

2021 de Young Museum Accessibility Review - Key Findings

In July 2021, the de Young Museum retained MIG to conduct an independent review of accessibility issues at the Museum within Golden Gate Park, stemming from the temporary road closure of John F. Kennedy Drive and removal of accessible parking surrounding the Museum. **This report details how the permanent elimination of these free ADA parking spaces that serve the de Young Museum, and the permanent closure of the street, causes a reduction of access through the removal of accessible features.**

ADA Standards allow alternatives to specified requirements that provide **substantially equivalent or greater accessibility and usability as an “equivalent facilitation.”**¹ The question of whether an alternative solution is “equivalent” involves considerations as to whether it is just as, if not more, effective in terms of accessibility, usability, convenience, and reliability for people with disabilities.

This report provides a discussion of the regulatory requirements to provide access for Museum visitors with disabilities, applicable technical codes, and a summary analysis based on existing conditions. The report includes an assessment of the existing accessible parking and associated paths of travel serving the Museum and an analysis of the impact of street closures on meaningful access to the Museum. Finally, the report considers the alternative proposals from SFMTA and RPD’s Golden Gate Park Access and Safety Program, if permanent road closure is pursued beyond the temporary COVID-19 closure.

The report’s key findings include:

- **JFK Drive Provides Most Accessible Parking:** The JFK Drive spaces represent the best existing option for accessible parking that serves the de Young Museum, based on distance and accessible route. Per 11B-208.3.1, accessible parking serving a building or facility must be on the shortest accessible route from parking to the accessible entrance. The JFK Drive spaces are the closest accessible spaces to the de Young Museum, at a distance of 200 feet. With their removal, the closest accessible street spaces are along MLK Drive, 1,250 feet from the entrance to the Museum. This is an increase of over 1,000 feet in the required path of travel from accessible street parking to the de Young Museum. In addition, removing these spaces reduces accessibility for those who use a van lift in their vehicle for wheelchair access.
- **Shuttle Service is Inadequate:** The shuttle service runs only on weekends and holidays, and during limited hours; its shuttle stops and associated paths of travel are not accessible. Its schedule is unreliable. This service is not “equivalent facilitation” as it limits the time allowed to visit the park, and the length of visit is determined by shuttle service availability. Furthermore, the shuttle service does not provide substantially equivalent or greater accessibility and usability as someone having the ability to drive their personal vehicle and park at an accessible parking space and does not encourage independent access to the site.

¹ Americans with Disabilities Act, ADA Update: A Primer for State and Local Governments
https://www.ada.gov/regs2010/titleII_2010/title_ii_primer.html

- **Parking Garage Not Accessible For Drop-Offs:** The Music Concourse Parking Garage does not provide the minimum requirements for accessible passenger loading and drop-off zones. CBC and ADAS require a minimum 20 foot long by 8 foot wide vehicle pull-up area (11B-503.2). Adjacent to that is a required 20 foot long by 5 foot wide access aisle to load/unload people from the vehicle (11B-503.3). This entire area must be located on the same level and connected to an accessible route (11B-503.4). The minimum height of the vehicle pull-up spaces is required to provide a minimum clearance of 114 inches. (11B-503.5). The minimum clearance would be required at the vehicle pull-up spaces, access aisles serving them, and a vehicular route from an entrance to the passenger drop-off and loading zone to a vehicular exit. The parking garage provides 98-inch clearance.

This option would not be allowed as equivalent facilitation to the removal of parking, or the removal of the existing accessible drop-off adjacent to de Young Museum, currently provided at the Music Concourse area in front of the Museum.

- **Fulton Street Loading Zone & Parking Not a Replacement:** Fulton Street is located outside of the park site, therefore parking spaces are not within the park right-of-way. This proposed option diminishes an already deficient accessible parking within the park site creating less access. Additionally, the segments of Fulton Street within the project area are located on San Francisco's High Injury Network (HIN)². Since it is located along a HIN, it may not be a safe alternative, and due to not being located within the park right-of-way, it does not comply with ADA or CBC scoping³ requirements.

The entrance from Fulton Street and 10th Street is the closest site arrival point for public transportation and from the public sidewalk. However, an accessible route is not provided leading from this location to the Museum entrance. Closing JFK Drive also affects the accessible route from Fulton Street in other ways. The designated accessible routes lead to the crosswalks that cross JFK Drive. A crosswalk intends to alert motorists that there is a pedestrian crossing and to yield to a pedestrian. While on-site, it was observed that the bicyclists and motorized skateboards were moving at rapid rates and not yielding to pedestrians crossing, creating hazards to those coming from site arrival points located at Fulton Street. This condition reduces the accessibility intended for people using mobility aides and pedestrians with low vision or who are blind.

- **Tour Bus Parking/Japanese Tea Garden Parking Lot Less Accessible:** The spaces themselves do not comply with 11B-502. The access aisles are not marked correctly; paint has faded and is not in contrast with the asphalt (11B-502.3.3), and the slopes of the access aisles exceed 2% (11B-502.4). These access aisles are not connected to the shortest accessible route leading to the Museum entrance (11B-208.3.1). Parking spaces are located at the far end of the parking lot. Vehicles were parked on what would be considered the shortest accessible route that leads to the Japanese Garden and de Young Museum both days of the site visit, so the route requires diverting to MLK Drive from the parking lot to access the Museum.

This route has multiple locations where slopes make the walk inaccessible and vertical discontinuities exceed 1/2-inch. Containers block an alternative route from the lot directly linked

² <https://www.sfmta.com/project-updates/initial-plan-fulton-street-safety-and-transit-project>

³ CBC 11B-206.2.1

to the Japanese Tea Gardens and the de Young Museum. One would need to travel an additional 730 feet from this parking lot from where the existing accessible parking is located along JFK Drive. In short, this parking lot is not functionally accessible for Museum guests.

Conclusion

The closure of JFK Drive to vehicles and the associated removal of accessible parking has increased the burden on people with disabilities by increasing the distances these individuals must travel between their cars and the entrance to the de Young Museum. By removing free accessible parking in the immediate vicinity of the Museum and by not providing equivalent free parking within a reasonable travel distance to the Museum, the City is reducing program access and is not meeting its obligations under title II of the ADA. Alternative methods of accessing the Museum, including passenger drop-off areas, the park shuttle service, and walkways within the park, all have identified barriers to accessibility and do not negate the need for accessible parking spaces.

By reviewing programmatic access as a whole, those with ambulation disabilities have experienced a reduction in both parking and access to the Museum within Golden Gate Park. The new alternative and newly proposed options provide much less access, as has been shown in this report.

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DE YOUNG MUSEUM
AT GOLDEN GATE PARK
PARKING, PATHS OF TRAVEL,
AND SHUTTLE SERVICES -
ACCESSIBILITY REVIEW



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PREPARED FOR:

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1. INTENT OF REPORT

MIG was contacted as a consulting expert to examine access issues at the de Young Museum within Golden Gate Park in San Francisco, stemming from the removal of accessible parking surrounding the museum. This report provides a discussion of the regulatory requirements to provide access for museum visitors with disabilities, applicable technical codes, and a summary analysis based on existing conditions. The report includes an assessment of the existing accessible parking and associated paths of travel serving the museum and an analysis of the impact of street closures on meaningful access to the museum. Alternative methods of access are also examined, including the passenger drop-off area in front of the de Young Museum and parkwide shuttle service that includes a stop at the museum. MIG conducted a site visit on July 17 and 18, 2021, to verify existing conditions. MIG evaluated on-street parking provided in the park serving the museum, including the accessible parking spaces on John F. Kennedy (JFK) Drive and Martin Luther King Jr. (MLK) Drive. MIG also examined the parking lots and facilities serving the museum, passenger drop-off areas, and shuttle service stops.

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2. PROJECT UNDERSTANDING

MIG was asked to evaluate whether the City of San Francisco is meeting its obligations under the Americans with Disabilities Act (ADA) in the wake of the temporary removal (and planned permanent removal) of the 17 free accessible parking spaces along JFK Drive due to the closure of JFK Drive to vehicles. These free parking spaces are the closest accessible parking in the immediate vicinity of the de Young Museum. MIG's understanding is that the COVID-19 pandemic has caused some extraordinary conditions and that the temporary closure of JFK Drive during the week provides more outdoor activity space. This temporary closure is allowed by the ADA. However, as this report will illustrate, the removal of these 17 free parking spaces that serve the de Young museum and the permanent closure of the street causes a reduction of access through the removal of accessible features. The accessible parking spaces on JFK Drive provide a crucial role in accessing the museum for visitors with disabilities.

As a title II agency, the City is responsible for providing accessible programs and facilities that are available without discrimination toward people with disabilities. A fundamental tenet of title II of the ADA is *“the principle that individuals with disabilities must be provided an equally effective opportunity to participate in or benefit from a public entity's aids, benefits, and services.”*¹ As such, in addition to applying the codes and regulations outlined in this report, the City has an obligation to consult with people with disabilities when setting priorities for achieving program access.

MIG's client, the Corporation of the Fine Arts Museum (COFAM), asserts that the closure of JFK Drive places a burden on people with disabilities who wish to visit the museum significantly diminishes program accessibility. The closure increases the distance these individuals must travel between their cars and the entrance to the museum, and there is a lack of equivalent free parking within a reasonable travel distance to the museum. This assertion is supported by anecdotal evidence from stakeholders in the disability community, suggesting that the longer routes required have prevented many guests from visiting the museum and reduced programmatic access.²

¹ 28 CFR § 35.130-35.135. II-3.3000 Equality in participation/ benefits

² Mayor's Disability Council Open Letter to San Francisco Recreation and Parks Department. <https://www.sfcta.org/sites/default/files/2021-01/MOD%20Open%20Letter%20to%20RecPark%202018.pdf>

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3. HISTORY

JFK Drive is the main thoroughfare through Golden Gate Park, providing access to major destinations for both San Francisco residents and visitors from outside the City. Portions of JFK Drive have long been closed to vehicle traffic on the weekends to promote active transportation and safer spaces for recreation; the Sunday vehicle closure has existed since 1967, with Saturday closures beginning in 2007. In response to the COVID-19 pandemic, JFK Drive from Kezar Drive to Transverse Drive was closed to cars every day of the week as part of the City's effort to allow greater physical distancing during outdoor activities. Now, the City is proposing to close JFK Drive to vehicles permanently.

The closure of JFK Drive and associated roads has disproportionately impacted community members with limited mobility, including people with disabilities. JFK Drive closure removes 26 accessible parking spaces in total, with 17 in the immediate vicinity of the de Young Museum. These 17 spaces are the closest free accessible parking spaces to the museum within 1/10th of a mile of the de Young Museum entrance. They represent 57% of the free accessible parking within a 1/4 mile of the museum entrance and 41% of the free accessible parking within 1/2 mile.³ Stakeholders from the disability community and museum visitors have voiced their concerns: in 2020, the Mayor's Disability Council convened a focus group specifically on the road closure. Its participants "all agreed that having adequate free parking adjacent to the de Young Museum is essential to their ability to enjoy that area of the Park."⁴

Officially, the City of San Francisco is committed to equity and inclusivity and has made efforts since the 1960s to make Golden Gate Park and the various sites within it more accessible to people with disabilities while at the same time balancing pro-bike and pro-pedestrian concerns. Street closure policies related to JFK Drive are currently codified in the San Francisco Park Code Section 6.12, *Disability Access Standards and Authorized Vehicular Traffic Use for Golden Gate Park During Sunday Road Closures*, excerpted here:

*(b) **Disability Access Standards.** The following disability access standards shall apply to the Sunday and holiday road closures of John K. Kennedy Drive and related roads.*

(i) Disability access to Golden Gate Park shall comply with the Americans with Disabilities Act and the Golden Gate Park Revitalization Act of 1998.

(ii) All vehicular access points to the areas of closure shall contain directional signage that describes all access points and accessible surface parking areas for people with disabilities and provides directions to the underground parking facility in the Music

³ *Access for All.* Fine Arts Museums of San Francisco. <https://deyoung.famsf.org/accessforall>

⁴ *JFK Drive Closure and People with Disabilities.* Summary of December 10, 2020 Focus Group. <https://www.sfcta.org/sites/default/files/2021-01/MOD%20focus%20group%20Dec%202020.pdf>

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Concourse. Signage also shall include telephone and TTY/TDD contact numbers where callers can obtain information on disability access during the road closure periods.

(iii) The Department, in consultation with the Department of Parking and Traffic, Fine Arts Museums, Golden Gate Park Concourse Authority, and Mayor's Office on Disability, shall explore and adopt disability access measures. Such measures may include, but are not limited to:⁵

(A) The provision of eight (8) accessible parking spaces on 8th Avenue between Fulton Street and John F. Kennedy Drive during the closure period.

(B) An additional ten (10) accessible parking spaces to assist with access to the road closure areas.

(C) A signed drop-off zone for people with disabilities on Bowling Green Drive as close as practicable to its intersection with John F. Kennedy Drive.

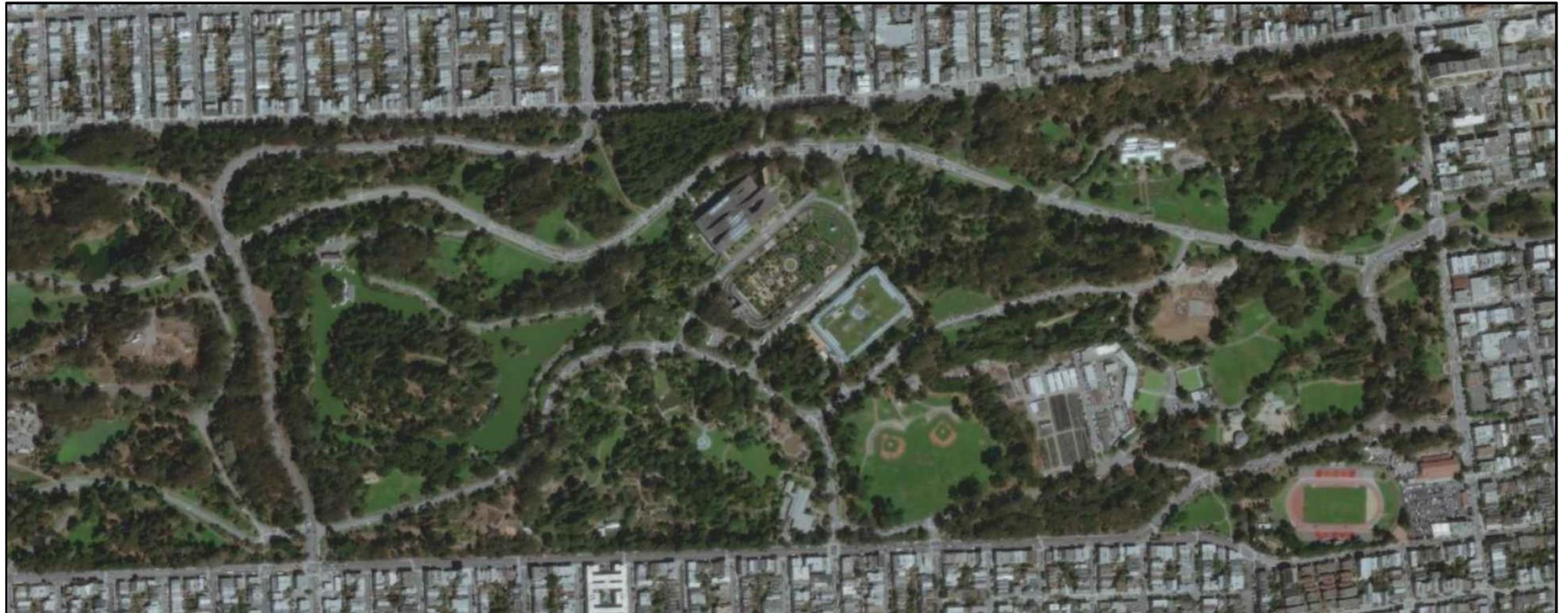
(D) An authorized intra-park transit shuttle that is accessible and operates frequently on the closed sections of John F. Kennedy Drive, additional accessible parking spaces and additional signed drop-off zones for people with disabilities outside of the area of closure.

Although there are City policies to increase accessible parking within the park, the City is actively reducing access to the de Young Museum and other facilities within Golden Gate Park by removing the Music Concourse surface parking lot and the proposed removal of the accessible parking along JFK Drive. Paid parking is available at the Music Concourse Underground Garage, a privately -owned and operated parking garage built on city-owned property leased by the non-profit 'Music Concourse Community Partnership' (MCCP) located adjacent to the de Young Museum. Free or discounted parking for people with disability placards is not available in the garage. The Music Concourse surface parking Lot near the museum has been reallocated for other functions.

Recently, five new on-street accessible parking spaces were installed along MLK Drive at the entrance to the Music Concourse at the intersection with Nancy Pelosi Drive.⁶ These spaces are at a greater distance to the museum than the spaces on JFK Drive. Additionally, the parking spaces are located along a circulation path that does not meet the requirements of an accessible route due to uneven walks and a reduction in width. This location is discussed later in this report and shown in Exhibit 1.

⁵ https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_park/0-0-0-353

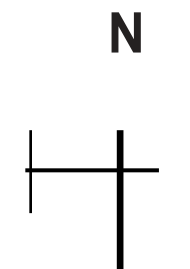
⁶ Golden Gate Park Stakeholder Working Group and Action Framework. May 2021. https://www.sfcta.org/sites/default/files/2021-05/GGP_Stakeholder_Working_Group_and_Action_Framework-2021-05-11-FINAL.pdf



de Young Museum
Shuttle Map Exhibit



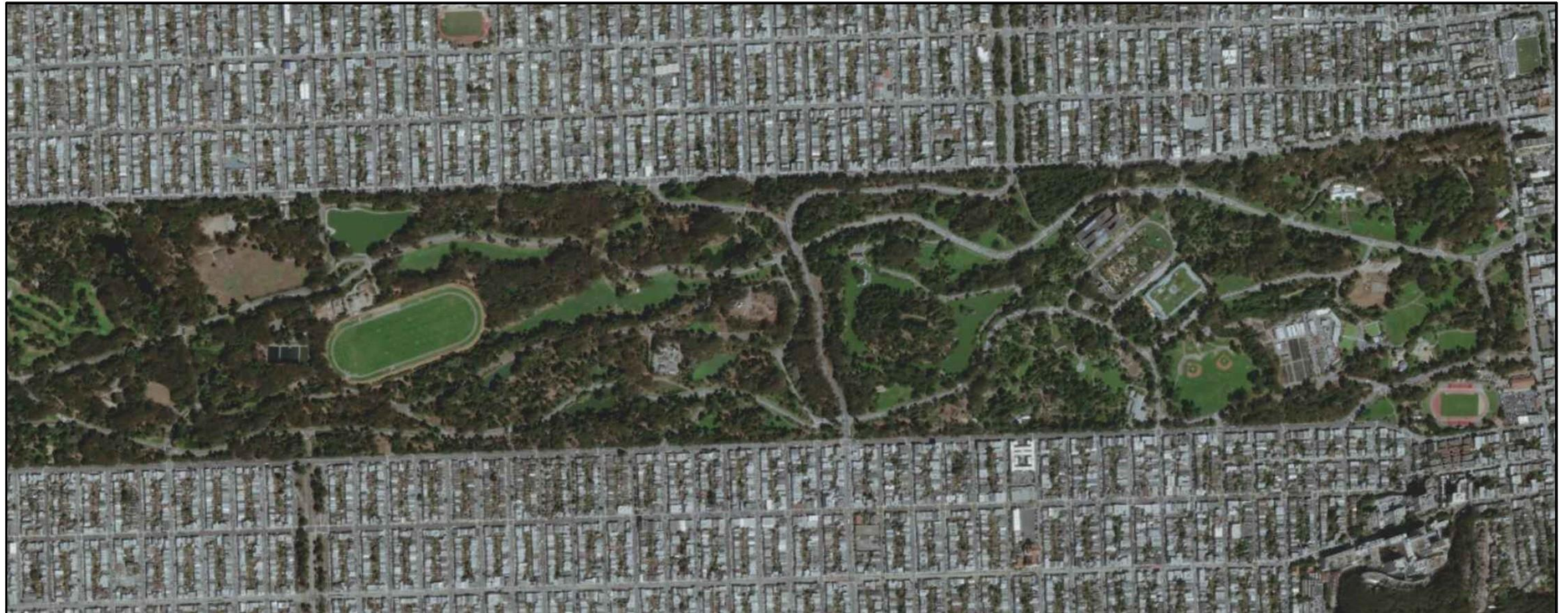
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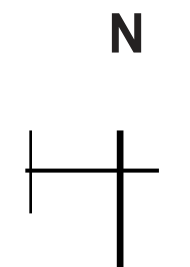
Overall parking within Golden Gate Park lacks the minimum required accessible spaces, as detailed later in this document and depicted in Exhibit 2 and Exhibit 4, which illustrates the accessible spaces referenced in this report and located within the vicinity of the de Young museum. Additionally, the existing accessible spaces in the immediate vicinity of the de Young Museum do not meet code requirements, as described in Section 6 *Code Requirements Analysis* of this document and further detailed in the attached *Deficiency Report*.



**de Young Museum
Accessible Parking Exhibit**



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4. PROGRAM ACCESS

The ADA is a comprehensive civil rights law that ensures programs, activities, and services of state and local public entities (title II agencies) do not discriminate on the basis of disability. As a title II agency, the City is responsible for the provision of accessible programs and facilities. This includes facilities it owns and leases to others, as is the case with the de Young Museum within Golden Gate Park. The City and the Recreation and Parks Department are thus responsible for access to the museum. The following subsections outline the applicable regulations that apply to evaluating meaningful programmatic access to the museum.

A. 28 CFR 35.149

Section 35.149 of the Code of Federal Regulations, *Discrimination prohibited*, states:

Except as otherwise provided in § 35.150, no qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

A public entity may not deny the benefits of its programs to individuals with disabilities because its facilities are inaccessible. This standard, known as program accessibility, applies to all existing facilities of a public entity. It is the City's responsibility to ensure that the facilities of Golden Gate Park do not exclude individuals with disabilities from participation in programs at the de Young Museum, as it is with other programs occurring throughout the park.

B. 28 CFR 35.133 Maintenance of accessible features.

Section 35.133 of the Code of Federal Regulations, *Maintenance of accessible features*, states:

(a) A public entity shall maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities by the Act or this part.

(b) This section does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs.

(c) If the 2010 Standards reduce the technical requirements or the number of required accessible elements below the number required by the 1991 Standards, the technical requirements or the number of accessible elements in a facility subject to this part may be reduced in accordance with the requirements of the 2010 Standards.

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The Department of Justice (DOJ) elaborates on this topic.⁷

*"Temporary access interruptions for maintenance, repair, or operational activities are permitted, but must be remedied as soon as possible and may not extend beyond a reasonable period of time. Staff must be prepared to assist individuals with disabilities during these interruptions. For example, if the accessible route to a biology lab is temporarily blocked by chairs from a classroom that is being cleaned, staff must be available to move the chairs so a student who uses a wheelchair can get to the lab. In addition, if an accessible feature such as an elevator breaks down, public entities must ensure that repairs are made promptly and that improper or inadequate maintenance does not cause repeated failures. Entities must also **ensure that no new barriers are created that impede access by people with disabilities**. For example, routinely storing a garbage bin or piling snow in accessible parking spaces makes them unusable and inaccessible to people with mobility disabilities."*

The permanent closure of JFK Drive creates a disruption to accessing the museum through increasing travel distance, not providing equivalent free parking in close proximity, and not ensuring accessible routes from the accessible parking provided. The shuttle service has been implemented to assist with the disruption of parking access. Still, the shuttle service is inconsistent, only runs on the weekends and holidays, and does not provide accessible bus stops or accessible routes to the bus stops.

The ADA Standards allow alternatives to specified requirements that provide substantially equivalent or greater accessibility and usability as an "equivalent facilitation." The question of whether an alternative solution is "equivalent" involves considerations as to whether it is just as, if not more, effective in terms of accessibility, usability, convenience, and reliability for people with disabilities. For example, the ADA Standards specify permanent or built-in features for independent access. Unless otherwise specified, alternatives involving temporary or portable solutions or requiring assistance from others are not generally deemed equivalent to the required minimum level of access.

The shuttle service does not provide substantially equivalent or greater accessibility and usability as someone having the ability to drive their personal vehicle and park at an accessible parking space and does not encourage independent access to the site.

Ongoing maintenance of accessible items is also addressed in the code and standard as noted in 11B-108 and as addressed in the DSA advisory, noting that this includes parking.

11B-108 Maintenance of accessible features: A public accommodation shall maintain in operable working condition those features of facilities and equipment that are required to

⁷ Americans with Disabilities Act, ADA Update: A Primer for State and Local Governments
https://www.ada.gov/regs2010/titleII_2010/title_ii_primer.html

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be accessible to and useable by persons with disabilities. Isolated or temporary interruptions in service or accessibility due to maintenance or repairs shall be permitted.

DSA Advisory to 11B-108 is presented here for further context:

Advisory 11B-108 Maintenance of accessible features. Features for accessibility must be permanently functional, unobstructed and may not be removed. It is not sufficient to provide features such as accessible routes, parking, elevators, ramps or signage if those features are not maintained in a manner that enables individuals with disabilities to use them. ...”

While some may feel that this would only be applicable to facilities on site, the CBC is clear that this applies to the public right-of-way, as noted in the following sections.

Section 1.9.1 .1. notes the codes are applicable to “all buildings, structures, sidewalks, curbs and related facilities constructed in the state by the use of state, county or municipal funds, or the funds of any political subdivision of the state...”

Section 1.9.1.1.4 adds with respect to buildings, structures, sidewalks, curbs and related facilities not requiring building permits, building standards published in the California Building Standards code relating to access for persons with disabilities and other regulations adopted pursuant to Government Code Section 4450, and in effect at the time of construction is commenced shall be applicable.

Section 1.9.1.2.3 Any curb or sidewalk intended for public use that is constructed in this state with private funds.

C. 28 CFR 35.151(b) Alterations.

Section 35.151 of the Code of Federal Regulations, *Alterations*, states:

(b) Alterations.

(1) Each facility or part of a facility altered by, on behalf of, or for the use of a public entity in a manner that affects or could affect the usability of the facility or part of the facility shall, to the maximum extent feasible, be altered in such manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992.

(4) Path of travel. An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration.

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11B-202.4 has the same requirements but has replaced the ‘primary function’ area to include an accessible path of travel to the specific area of alteration or addition.

*ALTERATION. [DSA-AC] A change, addition or modification in construction, **change in occupancy or use**, or structural repair to an existing building or facility. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility.*

The permanent closure of JFK Drive affects the usability of the program provided at the museum location and decreases the availability of accessible parking spaces that are within a manageable distance and along accessible routes to the museum facility. The closure of JFK Drive is defined as an alteration.

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5. APPLICABLE CODES

The standards that mandate accessibility for the City of San Francisco and the San Francisco Recreation and Park Department are the Americans with Disabilities Accessibility Standards (ADAS) and the California Building Code (CBC). In addition to the ADA and the CBC, the 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) are used as a comparable design standard when addressing facilities in the right-of-way. The City's obligation as a public agency requires implementing the accessibility standards for new projects and alterations. Application of the accessibility standards is dependent on the context of the location of the project. Both the 2010 ADA and the 2019 CBC apply to facilities and sites, and neither addresses scoping or technical requirements for the public right-of-way. As the two codes have an overlapping scope, and the technical requirements of the 2019 CBC are either equivalent or more stringent than the 2010 ADA. CBC scoping references are presented below, and technical references in the following section, *Code Requirements*. Corresponding 2010 ADA references can usually be found under the same number.

A. 2019 CBC

The closure of JFK Drive and removal of associated parking meets the definition for alteration, as a change in occupancy or use of a vehicular way affecting the usability of a building or facility. The City is required to remove physical barriers when it alters a facility, and reduction of access is not allowed per 11B-202.3.1 *Prohibited reduction of access*.

An alteration that decreases or has the effect of decreasing the accessibility of a building or facility below the requirements for new construction at the time of the alteration is prohibited.

Like the ADA, the CBC applies to facilities of a site. Excerpts of scoping relevant to parking facilities and accessing the museum are presented here.

Section 11B-206.2.1 Site arrival points specifies that at least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger drop-off and loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve. Where more than one route is provided, all routes must be accessible.

The CBC thus requires all arrival routes to the de Young Museum to be accessible.

Per CBC 11B-208.2, where more than one parking facility is provided on a site, the number of accessible spaces provided is calculated according to the number of spaces required for each parking facility.

Per 11B-208.3.1, parking spaces complying with 11B-502 that serve a particular building or facility shall be located on the shortest accessible route from parking to an entrance complying with 11B-206.4. Where parking serves more than one accessible entrance,

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parking spaces complying with 11B-502 shall be dispersed and located on the shortest accessible route to the accessible entrances. In parking facilities that do not serve a particular building or facility, parking spaces complying with 502 shall be located on the shortest accessible route to an accessible pedestrian entrance of the parking facility.

Exception 2 to 11B-208.3.1 is presented here for further context:

*Exception 2: Parking spaces shall be permitted to be located in different parking facilities if substantially equivalent or greater accessibility is provided in terms of **distance from an accessible entrance or entrances, parking fee, and user convenience.***

The exception gives entities some flexibility in how it provides accessible parking, but notably, includes *distance*, as well as *parking fee*, as considerations for providing *substantially equivalent or greater accessibility*. Paid parking is not an equivalent substitute for free parking elsewhere.

Recently added circulation path requirements, given in CBC 11B-250, may also affect the area surrounding the museum. This new section requires circulation paths contiguous to vehicular traffic to be physically separated from traffic, including into and out of parking spaces. Circulation paths include all exterior ways of passage provided for pedestrian travel, including walks, sidewalks, courtyards, ramps, stairways, and landings. Basically, circulation paths must be elevated at least 4 inches above adjacent vehicular areas.

B. PROWAG

On-street parking is not addressed in the scoping requirements and technical standards of the 2010 ADAS or 2019 CBC. Still, title II of the ADA requires local governments to provide accessible on-street parking in the absence of regulatory design specifications for on-street parking facilities. As such, PROWAG is used as a best practice technical standard in the absence of an adopted technical standard.

The San Francisco Property Information Map – Map Viewer⁸ shows Golden Gate Park and the roads within the property lines of the park in one parcel, and the roadways within the park parcel are not identified as public right-of-way. However, per 2011 PROWAG R105.5, public right-of-way is defined as *public land acquired for or dedicated to transportation purposes, or other land where there is a legally established right for use by the public for transportation purposes*. The roads through the extensive Golden Gate Park are on public land, and there is a legally established right for use by the public on these roadways for transportation purposes. As such, they are part of the public right-of-way.

Per 2011 PROWAG R214 On-Street Parking Spaces, where on-street parking is provided on the block perimeter and the parking is marked or metered, accessible parking spaces

⁸ [https://sfplanninggis.org/pim/map.html?search=1832033&layers=Parcels%20\(Block/Lot\)](https://sfplanninggis.org/pim/map.html?search=1832033&layers=Parcels%20(Block/Lot))

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complying with R309 shall be provided in accordance with Table R214. All parking within Golden Gate Park is technically *metered* because no parking is allowed in the park between the hours of 10 pm and 6 am, per Sec 6.01.g of the San Francisco Park Code. Thus, requirements to provide accessible parking spaces apply.

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6. CODE REQUIREMENT ANALYSIS

Code requirements compared to existing conditions at Golden Gate Park surrounding the de Young Museum are presented below. Further detail is given in the attached *Deficiency Report*.

A. Shuttle

The Recreation and Parks Department provides a loop shuttle service in Golden Gate Park, depicted in Exhibit 3.

Scoping for bus stops and bus loading zones is provided in CBC 11B-209. The shuttle service in Golden Gate Park meets the criteria for designated or specified public transportation services provided by public entities as described in *Advisory 11B-209.2.2 Bus loading zones* and is thus subject to the provisions. 11B-209.2.2 requires that each bus loading zone must be accessible, complying with 11B-810.2, *Bus boarding and alighting areas*. Section 11B-209.2.3 *On-street bus stops* note that on-street bus stops shall comply with Section 11B-810.2 to the maximum extent practicable.

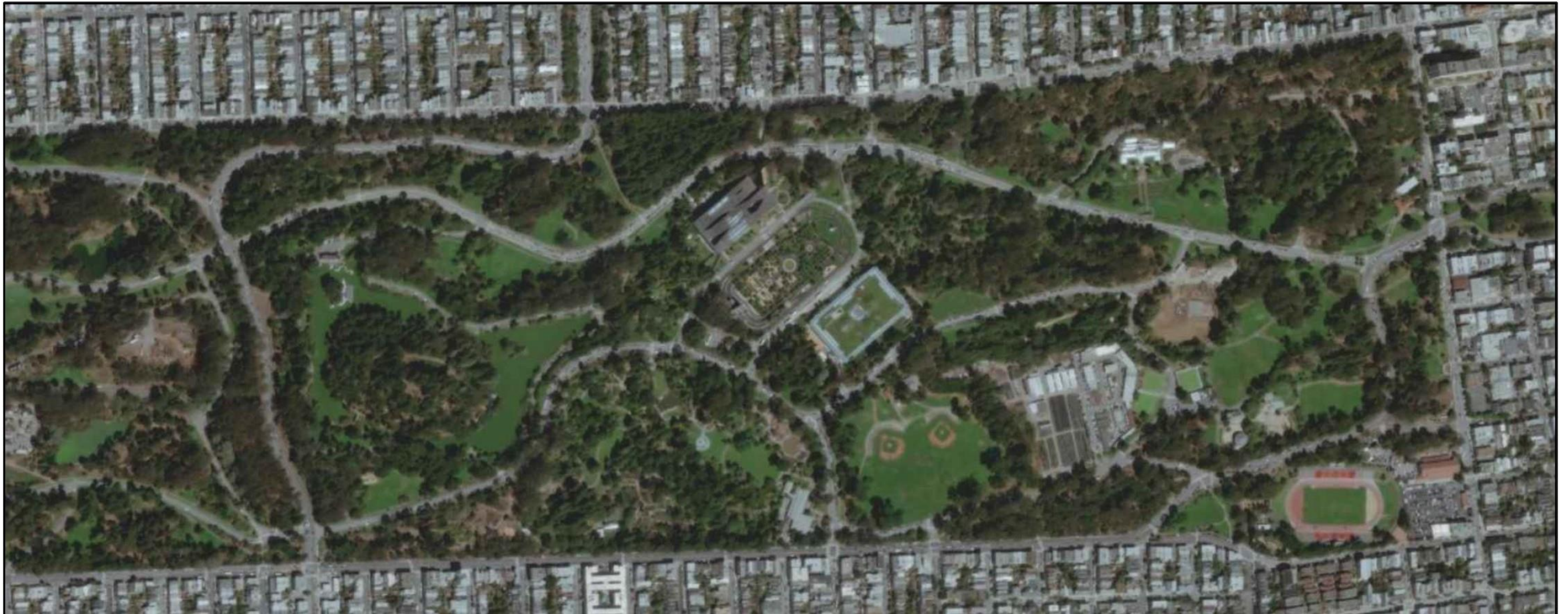
For each shuttle stop to be considered accessible, it must provide a 96 inch long, 60-inch wide boarding area (11B-810.2.2) with a slope of 2% maximum perpendicular to the roadway (11B-810.2.4) and also connect to an accessible route (11B-810.2.3).

Current Shuttle drop-off and pick-up locations are included in Exhibit 3 and are identified in the Deficiency Report. The shuttle locations are informal, lacking devoted infrastructure. If one did not know to look for the green signs designating *Bus Shuttle Stop* currently installed along the route, one would be unaware they exist. Lack of compliant boarding areas at shuttle stops and accessible routes to and from shuttle stop locations occur at the majority of the bus shuttle locations, as shown in the attached Deficiency Report.

Consumers have identified issues with the shuttle service. For example, the shuttle service is known to run on an unpredictable and infrequent schedule, distances between stops are too great to provide useful service through the park to people with disabilities, and the shuttle stops do not provide seating or shelter for inclement weather.⁹

While on-site, MIG observed that the shuttles averaged about 30 minutes frequency at each bus shuttle location. This frequency is double the anticipated time that is noted in the Golden Gate Park Stakeholder report.

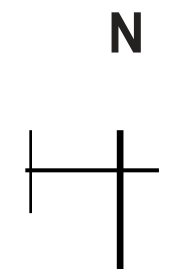
⁹ Mayor's Disability Council Open Letter to San Francisco Recreation and Parks Department. <https://www.sfcta.org/sites/default/files/2021-01/MOD%20Open%20Letter%20to%20RecPark%202018.pdf>



**de Young Museum
Shuttle Map Exhibit**



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DE YOUNG MUSEUM AT GOLDEN GATE PARK – ACCESSIBILITY REVIEW

Furthermore, the shuttle service runs only on weekends and holidays. Even if all shuttle stops and associated paths of travel were accessible, it is not an adequate replacement for the removed accessible parking spaces, as many museum guests visit during the week. Shuttle service is not provided during certain park events, including special events at the museum, as these events are conducted outside of the shuttle service designated hours of 9 am to 6 pm. This service is not “equivalent facilitation” as it limits the time allowed to visit the park, and the length of visit is determined by shuttle service availability.

B. Passenger Drop-Off Area

Passenger loading zones are provided on Hagiwara Tea Garden Drive in front of the de Young Museum on MLK Drive, as shown in Exhibit 4.

CBC 11B-209.2.1 requires at least one accessible passenger drop-off and loading zone (complying with 11B-503) for every 100 linear feet of drop-off and loading zone space provided. Approximately 334 total linear feet¹⁰ of passenger drop-off area is provided in front of the de Young Museum on Hagiwara Tea Garden Drive. This length would require four accessible passenger loading zones. Four curb ramps are provided in this area, but an accessible passenger loading zone is not provided. Access aisles are not marked with hatched lines and a border to discourage parking (11B-503.3.3), and slopes in the potential access aisle areas exceed 2% (11B-503.4). For reference, an image of code requirements for passenger loading zones is presented in Figure 1. The deficiencies at the passenger drop-off/loading area are noted in Appendix A. The items noted are relatively easy to resolve and will result in an accessible location for drop off and pick up to the de Young and surrounding museums.

The City is currently proposing multiple options. The following two options involve the Passenger Drop-Off Area:

- 1) **Parking Garage Signage and Upgrades**¹¹: *“The proposal would involve wayfinding signage updates both within the park and on surrounding city streets to better inform visitors of the permanent alignment of today’s carfree route as well as how to easily access the parking garage. The proposal would also involve promotion of the garage for free 15-minute access for pick ups and drop offs. This service is offered today, but few park visitors know or utilize it.”*

Items that should be considered for this recommendation are that the parking garage does not provide the minimum requirements for accessible passenger loading and drop-

¹⁰ Measured using GoogleEarth Pro tools.

¹¹ Golden Gate Park Access & Safety Program
<https://storymaps.arcgis.com/stories/c44dfec403664e0ca3d2af6bd048b2ae>



DE YOUNG MUSEUM AT GOLDEN GATE PARK – ACCESSIBILITY REVIEW

off zones. CBC and ADAS require a minimum 20 foot long by 8 foot wide vehicle pull-up area (11B-503.2). Adjacent to that is a required 20 foot long by 5 foot wide access aisle to load/unload people from the vehicle (11B-503.3). This entire area must be located on the same level and connected to an accessible route (11B-503.4). The minimum height of the vehicle pull-up spaces is required to provide a minimum clearance of 114 inches. (11B-503.5). The minimum clearance would be required at the vehicle pull-up spaces, access aisles serving them, and a vehicular route from an entrance to the passenger drop-off and loading zone to a vehicular exit. The parking garage provides 98-inch clearance.

This option would not be allowed as equivalent facilitation to the removal of parking, or the removal of the existing accessible drop-off adjacent to de Young Museum.

- 2) **Taxi Stand¹²:** *Taxis today can drop-off fares in Golden Gate Park but are not allowed to pick up passengers hailing them on streets within the park. In 2020, fully one quarter of all taxis rides in San Francisco used the Paratransit Debit Card, providing rides for seniors and residents with disabilities.*

This proposal would establish two taxi stands on Music Concourse: one adjacent to the DeYoung Museum and one adjacent to the CA Academy of Sciences. This would create queuing space for taxi operators in the Music Concourse, becoming a convenient and highly-visible alternative to travel by private vehicle.

This proposal would include allowing taxis to cross JFK at 8th Avenue in a Taxi/Muni-only lane, but this is not required to establish taxi stands in the Concourse.

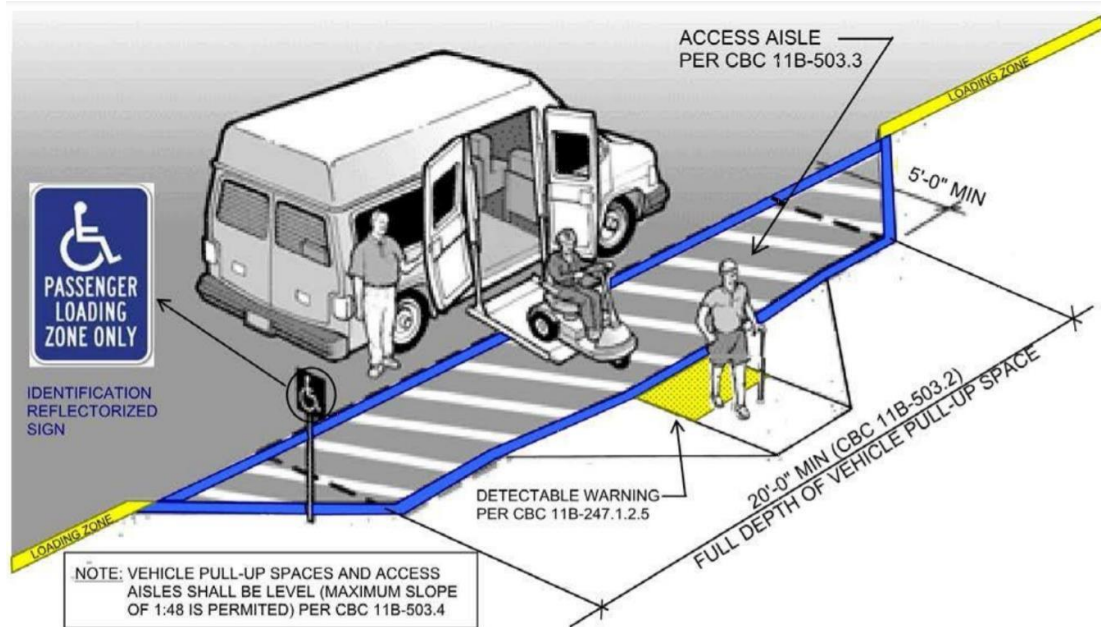
To provide the taxi stand, it appears that the existing drop-off areas that are currently planned to be relocated to the parking garage would be replaced. However, for the reasons noted in item 1, that is not an option.

In addition to the inability to relocate the existing drop-off area, taxis are not considered an equivalent facilitation to driving one's vehicle. Accessibility taxis have limited availability, and this includes accessible vehicles provided through services such as Uber and Lyft.

These two options noted as proposals for providing additional access reduce the already limited access within Golden Gate Park.

¹² Golden Gate Park Access & Safety Program
<https://storymaps.arcgis.com/stories/c44dfec403664e0ca3d2af6bd048b2ae>

DE YOUNG MUSEUM AT GOLDEN GATE PARK – ACCESSIBILITY REVIEW


Figure 1. Loading Zone Code Requirements¹³**FIGURE: PASSENGER DROP OFF AND LOADING ZONE ACCESS AISLE****C. Parking Lots**

Parking facilities serving the de Young Museum are depicted in Exhibit 4. CBC 11B-208.2 states that parking spaces complying with Section 11B-502 shall be provided in accordance with Table 11B-208.2. Where more than one parking facility is provided on a site, the number of accessible spaces provided is calculated separately according to the number of spaces required for each parking facility. Table 1 depicts both the provided and required accessible parking spaces for parking facilities near the museum.

¹³ Image of accessible passenger drop-off and loading area image from the DOJ, modified by the City of Santa Clara.

<https://www.santaclaraca.gov/home/showpublisheddocument/65924/637133103588930000>

DE YOUNG MUSEUM AT GOLDEN GATE PARK-ACCESSIBILITY REVIEW



Parking Area	Fee	Total Parking Spaces	Total Accessible Parking Spaces	Required Accessible Parking Spaces (ADA)	Total Accessible Parking Spaces Needed (ADA)
Japanese Tea Garden (Parking Lot #1)	\$15 per day	23	4	2	0
Music Concourse surface parking lot (<i>now signed no parking anytime</i>) (Parking Lot #2)	N/A	0	0	0	0
Music Concourse Garage	\$5.25/hr weekday \$6.25/hr weekends	836	33	17	0

The Music Concourse surface parking lot located behind the bandstand is the closest surface parking lot to de Young Museum is at the intersection of Hagiwara Tea Garden Drive and Music Concourse Drive, just south of the museum. This lot still exists physically and has marked accessible parking that is faded, but the lot has been closed and is no longer being used to provide parking. Instead, MIG observed during the site visit that the area has been repurposed as a food truck area and storage space for ped bikes, functionally removing the accessible parking.

While the number of accessible parking spaces provided in the Japanese Tea Garden lot is compliant, the spaces themselves do not comply with 11B-502. The access aisles are not marked correctly; paint has faded and is not in contrast with the asphalt (11B-502.3.3), and the slopes of the access aisles exceed 2% (11B-502.4). These access aisles are not connected to the shortest accessible route leading to the museum entrance (11B-208.3.1). Parking spaces are located at the far end of the parking lot. Vehicles were parked on what would be considered the shortest accessible route that leads to the Japanese Garden and de Young Museum both days of the site visit, so the route requires diverting to MLK Way from the parking lot to access the museum. As noted on Exhibit 1, one would need to travel an additional 730 feet from this parking lot from where the existing accessible parking is located along JFK Drive. This route has multiple locations where slopes make the walk inaccessible and vertical discontinuities exceed ½-inch. Containers block an alternative route from the lot directly linked to the Japanese Tea Gardens and the de Young Museum. In short, this parking lot is not functionally accessible for museum guests.

DE YOUNG MUSEUM AT GOLDEN GATE PARK – ACCESSIBILITY REVIEW

The private paid parking provided at the Music Concourse Garage is not an equivalent alternative to free street parking serving the museum. Many people are unwilling to pay at \$5.25/hour (weekday) or \$6.25/hour (weekend), especially people with disabilities or seniors on a fixed income. Van parking within the parking garage is also not compliant due to the size of the access aisles and structural columns located within the accessible stalls.

D. On-Street Parking Serving the de Young Museum

Since on-street parking within the right-of-way is not addressed in the scoping requirements and technical standards of ADAS and CBC, the 2011 PROWAG is used as the best practice technical standard.

Fulton Street

The entrance from Fulton Street and 10th Street is the closest site arrival point for public transportation and from the public sidewalk. The route is designated by an ISA sign as the accessible route to the site. However, upon further investigation, an accessible route is not provided leading from this location to the museum entrance. Park pathways present significant grade issues, with the slope in the direction of travel often well above the allowable 5% and additional cross slope issues (11B-405). Once on the path, these pathways also lack directional signage where paths intersect, leading to multiple directions for a route leading toward the museum (11B-216.6).

ADAS and CBC codes require that an accessible route be provided from all site arrival points, including bus stops and the public sidewalk. These also must be located within close proximity to the general circulation path. (11B-206.2.1) See Exhibit 1 'Accessible Routes'.

Closing JFK Drive also affects the accessible route from Fulton Street in other ways. The designated accessible routes lead to the crosswalks that cross JFK Drive. A crosswalk intends to alert motorists that there is a pedestrian crossing and to yield to a pedestrian. While on-site, it was observed that the bicyclists and motorized skateboards were moving at rapid rates and not yielding to pedestrians crossing, creating hazards to those coming from site arrival points located at Fulton Street. This condition reduces the accessibility intended for people using mobility aides and pedestrians with low vision or who are blind.

The City is currently proposing an option to relocate JFK Drive accessible parking to Fulton Street¹⁴.

¹⁴ Golden Gate Park Access & Safety Program
<https://storymaps.arcgis.com/stories/c44dfec403664e0ca3d2af6bd048b2ae>

DE YOUNG MUSEUM AT GOLDEN GATE PARK – ACCESSIBILITY REVIEW

1) Fulton Street Loading Zone:

“Under the current car-free route, Fulton Street has the street parking closest to the DeYoung Museum.

This project proposal would create loading zones and 14-16 new ADA blue zone spaces on Fulton Street to facilitate park access and drop-offs for trips coming from the north. This would also include sidewalk widening on Fulton Street and pathway upgrades between Fulton Street and the Music Concourse in order to meet ADA disability access guidelines.”

Fulton Street is located outside of the park site. ADAS requires at least one accessible route must be provided within the site to the accessible facility entrances from these site arrival points, where provided:

- Accessible parking and accessible passenger loading zones
- Public streets and sidewalks
- Each public transportation stop

Site arrival points include accessible parking spaces and accessible passenger loading zones, public transit stops located on sites, and public streets and sidewalks.

CBC goes beyond to state, “Where more than one route is provided, all routes shall be accessible.”¹⁵

This proposed option reduces an already deficient accessible parking within the park site creating less access.

Additionally, “Segments of Fulton Street within the project area are located on San Francisco’s High Injury Network (HIN) [sic], including the segments from 6th Avenue to 11th Avenue...” and ‘...Fulton between 6th and 11th Avenues is part of the City’s Vision Zero “High Injury Network” where the most collisions occur -- and each of the four locations where the crossing distance would be reduced is a pedestrian entrance to Golden Gate Park. The changes would require removal of just two auto and three motorcycle parking spaces, on the park side of the street at 6th Avenue.”¹⁶ The proposed design moves 14 to 16 accessible parking spaces to Fulton Street along the HIN. Due to this area being dangerous for pedestrians, the other projects propose a reduction of parking within this area and adding bus bulb-outs. Since it is located along a HIN, it may not be a safe alternative, and due to not being located within the park right-of-way, it does not comply with ADA or CBC scoping¹⁷ requirements.

¹⁵ CBC 11B-206.2.1

¹⁶ <https://www.sfmta.com/project-updates/initial-plan-fulton-street-safety-and-transit-project>

¹⁷ CBC 11B-208.2

DE YOUNG MUSEUM AT GOLDEN GATE PARK – ACCESSIBILITY REVIEW

MLK Parking Spaces

On-street parking spaces on MLK Drive do not provide access aisles per R309.2.1. Five-foot minimum access aisles are required by PROWAG where the width of the adjacent sidewalk or available right-of-way exceeds 14 feet. Since the property is all City-owned, the City is not limited by right-of-way on park roads. Sufficient space exists in most places to provide access aisles and curb ramps, as provided at other locations in the park.

Were the *Narrow Sidewalks*¹⁸ criteria to be applied, negating the need for access aisles, several MLK spaces still would not meet the standards. Some spaces are located midblock, without a curb ramp to provide a connection to the accessible route. R309.2.2 requires accessible spaces to be located at the end of the block face when an access aisle is not provided.

JFK Parking Spaces

Van accessible signs are provided at some of the accessible spaces on JFK Drive. PROWAG does not specify a minimum number for providing van accessible on-street parking spaces. These spaces do not meet the CBC requirements for van spaces due to the widths of the spaces and potential access aisles, and the surface slopes. PROWAG does not require a minimum width of on-street parking spaces, nor a maximum slope, as it is tied to the road grade. However, it does require a connection to a pedestrian access route.

It is important to note that while the PROWAG does not provide minimum widths to the on-street parking, the City of San Francisco does require 8-foot minimum parking stalls width for on-street parking.

The JFK Drive spaces represent the best existing option for accessible parking that serves the de Young Museum, based on distance and accessible route. Removing these spaces reduces accessibility for those who use a van lift in their vehicle for wheelchair access.

Per 11B-208.3.1, accessible parking serving a building or facility must be on the shortest accessible route from parking to the accessible entrance. Exhibit 1 shows that the JFK Drive spaces are the closest accessible spaces to the de Young Museum, at a distance of 200 feet. With their removal, the closest accessible street spaces are along MLK Way, 1,250 feet from the entrance to the museum. This is an increase of over 1,000 feet in the required path of travel from accessible street parking to the de Young Museum.

Park-wide On-Street Parking


MIG also examined accessible on-street parking serving the greater Golden Gate Park for additional context. While PROWAG R214 references "block perimeter" as the unit for

¹⁸ PROWAG R309.2.2

DE YOUNG MUSEUM AT GOLDEN GATE PARK-ACCESSIBILITY REVIEW

calculating required accessible parking, the nature of the park roads do not adhere to block structure. As a result, MIG has chosen to use sections of the park instead, as the sections are shown in Figure 5 of the *Golden Gate Park Stakeholder Working Group and Action Framework*.¹⁹ Table 3 summarizes the available versus required on-street parking that will remain if the JFK parking is removed.

As referenced in Exhibit 2, the park lacks the minimum number of accessible on-street parking spaces within Golden Gate Park. In the eastern areas of the park identified by the Golden Gate Park Stakeholder Group, the minimum accessible parking requirements have not been met. As a result, additional accessible on-street parking spaces are needed along the roadways in many areas of the park and will need to remain open to vehicle traffic. Any removal of existing parking condenses vehicle traffic into the other areas of the park, further congesting limited spaces.



Parking Area Section	Cost	Total Parking Spaces	Number of Accessible Parking Spaces	Required number of Accessible Parking Spaces (PROWAG)	Total Missing Accessible Parking Spaces (PROWAG)
Kezar Drive	Free	100	0	4	4
MLK East/Bowling Green	Free	290	6	12	6
MLK Central & Nancy Pelosi	Free	315	10	13	3
MLK West & Tea Garden	Free	215	5	9	4
Stow Lake East	Free	210	6	9	3
Stow Lake West	Free	190	1	6	5
Transverse	Free	300	0	12	12
Lindley & Marx Meadows, Hellman Hollow	Free	400	0	16	16
Elk Glen Picnic Area/Mallard Lake	Free	200	0	6	6
<i>Total based on individual roadways</i>		<i>2220</i>	<i>28</i>	<i>87</i>	<i>59</i>
<i>Total based on the total number of spaces within park roadways</i>		<i>2220</i>	<i>28</i>	<i>89</i>	<i>61</i>

¹⁹ *Golden Gate Park Stakeholder Working Group and Action Framework*, May 2021, [https://www.sfcta.org/sites/default/files/2021-05/GGP Stakeholder Working Group and Action Framework-2021-05-11-FINAL.pdf](https://www.sfcta.org/sites/default/files/2021-05/GGP%20Stakeholder%20Working%20Group%20and%20Action%20Framework-2021-05-11-FINAL.pdf)

DE YOUNG MUSEUM AT GOLDEN GATE PARK – ACCESSIBILITY REVIEW

7. CONCLUSION

The closure of JFK Drive to vehicles and the associated removal of accessible parking has increased the burden on people with disabilities by increasing the distances these individuals must travel between their cars and the entrance to the de Young Museum. Before the closure of JFK Drive, there were 26 accessible parking spaces in total, with 17 of the free accessible parking spaces located within 200 feet of the de Young Museum. There are now no accessible parking spaces on JFK Drive, and travel distance has increased by over 1,000 feet. While this may not appear to be very far to some, it can be an incredible feat for those using mobility devices. Some disabilities contribute to an overall loss of muscle, causing fatigue and the need for using mobility aides such as multiple sclerosis and amyotrophic lateral sclerosis. For those using walkers or canes, many people lack stamina, have poor balance, or use mobility devices because of respiratory, cardiac, or neurological disabilities. The longer travel distances required can result in the difference between making a museum visit or staying home, as the distance can be more than one can handle.

When parking is viewed in its entirety, Golden Gate Park lacks the minimum required accessible spaces, with the existing accessible spaces not meeting ADA or code requirements.

By removing free accessible parking in the immediate vicinity of the museum and by not providing equivalent free parking within a reasonable travel distance to the museum, the City is reducing program access and is not meeting its obligations under title II of the ADA. Alternative methods of accessing the museum, including passenger drop-off areas, the park shuttle service, and walkways within the park, all have identified barriers to accessibility and do not negate the need for accessible parking spaces.

While this area predates the mandatory ADA requirements for new construction after January 26, 1991, the City chose to add these parking spaces to accomplish program access for this area.

In summary, the de Young Museum and its patrons are not requesting additional access, only restoring and maintaining what was previously provided by the City to create program access initially. By reviewing programmatic access as a whole, those with ambulation disabilities have experienced a reduction in both parking and access to the museum within Golden Gate Park. The new alternative and newly proposed options provide much less access, as has been shown in this report.

Prior to the final closure of JFK Drive, it is recommended that the City reopen accessible parking spaces until a final agreement can be achieved that provide equivalent facilitation to the prior existing conditions to meet its title II obligations of making sure their programs remain accessible to all.

APPENDIX A: DEFICIENCY REPORT

ACCESSIBLE ROUTE
FULTON STREET

Comment#: 01

Deficiency: Accessible Route - Vertical Displacement - Height



Accessible route leading from bus stop and 2 accessible parking spaces located at Fulton Street entrance to accessible route has a large crack creating a 2-inch change of elevation and creates a tripping hazard along entire width of walk.

Measurement: 2 inches

Recommended Remediation:

Replace/grind locations where changes in elevation occur. Changes in level of ¼" high maximum shall be permitted to be vertical and without edge treatment. Changes in level between ¼" high minimum and ½" high maximum shall be beveled with a slope not steeper than 1:2. ADA Advisory: Change in level of ½" is permitted to be ¼" vertical plus ¼" beveled.

Floor/Area: Accessible Route
Room/Spot: Fulton Street
Notes: 01

Code Compliance:		YIN/NA		
2010 ADAS	303.2, 303.3	N	Quantity: 1	each
2019 CBC	11B-303.2	N		
	11B-303.3			

Comment#: 02

Deficiency: Accessible Route - Slopes - Cross Slope



The cross slope of accessible routes exceeds 1:48 (2.0 %). 21' into accessible route from Fulton street cross slope of 3.6%.

Measurement: 3.6 % grade

Recommended Remediation:

Remove and replace walk. Install walk that provides cross slopes at circulation route of 1:48 maximum.

Floor/Area: Accessible Route
Room/Spot: Fulton Street
Notes: 02

Code Compliance:		YIN/NA		
2010 ADAS	405.2	N	Quantity: 1	each
2019 CBC	11B-406.5.7	N		

Comment#: 03

Deficiency: Accessible Route - Slopes - Cross Slope



The cross slope of accessible routes exceeds 1:48 (2.0 %). 29' into accessible route from Fulton street cross slope of 5%.

Measurement: 5 % grade

Recommended Remediation:

Remove and replace walk. Install walk that provides cross slopes at circulation route of 1:48 maximum.

Floor/Area: Accessible Route
Room/Spot: Fulton Street
Notes: 03

Code Compliance:		YIN/NA		
2010 ADAS	405.2	N	Quantity: 1	each
2019 CBC	11B-406.5.7	N		

Comment #: 04

Deficiency: Accessible Route - Slopes - Cross Slope



The cross slope of accessible routes exceeds 1:48 (2.0 %). 37' into accessible route from Fulton street cross slope of 5.7%

Measurement: 5.7 % grade

Recommended Remediation:

Remove and replace walk. Install walk that provides cross slopes at circulation route of 1:48 maximum.

Floor/Area: Accessible Route
Room/Spot: Fulton Street
Notes: 04

Code Compliance:		YIN/NA		
2010 ADAS	405.2	N	Quantity: 1	each
2019 CBC	11B-406.5.7	N		

Comment#: 05

Deficiency: Accessible Route - Slopes - Cross Slope



The cross slope of accessible routes exceeds 1:48 (2.0 %). 52' into accessible route from Fulton street cross slope of 3.0%

Measurement: 3.0 % grade

Recommended Remediation:

Remove and replace walk. Install walk that provides cross slopes at circulation route of 1:48 maximum.

Floor/Area: Accessible Route
Room/Spot: Fulton Street
Notes: 05

Code Compliance:		YIN/NA		
2010 ADAS	405.2	N	Quantity: 1	each
2019 CBC	11B-406.5.7	N		

Comment #: 06

Deficiency: Accessible Route - Slopes - Running Slope



The slope in the direction of travel exceeds the allowable 5%. Approximately 110' into accessible route from Fulton street running slope of 19.2%.

Measurement: 19.2 % grade

Recommended Remediation:

Accessible routes shall consist of one or more of the following components: walking surfaces with a running slope not steeper than 1:20, doorways, ramps, curb ramps excluding the flared sides, elevators, and platform lifts.

Floor/Area: Accessible Route
Room/Spot: Fulton Street
Notes: 06

Code Compliance:		YIN/NA		
2010 ADAS	402.2	N	Quantity: 1	each
2019 CBC	11B-402.2	N		

Golden Gate Park
San Francisco, CA

Assessment Date: 7/16/2021

Comment#: 07

Deficiency: Accessible Route - Directional Signage - General



Along JFK Street the directional sign is located at the designated bike path. Signage is not aligned correctly at the beginning and the end of the routes. Signage needs to be added and revised once accessible routes are designated correctly.

Measurement: 0 count

Recommended Remediation:

Install directional signage that indicates the location of the nearest accessible entrance. Signs shall have the International Symbol of Accessibility (ISA) indicating the accessible route to the nearest accessible entrance. Signs shall be provided at every junction when the accessible route diverges from the regular circulation path. Signs shall be a minimum 40" AFF to bottom of sign.

Floor/Area: Accessible Route
Room/Spot: Fulton Street
Notes: 07

Code Compliance:		YIN/NA	Quantity:	
2010 ADAS	216.6, 703.5.6	N	1	each
2019 CBC	11B-216.6 11B-703.5.6	N		

Comment#: 08

Deficiency: Accessible Route - Directional Signage - General



There is no directional signage where paths connect to the accessible route. Path leads to playground and up to JFK drive and de Young Museum. Neither connect to an accessible route even though entrance to path shown as designated accessible route.

Measurement: 0 count

Recommended Remediation:

Install directional signage that indicates the location of the nearest accessible entrance. Signs shall have the International Symbol of Accessibility (ISA) indicating the accessible route to the nearest accessible entrance. Signs shall be provided at every junction when the accessible route diverges from the regular circulation path. Signs shall be a minimum 40" AFF to bottom of sign.

Floor/Area: Accessible Route
Room/Spot: Fulton Street
Notes: 08

Code Compliance:		YIN/NA	Quantity:	
2010 ADAS	216.6, 703.5.6	N	1	each
2019 CBC	11B-216.6 11B-703.5.6	N		

Golden Gate Park
San Francisco, CA

Assessment Date: 7/16/2021

PARKING LOT #1
JAPANESE TEA GARDEN

Comment#: 09

Deficiency: Parking - Accessible Route - Adjacent



Access aisle is not located to an accessible route. It appears ponding had led to debris collecting along the accessible route that connects stall 1 access aisle to an accessible route. The other 3 stalls were compliant.

Measurement: 0 count

Recommended Remediation:

Clear debris and maintain to provide accessible route to connect to access aisle.

Floor/Area: Parking Lot #1
Room/Spot: Japanese Tea Garden
Notes: Accessible Route

Code Compliance:		YIN/NA		
2010 ADAS	208.3.1	N	Quantity: 1	each
2019 CBC	11B-208.3.1	N		

Comment #: 10

Deficiency: Parking - Accessible Route - Adjacent



The access aisle is not connected to the shortest accessible route that leads to a facility entrance. Vehicles were parked on what would be considered the shortest accessible route leading to the Japanese Garden and de Young Museum both days of the site assessment.

Measurement: 0 count

Recommended Remediation:

Relocate accessible parking spaces that serve a particular building or facility to be located on the shortest accessible route from parking to an accessible entrance.

Floor/Area: Parking Lot #1
Room/Spot: Japanese Tea Garden
Notes: Accessible Route

Code Compliance:		YIN/NA		
2010 ADAS	208.3.1	N	Quantity: 1	each
2019 CBC	11B-208.3.1	N		

Golden Gate Park
San Francisco, CA

Assessment Date: 7/16/2021

Comment#: 11

Deficiency: Parking - Accessible Route - Adjacent



The access aisle is not connected to the shortest accessible route that leads to an facility entrance. Containers are blocking the route leading to the other route that would be directly linked to the Japanese Tea Gardens and the de Young Museum. Parking spaces are also located at the far end of the parking lot.

Measurement: 0 count

Recommended Remediation:

Recommend reviewing the layout of the existing parking lot and relocating the accessible parking spaces that serve a particular building or facility to be located on the shortest accessible route from parking to an accessible entrance.

Floor/Area: Parking Lot #1
Room/Spot: Japanese Tea Garden
Notes: Accessible Route

Code Compliance:		YIN/NA	Quantity:	
2010 ADAS	208.3.1	N	1	each
2019 CBC	11B-208.3.1	N		

Comment #: 12

Deficiency: Accessible Route - Slopes - Running Slope



The slope in the direction of travel exceeds the allowable 5% where accessible route from accessible parking at Japanese parking lot connects to MLK Drive.

Measurement: 9.5 % grade

Recommended Remediation:

Accessible routes shall consist of one or more of the following components: walking surfaces with a running slope not steeper than 1:20, doorways, ramps, curb ramps excluding the flared sides, elevators, and platform lifts.

Floor/Area: Parking Lot #1
Room/Spot: Japanese Tea Garden
Notes: Accessible Route

Code Compliance:		YIN/NA	Quantity:	
2010 ADAS	402.2	N		each
2019 CBC	11B-402.2	N		

Golden Gate Park
San Francisco, CA

Assessment Date: 7/16/2021

Comment#: 13

Deficiency: Accessible Route - Slopes - Cross Slope



Multiple locations along MLK where cross slope of accessible routes exceeds 1:48 (2.0 %). Cross slopes ranged from 3.2% to 8.6% between connection to circulation path of parking lot and Hagiwara Tea Garden Drive.

Measurement: 1.5 % grade

Recommended Remediation:

Remove and replace walk. Install walk that provides cross slopes at circulation route of 1:48 maximum.

Floor/Area: Parking Lot #1
Room/Spot: Japanese Tea Garden
Notes: Accessible Route

Code Compliance:		YIN/NA	Quantity:	
2010 ADAS	405.2	N	1	each
2019 CBC	11B-406.5.7	N		

Comment #: 14

Deficiency: Accessible Route - Vertical Displacement - Height



Accessible route has multiple locations where changes in level over 1/4" vertical or 1/2" beveled occur. Gap in asphalt of 1-1/2" deep x 6" wide is located adjacent to light standard just beyond entry to circulation path leading to accessible parking off of MLK Street.

Measurement: 1.5 inches

Recommended Remediation:

Replace/grind locations where changes in elevation occur. Changes in level of 1/4" high maximum shall be permitted to be vertical and without edge treatment. Changes in level between 1/4" high minimum and 1/2" high maximum shall be beveled with a slope not steeper than 1:2. ADA Advisory: Change in level of 1/2" is permitted to be 1/4" vertical plus 1/4" beveled.

Floor/Area: Parking Lot #1
Room/Spot: Japanese Tea Garden
Notes: Accessible Route

GPS:

Code Compliance:		YIN/NA	Quantity:	
2010 ADAS	303.2, 303.3	N	1	each
2019 CBC	11B-303.2	N		
	11B-303.3			

Golden Gate Park
San Francisco, CA

Assessment Date: 7/16/2021

Comment#: 15

Deficiency: Parking - Signage - Minimum Fine



The parking identification sign does not include the text "Minimum Fine \$250" below the ISA. Typical at all accessible stalls.

Measurement: 0 count

Recommended Remediation:

Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250".

Floor/Area: Parking Lot #1
Room/Spot: Japanese Tea Garden
Notes: Stall 1

Code Compliance:		YIN/NA		
2010 ADAS	N/A	N/A	Quantity: 4	each
2019 CBC	11B-502.6.2	N		

Comment#: 16

Deficiency: Parking - Access Aisle Markings - General



The adjacent access aisle are not marked correctly. Painting has faded and is not in contrast with asphalt.

Measurement: 0 count

Recommended Remediation:

Access aisles serving parking spaces shall be provided. Access aisles shall be marked with a blue painted borderline around their perimeter. The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white. The words "NO PARKING" shall be painted on the surface within each access aisle in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. Access aisle markings may extend beyond the minimum required length.

Floor/Area: Parking Lot #1
Room/Spot: Japanese Tea Garden
Notes: Stall 1

Code Compliance:		YIN/NA		
2010 ADAS	502.3	N	Quantity: 1	each
2019 CBC	11B-502.3	N		

Golden Gate Park
San Francisco, CA

Assessment Date: 7/16/2021

Comment#: 17

Deficiency: Parking - Access Aisle - Slope



The slope of the access aisle in any direction exceeds 1:48 (2.0%) grade.

Measurement: 2.4 % grade

Recommended Remediation:

Re-grade and resurface the access aisle to provide 1:48 maximum slopes in all directions. Floor or ground surfaces. Parking spaces and access aisles serving them shall comply with Section 11B-302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. Exception: Slopes not steeper than 1:48 shall be permitted.

Floor/Area: Parking Lot #1
Room/Spot: Japanese Tea Garden
Notes: Stall 1

Code Compliance:		YIN/NA		
2010 ADAS	502.4	N	Quantity: 1	each
2019 CBC	11B-502.4	N		

Comment #: 18

Deficiency: Accessible Route - Vertical Displacement - Height



Accessible route has a change of elevation of 1-1/4" where accessible route from accessible parking at Japanese parking lot connects to MLK Drive.

Measurement: 1.25 inches

Recommended Remediation:

Replace/grind locations where changes in elevation occur. Changes in level of 1/4" high maximum shall be permitted to be vertical and without edge treatment. Changes in level between 1/4" high minimum and 1/2" high maximum shall be beveled with a slope not steeper than 1:2. ADA Advisory: Change in level of 1/2" is permitted to be 1/4" vertical plus 1/4" beveled.

Floor/Area: Parking Lot #1
Room/Spot: Japanese Tea Garden
Notes: Stall 1

Code Compliance:		YIN/NA		
2010 ADAS	303.2, 303.3	N	Quantity:	each
2019 CBC	11B-303.2, 11B-303.3	N		

Golden Gate Park
San Francisco, CA

Assessment Date: 7/16/2021

**PASSENGER DROP OFF
HAGIWARA TEA GARDEN DR.**

Comment#: 19

Deficiency: At Grade Transitions - Perpendicular Curb Ramp - Landing Length

Landing does not provide minimum 48 inches length at the top of the perpendicular curb ramp.



Measurement: 46 inches

Recommended Remediation:

Replace curb ramp landing. Landings shall be provided at the tops of curb ramps and blended transitions. The landing clear length shall be 48 inches minimum.

Floor/Area: Passenger Drop Off
Room/Spot: Hagiwara Tea Garden Dr.

Code Compliance:		YIN/NA		
2010 ADAS	406.4	Y	Quantity: 2	each
2019 CBC	11B-406.5.3	N		

Comment #: 20

Deficiency: At Grade Transitions - Perpendicular Curb Ramp - Landing Slope

The slope of the landing at the top of the curb ramp near the drive thru ordering location is steeper than 1:48 (2.0%) in any direction. Grooves required to be maximum 1:48. Slopes at grooves is 3.1%. Typical at both drop off areas in front of de Young museum.



Measurement: 3.1 % grade

Recommended Remediation:

Replace landing. The slope of the landing in all directions shall be 1:48 maximum. This should be coordinated with additional comment on lack of passenger loading zone at same level as vehicular space.

Floor/Area: Passenger Drop Off
Room/Spot: Hagiwara Tea Garden Dr.

Code Compliance:		YIN/NA		
2010 ADAS	405.7.1	N	Quantity: 2	each
2019 CBC	11B-406.5.3	N		

Golden Gate Park
San Francisco, CA

Assessment Date: 7/16/2021

Comment#: 21

Deficiency: Passenger Drop-off/Loading - Access Aisle - Floor and ground surfaces

Vehicle pull-up spaces and access aisles serving are not at the same level as the vehicle pull-up space they serve. Slopes steeper than 1:48 (2.083).



Measurement: 6 inches

Recommended Remediation:

Adjust grades as necessary to provide vehicle pull-up spaces and access aisles serving them so the access aisles are at the same level as the vehicle pull-up space they serve with slopes not steeper than 1:48 (2.083%). Drop off areas shall be 5' wide x 20' deep minimum. Access aisle shall be painted to discourage parking within that area.

Floor/Area: Passenger Drop Off
Room/Spot: Hagiwara Tea Garden Dr.
Notes: Typical

Code Compliance:	YIN/NA		
2010 ADAS 503.4	N	Quantity: 2	each
2019 CBC 11B-503.4	N		

MLKJR DRIVE

Comment#: 22

Deficiency: Passenger Drop-off/Loading - Access Aisle - Floor and ground surfaces

Vehicle pull-up spaces and access aisles serving are not at the same level as the vehicle pull-up space they serve.



Measurement: 0 count

Recommended Remediation:

Adjust grades as necessary to provide vehicle pull-up spaces and access aisles serving them so the access aisles are at the same level as the vehicle pull-up space they serve with slopes not steeper than 1:48 (2.083%). Drop off areas shall be 5' wide x 20' deep minimum. Access aisle shall be painted to discourage parking within that area.

Floor/Area: Passenger Drop Off
Room/Spot: MLK Jr Drive
Notes: Botanical Garden

Code Compliance:	YIN/NA		
2010 ADAS 503.4	N	Quantity:	each
2019 CBC 11B-503.4	N		

SHUTTLE STOP

#1

Comment#: 23

Deficiency: Bus Stops - Loading Zones - Boarding/Alighting



This area needs to be verified as measurements were not taken for shuttle stops.

Measurement: count

Recommended Remediation:

Each bus loading zones must provide a clear loading area 96-inches long minimum measured perpendicular to the curb or vehicle roadway edge, and 60-inches minimum, measured parallel to the vehicle roadway.

Floor/Area: Shuttle Stop

Room/Spot: #1

Code Compliance:

YIN/NA

2010 **ADAS** 209.2.2, 810.2

Quantity: 1 each

2019 CBC 11B-209.2.2

11B-810.2

#2

Comment#: 24

Deficiency: Bus Stops - Loading Zones - Boarding/Alighting



This area does not provide a boarding or alighting area for loading and unloading.

Measurement: 0 count

Recommended Remediation:

Each bus loading zones must provide a clear loading area 96-inches long minimum measured perpendicular to the curb or vehicle roadway edge, and 60-inches minimum, measured parallel to the vehicle roadway.

Floor/Area: Shuttle Stop

Room/Spot: #2

Code Compliance:

YIN/NA

2010 **ADAS** 209.2.2, 810.2

Quantity: 1 each

2019 CBC 11B-209.2.2

11B-810.2

Comment#: 25

Deficiency: Bus Stops - Loading Zones - Connection



This area does not provide connection with an accessible route to the walk.

Measurement: 0 count

Recommended Remediation:

Each bus loading zones must provide a connection to streets, sidewalks, or pedestrian paths by an accessible route.

Floor/Area: Shuttle Stop

Room/Spot: #2

Code Compliance:

YIN/NA

2010 **ADAS** 209.2.2, 810.2.3

N

Quantity: 1 each

2019 CBC 11B-209.2.2

N

11B-810.2.3

#3

Comment#: 26

Deficiency: Bus Stops - Loading Zones - Boarding/Alighting



This area does not provide a boarding or alighting area for loading and unloading.

Measurement: 0 count

Recommended Remediation:

Each bus loading zones must provide a clear loading area 96-inches long minimum measured perpendicular to the curb or vehicle roadway edge, and 60-inches minimum, measured parallel to the vehicle roadway.

Floor/Area: Shuttle Stop

Room/Spot: #3

Code Compliance:

YIN/NA

2010 **ADAS** 209.2.2, 810.2

N

Quantity: 1 each

2019 CBC 11B-209.2.2

N

11B-810.2

Comment#: 27

Deficiency: Bus Stops - Loading Zones - Connection



This area does not provide connection with an accessible route to the walk.

Measurement: 0 count

Recommended Remediation:

Each bus loading zones must provide a connection to streets, sidewalks, or pedestrian paths by an accessible route.

Floor/Area: Shuttle Stop

Room/Spot: #3

Code Compliance:

	YIN/NA		
2010 ADAS 209.2.2, 810.2.3	N	Quantity: 1	each
2019 CBC 11B-209.2.2	N		
11B-810.2.3			

#4

Comment#: 28

Deficiency: Bus Stops - Loading Zones - Boarding/Alighting



This area does not provide a boarding or alighting area for loading and unloading.

Measurement: 0 count

Recommended Remediation:

Each bus loading zones must provide a clear loading area 96-inches long minimum measured perpendicular to the curb or vehicle roadway edge, and 60-inches minimum, measured parallel to the vehicle roadway.

Floor/Area: Shuttle Stop

Room/Spot: #4

Code Compliance:

	YIN/NA		
2010 ADAS 209.2.2, 810.2	N	Quantity: 1	each
2019 CBC 11B-209.2.2	N		
11B-810.2			

Comment#: 29

Deficiency: Bus Stops - Loading Zones - Connection



This area does not provide connection with an accessible route to the walk.

Measurement: 0 count

Recommended Remediation:

Each bus loading zones must provide a connection to streets, sidewalks, or pedestrian paths by an accessible route.

Floor/Area: Shuttle Stop

Room/Spot: #4

Code Compliance:

		YIN/NA		
2010 ADAS	209.2.2, 810.2.3	N	Quantity: 1	each
2019 CBC	11B-209.2.2	N		
	11B-810.2.3			

#5

Comment#: 30

Deficiency: Bus Stops - Loading Zones - Boarding/Alighting



This area does not provide a boarding or alighting area for loading and unloading.

Measurement: 0 count

Recommended Remediation:

Each bus loading zones must provide a clear loading area 96-inches long minimum measured perpendicular to the curb or vehicle roadway edge, and 60-inches minimum, measured parallel to the vehicle roadway.

Floor/Area: Shuttle Stop

Room/Spot: #5

Code Compliance:

		YIN/NA		
2010 ADAS	209.2.2, 810.2	N	Quantity: 1	each
2019 CBC	11B-209.2.2	N		
	11B-810.2			

Comment#: 31

Deficiency: Bus Stops - Loading Zones - Connection



This area does not provide connection with an accessible route to the walk.

Measurement: 0 count

Recommended Remediation:

Each bus loading zones must provide a connection to streets, sidewalks, or pedestrian paths by an accessible route.

Floor/Area: Shuttle Stop

Room/Spot: #5

Code Compliance:

	YIN/NA	Quantity:	
2010 ADAS 209.2.2, 810.2.3	N	1	each
2019 CBC 11B-209.2.2	N		
11B-810.2.3			

#6

Comment#: 32

Deficiency: Bus Stops - Loading Zones - Boarding/Alighting



This area does not provide a boarding or alighting area for loading and unloading.

Measurement: 0 count

Recommended Remediation:

Each bus loading zones must provide a clear loading area 96-inches long minimum measured perpendicular to the curb or vehicle roadway edge, and 60-inches minimum, measured parallel to the vehicle roadway.

Floor/Area: Shuttle Stop

Room/Spot: #6

Code Compliance:

	YIN/NA	Quantity:	
2010 ADAS 209.2.2, 810.2	N	1	each
2019 CBC 11B-209.2.2	N		
11B-810.2			

Comment#: 33

Deficiency: Bus Stops - Loading Zones - Connection



This area does not provide connection with an accessible route to the walk.

Measurement: 0 count

Recommended Remediation:

Each bus loading zones must provide a connection to streets, sidewalks, or pedestrian paths by an accessible route.

Floor/Area: Shuttle Stop

Room/Spot: #6

Code Compliance:

		YIN/NA		
2010 ADAS	209.2.2, 810.2.3	N	Quantity: 1	each
2019 CBC	11B-209.2.2	N		
	11B-810.2.3			

#8

Comment#: 34

Deficiency: Accessible Route - Protrusion - Post Mounted Objects



Protruding objects posted on two posts more than 12" apart: the lowest part of the object is over 27" or under 80" above finish floor. Bottom of sign is located at 79-3/4" AFF.

Measurement: 79.75 inches

Recommended Remediation:

Free-standing objects mounted on posts or pylons shall overhang circulation paths 12 inches maximum when located 27 inches minimum and 80 inches maximum above the finish floor or ground. Where a sign or other obstruction is mounted between posts or pylons and the clear distance between the posts or pylons is greater than 12 inches, the lowest edge of such sign or obstruction shall be 27 inches maximum or 80 inches minimum above finish floor or ground.

Floor/Area: Shuttle Stop

Room/Spot: #8

Notes: Hagiwara Tea Garden Dr.

Code Compliance:

		YIN/NA		
2010 ADAS	307.3	N	Quantity: 1	each
2019 CBC	11B-307.3	N		

STREET PARKING

JFK DRIVE

Comment#: 35

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 83.5 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking

Room/Spot: JFK Drive

Notes: 01

Code Compliance:

YIN/NA

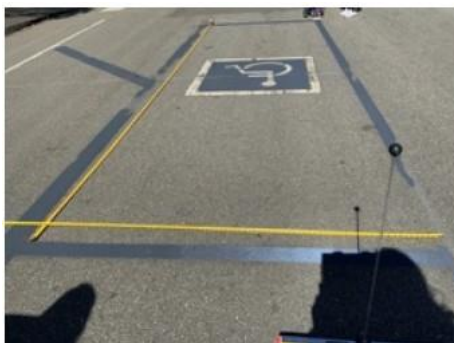
PROWAG R310.2

N

Quantity: 1 each

Comment#: 36

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 87 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking

Room/Spot: JFK Drive

Notes: 02

Code Compliance:

YIN/NA

PROWAG R310.2

N

Quantity: 1 each

Comment#: 37

Deficiency: On-Street Parking - Accessible Stall - Width

The parking stall is less than the minimum required width of 96 inches.



Measurement: 84 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 03

Code Compliance:

YIN/NA

PROWAG R310.2

N

Quantity: 1 each

Comment#: 38

Deficiency: On-Street Parking - Accessible Stall - Width

The parking stall is less than the minimum required width of 96 inches.



Measurement: 74.5 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 04

Code Compliance:

YIN/NA

PROWAG R310.2

N

Quantity: 1 each

Comment#: 39

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 84 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 05

Code Compliance:	YIN/NA		
PROWAG R310.2	N	Quantity: 1	each

Comment#: 40

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 84 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 06

Code Compliance:	YIN/NA		
PROWAG R310.2	N	Quantity: 1	each

Comment#: 41

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 84 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 07

Code Compliance: YIN/NA
PROWAG R310.2 N Quantity: 1 each

Comment#: 42

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 85 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 08

Code Compliance: YIN/NA
2010 **ADAS** R310.2 N Quantity: 1 each

Comment#: 43

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 85 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 09

Code Compliance: YIN/NA
PROWAG R310.2 N Quantity: 1 each

Comment#: 44

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 87 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 14

Code Compliance: YIN/NA
PROWAG R310.2 N Quantity: 1 each

Comment#: 45

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 87 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 16

Code Compliance: YIN/NA
PROWAG R310.2 N Quantity: 1 each

Comment#: 46

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 87 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 17

Code Compliance: YIN/NA
PROWAG R310.2 N Quantity: 1 each

Comment#: 47

Deficiency: On-Street Parking - Accessible Stall - Width



The parking stall is less than the minimum required width of 96 inches.

Measurement: 87 inches

Recommended Remediation:

Car parking spaces shall be 96-inches (8 ft.) minimum width at on-street parking.

Floor/Area: Street Parking
Room/Spot: JFK Drive
Notes: 18

Code Compliance:
PROWAG R310.2

YIN/NA
N

Quantity: 1 each

MLKJR DR.

Comment#: 48

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr.
Notes: 19

Code Compliance:
PROWAG R309.2.1

YIN/NA
N

Quantity: 1 each

Golden Gate Park
San Francisco, CA

Assessment Date: 7/16/2021

Comment#: 49

Deficiency: On-Street Parking - Access Aisle - Curb Ramp



No curb ramp is provided at on-street parking spaces 29 and 30 to provide connection to accessible route. The first on-street parking stall is served by the curb ramp behind the vehicle.

Measurement: count

Recommended Remediation:

Curb ramps or blended transitions shall connect the access aisle to the pedestrian access route for the first two parking stalls (#29 and 30). Curb ramps shall not be located within the access aisle.

Floor/Area: Street Parking
Room/Spot: Nancy Pelosi Dr.
Notes: 29

Code Compliance:	YIN/NA		
PROWAG R309.4	N	Quantity: 3	each

Comment#: 50

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr.
Notes: 20

Code Compliance:	YIN/NA		
PROWAG R309.2.1	N	Quantity: 1	each

Comment#: 51

Deficiency: On-Street Parking - Access Aisle - Curb Ramp



No curb ramp is provided at on-street parking spaces 29 and 30 to provide connection to accessible route. The first on-street parking stall is served by the curb ramp behind the vehicle.

Measurement: count

Recommended Remediation:

Curb ramps or blended transitions shall connect the access aisle to the pedestrian access route for the first two parking stalls (#29 and 30). Curb ramps shall not be located within the access aisle.

Floor/Area: Street Parking
Room/Spot: Nancy Pelosi Dr.
Notes: 30

Code Compliance:

YIN/NA

PROWAG R309.4

N

Quantity: 1 each

Comment#: 52

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: Nancy Pelosi Dr.
Notes: 32

Code Compliance:

YIN/NA

PROWAG R309.2.1

N

Quantity: 1 each

Comment#: 53

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr.
Notes: 21

Code Compliance:
PROWAG R309.2.1

YIN/NA
N

Quantity: 1 each

Comment#: 54

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr.
Notes: 22

Code Compliance:
PROWAG R309.2.1

YIN/NA
N

Quantity: 1 each

Comment#: 55

Deficiency: On-Street Parking - Access Aisle - General

No access aisle is provided at the on-street parking.



Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr.
Notes: 23

Code Compliance:
PROWAG R309.2.1

YIN/NA
N

Quantity: 1 each

Comment#: 56

Deficiency: On-Street Parking - Access Aisle - Curb Ramp

No curb ramp is provided at on-street parking to provide connection to accessible route.



Measurement: 0 count

Recommended Remediation:

Curb ramps or blended transitions shall connect the access aisle to the pedestrian access route. Curb ramps shall not be located within the access aisle.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr.
Notes: 23

Code Compliance:
PROWAG R309.4

YIN/NA
N

Quantity: 1

Comment#: 57

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking. Sidewalk adjacent to designated accessible stall has a kiosk located there. This will not allow sufficient space for passenger loading/unloading.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr.
Notes: 24

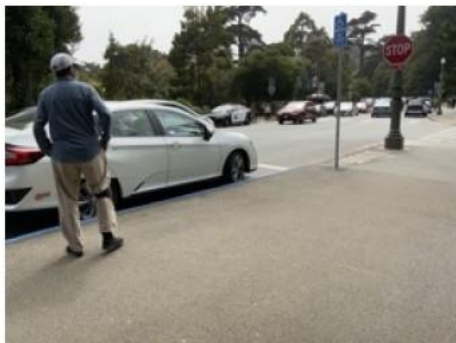
Code Compliance:
PROWAG R309.2.1

YIN/NA
N

Quantity: 1 each

Comment#: 58

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking.

Measurement: count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr.
Notes: 25

Code Compliance:
PROWAG R309.2.1

YIN/NA
N

Quantity: each

Comment#: 59

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking and parking space is located adjacent to a light pole. This will not allow sufficient space for passenger loading/unloading.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr.
Notes: 26

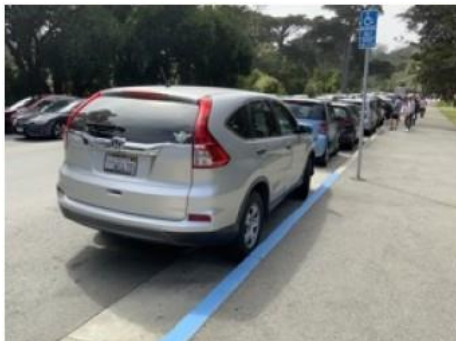
Code Compliance:
PROWAG R309.2.1

YIN/NA
N

Quantity: 1 each

Comment#: 60

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr.
Notes: 27

Code Compliance:
PROWAG R309.2.1

YIN/NA
N

Quantity: 1 each

Comment#: 61

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking

Room/Spot: MLK Jr Dr.

Notes: 28

Code Compliance:

YIN/NA

PROWAG R309.2.1

N

Quantity: 1 each

MLK JR DR./BOTANICAL GARDEN

Comment#: 62

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking

Room/Spot: MLK Jr Dr./Botanical Garden

Notes: 33

Code Compliance:

YIN/NA

PROWAG R309.2.1

N

Quantity: 2 each

Comment#: 63

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking.

Measurement: 0 count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: MLK Jr Dr./Botanical Garden
Notes: 34

Code Compliance:
PROWAG R309.2.1

YIN/NA
N

Quantity: 1 each

BOWLING GREEN DR.

Comment#: 64

Deficiency: On-Street Parking - Access Aisle - Curb Ramp



No curb ramp is provided at on-street parking to provide connection to accessible route.

Measurement: 0 count

Recommended Remediation:

Curb ramps or blended transitions shall connect the access aisle to the pedestrian access route. Curb ramps shall not be located within the access aisle.

Floor/Area: Street Parking
Room/Spot: Bowling Green Dr.
Notes: 35

Code Compliance:
PROWAG R309.4

YIN/NA
N

Quantity: 3 each

Golden Gate Park
San Francisco, CA

Assessment Date: 7/16/2021

Comment#: **65**

Deficiency: On-Street Parking - Access Aisle - Curb Ramp



No curb ramp is provided at on-street parking to provide connection to accessible route.

Measurement: 0 count

Recommended Remediation:

Curb ramps or blended transitions shall connect the access aisle to the pedestrian access route. Curb ramps shall not be located within the access aisle.

Floor/Area: Street Parking
Room/Spot: Bowling Green Dr.
Notes: 36

Code Compliance:

YIN/NA

PROWAG R309.4

N

Quantity: 1 each

Comment#: **66**

Deficiency: On-Street Parking - Access Aisle - Curb Ramp



No curb ramp is provided at on-street parking to provide connection to accessible route.

Measurement: 0 count

Recommended Remediation:

Curb ramps or blended transitions shall connect the access aisle to the pedestrian access route. Curb ramps shall not be located within the access aisle.

Floor/Area: Street Parking
Room/Spot: Bowling Green Dr.
Notes: 37

Code Compliance:

YIN/NA

PROWAG R309.4

N

Quantity: 1 each

BOWLING GREEN PARK

Comment#: 67

Deficiency: On-Street Parking - Access Aisle - General



No access aisle is provided at the on-street parking, a 48-inch circulation path has been provided, but does not connect to a curb ramp leading to an accessible route.

Measurement: count

Recommended Remediation:

Where the width of the adjacent sidewalk or available right of way exceeds 14.0 feet, an access aisle 5 feet wide shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane. Exception is allowed at locations where adjacent street or sidewalks have not been altered, an access aisle would not be required provided that the parking space is located at the end of the block face.

Floor/Area: Street Parking
Room/Spot: Bowling Green Park
Notes: 38

Code Compliance:

YIN/NA

PROWAG R309.2.1

N

Quantity: 1 each