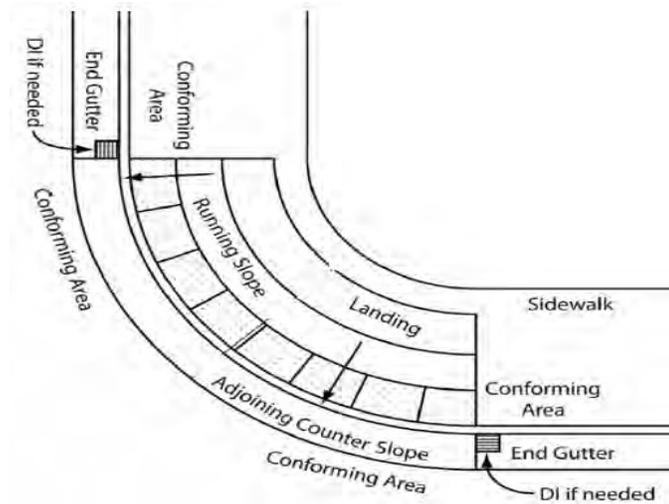
- DWSs must be 36 inches in depth (along the curb ramp slope) for most applications*. See note 10 on Revised Standard Plan RSP A88A. [Inspection Report – Field Measurement] {DIB 82-06 4.3.14(1)}

□ ***Exception** – For passageway applications, such as those shown on Revised Standard Plan RSP A88B, alternate DWS depths are required based on passageway lengths. Note that for passageway lengths less than 6 feet at street level, a DWS is not required.

- DWSs must be the “full” width of the curb ramp or passageway. DWS products generally come in full foot widths. Placement of a 4-foot width DWS on a 4-foot, 2-inch curb ramp width meets the “full” width intent. This same guideline is to be used for other curb ramp widths, allowing a maximum gap of 1 inch on each side of the DWS. This requirement may necessitate cutting the DWS. Discuss with your designer if you encounter this situation. [Inspection Report – Field Measurement] {DIB 82-064.3.14}

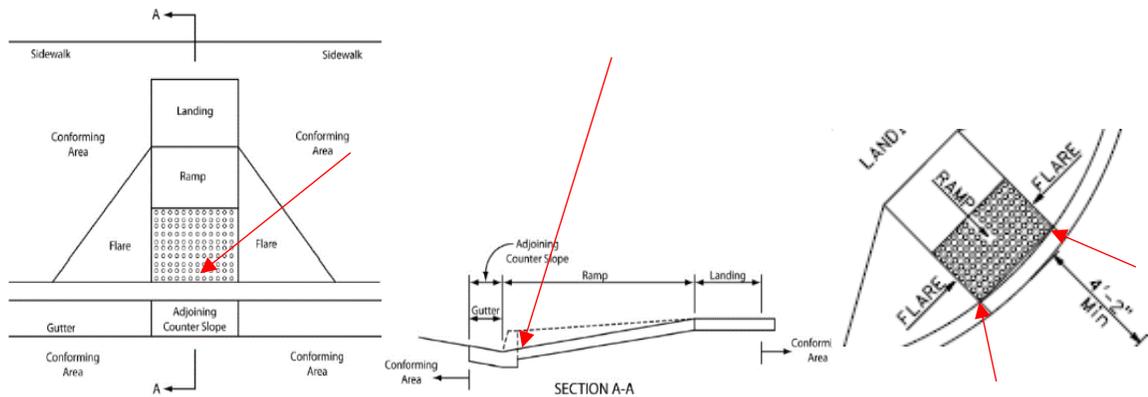


- Placement of DWS on radial curb ramps such as a blended transition should be addressed with a construction detail in the project plans. If not provided, discuss with your designer.

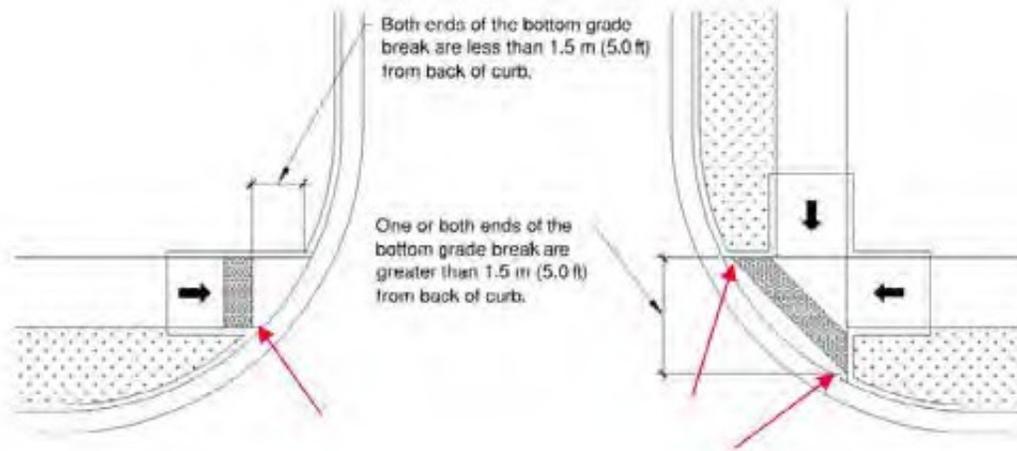


□ DWS are typically* placed at the projection of the back of curb line in standard curb ramp applications as shown below and on Revised Standard Plan RSP A88A. For diagonal or corner applications, the front corners of the DWS should generally be placed at the radially projected back of curb line. The project plans/construction details may show other acceptable DWS configurations for nonstandard applications. [Inspection Report – Field Verify] {DIB 82-06 4.3.14(3a)}

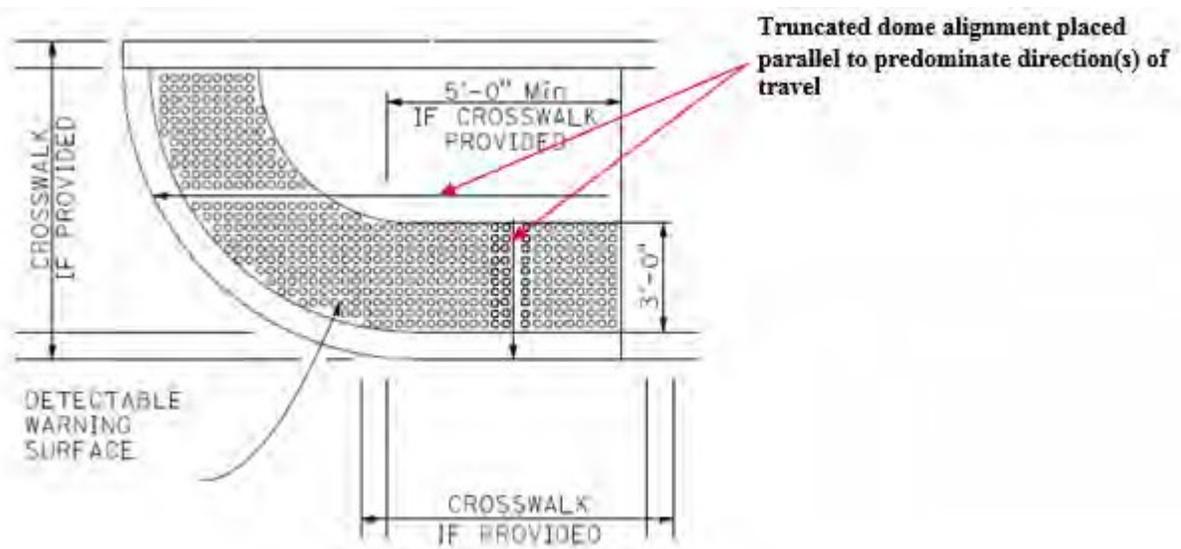
□ ***Exception** – Note that projects using Standard Plans/Revised Standard Plans A88A sheets dated March 21, 2014, or earlier included a note requiring that “the edge of the detectable warning surface nearest the street shall be from 6 inches to 8 inches from the gutter flowline.” Where practical, these projects should revise the note by change order to make sure the front edge/corners of the DWS will be placed at the projected back of curb line. Projects with A88A sheets dated after March 21, 2014, do not include the note; the details show the front edge/corners at the projected back of curb line, and no change order is necessary to ensure proper placement.



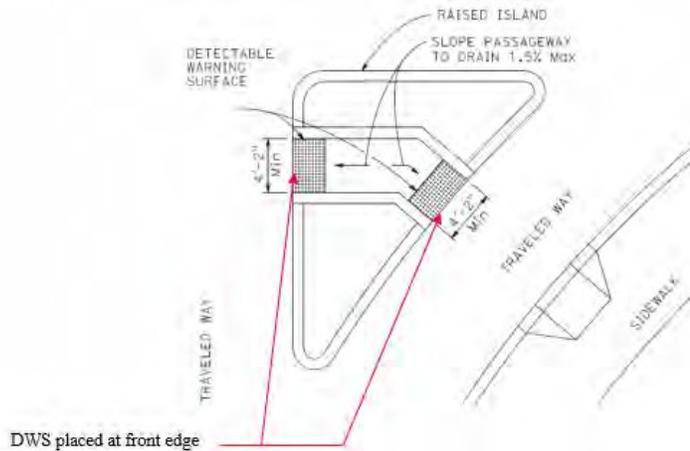
□ Special construction details may be in the project plans that provide alternative DWS placement such as those shown on the next page. If the ends of the bottom curb ramp grade break are in front of the back of curb projection, DWS shall be placed at the back of the curb projection. Where the ends of the bottom grade break are behind the back of curb projection and the distance from either end of the bottom grade break to back of curb projection is 60 inches or less, DWS shall be placed on the ramp run within one dome spacing of the bottom grade break. Where the ends of the bottom grade break are behind the back of curb projection and the distance from either end of the bottom grade break to the back of curb projection is more than 60 inches, DWS shall be placed on the lower landing at the back of curb projection. Bottom grade break line is to be perpendicular to the pedestrian path of travel and area between the grade break and projected curb line should be level. These situations should be accompanied by project details in the project plans and can be discussed with the project engineer. [Inspection Report – Field Verify] {DIB 82-06 4.3.14(3b) & (3c)}



□ For nonrectangular DWS locations such as case CM curb ramps, rectangular sheets will need to be cut to the required shape and placed with the alignment of the truncated domes parallel to the predominate direction(s) of pedestrian travel while maintaining the required 2.3- to 2.4-inch spacing (see below). Contractors should not cut through the truncated dome as it may create an abrupt vertical difference in height from the top of truncated dome to the surrounding surface that exceeds the ¼-inch maximum allowance. Note that some DWS manufacturers may have products that anticipate placement of truncated domes on a radial alignment. It is unlikely that these products meet the required 2.3- to 2.4-inch spacing requirement and therefore cannot be used.



- DWS at island passageways are typically placed at front of curb face or raised island as shown on Revised Standard Plan RSP A88B (Type A, B and C Passageways). [Inspection Report – Field Verify] {DIB 82-06 4.3.9}



- DWS may be cut and reapplied to allow removal of utility covers while maintaining full width and depth requirements (see note 12 on Revised Standard Plan RSP A88A).
- Obtain the prefabricated DWS 5-year manufacturer’s replacement warranty from the contractor. This warranty starts at contract acceptance and should be provided to Maintenance as part of the project closeout procedures. [Inspection Report – Field Verify] {Section 73-3.01D(2), “Warranties,” of the *Standard Specifications*. }

Ramps, Stairs, Handrails, and Guards Checklist

Ramps:

- Ramp maximum running slope is 8.3 percent. {DIB 82-06 4.3.7(2)}
- Ramp maximum cross slope is 2.0 percent. {DIB 82-06 4.3.7(3)}

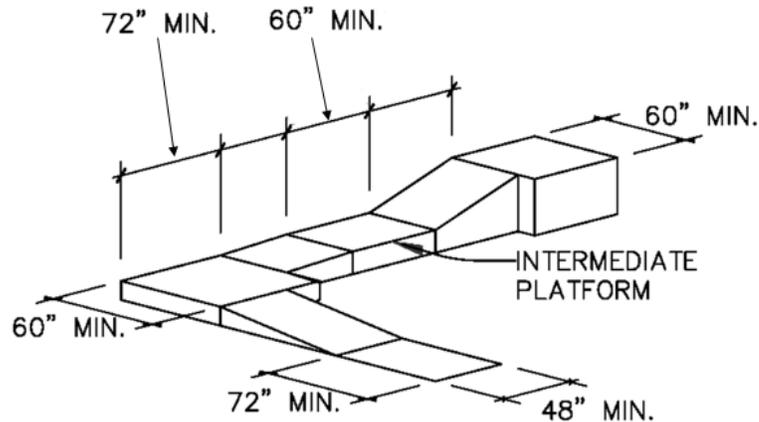


- There are special allowances for ramp running slopes at a historic property/historical resource with an approved design exception. Discuss these cases with your designer. {DIB 82-06 4.3.7(4)}
- Curved ramps must conform to the same running and cross slope requirements as straight ramps. Alternative methods to smart levels must be used for verification of running slopes on such features. {DIB 82-064.3.7}

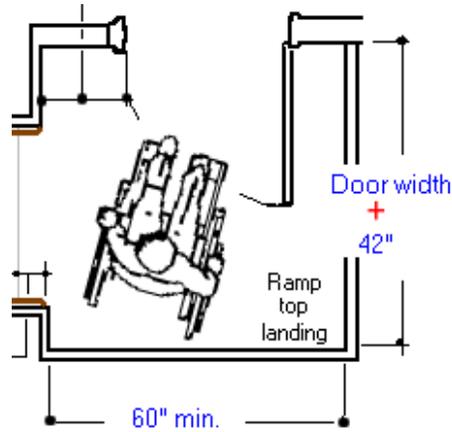


PERMANENT PEDESTRIAN FACILITIES ADA COMPLIANCE HANDBOOK

- Ramps with greater than 5.0 percent running slope and a minimum of 30-inch rise must have landings at the top and bottom of each ramp run (see schematic below).* {DIB 82-06 4.3.7(1)}
 - ***Exception** – Landings are not required when the ramp is within a sidewalk which is adjacent to existing street or roadway.
- Ramp landings must not exceed a maximum 2.0 percent slope in either direction (see schematic below). {DIB 82-06 4.3.13}
- Ramp landing width must be at least as wide as the widest ramp leading to the landing. Ramp’s top landing width must be a minimum of 60 inches (see schematic below). {DIB 82-06 4.3.13(2) & (4)}
- Ramp landing clear length must be a minimum of 60 inches in general. Ramp’s bottom landing clear length must be a minimum of 72 inches (see schematic below). {DIB 82-06 4.3.13(3)}
- Changes in direction ramp landings shall be a minimum of 60 inches by 72 inches with the longer dimension oriented parallel to the top ramp run (see schematic below). {DIB 82-06 4.3.13(5)}



- If a door swings onto a ramp landing, the landing depth must be a minimum of the door width plus 42 inches.



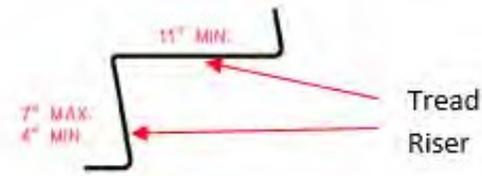
- A 2 inch minimum curb or barrier is required along the ramp length.* {DIB 82-06 4.3.12}



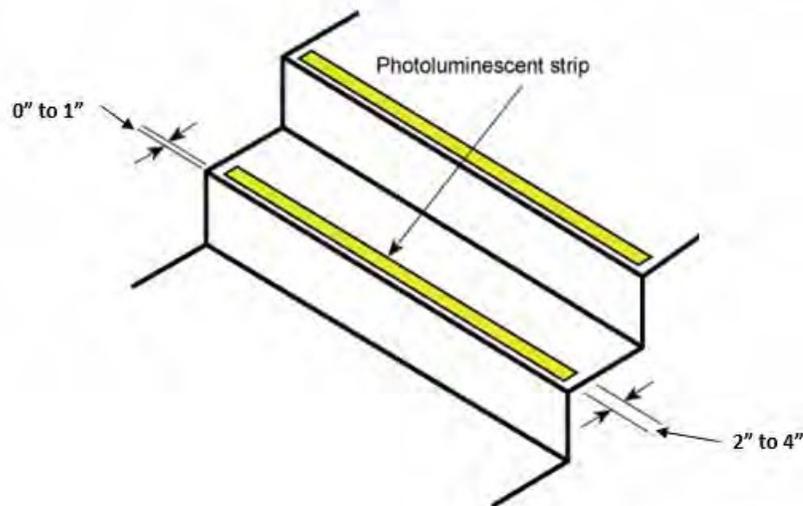
- ***Exception** – A curb or barrier is not required where a guard or handrail is provided with a guide rail centered 2 inches minimum and 4 inches maximum above the surface of the ramp.

Stairs:

□ Stair steps should have uniform riser height and tread depth. Risers should be 4 to 7 inches in height. Treads should be a minimum of 11 inches deep. Open risers should not be used.



□ Visual contrast strips should be placed on stair treads. Strip to be 2 to 4 inches in depth and be placed no more than 1 inch from nosing. Strip to be full width of the step. Exterior locations require strips on all stair treads. Interior locations require strips on the lowest tread and the edge of the upper approach.



Handrails:

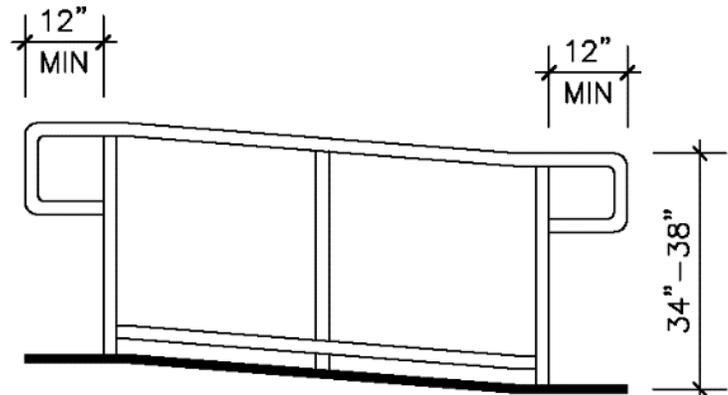
□ Handrails are required at ramp runs and stairs with rises greater than 6 inches. Handrails are not required on curb ramps or along sidewalks. {DIB 82-06 4.3.10(1)}

□ Handrails must be continuous and the full length of each stair flight or ramp run. Inside handrails on switchback or dogleg stairs or ramps shall be continuous between flights and runs. {DIB 82-06 4.3.10(2)}



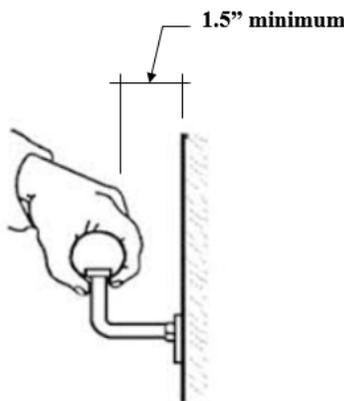
□ Handrails must extend a minimum of 12 inches beyond the ramp run or stairs. {DIB 82-06 4.3.10(8)}

□ Top of handrail gripping surface shall be mounted 34 inches through 38 inches above the ramp, stair or walking surface. {DIB 82-06 4.3.10(5)}



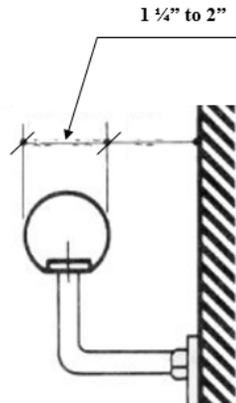
□ Handrail gripping surface shall be continuous. {DIB 82-064.3.10(4)}

□ Clearance between handrail gripping surfaces and adjacent surfaces shall be a minimum of 1.5 inches. {DIB 82-064.3.10(3)}

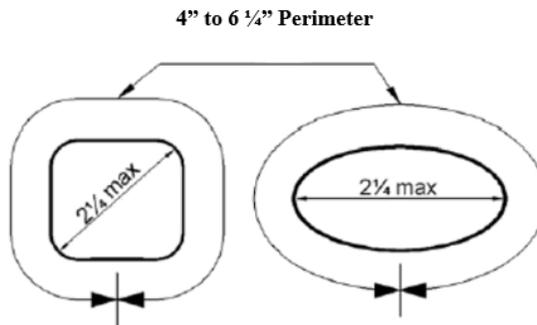


□ Handrails shall not rotate within their fittings. {DIB 82-06 4.3.10(6)}

- Handrail gripping surfaces with a circular cross section shall have an outside diameter of 1.25 inches minimum and 2.0 inches maximum. {DIB 82-06 4.3.10(7)}

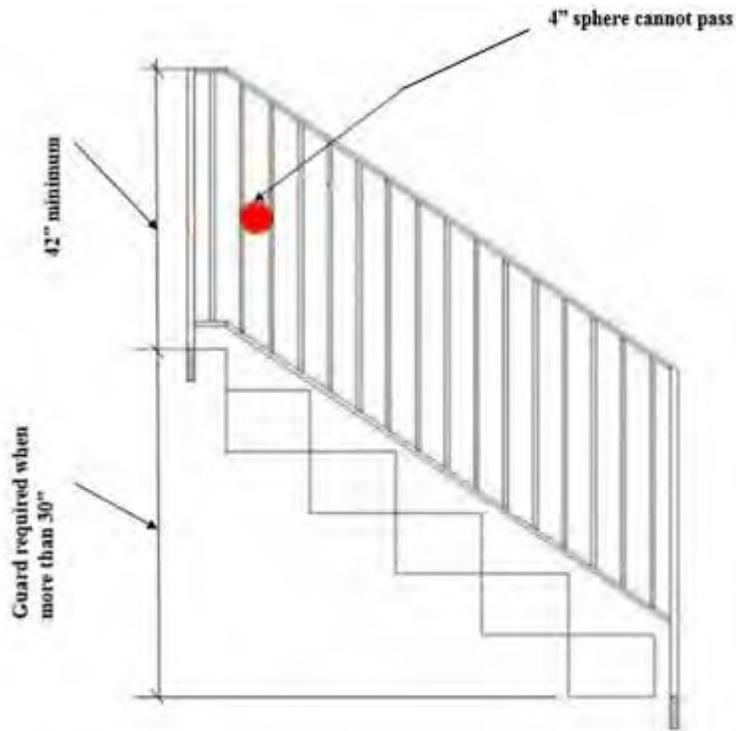


- Handrail gripping surfaces with a non-circular section shall have perimeter dimensional constraints of 4.0 inches minimum and 6.25 inches maximum, as well as a maximum cross-section dimension of 2.25 inches. {DIB 82-06 4.3.10(7)}



Guards:

- Guards are required along open-sided walking surfaces, including mezzanines, equipment platforms, stairs, ramps and landings that are more than 30 inches vertically from the floor or grade and within 36 inches horizontally to the edge of the open side. {DIB 82-06 4.3.11(3)}
- Guard height is a minimum of 42 inches measured from the walking or ramp surface (on stairs measured from the leading edges of the tread nosing). {DIB 82-06 4.3.11(4)}
- Guards shall not have openings that allow passage of a 4-inch diameter sphere from bottom to the top of the guard. {DIB 82-06 4.3.11(5)}



Pedestrian Push Buttons and Accessible Pedestrian Signals Checklist

□ Pedestrian push button (PPB) should be unobstructed and adjacent to a level (2.0 percent maximum)*, all-weather surface to provide access from a wheelchair. [Inspection Report – Field Verify] { *California Manual on Uniform Traffic Control Devices* [CA-MUTCD] – Section 4E.08 04-A }

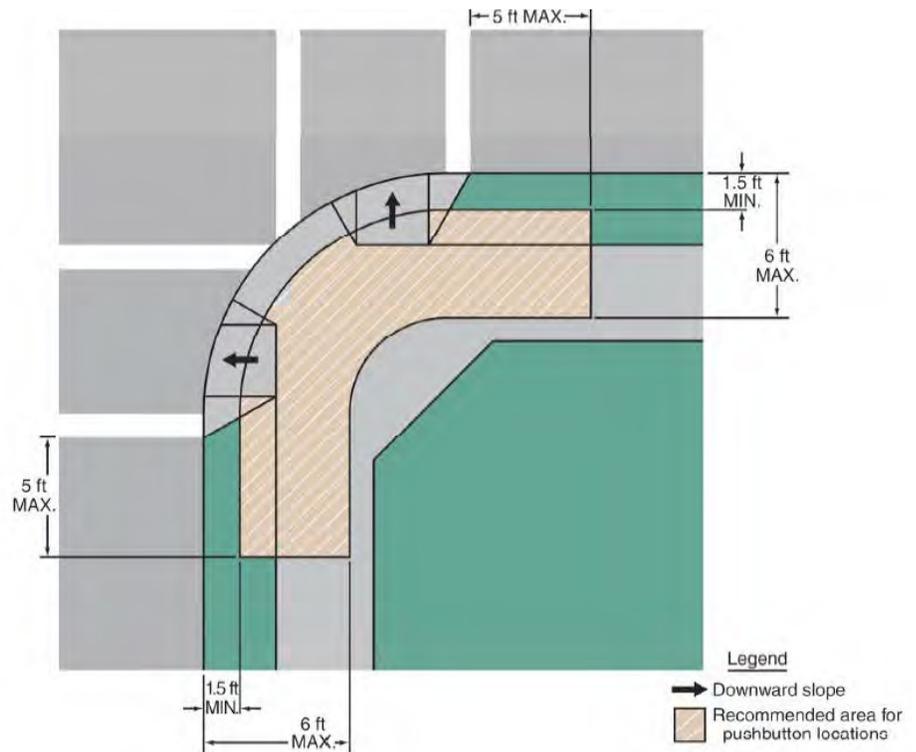
□ ***Exception** – If impractical to place the PPB adjacent to a level all-weather surface, the surface should be as level as feasible. { *CA-MUTCD* – Section 4E.08 05 }

□ Where there is an all-weather surface, provide a wheelchair accessible route from the push button to the ramp. { *CA-MUTCD* – Section 4E.08 04-B }

□ PPB located between the edge of the crosswalk line (extended), farthest from the center of the intersection and the side of a curb ramp (if present), but not greater than 5 feet from said crosswalk line (Refer to Figure 4E-3 of the *California MUTCD* in the absence of project details). { *CA-MUTCD* – Section 4E.08 04-C }

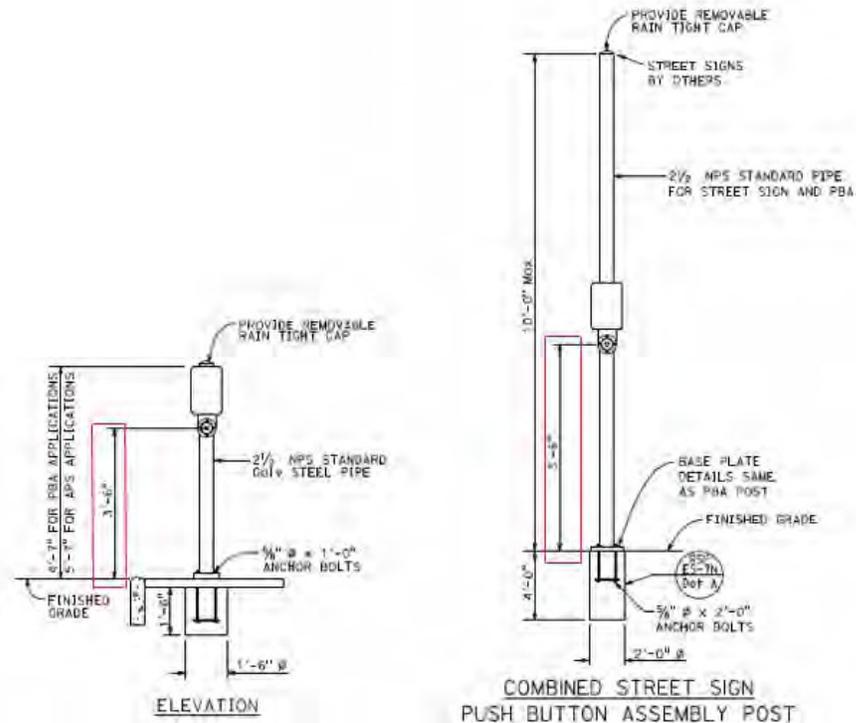
□ PPB is located from 1.5 feet to 6 feet* from the edge of the curb, shoulder, or pavement (see right or refer to Figure 4E-4 of the *California MUTCD* in the absence of project details). { *CA-MUTCD* – Section 4E.08 04-D }

□ ***Exception** – If impractical to meet these distances, it should not be farther than 10 feet from the edge of curb, shoulder or pavement (discuss these situations with your designer). { *CA-MUTCD* – Section 4E.08 06 }



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- PPB mounting height approximately 3 feet 6 inches, but no more than 4 feet above the sidewalk/all-weather surface. [Inspection Report – Field Verify] {CA-MUTCD – Section 4E.08 04-F and Revised Standard Plan ES7A}



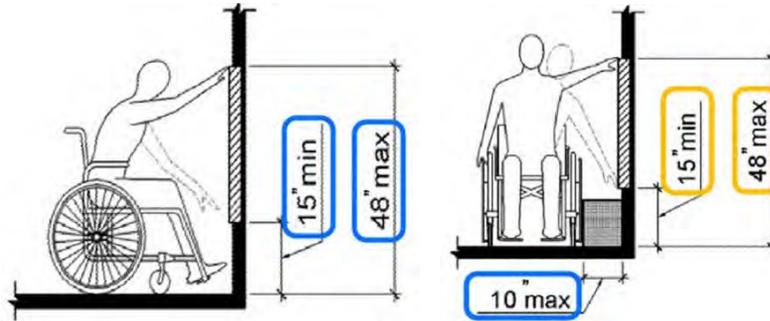
- Face of the PPB is to be mounted parallel to the crosswalk direction it serves. {CA-MUTCD – Section 4E.08 04-E}



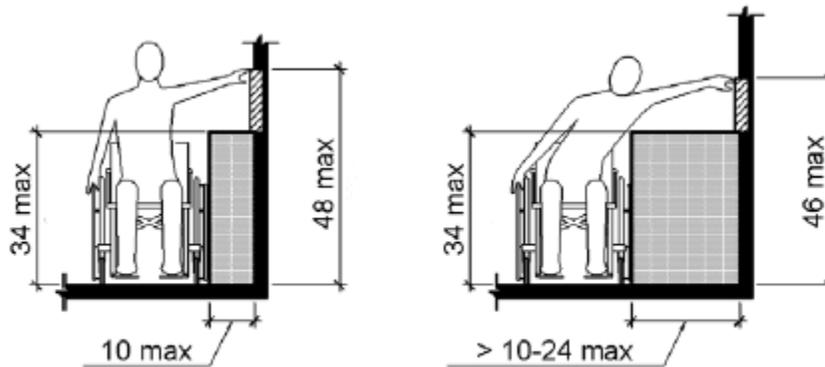
- Where two PPB are provided on the same corner of a signalized locations, the push buttons should be separated by at least 10 feet.* {CA-MUTCD – Section 4E.08 07}
- ***Exception** – If impractical to provide the 10 feet minimum separation, PBBs may be placed closer together or at the same pole location (discuss this situation

with your designer as there will be additional requirements). {CA-MUTCD – Section 4E.08 08}

- Unobstructed forward and side reaches should be 15 inches minimum and 48 inches maximum. A side reach obstruction is allowable if it does not exceed 10 inches maximum in either height or width. [Inspection Report – Field Verify] {DIB 82-06 4.3.15(1) & (2)}



- Obstructed high side reach – Where a clear floor or ground space allows a parallel approach to an element and the high side reach over an obstruction, the height of the obstruction shall be 34 inches maximum and the depth of the obstruction shall be 24 inches maximum. The high side reach shall be 48 inches maximum for a depth of 10 inches maximum. Where the depth exceeds 10 inches, the high side reach shall be 46 inches maximum for a reach depth of 24 inches maximum. {DIB 82-06 4.3.15(3)}



Parking Facilities

General:

- Accessible parking spaces that serve a particular building or facility shall be on the shortest accessible route from adjacent parking to an accessible entrance. [Inspection Report – Field Verify] {DIB 82-06 4.3.17}
- Accessible parking spaces that serve more than one accessible entrance shall be dispersed and located on the shortest accessible route to the accessible entrances. {DIB 82-06 4.3.17}
- In parking facilities that do not serve a particular building or facility, accessible parking spaces shall be on the shortest accessible route to an accessible pedestrian entrance of the parking facility. [Inspection Report – Field Verify] {DIB 82-06 4.3.17}

Off-Street Parking:

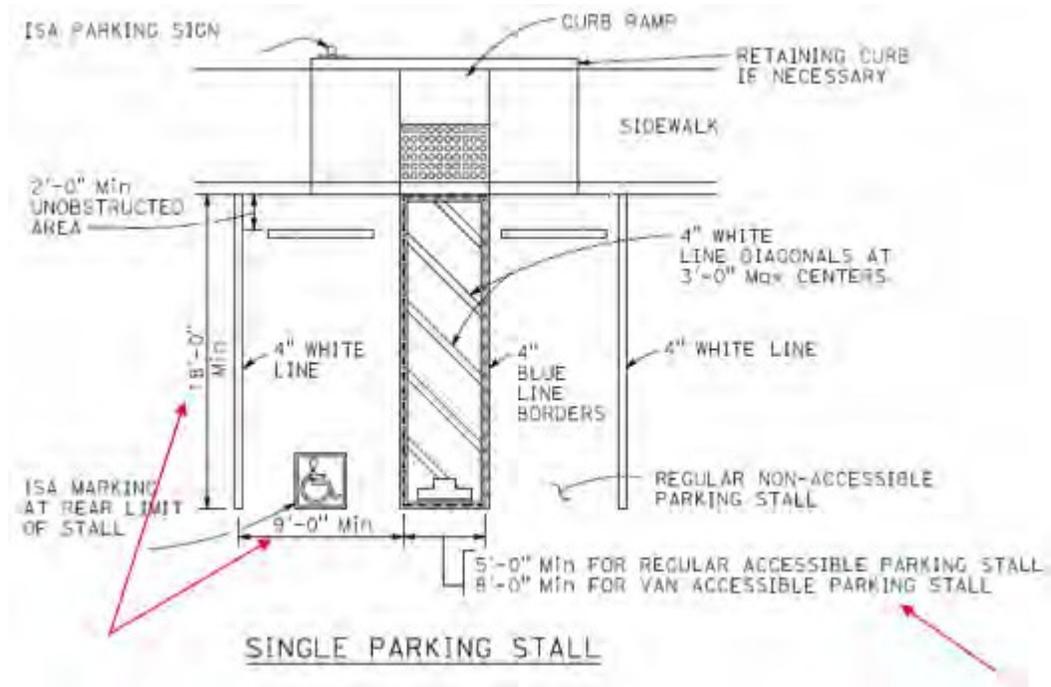
- For off-street accessible parking spaces, there is a minimum number of required accessible parking spaces based on the total number of parking spaces provided in the parking facility. [Inspection Report – Field Verify] {DIB 82-06 4.3.17 (1)}

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1-25	1
26-50	2
51-75	3
76-100	4
101-150	5
151-200	6
201-300	7
301-400	8
401-500	9
501-1,000	See Note 1
1,001 and over	See Note 2

Notes:

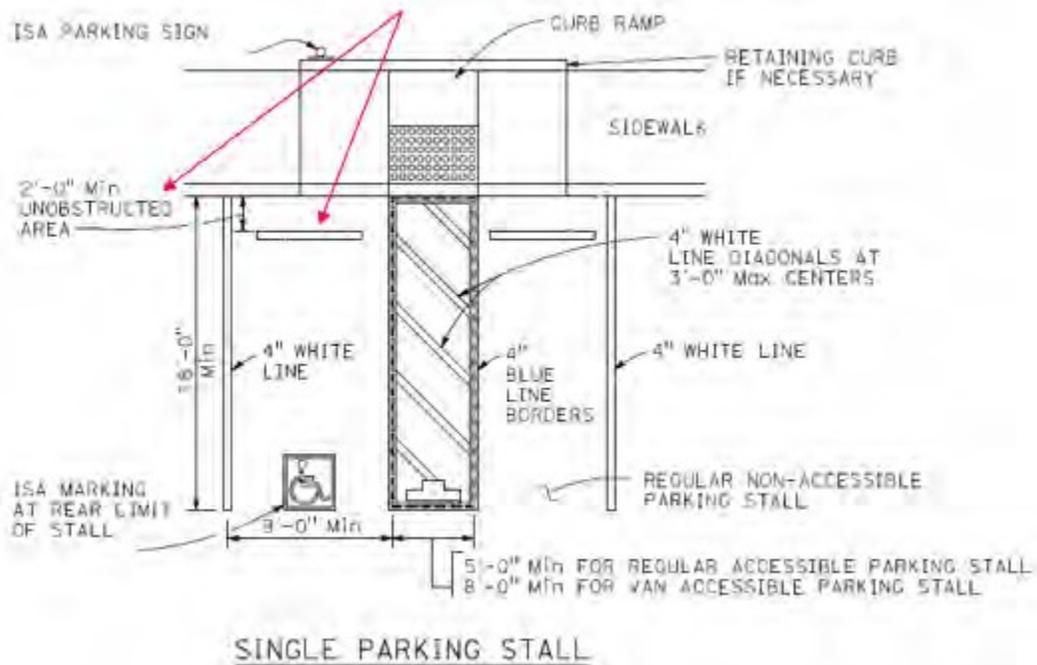
1. Two percent of total.
2. Twenty plus one for each 100, or fraction thereof, over 1,000.

- For off-street accessible parking spaces, one of every six accessible parking spaces must be a van accessible parking space. If there is only one accessible parking space provided, it needs to be a van accessible parking space. [Inspection Report – Field Verify] {DIB 82-06 4.3.17 (2)}
- For off-street accessible parking, the minimum parking space length is 216 inches measured from the front of the parking stall to the end of the stall marking stripe for straight parking stalls (see next page). For diagonal parking stalls, refer to Standard Plan A90A detail for “Diagonal Double Parking Stalls.” [Inspection Report – Field Measurement] {DIB 82-06 4.3.17 (3)}



- For off-street accessible parking, the minimum parking space width is 108 inches for cars (see above). The same 108-inch minimum width is allowed for van accessible parking spaces when a minimum 96 inch wide accessibility aisle is provided to the right (vehicle facing forward) of the van accessible parking space. If the minimum 96-inch wide accessibility aisle is not met, the minimum width of a van accessible space is 144 inches. [Inspection Report – Field Measurement] {DIB 82-06 4.3.17(3)}
- For off-street accessible parking a 60-inch minimum width accessibility aisle is required for cars and a 96-inch minimum width accessibility aisle is standard for vans unless a wider parking space is provided (see above). [Inspection Report – Field Measurement] {DIB 82-06 4.3.17(4)}

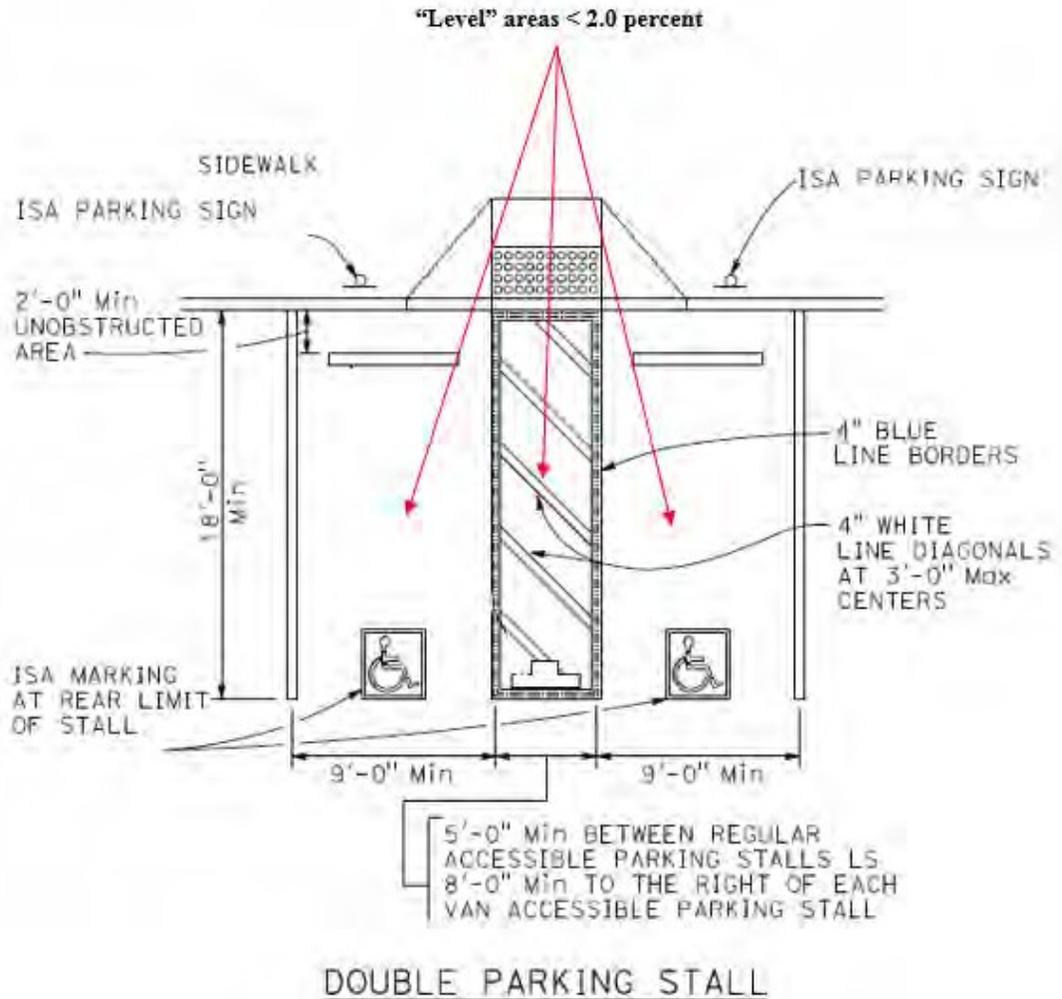
- For off-street accessible parking, each parking stall shall provide a curb or parking bumper if required to prevent encroachment of vehicles over the required clear width of walkways. Where bumpers are used, a minimum of 2 feet unobstructed area is required between the curb and the bumper (see below). [Inspection Report – Verify] {DIB 82-06 4.3.17}



- For off-street accessible parking, stalls shall be located so that persons with disabilities are not compelled to wheel or walk behind parked vehicles other than their own. [Inspection Report – Verify] {DIB 82-06 4.3.17}

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- For off-street accessible parking, spaces and accessibility aisles shall be level with surface slopes less than 2.0 percent maximum (see below). [Inspection Report – Verify] {DIB 82-06 4.3.17 (5)}



□ Off-street parking signs shall include sign R100B (CA) posted at a conspicuous place at each entrance to the parking facility or immediately adjacent to and visible from each accessible stall. The sign shall include the address where the towed vehicle may be reclaimed and the telephone number of the local traffic law enforcement agency. [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90A}



SIGN R100B (CA)

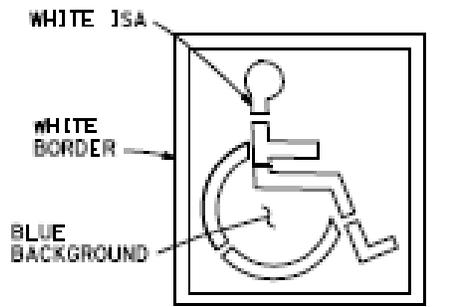
□ Off-street parking signs shall include sign R99C (CA) or R99 (CA) with Plaque R99B (CA) at each accessible stall. For van-accessible spaces, sign R7-8b shall be added. Regardless of sign configuration, the lowest sign edge at each stall shall provide a minimum of 84 inches clearance from the highest surrounding surface. [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90A}



SIGN R99C (CA)

SIGN R99 (CA)

PLAQUE R99B (CA)

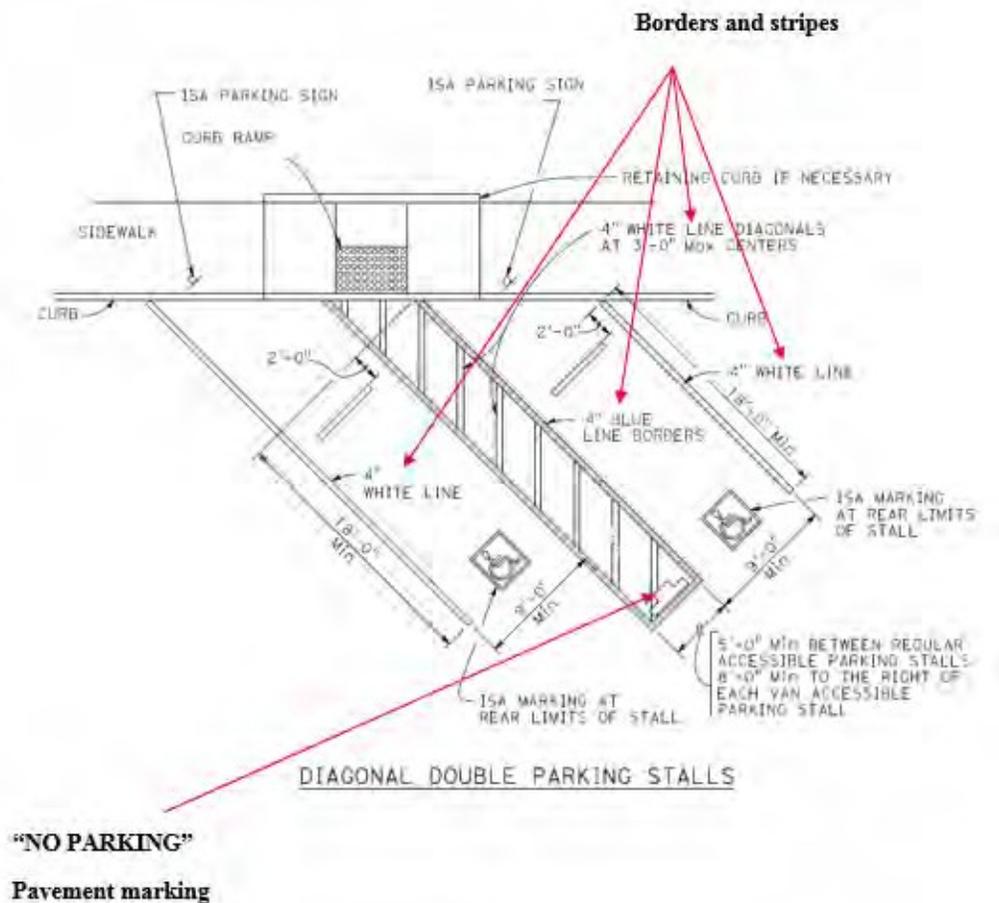


[ISA MARKING
See Standard Plan A24C

DETAIL A

□ For off-street accessible parking stalls, include the International Symbol of Accessibility (ISA) marking (see Standard Plans A90A and A24C) with white border, blue background and white ISA. Place in each accessible parking stall at the rear limit and centered in the width of the stall. [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90A}

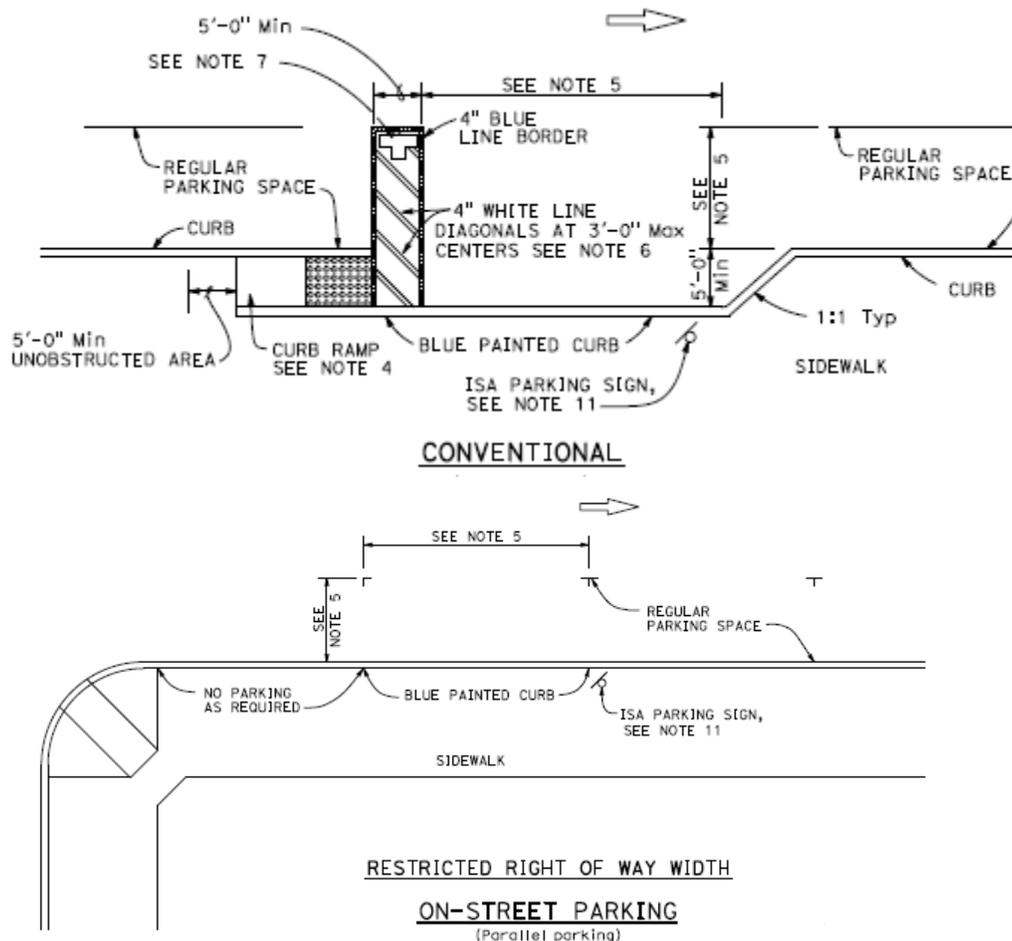
□ For off-street accessible parking stalls, include 4 inch white lines on stall edges, excluding those edges at accessibility aisles (see below). [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90A}



- For accessibility aisles, include 4-inch blue line borders and 4-inch white* line diagonals at 36 inch maximum centers. *Blue paint, instead of white paint diagonals may be used for marking accessibility aisles in areas where snow may cause white marking visibility concerns (see previous page). Include the words “NO PARKING” in white letters no less than 12 inches high within and at the traffic end of accessibility aisles (see Standard Plan A90A for location and A90B and A24E for pavement marking details). [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90A}
- Curb ramps and DWS are compliant and do not to encroach into accessible parking spaces or accessibility aisles. [Inspection Report – Verify] {DIB 82-06 4.3.17}

On-Street Parking:

- Accessible parking spaces shall be located so that persons with disabilities are not compelled to wheel or walk behind parked vehicles other than their own (see Standard Plan A90B for “conventional” or “restricted right-of-way width” cases). [Inspection Report – Verify] {DIB 82-06 4.3.17}



- Surface slopes of accessible parking spaces shall be the minimum feasible. [Inspection Report – Verify]
- Installation of required ISA signage, R99 (CA) and R99B (CA) or R99C (CA), must provide a minimum of 84 inches of clearance from the lowest edge of sign to the highest surrounding surface. [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90B }
- Accessible spaces must be a minimum of 240 inches in length and 96 inches in width unless the local jurisdiction calls for larger minimums. [Inspection Report – Measurement] {Standard Plan A90B }
- Curbs at accessible spaces shall be painted blue. [Inspection Report – Verify] {DIB 82-06 4.3.17 and Standard Plan A90B }
- Accessibility aisles shall be a minimum of 60 inches in width and shall be marked with 4-inch blue line borders and 4-inch white line diagonals at 36-inch maximum centers. Blue paint, instead of white paint diagonals may be used for marking accessibility aisles in areas where snow may cause visibility issues. Include the words “NO PARKING” in white letters no less than 12 inches high within and at the traffic end of accessibility aisles (see Standard Plans A90B and A24E for location and pavement marking details). [Inspection Report – Measurement/Verify]{DIB 82-06 4.3.17 and Standard Plan A90B }
- There shall be no obstructions on the sidewalk adjacent to and for the full length of the accessible parking space, except for the ISA parking sign. {Standard Plan A90B }
- If the “restricted right-of-way width” detail is used and it conflicts with a bus stop or other uses, the detail may be applied to the other end of the block. Discuss this situation with your designer. {Standard Plan A90B }

Special Locations

Bus Stops:

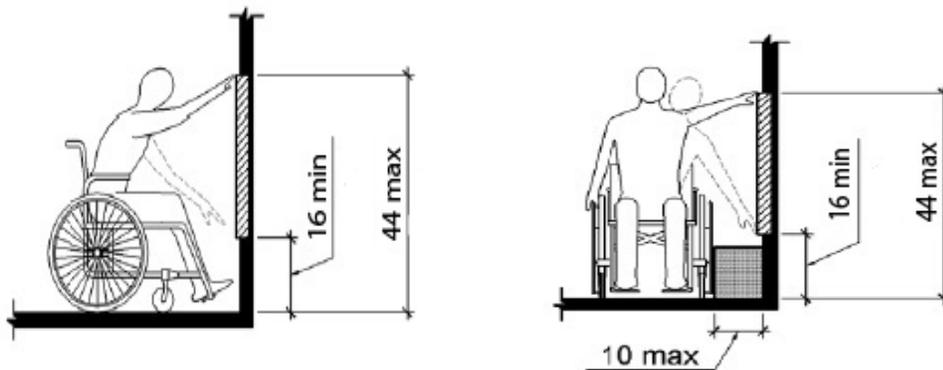
- Boarding and alighting areas shall provide a clear length of 96 inches minimum, measured perpendicular to the curb or vehicle roadway edge, and a clear width of 60 inches minimum, measured parallel to the vehicle roadway. {DIB 82-06 4.3.16(1)}
- Where provided, new or replaced bus shelters shall be installed or positioned to permit a wheelchair or mobility aid user to enter from the public way and to reach a location, having a minimum clear floor area of 30 inches by 48 inches, entirely within the perimeter of the shelter. {DIB 82-06 4.3.16 (2)}
- Boarding and alighting areas shall be connected to streets, sidewalks, or pedestrian paths by an accessible route. Newly constructed bus stop pads shall provide a square curb transition between the pad and roadway elevations or detectable warnings. Caltrans Type A or B curb will satisfy the square curb requirement (See Standard Plan A87A). {DIB 82-06 4.3.16 (3)}
- Parallel to the roadway, the slope of the boarding and alighting area shall be the same as the roadway, to the maximum extent practicable. Perpendicular to the roadway, the slope of the boarding and alighting area shall not be steeper than 2.0 percent. {DIB 82-06 4.3.16 (4)}

Railroads:

- Where an accessible path crosses railroad tracks, the openings for wheel flanges shall be permitted to be 2.5 inches maximum. [Inspection Report – Field Verify] {DIB 82-06 4.3.6(2)}

Exhibits:

- Pedestrian facilities that are part of non-motorized transportation facilities may include vertical exhibit panels, wayside exhibit panels, and touchable exhibits. These exhibits have special forward and side reach requirements in DIB 82-06. Unobstructed forward reach for exhibits shall not exceed a maximum high forward reach of 44 inches or a minimum low forward reach of 16 inches above the finished surface. Unobstructed side reach for exhibits shall not exceed a maximum high side reach of 44 inches or a minimum low side reach of 16 inches above the finished surface. {DIB 82-06 4.3.15(4) & (5)}



Special Considerations

Pre- Postconstruction Surveys:

□ Projects may include a pre-postconstruction survey bid item for certain permanent pedestrian facilities, such as non-standard plan curb ramps. When used, the summary of quantities plan sheet will identify which individual facilities will require the surveys. These surveys must be performed by a California licensed surveyor or California registered engineer.

The required documentation for the postconstruction survey needs to capture the slopes and dimensions for each element of the facility. A minimum of three measurements are to be recorded for slopes and dimensions of each element. These may be captured and submitted in any format as determined by the surveyor/engineer and include their professional stamp. Specification changes are planned that would require that this information be placed on a corresponding inspection report for the corresponding facility. Regardless, these facilities will still require spot verification by Caltrans field staff to ensure that contract and ADA compliance has been attained. The contractor's submitted postconstruction survey can be used to supplement verification inspection, but cannot replace verification inspection and certification by Caltrans.

Intersections Without Yield or Stop Control:

□ Intersections without yield or stop control receive special consideration as vehicular traffic may not always reduce speed at such locations. Common signalized intersections with three-phase control (red, yellow, green) are considered to be an intersection without yield or stop control as vehicles travelling through the intersection with a "green" signal may not reduce speed. In contrast, signalized intersections with either flashing yellow or flashing red are considered intersections with yield or stop control respectively, the same is true for intersections signed with yield or stop signs.

It may also be possible that an intersection contains yield or stop control in one direction, but does not have yield or stop control in another direction (for example, at rural road crossing of highway). This will affect the ADA compliance requirements for the pedestrian facility traversing the intersection. {see DIB 82-06 4.3.5, Figure 4.3.5 – Cross Slope Examples }

From: [Jacob Patterson](#)
To: [Gonzalez, Joanna](#)
Cc: [Miller, Tabatha](#); [Lemos, June](#); [O'Neal, Chantell](#)
Subject: Public Comment -- 4/14/21 PC meeting, Item No. 6A, CDP 3-20 (1 of 2)
Date: Monday, April 12, 2021 2:48:04 PM

Joanna,

Here is another public comment for CDP 3-20. Concerning Coastal General Plan Policy OS-5.2, page 6 of the new staff report states "the sidewalk improvements shown between East Chestnut Street and Maple Street may result in the loss of some trees and tree wells located in this area along the northbound side of SR 1." However, the staff report completely fails to analyze or address how the project is consistent with this applicable policy, probably because the project is not consistent with it.

Policy OS-5.2: *To the maximum extent feasible* and balanced with permitted use, *require* that site planning, construction, and maintenance of development *preserve existing healthy trees* and native vegetation on the site. (emphasis added)

The staff report acknowledges that the project proposes to remove existing vegetation at various locations but there is no evidence that any of the vegetation stated for removal (other than the existing, apparently healthy trees next to Rite Aid) meets the criteria for protection because none of that vegetation has been identified as native vegetation. As such, the only significant issue and inconsistency is the potential removal of the trees just north of Chestnut Street. The issue that must be analyzed as part of this project review is to determine if it is feasible to retain those existing trees yet no such feasibility analysis has been performed by the applicant or the City. That is not permitted. Luckily, I have determined that it is indeed feasible to retain these trees and still accomplish the project objectives because the existing tree wells are more than six feet away from the raised curbs at the east side of the parkway, meaning that there is and will be a full six feet of unobstructed sidewalk that can provide more than the required 48" of accessible flat travel path next to the planting wells where the trees are located, as shown in the photos below.

Although Special Condition #6 is a fine idea to facilitate compliance with CLUDC section 17.34.070, it is not sufficient to ensure that this project is consistent with Policy OS-5.2. An additional special condition must be added to require the retention of the existing trees along the east side of SR1 for the one block north of Chestnut Street (i.e., in front of Rite Aid) because it is feasible to retain them and still construct a fully compliant sidewalk up to six feet wide, which is in excess of the 48" minimum width required by the ADA.



(I will also submit a video file that more clearly demonstrates that the measurements show at least six feet in width and that the tape measure was not moved between the wide shot and close-up.)

Regards,

--Jacob

From: [Jenny Shattuck](#)
To: [CDD User](#); [Gonzalez, Joanna](#)
Subject: Public comment cpu 30-20
Date: Wednesday, April 14, 2021 11:26:40 AM

These pictures show the very inaccessible intersection at Cypress and Main that I referenced in my previous letter. If you have not visited this site, I urge you to do so. Having someone in a wheelchair with you might help bring to light the difficulties in even small details, like the inability to reach or push the traffic control buttons to safety cross Main st.

This was supposed to be included in this project and a special condition that it is included should be made. This includes the area between Oak st and the Chamber of commerce visitor center as well. It is inaccessible and I have watched people cross or walk into into traffic lanes to access with small children and strollers.

As someone with disabilities of my own, I support what Access Fort bragg requested in the comments from the last meeting.

Thank you for all your hard work and dedication to our community.

Jenny Shattuck
Fort Bragg

Cypress St









From: [Jacob Patterson](#)
To: [Gonzalez, Joanna](#)
Cc: [O'Neal, Chantell](#); [Smith, John](#); [Miller, Tabatha](#)
Subject: Public Comment re recommended CEQA determination for CDP 3-20 (4/14/21 PC meeting)
Date: Tuesday, April 13, 2021 12:51:58 PM

Planning Commission,

I have an additional public comment concerning CDP 3-20. After reviewing Annemarie's public comment objecting to the City's intended reliance on a Class 1 categorical exemption from further environmental review under CEQA, I thought I would elaborate on her position a bit because I think her position presents a fair argument that CEQA review may actually be necessary for this project for the reasons she suggests but also concerning the potential removal of existing street trees in front of Rite Aid, which also presents a potentially significant impact of the project. (Please note I am not attempting to speak for or represent Annemarie in any way, only sharing my personal opinions in response to reading her public comments.) Annemarie's objections concern the retaining walls and new sidewalk segments near the Boatyard Center, which also potentially applies to the new retaining wall and sidewalk segment near the Century 21 building between Spruce and Elm Streets. Unlike some of the other proposed work, these proposed facilities are entirely new and do not constitute existing facilities covered by the Class 1 categorical exemption.

In general, Class 1(c) categorical exemptions include the following types of existing facilities:

CLASS 1: EXISTING FACILITIES

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of an existing use.

(c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purpose of public safety).

Class 1(c), in combination with Classes 1(d) and (f) and Class 2, includes the following:

1. Cleaning and other maintenance of all facilities.
2. Resurfacing and patching of streets.
3. Street reconstruction within existing curb lines.
4. Replacement of existing drainage facilities.
5. All work on sidewalks, curbs and gutters without changes in curb lines, including lowering of curbs for driveways, and additions of sidewalk bulbs when not in conjunction with a program for extensive replacement or installation.
6. Replacement of stairways using similar materials.
7. Repair and replacement of bicycle ways, pedestrian trails, and dog exercise areas, and signs so designating, where to do so will not involve the removal of a scenic resource. (Creation of bicycle lanes is covered under Class 4(h).)
8. Replacement of light standards and fixtures, not including a program for extensive replacement throughout a district or along an entire thoroughfare.

9. Changes in traffic and parking regulations, including installation and replacement of signs in connection therewith, where such changes do not establish a higher speed limit along a significant portion of the street and will not result in more than a negligible increase in use of the street.
10. Installation and replacement of guide rails and rockfall barriers.
11. Installation and removal of parking meters.
12. Painting of curbs, crosswalks, bus stops, parking spaces and lane markings, not including traffic rechannelization.
13. Installation, modification and replacement of traffic signals, where no more than a negligible increase in use of the street will result.
14. Replacement of transit vehicle tracks and cable car cables, with no alteration of grade or alignment.
15. Rechannelization or change of traffic direction, where no more than a negligible increase in use of the street will result.
16. Installation of security fencing and gates.

Upon consideration of Annemarie's comments, the issue with this project is that although some of the proposed work arguably involves repair, maintenance, or replacement of existing facilities and would therefore be covered by a Class 1 exemption, some of the proposed work involves the installation of entirely new facilities where none existed before. The most prominent example is the new sidewalk and retaining wall along SR1 in front of the Boatyard Center north from the Highway 20 intersection with SR1. This entirely new retaining wall doesn't fit into the Class 1(c) categorical exemption for existing facilities because no pedestrian facilities or retaining walls exist at that location, which is also a very prominent southern entrance to our town. This retaining wall presents concerns about potentially significant impacts in a variety of areas Annemarie mentioned in her comments, including but not limited to aesthetic impacts to our southern gateway that may need to be mitigated to reduce their significance. As such, the applicant's and consultant's recommendation that the City can rely on a Class 1 categorical exemption for this entire project is misplaced and the City should perform at least an Initial Study, if not prepare a Mitigated Negative Declaration focused on the potentially significant impacts of the proposed work that constitute new rather than existing facilities prior to considering this project for approval.

Best regards,

--Jacob

Albion Bridge Stewards

A working group of the Albion Community Advisory Board

P.O. Box 363
Albion, CA 95410

By Electronic Mail

jgonzales@fortbragg.com

April 14, 2020

Chair Jeremy Logan
and Commissioners
Planning Commission
City of Fort Bragg
416 N Franklin Street
Fort Bragg, CA 95437
Attn.: Ms. Joanna Gonzalez
Administrative Assistant, Community Development Department

RE: ITEM 6A, PLANNING COMMISSION MEETING, APRIL 14, 2021
(COASTAL DEVELOPMENT PERMIT APPLICATION 3-20, CALTRANS)

Dear Chair Logan and Commissioners,

Thank you for this opportunity to comment on the Caltrans application to the City of Fort Bragg for Coastal Development Permit 3-20 (CDP), which is before you for public hearing this evening. As you know, notice of the City staff report and materials for this hearing was posted at about 2 pm on Sunday, April 11, 2020, which has left an insufficient time of two work days for public review and analysis of them prior to today, and for preparation of comments.

Request. For the reasons discussed below, we respectfully request the Planning Commission to deny the CDP application, *or, in the alternative*, require that an Environmental Impact Report (and also an Environmental Impact Statement, if the project involves federal funding) on the Caltrans project be prepared and circulated for public review.

To be clear from the start, we support full City – and Caltrans - compliance with the Americans with Disabilities Act of 1990, as amended (ADA), the federal regulations that implement it (collectively, the ADA requirements), and other applicable laws.

The Albion Bridge Stewards are a voluntary association of (in alphabetical order) active citizens, artists, business owners, professionals, property owners, residents, retirees, students, teachers, visitors, and workers in Albion, Mendocino County, and elsewhere in California, North America, and on other continents. We actively engage for the preservation of the historic(al) Albion River Bridge, other sustainable infrastructure, and their natural and sustainable built environmental context, including through:

Website: <http://albioncab.wordpress.com>
Email: acab@mcn.org



(a) full public agency disclosure and analysis of:

- (1) all proposed development project components, as required by adopted requirements of the regulatory agency or agencies;
- (2) potential direct and cumulative significant impacts of development projects on the physical environment, as required by the California Environmental Quality Act (CEQA) and the United States National Environmental Protection Act (NEPA);
- (3) all proposed mitigation measures, including through a site-specific, transparent, and enforceable monitoring-reporting plan, that the applicant or the regulating agency propose to reduce identified potential significant impacts to below a level of defined significance, consistent with *Sundstrom v Mendocino County*, and,

(b) rigorous analysis of, and findings regarding, proposed project compliance with all germane certified LCP, Coastal Act, and as applicable (e.g., where a project involves federal funding), US Department of Commerce -approved California Coastal Management Program regulatory requirements and standards.

1. Inadequate Notice. Notice on Sunday afternoon, April 11, 2021, of the revised staff report on CDP application 3-20 – two working days before the scheduled public hearing – is inadequate to meet the recognized public right in Coastal Act section 30006 to full participation in decisions affecting coastal planning, conservation, and development; achievement of sound coastal conservation and development through public understanding and support; and the widest opportunity for public participation. In adopting the LCP for transmittal to the Coastal Commission for certification, the City certified that the local coastal program is intended to be carried out in a manner fully in conformity with the Coastal Act. We respectfully request that the Planning Commission comply with section 30006 before it hears and potentially acts on CDP application 3-20.

2. The Caltrans Project Description and Plans. First, the 7-line Caltrans project description text is by its own admission incomplete,¹ and on that basis inconsistent with LCP Zoning Code sections 17.70.040.B (CDP application must comply with City's list of required application contents²) and 17.70.070.A (completeness and accuracy of CDP application required).

¹ "The California Department of Transportation (Caltrans) is applying for a Local Coastal development permit for the Fort Bragg Americans with Disabilities Act (ADA) Improvement project (project). Located in the city of Fort Bragg, the project would upgrade a section of State Route 1 to meet current ADA standards from post miles 59.80 through 62.10, in Mendocino County. The scope of work would **include** reconstructing 1,384 lineal feet of sidewalk, installation of 1,100 lineal feet of new sidewalk, construction of 37-curb ramps, installing a new 741 linear foot retaining wall, performing associated drainage inlet and culvert work, and placing pavement markings at specified locations." (Emphasis added.)

² The City has published the specified list of information required in a CDP application at: <https://city.fortbragg.com/DocumentCenter/View/1281/Coastal-Development-Permit-Brochure--CLUDC-PDF>. The City's submittal requirements germane to the Caltrans project, which Caltrans has not met, consist of (1) a site plan that depicts all involved lots or parcels, with their dimensions, and the location of the landward boundary line of the germane coastal program first road that parallels the sea (for Coastal Act section 30604(c) compliance and exact post-LCP certification appeal area determination), all related driveways, approaches, barriers, parking, and loading areas, the location of germane utilities [here, the stormwater drainage system on which the project proposes to rely], to-scale drawings, identification of all

Second, the Planning Commission agenda (staff) report references project components – such as widening of the Highway 1/Main Street pavement by “7 to 14 feet” – that neither the Caltrans project textual description nor the project “typical” cross sections (e.g., in Typical Cross Section X-1 and X-2) disclose in the context of the specific project components depicted on project plan (“Layout”) sheets L-1 through L-21, as applicable.

3. The Caltrans “ADA” Project. Regrettably, the piecemeal project that Caltrans has presented in its incomplete project plans to the City does not provide continuous, clearly ADA-consistent, sidewalks (e.g., slopes, surface textures and contrast, defined platform boarding edges) along, associated ramps (slopes, counter slopes, flared sides in relation to parking spaces and travel lanes), and pedestrian crossings of Highway 1/Main Street, and on that basis is incomplete, and on its face inconsistent with the mandatory ADA requirements. We respectfully request that the Planning Commission direct City staff to require Caltrans to present a project description that specifically (a) describes the project as a whole, and (b) does so with specifically identified compliance with all germane ADA requirements.

4. Highway 1/Main Street Widening. The Planning Commission agenda (staff) report and the Caltrans project plans disclose that Caltrans proposes new development in and upcoast from the Highway 1/Highway 20 intersection (major retaining wall), in the Highway 1/Main Street intersections adjacent and that lead into the former GP Mill site (cross walk, sidewalks/ramps), and along the west side of Highway 1/Main Street between project stations “229+19.30 and 231+76.40” (widening by 7-14 feet). The agenda (staff) report notes that SR 1 is the only north-south road serving the north coast of Mendocino County, providing a local transportation corridor for many communities and the primary access route for visitors. (Page 4.0.). The agenda (staff) report further generally states - albeit without reference to or analysis of baseline, post-project, and project as a whole traffic data - that “vehicle volumes on SR 1 have increased steadily over the years”. (Id.) The agenda (staff) report - again without reference to or analysis of baseline, post-project, and project as a whole traffic data – concludes that “the proposed improvements will not add additional vehicular traffic on the roadway”, although “SR 1 is a primary thoroughfare through the City of Fort Bragg”.³ (Id.)

tree species and sizes on the project parcels, identification of all trees proposed to be removed, proposed landscaping, potential project implementation phasing, clear renditions of elevations of proposed new sidewalks and retaining walls, a complete title history of Caltrans ownership of the project parcels, a grading plan, and complete drainage and erosion control plan, a construction pollution prevention plan, a stormwater runoff mitigation plan, a geotechnical report for the sites of proposed retaining walls, sidewalks, Highway 1 crossings, and drainage system, all germane documents to support an independent CEQA/NEPA determination by the Planning Commission, evidence of the adequacy of the City street and drainage facility infrastructure to serve the project, and sample project materials.

³ Although the staff report states that this project proposes no additional travel lanes in this project component, and the CDP application fails to present the required cross-section(s) that depict existing and proposed post-project completion conditions and Caltrans plans in the subject area, project Layout Sheet L-19, the proposed widening, if authorized and implemented, would clearly (a) cumulatively increase the impervious surface area in the corridor, and (b) provide the basis for addition of an additional travel lane. However, the agenda (staff) report fails to analyze – or mitigate - the potentially significant adverse effects of the cumulative adverse impacts of this project component on existing City stormwater drainage infrastructure, receiving water quality, and associated protected coastal biological, visual, and pedestrian access resources. On preliminary review, project layout sheet L-19 depicts no continuous sidewalk along the westerly side of highway 1/main Street in this segment.

Planning Commission Chair Jeremy Logan
and Commissioners
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Cumulatively, these development components may likely function, including with other past, current, and future Caltrans projects along Highway 1 between Gualala and South Leggett, to increase traffic average daily trips (ADT's) to the 150% increase over the 2009 baseline ADT conditions that Caltrans advanced, in part, to propose the removal and rehabilitation of the state- and federal-listed historic(al) Albion River Bridge. As a result, the Caltrans self-exemption of the project proposed in the application for CDP 3-20 from CEQA and NEPA environmental review is invalid. We therefore respectfully request that the Planning Commission determine and direct that the required EIR/EIS be prepared to analyze the cumulative (as well as direct) impacts of the project (including of the project as a whole) on the environment and protected historic(al) resources).

5. Coastal Act section 30604(c). The Planning Commission agenda (staff) report altogether omits for Planning Commission and public review the Coastal Act-required analysis and finding of whether the project conforms – in addition to the LCP standards – with the Coastal Act Chapter public access and recreation standards, notwithstanding that (a) staff acknowledges that as a result of the project “traffic could potentially be impacted during construction in turn impacting businesses” (page 4), and (b) fails to analyze the direct and cumulative quantified effects of the project in relation to PRC sections 30210-30224.5.

First, the project is located within the Coastal Commission's identified post-City of Fort Bragg LCP certification appeal jurisdiction by location between the first road that parallels the sea and the sea (as staff the Planning Commission agenda (staff) report generally notes on page 1), which triggers mandatory project review pursuant to Coastal Act section 30604(c).

Second, Coastal Act section 30604(c) requires that “Every coastal development permit issued for any development between the nearest public road and the sea or the shoreline of any body of water located within the coastal zone shall include a specific finding that the development is in conformity with the public access and public recreation policies of [Coastal Act] Chapter 3 (commencing with Section 30200)”.

(Third, the City in transmitting the LCP to the Coastal Commission for certification review certified that LCP implementation would intentionally conform to the Coastal Act.

The Planning Commission and the public do not – and cannot at this late hour – have before them the detailed analysis and finding required by PRC section 30604(c), which renders any potential Planning Commission decision to approve CDP 3-20 inconsistent with both Council's certification at the time of LCP transmittal to the Coastal Commission and the Coastal Act.

6. Speculative Mitigation. The Planning Commission agenda (staff) report relies on what appear - based on the imprecise, in parts open-ended construction (syntax), and variously unmonitored and therefore unenforceable provisions - to be Caltrans-provided “special conditions” 1, 2, 3, 4, 5, 6, 7, 8, and 9 that call for future plans and speculative future project mitigations that the Planning Commission does not have before it, the agenda (staff) report does not – and cannot – analyze at this time for consistency with the LCP and Coastal Act (or pursuant to CEQA and NEPA), and that Caltrans failed for whatever reason(s) to submit to City staff for CDP application review, as required by the LCP Zoning Code. The Court in *Sundstrom v County of Mendocino* prohibited reliance on future plans and speculative mitigation measures to offset potentially significant effects of a project on the environment. We respectfully request the Planning Commission to follow the law.

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and Commissioners
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Thank you for this opportunity to comment during the very short amount of available time since posting of the agenda (staff) report and materials last Sunday.

Respectfully submitted on behalf of the Albion Bridge Stewards:
(by authorized electronic signatures)



Ali van Zee
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Mary Walsh

Mary Walsh
P.O. Box 161, Albion, California 95410



Tom Wodetzki
P.O. Box 187, Albion, California 95410



Maria Hansen
P.O. Box 326, Albion, California 95410

From: [Jenny Shattuck](#)
To: [Gonzalez, Joanna](#)
Subject: Additional comment
Date: Wednesday, April 14, 2021 6:54:35 PM

Can they swap out the east side of cypress st repairs for West side? We were told 2 years ago the west side of cypress would be included in this application as it is most dangerous.

We cant wait 2 more years for this dangerous intersection.

Jenny

From: [Jenny Shattuck](#)
To: [Gonzalez, Joanna](#)
Date: Wednesday, April 14, 2021 6:54:34 PM

How will we access south coastal trail while east of cypress is being worked on? Given only access is from east to dead end sidewalk for those in a wheelchair and no safe access from Oak south ?

Jenny Shattuck