

CITY OF COLUMBUS, OHIO
ADA RULES AND REGULATIONS



Effective May 4, 2023

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I. AUTHORITY

Pursuant to the authority granted under Ordinance 1987-2008 passed December 15, 2008 ([Section 2105.125 of the Columbus City Code](#), 1959, as amended), the Director of Public Service hereby adopts, establishes, and publishes these rules and regulations to be effective at the earliest time allowed by law. These rules supersede rules previously promulgated in 2011.

II. APPLICATION

This policy shall be applicable to all ADA features installed within right-of-way controlled by the City of Columbus. This policy shall also replace and supersede the following General Policies and Procedures:

- City of Columbus - Rules and Regulations - Wheelchair Ramp Requirements, April 1, 2018

III. EFFECTIVE DATE

This policy shall be effective April 1, 2018 and shall supersede all previous applicable policies and standards. All site plans, permits and capital improvement plans submitted for review following the effective date shall comply with these rules and regulations.

IV. BACKGROUND

The Americans with Disabilities Act (ADA) of 1990 established that it is discriminatory and a violation of a disabled person's civil rights to deny access to various public and privately owned facilities and resources that are accessible to able-bodied persons. Title II of ADA applies to state and local governments. Among the items listed in Title II that shall be made accessible are pedestrian facilities and routes along public right-of-ways. Responsibility for making these facilities compliant in the City of Columbus is the responsibility of the Department of Public Service.

The ADA gives responsibility for enforcing these requirements to the US Department of Justice (DOJ). The DOJ issues standards that provide specific requirements for ADA compliance for all public facilities and many private facilities available for use by the general public. The most recent DOJ standards were issued in 2010 and are commonly known as "DOJ's 2010 Standards." These standards, for the most part, are those presented in various guideline documents developed and published by the Access Board.

In order to provide a practical framework for determination of accessibility, the Access Board, an agency established by the Federal Government to create guidelines, developed the concept of the **Pedestrian Access Route**, or **PAR**. This is in essence a path through and contained within a pedestrian facility that has slope, grade, surface characteristic, and other features that make it usable by persons having certain mobility and sensory impairment conditions. The PAR must be an unbroken route that will provide access to any destination along a given right-of-way that can otherwise be reached by an able-bodied pedestrian. It may extend the entire width of a sidewalk or walkway, or it may consist of only a specified width of the overall walkway or path.

Curb ramps are essential elements of a PAR and they are required when the route requires a change in elevation. This usually occurs in curbs at intersections, where an individual must travel from a sidewalk down onto street level in order to negotiate a crosswalk, and then return to the sidewalk on the opposite side. However, curb ramps may be constructed any time a change in elevation is

necessary. Curb ramps shall always include detectable warnings when a portion of the PAR crosses a public street, or where specifically required crossings at private drives per Columbus ADA Rules and Regulations or standard drawing.

Curb ramps are constructed at curbed intersections, if a sidewalk is present. A variation of a curb ramp with blended transitions may be constructed where sidewalk is present, but no curbs. Curb ramps may also be required when no sidewalk is present but access is needed to pedestrian push buttons located off the roadway. In most cases however, curb ramps do not need to be built where there is no sidewalk, since by definition the pedestrian route will be along the roadway pavement.

V. DEFINITIONS

The following words, terms and phrases, when used in these rules and regulations, shall have the meanings ascribed to them, except when the context clearly indicates a different meaning:

- A. **ADA** - Americans with Disabilities Act of 1990, and all subsequent amendments.
- B. **Alley** - A thoroughfare typically located in the middle of a block that allows access to the rear of buildings. The legal definition of an alley used by the City of Columbus can be found in [ORC 4511.01\(XX\)](#).
- C. **Alteration** - A change to a facility that affects or could affect the usability of the facility or part thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, or changes or rearrangement of the structural parts or elements. Normal maintenance is not considered an alteration unless it affects the usability of the facility.
- D. **Addition** - An expansion, extension or increase in the area of a facility within the Right-of-Way. Additions are treated as new construction as defined in ADA.
- E. **Blended Transition** - A raised pedestrian street crossings, depressed corners, or similar connections between pedestrian access routes at the level of the sidewalk and the level of the pedestrian street crossing that have a grade of 5 percent or less. Blended transitions are suitable for a range of sidewalk conditions. Blended transitions shall have a detectable warning strip the full width of the blended transition.
- F. **Capital Improvement Project (CIP)** - A publicly funded project in the Right-of-Way.
- G. **Crosswalk** - (1) That part of a roadway at intersections ordinarily included within the real or projected promulgation of property lines and curb lines or, in the absence of curbs, the edges of the traversable roadway. (2) Any portion of a roadway at an intersection or elsewhere distinctly indicated for pedestrian crossing by lines or other markings on the surface. ([COC Code 900.04](#)). All crosswalks are required to be compliant.
- H. **Curb Ramp** - A short ramp cutting through a curb or running up to it. This is the primary means of providing an accessible route from sidewalks to crosswalks. The accessible portion of the curb ramp typically includes an upper landing and a sloped ramp with detectable warning unit. Flares placed on either side of the sloped ramp are considered to be a part of the inaccessible portion of the ramp. The term “Wheelchair Ramp” has identical meaning.
- I. **Detectable Warning Unit** - A standardized surface feature built on or applied to walking surfaces or other elements to warn visually impaired people of hazards on a circulation path. These units are typically used in instances where pedestrians are passing from dedicated walking areas onto areas having vehicular traffic.

- J. Developer** - For the purpose of this document, the party initiating a project or process that will involve changes in the City Right-of-Way.
- K. DOJ's 2010 Standards for Accessible Design** - ADA Accessibility Guidelines for Buildings and Facilities.
- L. DPS** - The City of Columbus Department of Public Service.
- M. DPU** - The City of Columbus Department of Public Utilities.
- N. Intersection** - The area embraced within the prolongation or connection of the lateral curb lines, or if none, then the lateral boundary lines of the roadways of two highways which join one another at, or approximately at, right angles, or the area within which vehicles traveling upon different highways joining at any other angle may come in conflict. ([ORC 4511.01\(KK\)](#))
- O. Landing** - A relatively flat area (slope less than 1:48 or 2.08%, any direction) used by disabled individuals to move from one sloped area to another. It is configured in such a way that a 5' diameter circle representing the turning movement of a wheelchair can be superimposed upon the landing without there being any obstructions to said turning movement. Landing is synonymous with turning space for the purpose of this document.
- P. Long Flare** - The area adjacent to the sloped portion of ramp that provides a transition from the sloped portion of the ramp to the existing surface. It is not designed to be part of an accessible route; however it is designed to be walked upon by able-bodied pedestrians.
- Q. New Construction Projects** - A type of project that provides facilities in an area that had previously been unused and undeveloped. New build projects are subject to a higher level of compliance than the levels for additions or alterations. This also includes projects where the existing facility is completely removed and replaced with a new facility even if the new facility is intended to perform the same function as the original facility.
- R. Orphan Ramp** - Also known as unmatched ramp. This means a ramp which provides access to a legal crosswalk for which there is no corresponding ramp on the opposite end that allows a disabled pedestrian to exit the crosswalk and access an existing sidewalk.
- S. Pedestrian Pad (Ped Pad)** - Access from the roadway to a pedestrian push button, not connected to any sidewalk. Synonymous with Pushbutton Access Pads for the purpose of this document.
- T. PROWAG** - The Proposed Right-of-Way Access Guidelines (Proposed Draft Published, July 26, 2011)
- U. PAR** - Pedestrian Access Route (for definition and explanation, see [Section IV](#) of this document.)
- V. Scope of Work** - A document created and/or approved by the City of Columbus detailing requirements of the plan for a project.
- W. Short Flare** - The area adjacent to the sloped portion of the ramp that provides a transition from the sloped portion of the ramp to the existing surface. It is not designed to be part of an accessible route. Unlike a long flare, it is not designed to be traversed by able-bodied individuals. This flare is only to be used when a ramp is adjacent to a non-walkable surface.
- X. Turning Space** - Synonymous with landing for the purpose of this document.

VI. STANDARDS AND REFERENCES: DESCRIPTIONS AND HIERARCHY

The Citywide ADA rules and regulations were developed based on guidance and requirements described in the below hierarchy of documents. For an ADA related issue within the right-of-way for which clear guidance is not provided by the Citywide ADA Rules and Regulation, refer to the hierarchy below to determine ADA compliance.

Hierarchy of documents outside the City of Columbus:

1. DOJ's 2010 ADA Standards for Accessible Design, September 15, 2010
2. PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (2011) (aka: Public Rights of Way Accessibility Guidelines)
3. OMUTCD – Section 4E – Pedestrian Control Features
4. Shared Use Paths – Proposed Supplement to PROWAG
5. OMUTCD – Chapter 6D – Pedestrian Considerations (relating to MOT for disabled persons)
6. OMUTCD – Chapter 6G – Type of Temporary Traffic Control Zone Activities

VII. CURB RAMP CONSTRUCTION: CONDITIONS AND SCOPING

A. General Scoping Requirements:

1. New Construction and Additions:

All new construction having no pre-existing constraints located outside the scope of the project is subject to the full extent of DOJ's 2010 Standards for Accessible Design requirements. Examples of these types of projects include roadway extensions, construction of new sidewalks in undeveloped areas, new subdivisions, and other new developments.

Corners. In addition, all corners of all intersections affected by a given project, contained within the scope of said project, shall be made compliant. Even if road improvements were made that include only one part of an intersection, Title II requires that all PARs passing through that intersection shall be made compliant. Responsibility for this varies depending on the type of project. See following sections for more information.

Sidewalks – New Construction or Addition. Full compliance is required for projects involving construction of new sidewalks in areas previously having no sidewalk facilities.

2. Alterations:

This work consists of making changes to existing facilities or structures within existing rights-of-way. Compliance requirements are less strict than for new construction in that it is limited to work which is “technically feasible”; that is work possible given the constraints imposed by the existing conditions. Compliance is required to be made to the maximum extent possible, given these constraints. Curb ramps shall be constructed any

time a curbed roadway undergoes an alteration and sidewalk is present. Roadway improvements that trigger installation of curb ramps include, but are not limited to, the following:

- a. Improvements to the geometry of the intersection, such as installation of new turn lanes, or widening of existing lanes.
- b. Signal improvements
- c. Grade elevation changes
- d. Crosswalk striping improvements
- e. Resurfacing
- f. Streetscape improvements
- g. Sidewalk improvements within the legal crosswalk
- h. Microsurfacing
- i. Cape seal
- j. In-Place asphalt recycling
- k. Thin lift overlays
- l. Open-graded surface course

B. Examples:

1. Examples of work not considered alterations:

Maintenance and repair work that does not “alter” existing elements of the pedestrian pathway triggers no obligation to provide accessible features.

Examples of this work include but are not limited to the following:

- a. Spot patching and pothole repair
- b. Reseating of disturbed curbing
- c. Restriping of existing markings in place
- d. Thincoat sealing
- e. Crack sealing
- f. Trenching for underground utility construction
- g. Diamond grinding
- h. Spot friction treatments
- i. Joint repair
- j. Traffic signal timing adjustments

2. Examples of when ADA improvements are required on specific items:

Sidewalks – Alteration. Curb ramps or blended transitions in appropriate locations shall be installed when new sidewalks are constructed in existing right-of-ways, or when existing sidewalks are rebuilt. An unbroken, compliant PAR shall be installed that crosses the path of private drives and other access points wherever there is a public sidewalk in the right-of-way or in a dedicated easement. When sidewalk construction terminates at a private drive or access point, a sidewalk stub shall be constructed on the opposite side of the private drive or access point where sidewalk construction occurs, unless otherwise approved by the City Engineer or designee.

C. Responsibilities of Project Types:

1. Resurfacing.

Resurfacing is defined as milling and filling or overlay of a roadway surface from one intersection to another intersection. The limits of an intersection are defined by the boundary of the legal crosswalk. Resurfacing is also defined as milling and filling or overlay of any width, adjacent to the curb within a legal crosswalk, extending any given length along the roadway. As such it is considered an alteration, and compliance is required to the maximum extent possible. The scope for any resurfacing project that includes roadway having curbs and sidewalk shall include compliant curb ramps. Further, curb ramps shall be constructed prior to or concurrently with resurfacing activities. If curb to curb resurfacing extends into any legal crosswalk of an intersection, all curb ramps within that intersection must be made fully compliant.

2. Roadway Improvements – Capital Improvement Projects.

If these projects are scoped within existing right-of-ways, they are considered to be an alteration. Scoping for any Capital Improvement Project (CIP) initiated within the limits of the corporate boundary of the City of Columbus that includes curb and sidewalk shall include curb ramps. In addition, any intersections completely or partially affected by CIP work that result in improvements shall be made compliant.

3. Utility Improvements – Capital Improvement Projects.

If resurfacing (as defined previously in this section) of the roadway results from utility improvements, then the responsibilities of resurfacing apply. If the resurfacing associated with a utility project only affects one leg of an intersection, the project is only responsible for making that leg compliant. If resurfacing impacts two or more legs of an intersection, all legs of the intersection must be made compliant. These shall be included in the scope of the utility project. If corners of intersections beyond the edge of any curb present (i.e. outside of the paved area) are disturbed as a result of utility construction activities, affected corners shall be rebuilt compliant. This will include the installation of curb ramps if required. If this results in an “orphan ramp” situation, the utility shall abide by requirements in [Section VIII.F](#) of this policy.

4. Roadway Improvements – Privately Funded.

Any roadway improvements generated as a result of private development projects, such as new turn lanes, new signals, or pavement improvements, shall include as part of the project scope all work that will make any affected intersections compliant. Ultimate responsibility for making these intersections compliant will rest with the developer. This includes the installation of curb ramps and pedestrian accessible controls for walk signals as determined by the Department of Public Service where needed. If this results in an “orphan ramp” situation, the developer shall abide by requirements in [Section VIII.F](#) of this policy.

5. Privately Funded Property Improvements.

In the event that a developer makes improvements to a parcel that occupies one corner of an intersection, the scope for the project shall include construction required to make the corner he or she owns or controls compliant, as well as opposing ramps as needed in order to avoid an “orphan ramp” situation, as determined by the Department of Public Service.

Refer to [Section VIII.F](#) for requirements pertaining to “orphan ramps.” The improvements of a single-unit dwelling on an existing platted lot will not require the property owner to construct the curb ramps. The Division of Infrastructure Management will coordinate the construction of these ramps via Citywide curb ramp project.

6. Utility Improvements Privately Funded.

Privately funded utility improvements within the right-of-way will require all disturbed facilities to be restored to a currently ADA compliant condition. For example, if an existing curb ramp is disturbed or a corner where sidewalk meets the curb that does not contain a ramp is disturbed, a new compliant curb ramp will be required. Transition to existing facilities will be required per this document. Improvements to areas not disturbed such as opposing ramps will not be required. When resurfacing is required as part of the project, the requirements of [Section VII.C.1](#) will also apply.

VIII. CURB RAMP CONSTRUCTION SCENARIOS

A. 4-Way Intersections.

All corners at all 4-way intersections that have sidewalks shall be made compliant, except at non-signalized crossings of arterial streets. See [Section VIII.G](#).

B. 3-Way (“Tee”) Intersections.

The decision whether to construct 4 ramps (two pedestrian accessible routes or PARs) or 6 ramps (three PARs) will be based on the following conditions:

- In areas of low pedestrian volume, including residential and collector streets, two PARs will be created at T intersections, unless there is a specific justification to build three PARs.
- For unsignalized arterial intersections, only two PARs will be constructed.

For signalized intersections, all three PARs will be constructed except where physical constraints are present that would preclude construction of a desired ramp at a given location, as removal or relocation of these obstructions will be prohibitively expensive or would not be practical from a constructability standpoint. These constraints include, but are not limited to, driveways, utilities, storm structures, or other permanent street furniture.

- In the event that four ramps are required, and there is a choice of locations for ramps accessing the PARs crossing the through street, preference will be given for the PAR that does not cross the right-turn movement of the intersecting street, as illustrated in [Figure 8-1](#).

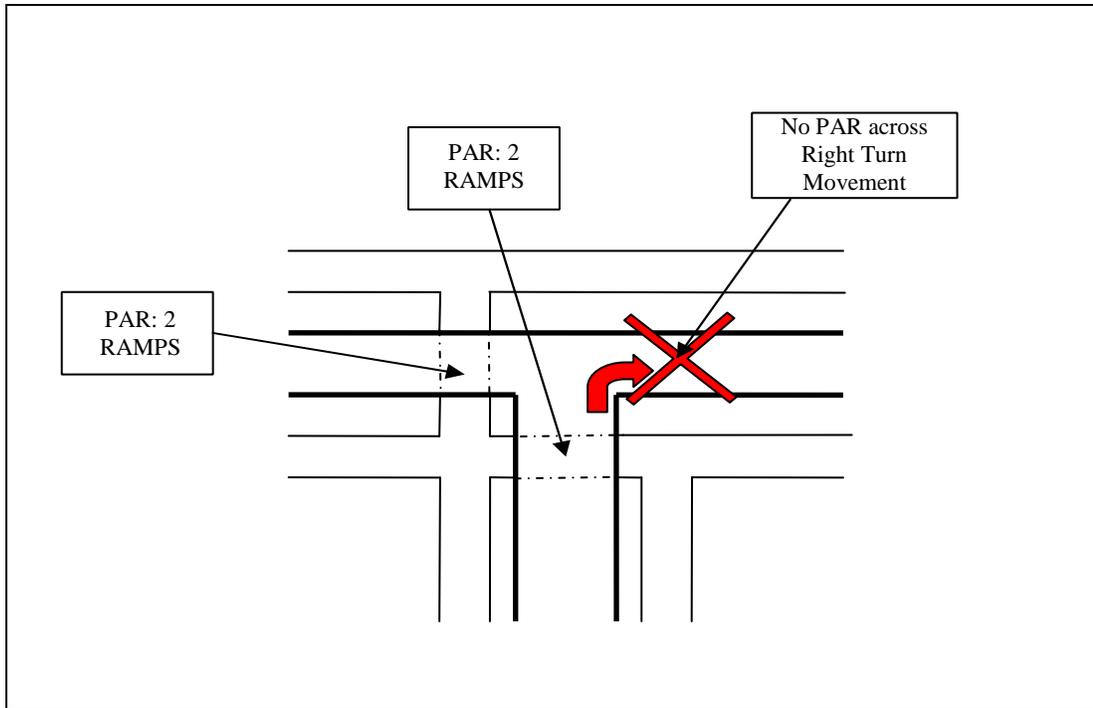


Figure 8-1

C. Offset Streets Scenario.

Under some conditions, an intersection may be “offset”; that is, the centerline of one leg of an intersection may be shifted a significant distance from the centerline of its opposing side. If the offset is 200 feet or less, the intersection shall be treated as a single 4-way intersection, and ramps do not have to be installed within the interior of the offset. If the offset exceeds 200 feet, the intersection shall be treated as two separate “tee” intersections. Refer to [Figure 8-2](#).

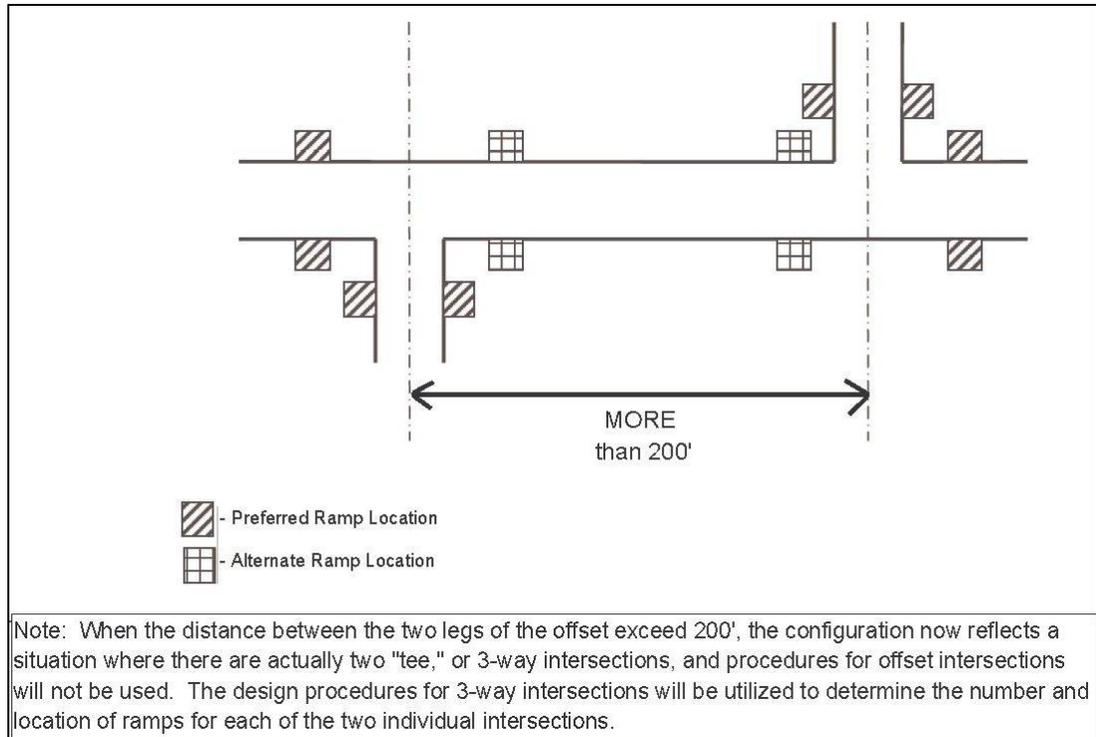


Figure 8-2

D. Curb Ramps at Alleys.

An alley is a specialized, limited use roadway that provides limited access to the rear of specific properties in a neighborhood or central business district. An intersection of an alley with a street, according to [ORC 4511.01\(KK\)\(3\)](#), is not an intersection. This, in turn, means that there are no legal crosswalks in place that will traverse the street, therefore no PAR crosses the larger street. A PAR does however cross the alley, as this entails crossing a City of Columbus right-of-way. Refer to [Figure 8-3](#).

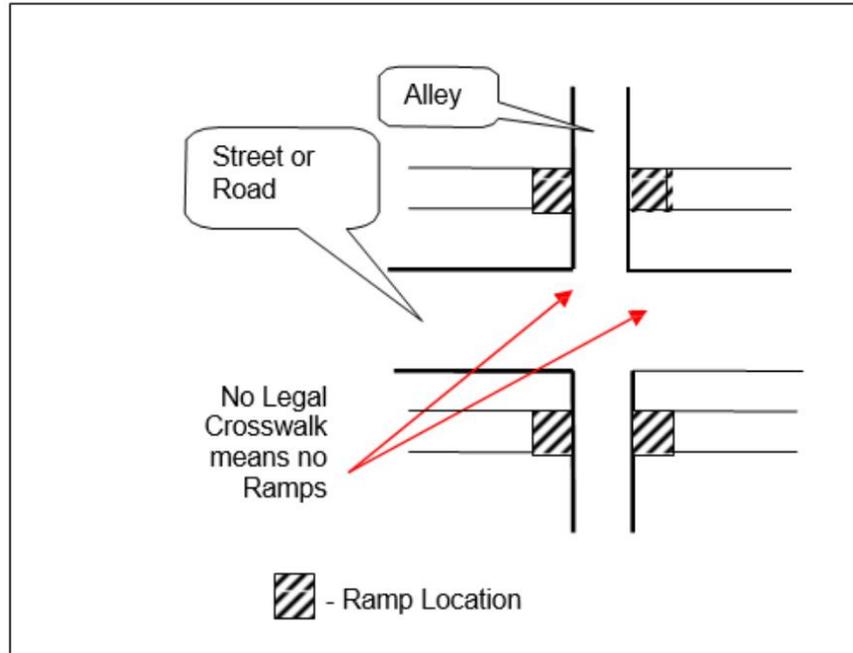


Figure 8-3

1. Definitions of Alleys:

According to [Section 2101.03 of the Columbus City Code](#), “Alley” means street or highway intended to provide access to the rear or side of lots or buildings in the City and not intended for the purpose of through vehicular traffic, and includes any street or highway that has been declared an “alley” by City Council. This definition is based on [ORC 4511.01\(XX\)](#). Alleys also typically do not serve as the primary frontage for properties along them - any roadway that has buildings that front on that roadway that do not have an alternate primary frontage (i.e., use the alley as the basis for its address) cannot be defined as an alley, even if it has been declared an alley by code or by name.

Curb ramps allowing pedestrians to traverse the major roadway shall be constructed at intersections of alleys and roadways if marked crosswalks are in place traversing that main roadway.

2. PARs Crossing Alleys:

The alley crossing must meet the same requirements as a typical crosswalk. Typically the most difficult issue is providing a compliant cross-slope. All new construction that includes alley returns will require full compliance.

Alterations that are not specifically scoped to reconstruct the alley will not require that the cross-slope of the PAR crossing the alley be made fully compliant when it requires work beyond the original scope of the project. For example, resurfacing will correct the alley PAR when the correction can be performed with 1½” milling or less and asphalt built-up. Stand-alone curb ramp projects will not require milling to correct the PAR since milling is not in the original project scope. Full depth street reconstruction including alley returns will require the alley PAR to be made compliant.

Where the alley PAR is not made compliant, ramps shall be constructed to be compliant and accommodate future alley PAR correction without the need for ramp replacement.

Asphalt transition patches will be installed in the alley to transition from the compliant ramp to the non-compliant PAR as smoothly as possible. Refer to [Figure 8-4](#) for further details.

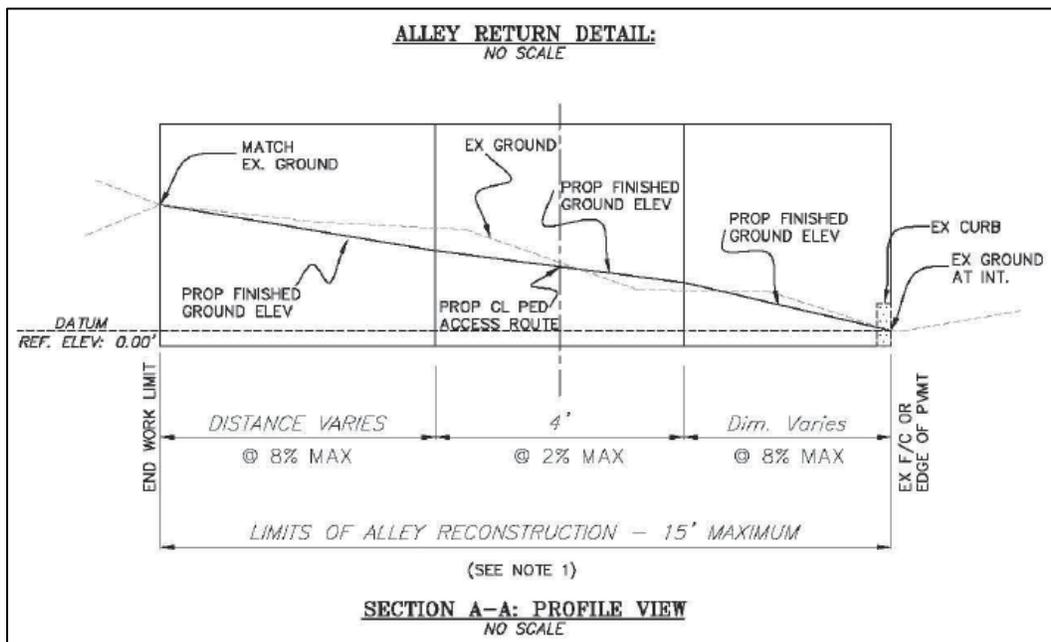


Figure 8-4

E. Sidewalk Transitions at Private Driveways.

Unless expressly stated otherwise, construction of curb ramps or blended transitions at privately owned driveways is the responsibility of the property owner or developer, and not the City. Curb ramps and blended transitions in areas having sidewalks will be constructed as part of pavement repair work, and will be triggered when the property owner requests a right-of-way permit or submits construction plans for review. The property owner will be required to construct all features of the approach located in the City right-of-way according to City of Columbus standards and to ensure that a compliant PAR is constructed across the width of the drive, as stated in City of Columbus and ADA.

Detectable warning units are not required at approaches to driveways serving single family residential units or to duplex residential units. They are required at approaches to driveways providing access to publicly accessible parking areas serving multifamily residential and commercial establishments if the intersection is signalized or has marked crosswalks.

When sidewalk construction terminates at a private drive or access point, a sidewalk stub shall be constructed on the opposite side of the private drive or access point where sidewalk construction occurs unless otherwise approved by the City Engineer or designee.

F. Non-Paired or “Orphan” Ramps.

It is considered best practice to install ramps in pairs, that is, when a ramp is constructed on one side of a street, a ramp will be constructed on the opposite side of the street. This creates a continuous PAR throughout the length of the legal crosswalk, and is done so to prevent stranding disabled persons within the roadway. City of Columbus policy is to prohibit unpaired ramps, and require that, when construction activities affect an intersection, all corners with

sidewalks that are impacted by the construction shall have compliant curb ramps installed. No break in a PAR is permitted within a legal crosswalk. Refer to [Figure 8-5](#). There are circumstances where ramps would not be placed in a pair, but one ramp is warranted. This exception occurs where only one side of the curbed street has sidewalk and the ramp provides access from the street to the sidewalk and vice versa.

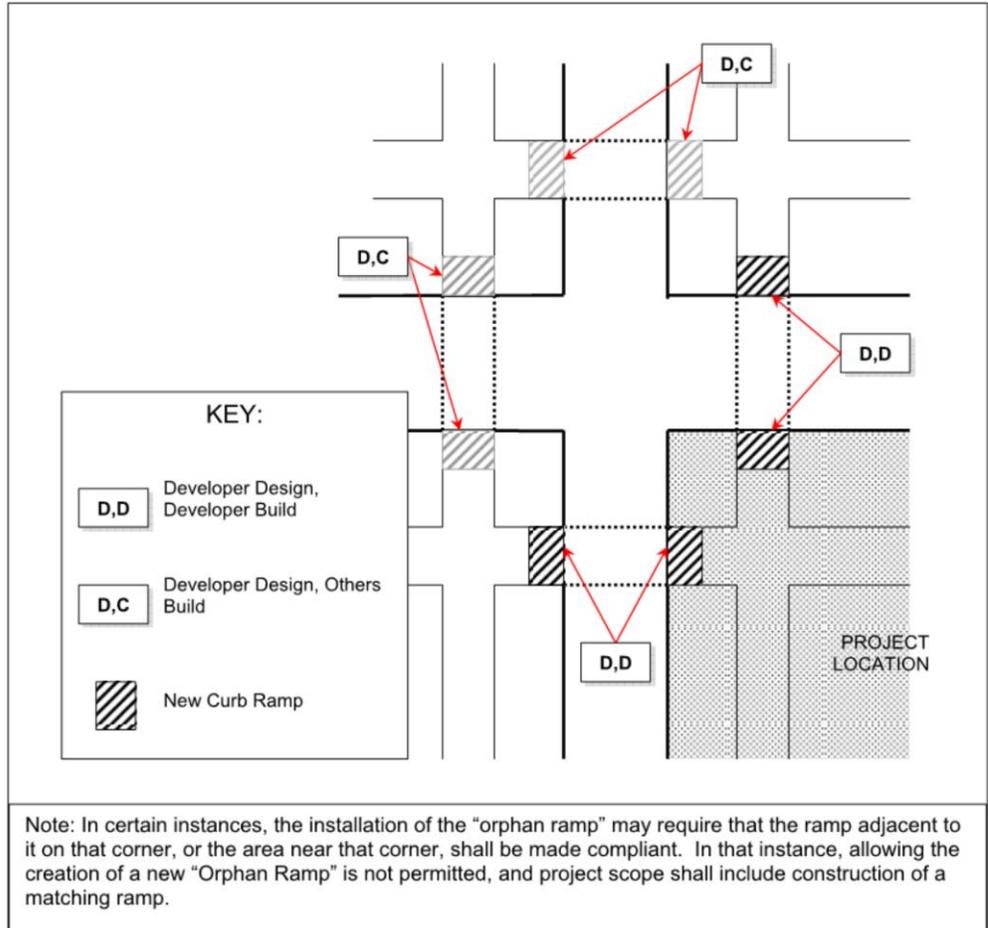


Figure 8-5

In the event that a construction project impacts one or more corners of an intersection, the scope of the project shall include the following to create a compliant PAR from each corner impacted by construction:

1. Ramp Design:

The developer or agency responsible for the project shall provide the complete design of all curb ramps to be constructed at each intersection impacted by construction. The remaining ramps at that intersection that will not be constructed with the project shall be designed to the requirements of Design/Build drawings and included on the plan showing the entire intersection. This requirement is necessary to ensure that curb ramps installed with the project are properly designed and located accounting for future curb ramp installations on corners not impacted by the project. The City will maintain the design for future use. At signalized intersections, the design may also include separate pedestrian push button devices.

2. Ramp Construction:

The developer or agency responsible for the project impacting an intersection shall be responsible for constructing compliant curb ramps and pedestrian push buttons to restore all impacted PARs under the following conditions:

a. Non-existent curb ramps on undisturbed opposing corners:

Where a sidewalk is present, but no ramp exists at the opposite end of each crosswalk at intersection corners impacted by the project, the developer or agency shall be responsible for the construction of those ramps, in addition to the curb ramps at the intersection corner(s) disturbed by the project. If insufficient right-of-way exists that would preclude the construction of an opposing ramp or if significant utility relocations that would cause an undue burden on the developer/agency would be necessary to permit the construction of an opposing ramp, the developer/agency may request a waiver of this requirement from the Division of Infrastructure Management. If such a waiver is approved, the City will take the responsibility for construction of the required opposing ramp(s) and the developer/agency will be assessed an appropriate fee. The provisions of this section shall not apply to the redevelopment of a single-unit dwelling on an existing platted lot. In the case of a redevelopment of a single-unit dwelling within an existing platted lot, the property owner shall be responsible for construction of sidewalk at the intersection corner disturbed by the project, but would be granted an automatic waiver of the requirements to install any ramp(s), with the City taking the responsibility for the construction of the required ramp(s).

b. Non-compliant curb ramps on undisturbed opposing corners:

Where a non-compliant curb ramp exists at the opposite end of each crosswalk at intersection corners impacted by the project, the City shall be responsible for the cost of constructing the replacement of the noncompliant curb ramps. The developer or agency shall be responsible for the construction of compliant ramps at the intersection corner(s) disturbed by the project and the design of opposing ramps to ensure that the ramps to be built by the developer or agency shall be properly located.

G. Unsignalized Arterial Intersections.

Unsignalized crossings of arterial streets will have paired ramps crossing the arterial on one side of the intersection and ramps crossing the side street on both sides of the arterial. Signalized arterial intersections will receive ramps crossing all legal crosswalks. Refer to [Figure 8-6](#).

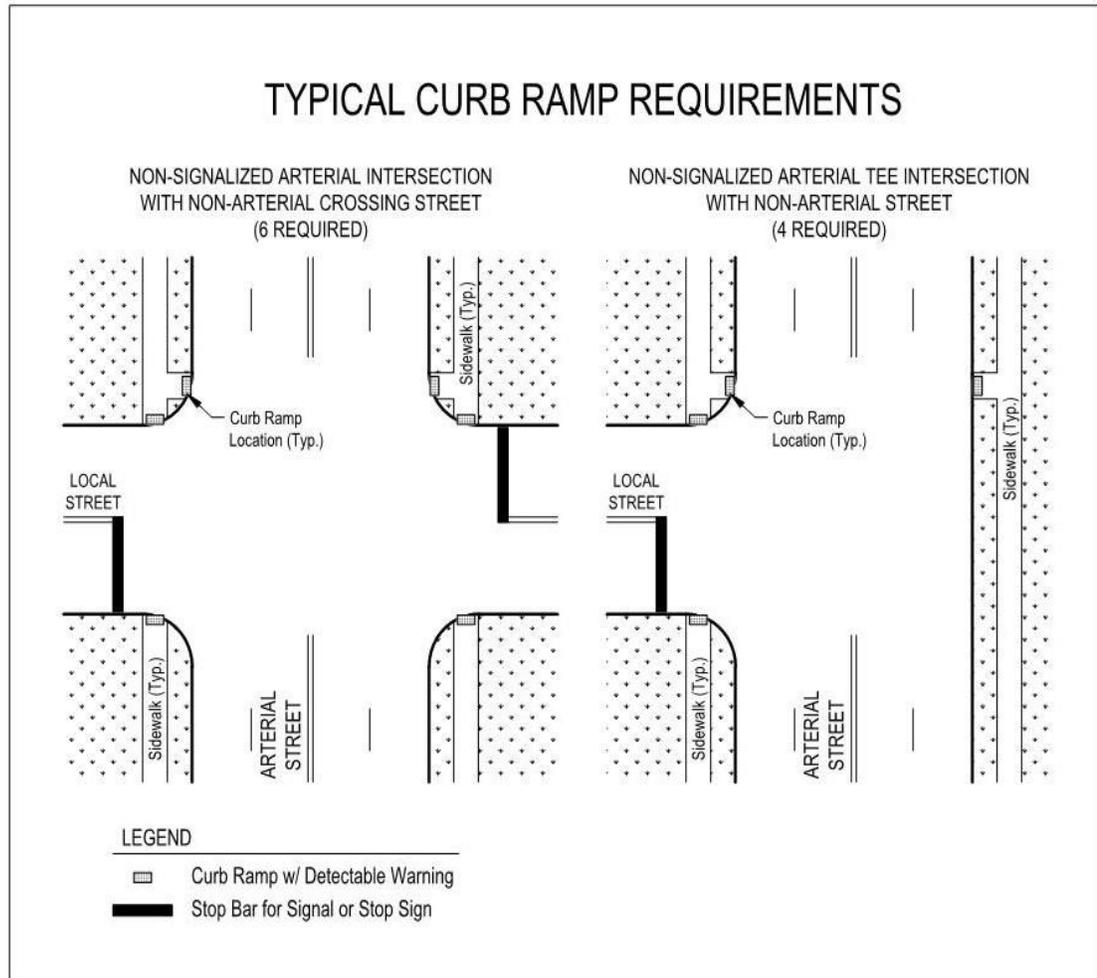


Figure 8-6

H. Relocation of Pedestrian Push Buttons.

Where an alteration constructs or reconstructs ramps where an existing pedestrian push button is present, the push button shall be relocated to a position compliant with current push button positioning if:

1. Other signal pole or cabinet work is part of the scope of the project.
2. Relocating the push button at a later time would require removal of the proposed ramp to place underground conduit.
3. The new ramp position makes the push button less accessible than the current position.

I. Pedestrian Pads.

Where pedestrian push buttons are present, ADA compliant access must be provided to them. Where push buttons are present on a corner where there is no sidewalk, a pedestrian pad (PP) shall be constructed to allow for access from the roadway to the push button. The pedestrian pad can be connected to curbed or uncurbed roadway and can be considered a ramp or a blended transition based on field conditions. At minimum, it provides access to a single push button and PAR, but the best practice is access to the push button and both crosswalks at a corner.

This can be accomplished through two connected ramps/blended transitions or one shared ramp in that order of preference. Standard drawings provide further detail on the horizontal alignment of these PPs, and grades and dimensions must be in compliance with the technical requirements of this document. The push button can be located in any of the positions allowed in [Figures 12-2](#), and [12-3](#). A single PP that only accesses one push button and crosswalk should only be utilized when connected and shared ramps accessing both crosswalks are not feasible.

J. Pinch Points.

On alteration projects, it is permissible to reduce the width of the pedestrian access route (PAR) to no less than 32 inches along the PAR for distance of no more than 24 inches and the clear width shall be permitted to be reduced to 36 inches for 48 inches along the PAR (DOJ 403.5.1) where it is not technically feasible to have a PAR width of 48 inches minimum. An example of this would be where the sidewalk is obstructed by an object that would be difficult to move within the scope of the project. Such would be the case of a strain pole for traffic signals or a power pole if replacing them was not in the project scope.

On new construction projects, any reduction of the PAR width below 48 inches requires written approval of the City Engineer or the Engineer's authorized representative.

IX. TECHNICAL RAMP REQUIREMENTS

A. Running Slope.

This is the slope that runs parallel to the direction of travel along a ramp.

City of Columbus Standard:

- Running slope maximum: 1:13 or 7.69%

Federal Standard:

- Running slope maximum: 1:12 or 8.33%

Note: The running slope may run downwards toward the street, which is typical, or in rare circumstances, it may run upward toward the street. Both situations are permitted, as long as the running slope does not exceed the maximum standards.

EXCEPTION: A combination/parallel curb ramp shall not be required to exceed 15 feet in length.

Inspection Guidelines and Construction Tolerances: Ramps are to be designed and constructed to the 1:13 running slope maximum. If an ensuing inspection notes that this standard has not been met, yet the slope of the ramp does not exceed the Federal standard of 1:12, the ramp may be approved, provided it does not violate other ramp design and construction standards established by the City of Columbus.

B. Cross Slope.

This is the slope that runs perpendicular to the direction of travel down a ramp. It also applies to landings or other level surfaces of a curb ramp.

City of Columbus Standard:

- Cross slope maximum: 3/16" per foot or 1.56%

Federal Standard:

- Cross slope maximum: 1/4" per foot (1:48) or 2.08%

EXCEPTION: For crosswalks that do not have yield or stop control, a cross slope of up to 5% is permitted. This includes signalized intersections. The cross slope of midblock cross walks may match the grade of the street.

Inspection Guidelines and Construction Tolerances: Ramps are to be designed and constructed to the 3/16" per foot, or 1.56%, cross slope maximum. If an ensuing inspection notes that this standard has not been met, yet the slope of the ramp does not exceed the Federal standard of 1/4" per foot (1:48), or 2.08%, the ramp may be approved provided it does not violate other ramp design and construction standards established by the City of Columbus.

C. Landing (Turning space).

A landing 48 inches minimum by 48 inches minimum shall be provided at the top of perpendicular curb ramps and at the bottom of a parallel curb ramp run and shall be permitted to overlap other landings and clear floor or ground space. General cross slope standards apply. If the turning space is constrained on 2 or more sides, it must be 48 inches by 60 inches with the 60 inch dimension in the direction of the ramp run. Refer to [Figure 9-1](#).

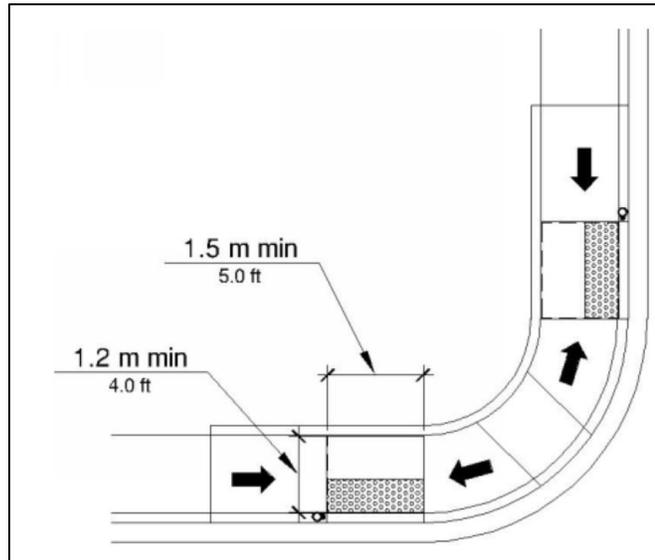


Figure 9-1

D. Long Flares.

On perpendicular curb ramps, flared sides no shorter than 10-times the curb height, measured along the curb line, shall be provided where a circulation path or walkable surface crosses the curb ramp.

E. Short Flares.

These are commonly 12" or wider (up to 5') at the curb, and are used at locations where there is no walkable surface adjacent to the ramp. Non-walkable surfaces may be grass, trees, landscaping, areas blocked by utility poles or street furniture, etc. Manhole covers and hatches are considered to be walkable surfaces, if they are flush with the sidewalk surface. Short flares should never be used at any location where pedestrian traffic can be expected to cross them. Refer to [Figure 9-2](#).

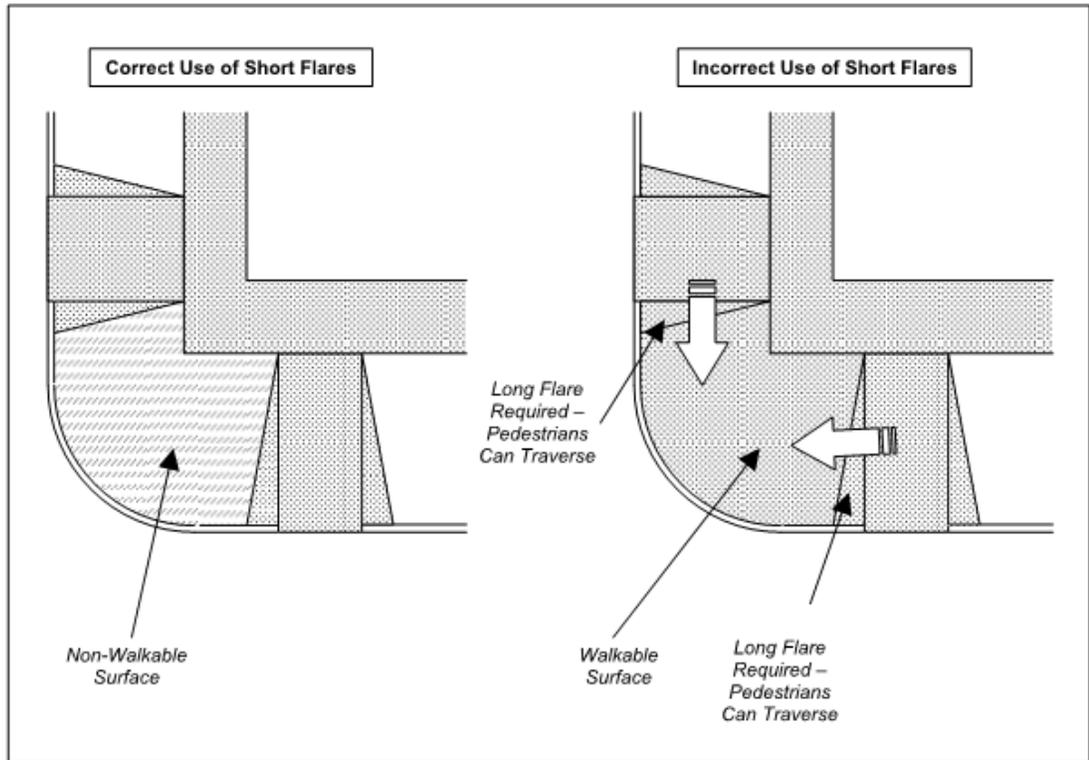


Figure 9-2

F. Blended Transitions.

These are elements of a PAR that serve the same function as a curb ramp and all requirements of the curb ramp remain with the exception of a landing is not required and the running slope cannot exceed 5%.

G. Width.

The clear width of landings, blended transitions, and curb ramps, excluding flares, shall be 48 inches minimum.

H. Detectable Warnings.

Detectable warning surfaces shall be provided in many conditions where a pedestrian path crosses a vehicular way. These conditions, as well as other requirements, are described throughout this document and to the specifications set forth in the [City of Columbus Standard Construction Drawing 2319](#).

I. Surfaces.

Surfaces of curb ramps, blended transitions, and landings shall comply with DOJ’s 2010 Standards for Accessible Design Section 301 thru Section 304. Gratings, access covers, and other appurtenances shall not be located on curb ramp landings or slopes, blended transitions, and gutter areas within the pedestrian access route. However, these items may be allowed within sections of the pedestrian accessible route, including flares, provided they comply with requirements set forth for PAR surfaces, in DOJ’s 2010 Standards for Accessible Design, Section 301 thru Section 304, or most current update.

J. Grade Breaks.

Grade breaks shall not be permitted on curb ramps, blended transitions, landings, and gutter areas within the pedestrian access route. Surface slopes that meet at grade breaks shall be flush. Grade breaks shall be perpendicular to the direction of travel and shall be no closer than 2-feet apart.

K. Changes in Level (“Lips”).

Vertical changes in level (“lips”) greater than 1/4” shall not be permitted on curb ramps, blended transitions, landings, or gutter areas within the pedestrian access route. Where adjusting elements in the field to achieve a flush transition in the PAR is not feasible, and the level difference is 1/2” or less, a bevel as depicted in [Figure 9-3](#) is permissible.



Figure 9-3

L. Horizontal openings located within the PAR.

Horizontal openings in gratings and joints shall not permit passage of a sphere more than 13mm (0.5 inches) in diameter. Elongated openings in gratings shall be placed so that the long dimension is perpendicular to the dominant direction of travel. Refer to [Figure 9-4](#).

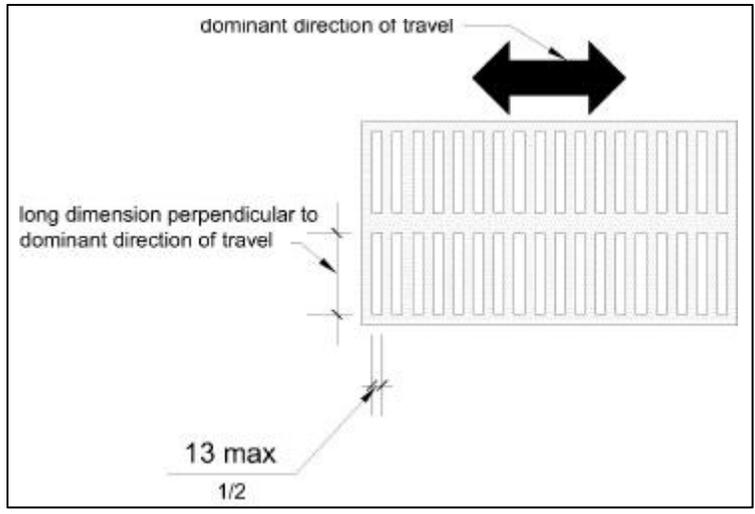


Figure 9-4

M. Counter Slopes.

The counter slope of the gutter area or street at the foot of a curb ramp or blended transition shall be 1:20 or 5% maximum for a minimum distance of 2-feet from the bottom of the ramp.

N. Location of Curb Ramps within Intersections.

Curb ramps at street intersections are to be located within the “Design Boundary” as shown in [Figure 9-5](#). Additional information is provided on the order of preference of this ramp placement location.

Establishing the Curb Ramp Design Boundary

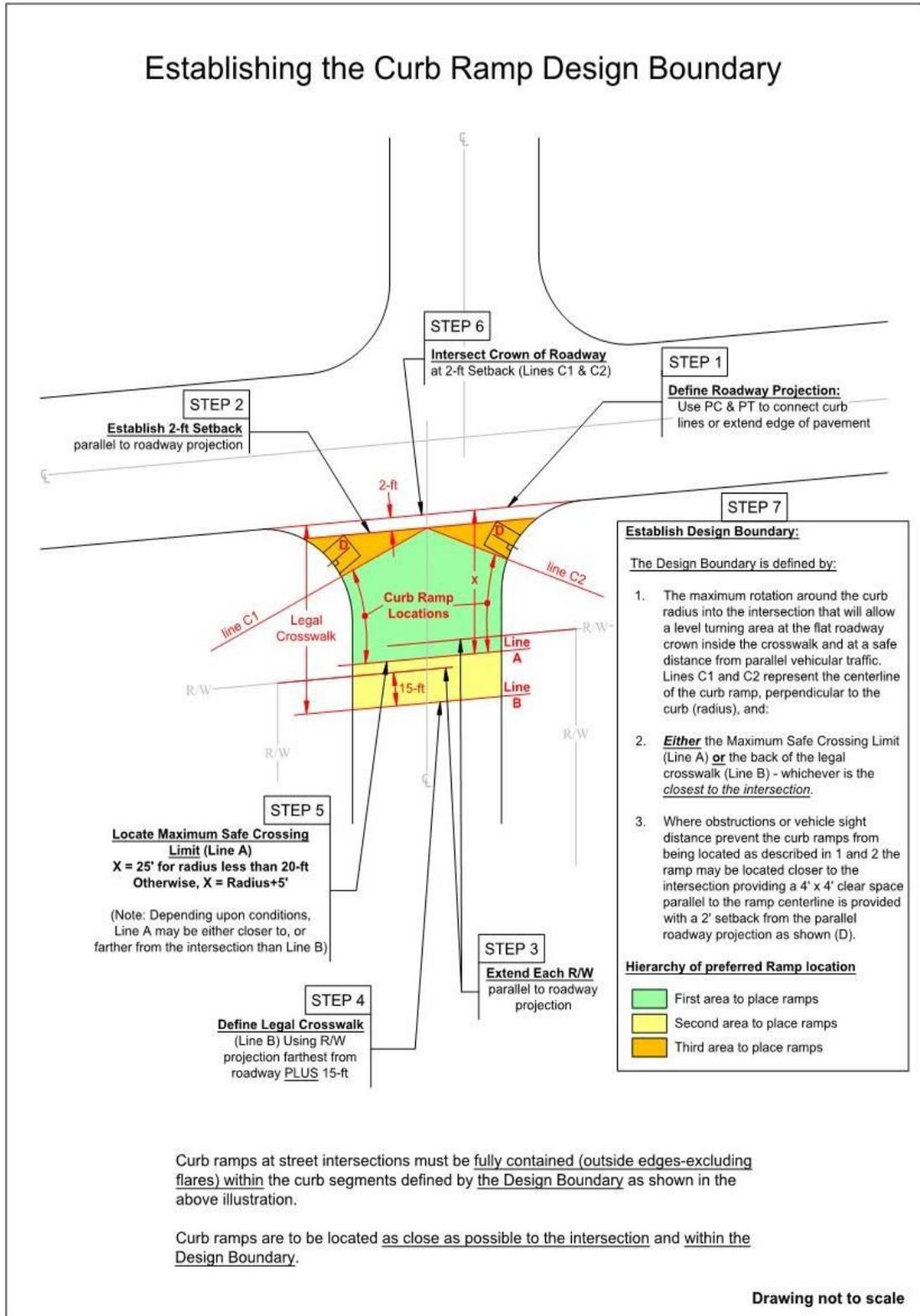


Figure 9-5

X. DESIGN AND CONSTRUCTION PROCEDURES

A. Ramp Design Types and Requirements

1. Full Design.

This is the most detail required in a ramp design. For a full design, an elevation is provided at every grade break within the ramp area. The entire ramp area is a walkable surface from where the sidewalk transitions from typical section to where it transitions back to typical section. All sidewalk width dimensions are shown along with slopes of the walk. Use flow arrows to indicate the prevailing slope. Right-of-way (ROW) limits are shown. All existing and proposed facilities and obstructions are shown. Push button locations are shown where applicable. This type of design should be used on new construction projects where the ramp is not connecting to an existing edge of pavement. It should also be used where existing physical or right-of-way constraints do not allow for space to adjust grades while maintaining minimum PARs and access outside the ROW.

2. Design/Build.

This is the most minimal type of ramp design. An aerial orthographic photo of the intersection is used as the base drawing. The designer places a tick mark perpendicular to the curb at the proposed centerline of the ramp and labels it with a letter detailing the standard drawing ramp type to be used from [Columbus Standard Construction Drawing 2319](#). All other work necessary to construct the ramp should be noted on the plans including but not limited to: locations of all facilities and obstructions, sign and striping relocation, right-of-way conflicts and encroachments, casting and pullbox adjustments, existing problems such as ponding to be corrected, and any other information needed to construct the ramp. All right-of-way acquisition must be completed prior to the start of the project. This design type should only be used on alteration projects where the designer assesses the ramp to be easily constructed within specifications. It is the responsibility of the designer to account for all existing conditions and call out a ramp that is feasible. Where modifications to the standard drawing ramps are necessary, they must be clearly noted on the drawing. It is the responsibility of the contractor to construct a compliant ramp and certify it via compliance form. If the contractor feels the plan design/build is not feasible, it is the contractor's responsibility to bring that to the attention of the administrator of the contract immediately, and not construct a non-compliant ramp without a design exception in advance.

3. Construction Scope for Design/Build.

The contractor is fully responsible for constructing compliant ramps of the type and approximate location specified in the design/build drawings. Prior to construction, the contractor must make a field assessment of the design and generate a submittal drawing showing the actual location of where the ramp and landing of the ramps are, along with the additional sidewalk replacement area for transition. Connection to existing facilities outside the right-of-way cannot be made any less accessible than the existing condition. If the contractor determines that ramps cannot be constructed as depicted in the design/build drawings, it must be clearly noted, and the contractor's recommended solution detailed on the submittal. The Construction Project Manager or designee will review and approve the contractor's submittal prior to commencing ramp work.

B. Design Requirements per Project Type

1. Resurfacing.

These alteration projects require the minimum design necessary to construct a compliant ramp. The majority of intersections will be design/build, but existing constraints may require full designs.

2. Roadway Improvements - Capital Improvement Projects.

Most ramps will be required to be fully designed. Whenever the connected roadway edge will change elevation, a full design is required. Design/build ramps will be called out in the scope where it is determined that grade, obstructions, and ROW do not necessitate a full design.

3. Utility Improvements - Capital Improvement Projects.

Most ramps will be required to be fully designed. Whenever the connected roadway edge will change elevation, a full design is required. DPU must have agreement in advance with DPS to use design build ramps on a utility improvement, capital improvement project.

4. Utility Improvements - Privately Funded.

For any ADA ramp to be constructed or reconstructed by a privately funded utility project, the permit holder must submit a design meeting the requirements of a design/build contractor submittal which must be provided to DPS for review and approval. A full design may be required where it is determined that location constraints will require more detail.

5. Roadway Improvements - Privately Funded.

Where there is work to the adjacent roadway, traffic signal, or push button changes, a full design is required.

6. Property Improvements - Privately funded.

Where a privately funded property improvement does not qualify for the City to design and construct the ramp(s), and does not require an E or CC plan, a design/build contractor submittal must be provided to DPS for review and approval. Based on complexity, DPS may require a full design be submitted.

XI. INTERSECTION DESIGN ADA BEST PRACTICES

The following are best practices to be utilized when designing ramps and PARs at an intersection. These are not absolute requirements but should be used when the project allows. The type of project, scope of work, availability of right-of-way, and existing facilities are all factors in the ultimate design of the intersection.

- Locate ramps as close to the intersection as possible so that the crosswalk is most visible to turning traffic and ramps are closest to the naturally travelled path. Detail on ramp location preference order is provided in [Figure 9-5](#).
- Ramp alignment should be as perpendicular as possible to the street being crossed. For corners with small radii (typically less than 11') moving the ramp to the straight section of

curb is typically best. For larger radii corners, locate the ramps within the legal crosswalk as close to the intersection as possible.

- The City of Columbus ramp type hierarchy is provided in [Columbus Standard Construction Drawing 2319](#).
- Utilize perpendicular ramps whenever possible.
- Align paired ramps as much as possible.
- Maximize ramp running slope.
- Minimize the use of cell walls and curb walls behind sidewalk and grade embankment when possible.
- Utilize all available ramp designs before acquiring ROW for the sole purpose of ramps. If ROW must be acquired, construct the most preferred ramp possible.
- Provide a concrete walking surface in the path that able-bodied pedestrians will typically take. On corners with tree/lawn and tighter radius corners, typically in residential areas, install type D ramps and include sidewalk for those not requiring ramp use to walk straight across the street to the opposing sidewalk.
- Do not create very small grass patches less than 3' by 4' that will become maintenance problems.

XII. OTHER ELEMENTS

A. Detectable Warning Units

1. General.

Detectable warnings shall consist of a surface of truncated domes complying with the [City of Columbus Construction and Material Specification 608](#). Detectable warnings provide a distinctive surface of truncated domes detectable by cane or underfoot to alert people with vision impairments of the transition to vehicular ways. These warnings compensate for the sloped surfaces of curb ramps which remove a tactile cue provided by curb faces. Detectable warnings shall be on the list of products approved by the City of Columbus.

2. Where Required.

Detectable Warnings (“truncated domes”) shall be used to mark the street edge where a pedestrian path crosses a vehicular way. Visually impaired persons traditionally use the curb as a way finding device that indicates the edge of pavement. As a rule of thumb, detectable warnings are to be installed in any situation where curb has been replaced with a level surface in order to allow persons having mobility disabilities to access crosswalks or other pavement areas. Detectable warnings shall be included in all PAR crossings of public roadways, alley crossings, and at all signalized or striped commercial driveways. This requirement exists whether-or-not the pathway is sloped to the roadway surface (curb ramp) or level (blended transition). Detectable warning units are not required at approaches to driveways serving single family residential units or to duplex residential units. They are required at approaches to driveways providing access to publicly accessible parking areas serving multifamily residential and commercial establishments if the intersection is signalized or has marked crosswalks. If such a crossing presents a hazard to pedestrian safety, the City may require that detectable warnings be used. It is important not

to place detectable warnings where not required, as this will diminish the effective message of the detectable warning. Where a detectable warning is improperly placed in the right-of-way, it should be removed.

Detectable warnings are used and shall be included to mark the following features:

- Curb ramps;
- Street-level transitions;
- Borders of medians and islands where the approaching ramps also have detectable warnings;
- Depressed corners;
- Borders of raised crosswalks and raised intersections;
- Street crossings for shared-use paths; and
- Sidewalks crossing railroad tracks.

B. Pedestrian Push Buttons and Accessible Pedestrian Signals (APS)

1. General.

Push buttons shall be mounted so that the face of the push button is no closer than 18 inches from the face of the curb.

Push buttons shall be mounted so that the face of the push button is no further than 10 feet from the face of the curb.

ADVISORY: Where no curb exists, this distance shall be measured from the edge of the gravel shoulder or berm farthest from the roadway. Where neither a curb, shoulder nor berm exists, distance shall be measured from the outside edge of the roadway ([Figure 12-4](#)).

EXCEPTION: The 10-foot maximum distance shall be waived if the length of the curb ramp, including a 4-foot landing or “clear ground space”, exceeds 10 feet or other existing conditions make this distance infeasible. Exceptions to this requirement must be accepted through the exception process described in this document.

Where push buttons are used to cross both streets at the same corner, a minimum separation of 10 feet shall be maintained ([Figure 12-1](#)).

EXCEPTION: The minimum distance from other push buttons shall not apply to push buttons located in medians and islands.

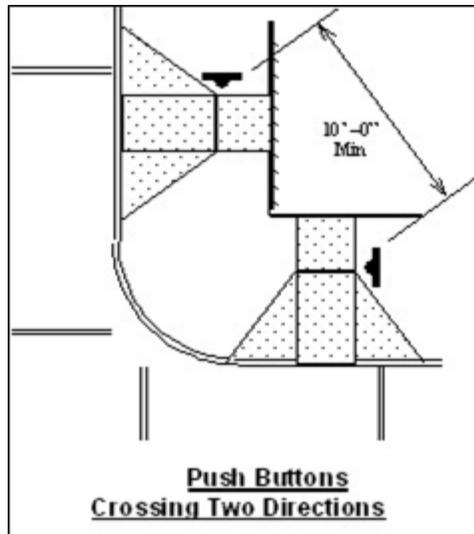


Figure 12-1

Push buttons shall not be located in the ramp slope or flares ([Figures 12-1](#), [12-2](#), [12-3](#), and [12-4](#)).

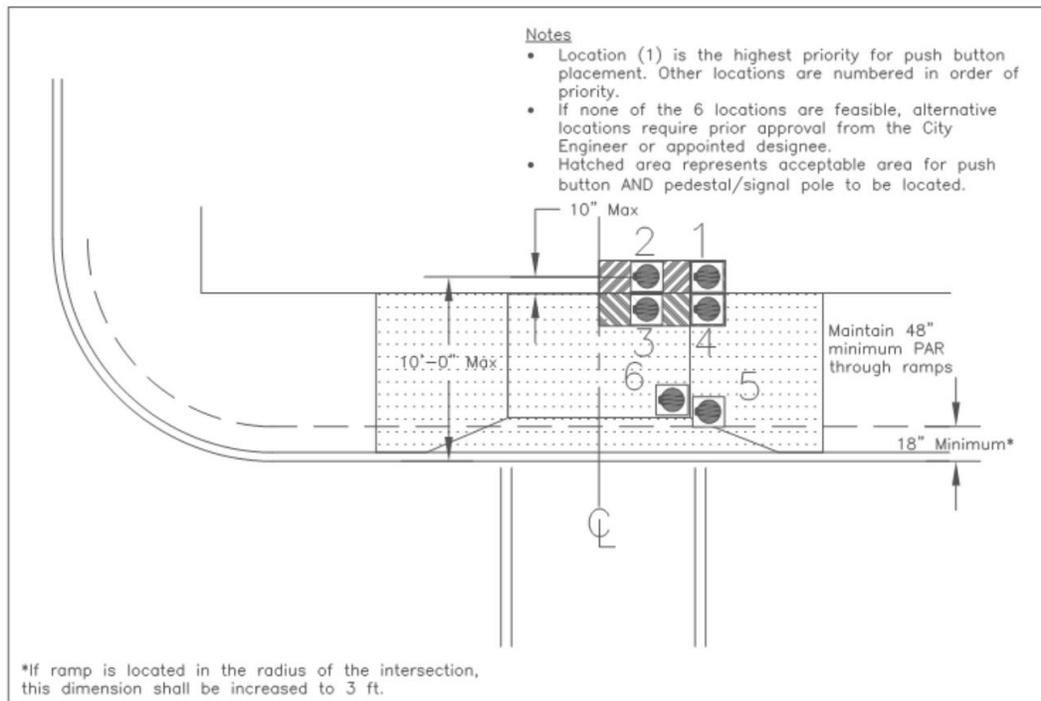


Figure 12-2

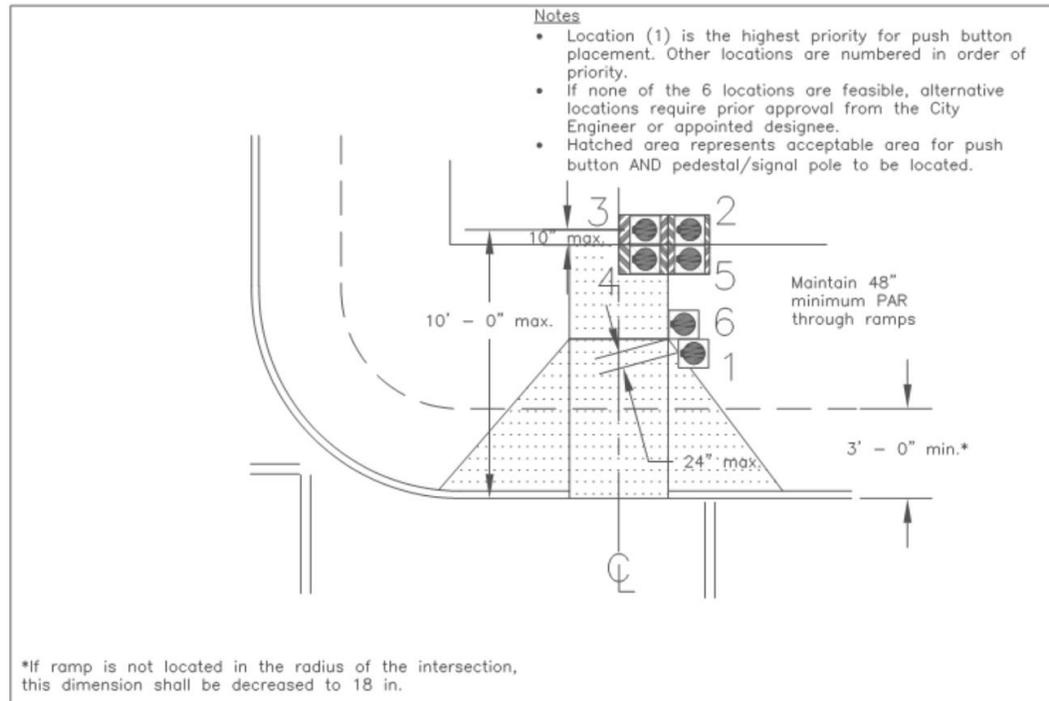


Figure 12-3

Push buttons may be located in the ramp landing or pedestrian walkway provided that the clear width of the Pedestrian Access Route (PAR) is not restricted to less than 48 inches ([Figures 12-2](#) and [12-3](#)).

2. Mounting Height.

A Push button mounting height of 42 inches is preferred. If deviating from the standard is required, the minimum allowable mounting height is 36 inches and the maximum allowable mounting height of 46 inches, as approved by the Engineer.

ADVISORY: Push button height shall be measured vertically from the center of the push button to the surface of the ramp landing.

3. Push button Device.

Refer to the [City of Columbus Construction and Material Specifications, Section 732.06](#) for push button specifications.

4. Reach and Proximity.

Push buttons shall be located no more than 10 inches behind the curb ramp landing. Standard for pedestal mounted push buttons is 10 inches rear and side reach. When the pushbutton is placed for forward reach, a maximum of 24" reach is allowable. Refer to [Figures 12-2](#) and [12-3](#).

5. Orientation.

If push buttons are mounted behind the sidewalk, the control face of the push button shall be parallel to the crosswalk being served. If push buttons are mounted in the sidewalk or

tree/lawn area, the control face of push buttons shall be perpendicular to the centerline of the street and parallel to the crosswalk being served and shall be mounted so that the control face of the push button is facing the intersection. Refer to [Figure 12-4](#).

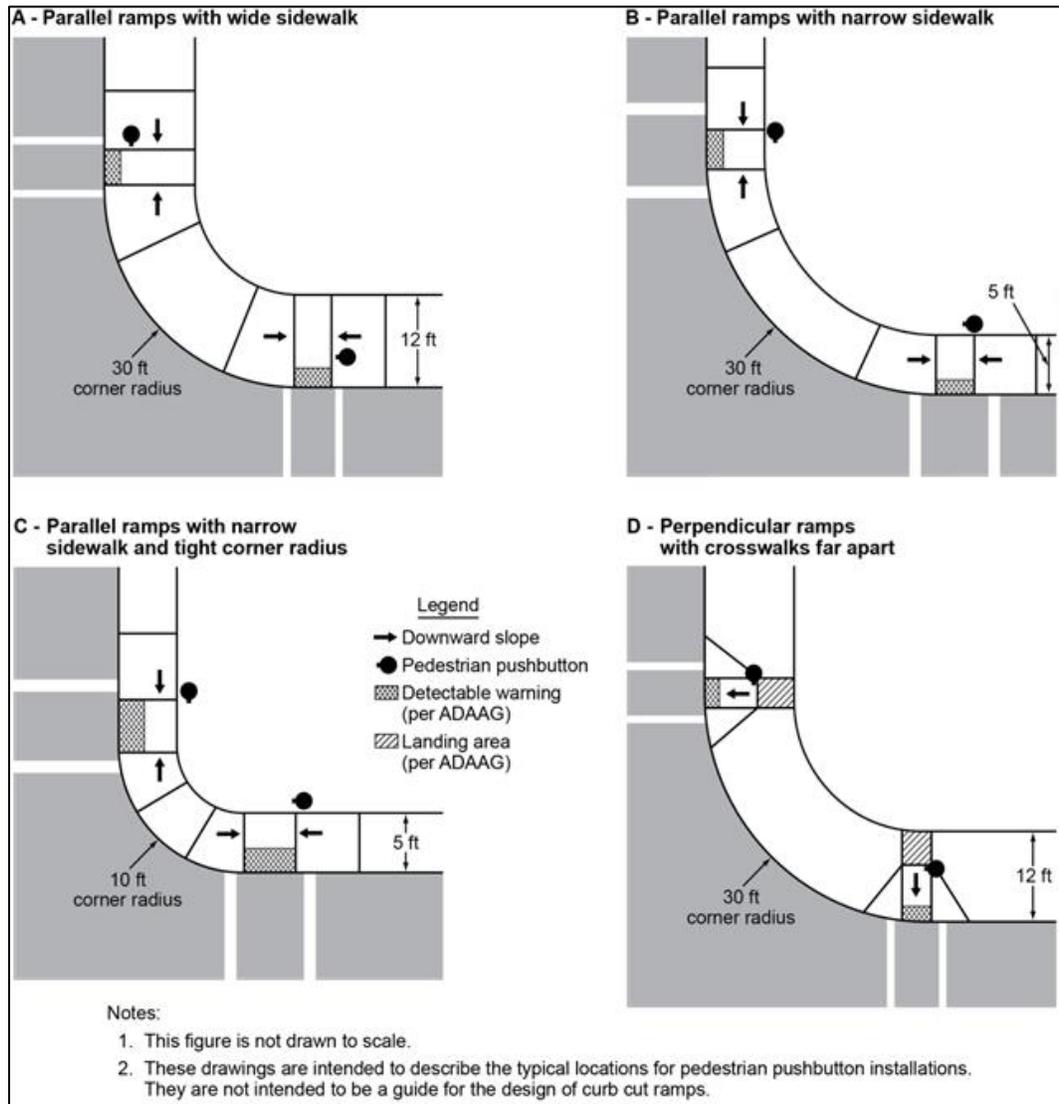


Figure 12-4

6. Accessible Pedestrian Signals (APS).

Accessible Pedestrian Signal installation will be based on public request and evaluation by the Department of Public Service. Push button placement described below is based on APS compliant positioning, so existing pedestals can be easily retrofitted with APS at a later date.

7. Conduit for Future APS Installation.

Conduits for future APS unit pedestal locations are to be installed on traffic signal builds. Refer to the Traffic Signal Design Manual for additional information.

8. Pushbutton Placement Exception.

Where placement of the pushbutton per [Figures 12-2](#) and [12-3](#) is not feasible, the placement area of the pushbutton may be expanded to what is shown in OMUTCD 4E-3. This expanded placement is only permitted as a last resort with a written design exception.

C. Shared-Use Paths

1. General.

Shared-use paths shall meet all requirements for an accessible “Pedestrian Access Route” as defined herein, and shall be designed in accordance with AASHTO’s “Guide for the Development of Bicycle Facilities” and the City of Columbus requirements.

2. Landings.

Landings shall be constructed where the running grade of the shared-use path exceeds 5%. For grades up to 8.33% (1:12), landings are required at every 30-inch change in elevation (rise). For steeper grades, consult the City Engineer or their designee. Landings may be on either side of the path and may alternate sides. Landings shall be 5 feet by 5 feet minimum. Approach and departure tapers to each landing are required.

3. Street Crossings.

- a. **Alignment.** Street crossings should be aligned with the shared-use path (see AASHTO for turn radius guidelines).
- b. **Curb Ramps.** Curb ramps meeting requirements specified elsewhere in this document shall be provided whenever the pathway crosses a curb or the travel paths of bicycles or motor vehicles.
- c. **Curb Ramp Width.** Curb ramps and transitions shall be as wide as the shared-use path when measured perpendicular to the centerline of the path and a minimum of 4-foot wide when measured perpendicular to the centerline of the wheelchair path.
- d. **Curb Ramp Flares.** Curb ramp flares shall lay outside of the width of the shared-use path.
- e. **Lips.** Lips greater than ¼” are not permitted.
- f. **Detectable Warnings.** Detectable warnings shall be provided in accordance with the requirements specified elsewhere in this document. Detectable warnings shall be installed at any and all locations where the base of the ramp and the street are flush.

D. ADA Parking Meters and Spaces

1. Accessible Parking Requirements

a. Definitions

- i. “Block” shall mean four (4) intersecting streets, not to include alleys.

- ii. “Marked or metered parking space” shall mean distinct individual parking spaces defined by a parking meter, sign or striping that defines a single stall for vehicular parking.
- iii. "Parking meter" means any mechanical or electronic device used, placed, installed, or erected at or near the curb adjacent to the parking lane, or otherwise on property which is owned, leased, or operated by the city. A parking meter includes, but is not limited to, single space meters, multi-space meters, and parking mobile payment applications authorized by the city of Columbus.
- iv. “Parking zone” shall mean an area covering multiple blocks containing parking meters. Parking zones will be defined by the Division of Mobility and Parking Services. Zones are used to manage the requirement of designated accessible parking spaces in areas with inconsistent or minimal parking per block to ensure that a minimum of four percent (4%) are designated accessible parking spaces.

b. General.

New construction or alterations where changes to parking meters, marked parking stalls, and streetscape projects that reconstruct the entire sidewalk area adjacent to marked or metered parking spaces will trigger required compliance with ADA parking requirements detailed below.

- i. In an area identified as a block, the City shall require that a minimum of four percent (4%) or a minimum of one (1) for every twenty-five (25) on-street marked and/or metered parking spaces on each block shall be accessible parking.
- ii. In an area identified as a parking zone, four percent (4%) or greater on-street marked or metered parking spaces in each parking zones shall be accessible parking.

c. Requirements of Accessible Marked and Metered Parking Spaces

- iii. All accessible parking spaces shall be identified by a sign displaying the International Symbol of Accessibility and placed at the front of the parking space as to not impede the deployment of a side-lift ramp. In the case where there is more than one accessible parking space, a sign displaying the International Symbol of Accessibility may be placed at the front of the first parking space and at the rear of the last space. A sign is not required at the front of each accessible parking space.
- iv. Accessible parking metered spaces may have a blue parking meter with an approximate height of forty-three (43) inches that includes a post and meter head.
- v. Parking meters may be located at the head or foot of the parking space.
- vi. Displays and information shall be visible from a point located 3.3 feet maximum above the center of the clear space in front of the parking meter or parking kiosk.
- vii. Accessible spaces shall be placed at the first and/or last parking space on the block perimeter where compliant curb ramp exist or will be constructed with the project affecting parking. Always place the ADA parking space on the lesser travelled street where feasible.

- viii. In locations where the first and/or last parking space cannot meet the required standards, the City shall evaluate the contiguous streets to determine if the first and/or last parking space can meet the required standards.
- ix. In locations where a mid-block parking space is requested, the City will evaluate on a case-by-case basis to determine if reasonable accommodations can be made.
- x. All on-street accessible parallel parking spaces shall be free of signs, street furniture, and other obstacles to permit deployment of a van side-lift ramp or the vehicle occupant to transfer to a wheelchair or scooter.
- xi. In the case where a construction project has displaced an on-street marked and/or metered accessible parking space, the City will reinstall the parking space upon completion of the construction project or will permanently move the accessible parking space to an alternative location.

d. Residential On-Street Accessible Parking

- i. On-street parking in some residential neighborhoods is a limited resource, especially in areas having minimal off-street parking facilities. The mobility of some citizens with disabilities or mobility challenges can be enhanced by the establishment of reserved parking spaces along public streets for handicapped designated vehicles.
- ii. All requests for a residential on-street handicapped parking space shall meet the requirements set forth in the Residential On-Street Handicapped Parking Rules and Regulations and shall be handled on a case-by-case basis

e. Review of current accessible parking

- i. On an annual basis, the Division of Mobility and Parking Services will review each designated parking zone to assure the four percent (4%) accessible parking requirement is compliant. If the parking zone is non-compliant, the Division will work diligently to identify accessible parking spaces meeting the requirements in [Section XII.D.1.c.](#)
- ii. Within one year of each parking zone being established, the Division will identify and sign appropriately four percent (4%) of the on-street parking in each parking zone as accessible parking spaces. The Division will maintain a map of each parking zone and identify each accessible parking space on the map.

XIII. EXCEPTIONS TO REQUIREMENTS

The intent is for all ADA facilities within the public right-of-way to meet the requirements described within this document. In alteration projects, existing conditions may prohibit full compliance by making it technically infeasible or creating a disproportionate cost to obtain full compliance. In this case, the project should make the location as compliant as possible, document the exception to ADA requirements, obtain the required approval, and maintain a record of the exception with project documentation.

Required Documentation. Where the project has determined that there is no other feasible means to construct a fully compliant facility, specific design exceptions will each be detailed and submitted to the City engineer or their designee for approval. The submission should be made by

the City representative for the project. This could be the design project manager, construction project manager, private plan reviewer, or permits counter representative.

The exception request shall include the following:

- Date
- Associated project name
- Project number
- Specific location
- Description of the exception
- Deviation from requirements
- Alternatives considered
- Justification for the exception
- Name of design professional requesting exception.

The City Engineer or his or her designee will review the request and determine if the exception is technically infeasible. If the exception is approved, a written approval will be provided to the City representative for the project. The exception shall be filed with the project documents to maintain the record.

XIV. ADA ACCEPTANCE PROCESS

The intent of this policy is to install and document ADA compliant ramps at all locations required by a project's limits and type of work. All newly constructed ramps must be accompanied with an official City of Columbus Curb Ramp Compliance Checklist signed by the contractor's ADA Compliance officer. The most current version of this form can be found on the City of Columbus website.

Any contractor performing modifications or constructing new ADA curb ramps and consultants designing new ramps or determining whether existing ramps are compliant, must name an ADA Compliance officer to represent the company regarding ADA issues. The ADA Compliance officer will sign off on all Curb Ramp Compliance Checklists. It is not required that the ADA Compliance officer be present at the time of measurement, but they take full responsibility for the ADA compliance information provided to the City of Columbus. The name of the ADA Compliance officer must be provided at the project's preconstruction meeting, design kick-off meeting, or initial meeting for other types of projects. Provide the ADA Compliance officer's name and contact information on a dated letter to be maintained with the project files.

XV. RAMP COMPLIANCE CHECK SCENARIOS

Existing Ramps to remain as compliant - When existing ramps, within the limits of a project whose scope requires installation of ADA ramps, are already compliant, the designer is not required to replace these facilities. An existing curb ramp may be considered compliant if it contained a currently accepted detectable warning in good condition and has no visible signs of non-compliance.

Ramps constructed with CIP projects - All new ramps constructed on projects administered by the City of Columbus must be accompanied by a Curb Ramp Compliance Checklist signed by the contractor's ADA Compliance officer. Payment may be withheld for the ramp until the compliance form is received.

Ramps constructed by private developers and private utilities - Compliance forms must be completed by the contractor's or designer's ADA Compliance officer for all new ramps constructed or existing ramps to remain within the scope of the project.

Compliance verification - The City of Columbus will assure compliance by randomly verifying compliance measurements of completed ramps and existing ramps to remain in place. If it is determined that a provided Curb Ramp Compliance Checklist is not accurate and calls a ramp compliant that is not, a strike will be tallied against the firm's ADA Compliance officer. If the Compliance officer accumulates three strikes in a rolling two year period, they will no longer be allowed to act as an ADA Compliance officer.