

January 27, 2011

Jeff Blair
Via email: jblair@fsu.edu

Dear Jeff:

Having attended the January 19th Accessibility Code and Law Workshop and having reviewed the data received 1/24/11, we offer the following suggestions for revisions/clarifications of Section 406 Curb Ramps:

406.1 states that curb ramps "...shall comply with 406, 405.2 through 405.5, and 405.10." 405 addresses "Ramps", not specifically "Curb Ramps" and should be clarified; e.g., curb ramps shall not have a running slope steeper than 1:12 (405.2). The allowance for steeper slopes "...for Existing Sites, Buildings and Facilities..." doesn't apply to Curb Ramps.

Advisory 405.2 Slope recommends "...the least possible running slope...". FHWA Guidelines for Accessible Public Rights-of-Way requires a minimum running slope of five percent. This aids in detectability for the visually impaired.

405.4 Floor and Ground Surfaces "... shall comply with 302." The reference would be better to 302.1 since other requirements of 302 are not related to "curb" ramps.

405.5 references to handrails, work equipment, etc. are not really applicable to curb ramps.

406.3 Sides of Curb Ramps requires flared sides for "Curb Ramps located where pedestrians must use them and all curb ramps which are not protected by handrails or guardrails shall have flared sides..." Virtually all curb ramps are used by pedestrians. No curb ramps have handrails or guardrails. The intent of flared sides is to provide transition between approaching sidewalks and the curb ramp. "Approaching sidewalks" in this case means that sidewalks on either side of the curb ramp are, in fact, sidewalks for pedestrian use versus, say, a grass strip or planting area, a common typical section used between the back of curb and a sidewalk. Also, in the latter case, a return curb on each side of the curb ramp should be recommended or required to assist in detection and way-finding for the visually impaired. Further in this regard, provision should be made to require proper alignment of ramps on opposite sides of the pedestrian crossing. Returned curbs are an aide for this purpose.

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406.6 addresses Diagonal Curb Ramps. Despite clear space requirements in the vehicular way at the bottom of such ramps, such ramps actually pose a hazard to disabled users and would be better prohibited entirely. There are few, if any, locations where dual ramps instead of diagonal ramps cannot be made to work. Yes, the cost would be greater but shouldn't preclude the better, safer design.

Thanks for the committee's efforts to improve and preserve the accessibility requirements for Florida's disabled community.

Sincerely,
DONALD W. MCINTOSH ASSOCIATES, INC.


George D. Delaney, P.E.
Vice President/Director of Engineering

GDD/lh