



PUBLIC WORKS COMMISSION
CITY AND COUNTY OF SAN FRANCISCO

London N. Breed, Mayor

Correspondence Log

May 13, 2023, through June 9, 2023

Date Received	From	Subject
6-2-2023	Aaron Breetwor	Small wheel access to driveways

To: DPW-Public Works Commission <publicworks.commission@sfdpw.org>
Cc: Aaron Breetwor [REDACTED]
Subject: Re: Small wheel access to driveways

On Jun 2, 2023 at 12:11 PM -0700, Aaron Breetwor [REDACTED] wrote:

Hello commissioners,

Thank you for your time today during public comment. Attached is the presentation I shared, with some slight updates for clarity. I will reply to this email with the video I showed.

I am available to work with the department to address driveway construction and other matters affecting those who use small-wheeled mobility devices and am happy to present a resume if needed.

Thank you again for your attention and efforts.

Warmly,

Aaron Breetwor
[REDACTED]

Public Comment on Driveway Construction

Presented 6.02.23 by Aaron Breetwor

For further discussion pertaining to matters of small-wheel mobility and accessibility please contact Aaron at 650.996.0616 or via email at aaron@cometskateboards.com

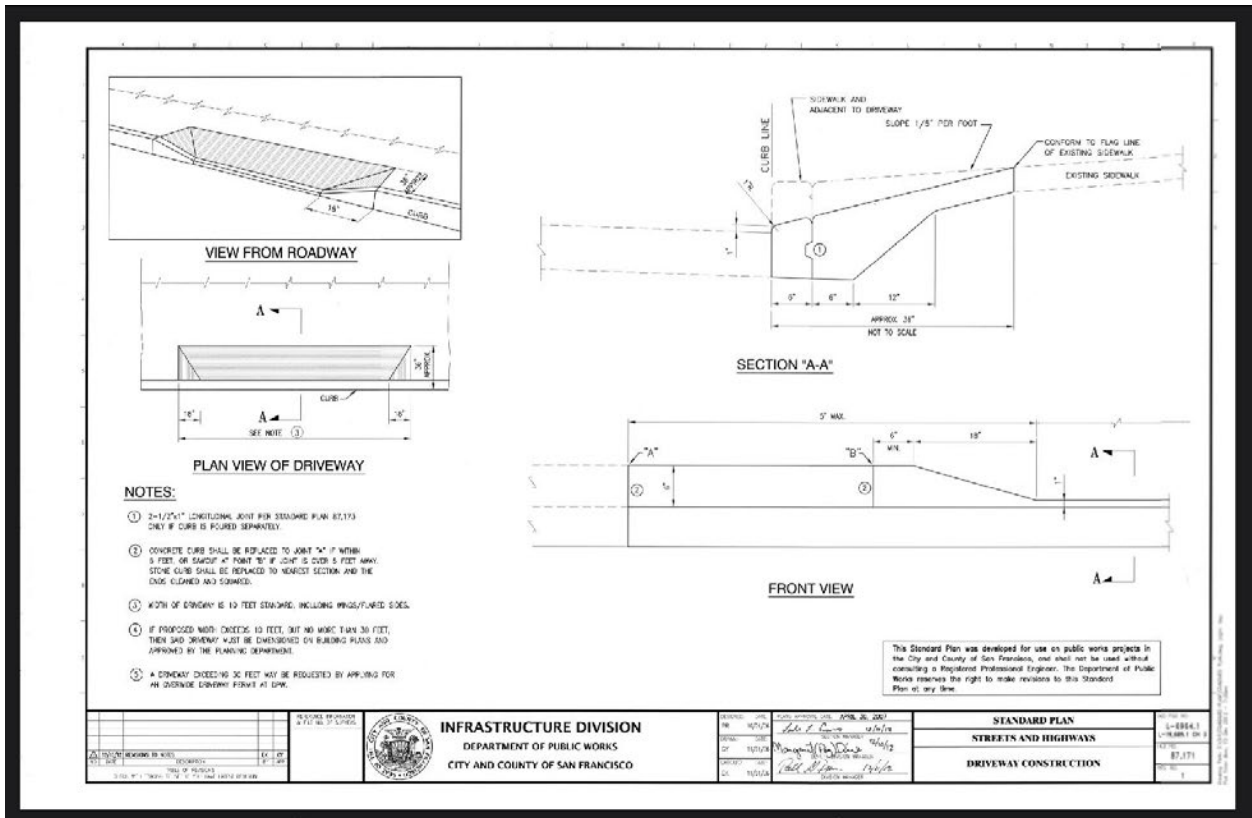
I first came to the commission [in April](#) to discuss driveway curb lips. I showed the drawings of the current [standard plan](#) from the SF department of public works' contractor resources, and made clear that the one-inch specification as it exists presents dangerous challenges for those who travel by skateboard.

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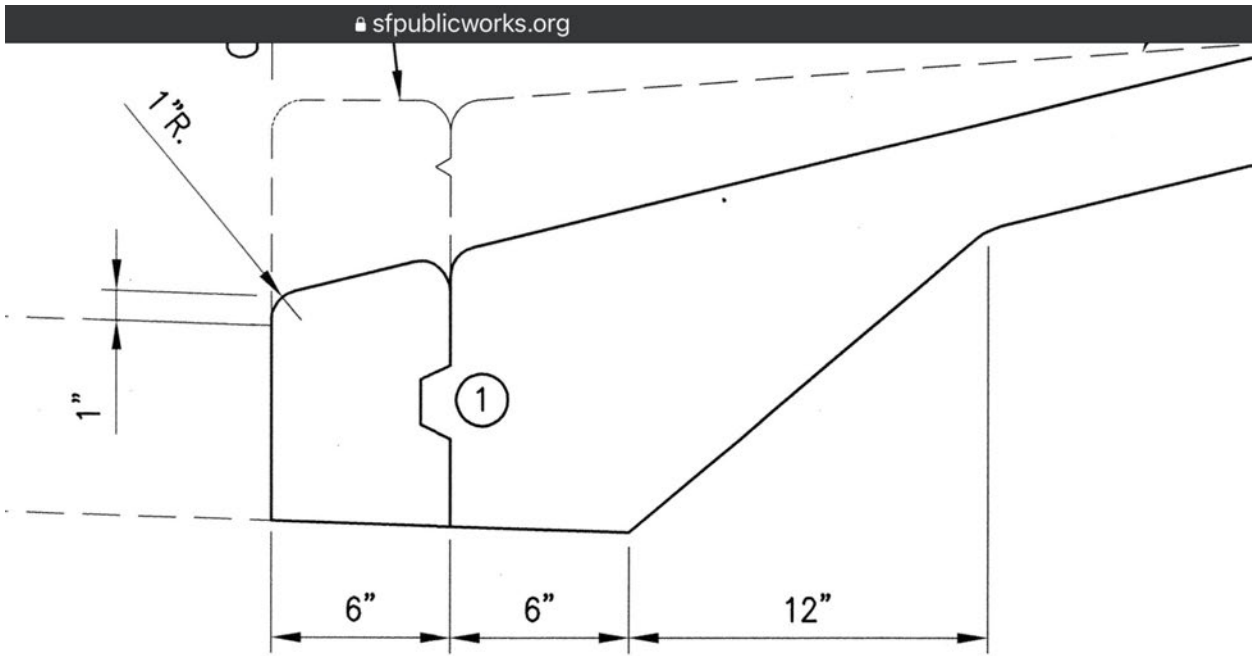


87171	L- 6964.1 and L- 19689.1 Ch 3	Driveway Construction
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[Item 1]: A screenshot of the location of the Standard Plan for Driveway Construction



[Item 2]: A screenshot of SFPDW Standard Plan drawing 87171 for Driveway Construction



[Item 3]: A detail of SFPDW Standard Plan drawing 87171 for Driveway Construction



[Item 4]: An example of a driveway curb lip on Shotwell Blvd which exceeds the specified one-inch height

Since my first visit to the commission, I've researched past drawings in the archive in an effort to understand the history of this detail. The [oldest drawing](#) publicly listed on SFDPW's website dates to 1950 and has no specification for driveway curb lip height. The [second-to-oldest drawing](#) is from 1962 and shows the one-inch specification in place today.

I've been skating in the city for 15 years and can tell you from my delighted experience that the Sunset district, which was developed largely in the 40s and 50s is home to thousands of driveways which are flush with the street.

Unfortunately new construction in the same neighborhood is scarily impassible.



[Item 5]: A new driveway in the Sunset District on Kirkham St between 43rd and 44th Ave (37.7587622, -122.5030715)

[view attached video for a demonstration of the above driveway's impassibility]

During my research I also found [ADA code 303](#), which states no change in surface height may be over $\frac{1}{4}$ " or a $\frac{1}{2}$ " provided the upper $\frac{1}{4}$ " is a bevel, and [code 406](#) which applies to all changes in level over a $\frac{1}{2}$ " and states "adjacent surfaces at curb ramps to walls, gutters and streets shall be at the same level."

303 Changes in Level

303.1 General. Where changes in level are permitted in floor or ground surfaces, they shall comply with 303.

EXCEPTIONS:

1. Animal containment areas shall not be required to comply with 303.

2. Areas of sport activity shall not be required to comply with 303.

303.2 Vertical. Changes in level of 1/4 inch (6.4 mm) high maximum shall be permitted to be vertical.



Figure 303.2 Vertical Change in Level

303.3 Beveled. Changes in level between 1/4 inch (6.4 mm) high minimum and 1/2 inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.

Advisory 303.3 Beveled. A change in level of 1/2 inch (13 mm) is permitted to be 1/4 inch (6.4 mm) vertical plus 1/4 inch (6.4 mm) beveled. However, in no case may the combined change in level exceed 1/2 inch (13 mm). Changes in level exceeding 1/2 inch (13 mm) must comply with 405 (Ramps) or 406 (Curb Ramps).

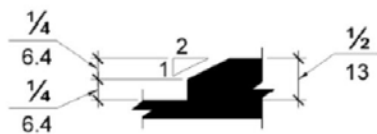


Figure 303.3 Beveled Change in Level

303.4 Ramps. Changes in level greater than 1/2 inch (13 mm) high shall be ramped, and shall comply with 405 or 406.

406.2 Counter Slope. Counter slopes of adjoining gutters and road surfaces immediately adjacent to the curb ramp shall not be steeper than 1:20. The adjacent surfaces at transitions at curb ramps to walks, gutters, and streets shall be at the same level.



Figure 406.2 Counter Slope of Surfaces Adjacent to Curb Ramps

Item 6]: Screenshot of ADA code 406.2

The driveway examples above do not meet either standard.



Item 7J: Left, 69mm wheel; Right, 59mm wheel; Below, pen for reference

For a clear visual, the wheels above are those which I and others use day to day. I'm sure members of the commission can imagine how an inch or more affects our journeys altogether differently than a quarter inch could.

These wheels work great on the transitions of curb ramps, which are spec'd with no lip and come flush with the street (setting aside for the moment the turbulent texture of detectable tiles which, below, my skate school students demonstrate to be challenging and dangerous to use at low speeds).



Item 8.1]: (caption below)



Item 8.2]: (caption below)



Item 8.3j]: A sequence of students from César Chavez Elementary experiencing difficulty traversing curb ramps' detectable tiles. Note how the young rider who goes around the detectable tile succeeds in ascending the curb ramp. This helps make clear why driveways are essential points of access for small wheels, especially when there is an immediate need to exit a bike lane due to any number of obstacles or hazards in a rider's path.

Through my research I found SFPD's [Curb Ramp Program](#), which adds and updates curb ramps as part of new construction projects. This is great to see, and I'm heartened by the department's commitment to accessibility. This brings me to my ask today, which is that this commission work to amend the ordinance that created the Curb Ramp Program to include the updating of all driveways to meet the [ADA's 303 standard](#).

Block by block, this work will be significantly less labor-, material- and capital-intensive than new curb ramps because it requires only grinding, which is subtractive, and necessitates no new additive construction.

Alternatively, a new ordinance could be passed which brings maintenance of the sidewalk and all its access points within the direct responsibility of the SFPD rather than property owners, because, as we see from examples shown above, the lack of oversight in new construction is creating harmful conditions for the types of low-cost, low-maintenance, low-emissions, multi-modal files of transportation the city is ostensibly laboring to promote.

My broader point here is that in order for non-automotive mid-speed mobility to be accessible for all, the city must think beyond *sidewalks* and *bike* lanes and take responsibility for creating a mid-speed mobility network that dignifies travel for those who go by other viable and often ideal modes.

Thank you.

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