

Stonefield Investments, LLC
Attention: Robbie Wright
1539 9th Street
Florence, Oregon 97439

Re: Stonefield Subdivision Design Exemption for Driveway Transition Grades
Rhododendron Drive TL 18-12-04-44-03800

Robbie,

Per your request, and by request of The City of Florence, Johnson Broderick Engineering has reviewed the Public Rights-of-Way Accessibility Guidelines (PROAG) prepared by the U.S. Access Board to determine if the six-foot-long transition of the sidewalk from a standard six-inch curb to a zero-height curb at the driveway will provide slopes within the specified guidelines.

In the PROAG a pedestrian access route is described as a continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path. Where a pedestrian circulation path is a prepared exterior or interior surface provided for pedestrian travel in the public right-of-way. These driveway transitions are a part of the pedestrian access route but are often mis-identified as required to meet the provisions for curb ramps. According to section R207.01 A curb ramp, blended transition, or a combination of curb ramps and blended transitions complying with R304 shall connect the pedestrian access routes at each pedestrian street crossing. The curb ramp (excluding any flared sides) or blended transition shall be contained wholly within the width of the pedestrian street crossing served. There is no mention of curb ramps being applied at driveway transitions, or non-street crossings. However according to R302.5.1 Within Street or Highway Right-of-Way. Except as provided in R302.5.3, where pedestrian access routes are contained within a street or highway right-of-way, the grade of pedestrian access routes shall not exceed the general grade established for the adjacent street or highway. In addition, Section R302.5.4 references physical constraints and states; where compliance with R302.5.1 or R302.5.2 is not practicable due to existing terrain or infrastructure, right-of-way availability, a notable natural feature, or similar existing physical constraints, compliance is required to the extent practicable.

The curb-side sidewalk runs along at the general grade established for the adjacent street as required by R30.5.1. This layout will cause the transitions to the driveway to be greater than the running slope of the sidewalk at one side of the driveway. This is understandable and leads us to infer that the driveway transitions need to be sloped greater than the adjacent road grade in all

curb-side sidewalks. With the knowledge there is no clearly stated distance or slope that the transitions need to meet in the PROAG, and that the site's existing terrain that has caused the design roadway slope to be from 12%-8.3% in most locations, it is our opinion that the 6' transitions on either side of the driveways are an adequate approach to meet the criteria the maximum extent practicable.

We appreciate the opportunity to be of service. Please call if you have any comments or questions.

Signed: 2023.09.20

Sincerely,

Robert L. Johnson, P.E.
Principal, Johnson Broderick Engineering, LLC



Expires: 2025.06.30