

PBOT

PORTLAND BUREAU OF TRANSPORTATION

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Jo Ann Hardesty Commissioner Chris Warner Director

CITY ENGINEER DIRECTIVE

Number	Supersedes	Effective Date	Cancellation Date
ST 002-04	ST 002-03	July 1, 2021	
Subject		Issuer	
City of Portland ADA Curb Ramp Design Criteria Curb Ramps On or Along ODOT Roadways Criteria for One Diagonal/Two Single Curb Ramps Technical Infeasibility Review and Approval		 Steve Townsen, P.E., City Engineer	

PURPOSE:

Provide clarification and guidance on (a) approvals of variances to the City of Portland ADA curb ramp criteria provided on the ADA Curb Ramp Design Form; (b) ODOT requirements for curb ramps built on or along ODOT roadways; (c) criteria for approval of one diagonal corner ramp in lieu of two single curb ramps at the corner; and (d) technical infeasibility review and approvals.

DIRECTIVE:

The City of Portland ADA Curb Ramp Design Criteria

The design criteria for City of Portland curb ramps is provided on the PBOT ADA Curb Ramp Design Form. Variance from these criteria requires a written justification and approval by the PBOT ADA Technical Advisor as shown on the ADA Curb Ramp Design Form.

Curb Ramps On or Along ODOT Roadways

ODOT requirements apply to curb ramp designs for ramps proposed on or along ODOT roadways. Specifically, obtain ODOT reviews and approvals and use ODOT forms and design exception procedures. Additionally, use ODOT Curb Ramp Inspection Forms for curb ramps constructed on or along ODOT roadways.

One Diagonal Ramp In lieu of Two Single Ramps Is a Variance to City of Portland ADA Curb Ramp Criteria

The City's preference is to build two single curb ramps at a corner, rather than one diagonal ramp. However, FHWA provides for a variety of curb ramp types and configurations. See

https://www.fhwa.dot.gov/environment/bicycle_pedestrian/publications/sidewalk2/pdf/08chapter7.pdf.

Constructing one diagonal curb ramp at a corner instead of two single ramps at a corner constitutes a variance from the City's criteria and requires approval of the PBOT ADA Technical Advisor. When one



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diagonal ramp is proposed, the Engineer of Record provides written justification on the ADA Curb Ramp Design Form in the area designated "Space for Additional Comments." Upon review and agreement, the ADA Technical Advisor approves by signing as provided on the ADA Curb Ramp Design Form.

In the case where additional right-of-way is necessary to construct two ramps at a corner, the City will first attempt to acquire said right-of-way, provided that the additional right-of-way does not contain a structure (such as a building). However, if acquiring additional right-of-way is not a viable option, another type of curb ramp configuration that fits within the existing right-of-way is allowable.

In the rare case where even one curb ramp cannot be constructed within the constrained right-of-way footprint, the crossing at this location may be closed, under the direction and authority of the City Traffic Engineer. City of Portland City Code 16.10.200 Duties of the City Traffic Engineer.

Technical Infeasibility Review and Approval

For an alteration project, the public agency must incorporate the ADA accessibility standards to the maximum extent feasible. 28 CFR §35.151(b). The feasibility meant by this standard is physical possibility only. A public agency is exempt from meeting the ADA standards in the rare instance where physical terrain or site conditions restrict constructing or altering the facility to the standard. ADA Accessibility Guidelines 4.1.6(1)(j). Cost is not a factor in determining whether meeting standards has been completed to the maximum extent feasible. DOJ's ADA Title II Technical Assistance Manual, § II-6.3200(3)-(4), 1993.

The ADA Curb Ramp Design Form is used to document the decision to enable the City to explain the decision of technical infeasibility. The PBOT ADA Technical Advisor will work with you to determine if the situation meets the technical infeasibility standard and to assist you in providing the written justification necessary to support this determination. Exceptions due to technical infeasibility require a written justification and approval by an ADA Technical Advisor.

The City Engineer designates ADA Technical Advisors. PBOT has the following six ADA Technical Advisors:

1. Tom Bennett, P.E. (ADA Technical Advisor Committee Lead)
2. Cori Wiessner, P.E.
3. Jason Grassman, P.E.
4. Raphael Haou, P.E.
5. Chris Wier, P.E.
6. Eva Huntsinger, JD, P.E.

The ADA Curb Ramp Design Form and other ADA resources is located on the PBOT website at:
<https://www.portland.gov/transportation/engineering/ada-page>

For additional information, please contact a PBOT ADA Technical Advisor.