

CARBONDALE AGE-FRIENDLY COMMUNITY INITIATIVE (CAFCI) 2020 ACCOMPLISHMENTS AND 2021 PRIORITIES

The purpose of this report is to inform Town government and residents about what CAFCI did in 2020, what we are working on in 2021 and challenges we anticipate going forward.

INTRODUCTION

Approximately 45 million Americans are currently age 65 or older. By 2030, that number will increase to 73 million. At that point, fully one in five Americans will be older than 65. By 2034, the United States will — for the first time ever — be a country with more older adults than children.

The most recent available Census figures¹ show Carbondale's population at 6972. Using that figure:

- The percentage of registered voters over 60 = 17.58%
- The percentage of registered voters over 65 = 13.22%²

According to the American Community Survey of December 2020³, 18.5% of Carbondale's population is over 60, with 11.5% being in their 60's and 7.3% being over 70.

A third source⁴ gives the following figures for Carbondale:

- Total population = 6972
- Over 60 = 1112 (15.94%)
- Over 65 = 671 (9.6%)

Whatever the actual numbers, the number of Carbondale residents over 60 is expected to double within in the next 10 years. Currently, services for Carbondale's older adult population are not organized or coordinated by local government. However, there are four local entities that provide programs or advocacy in addition to Garfield County (GarCo) Senior Services,

1. The Carbondale Parks and Recreation Department offers a variety of programs, including Silver Sneakers, mahjong, water aerobics and occasional bus trips.
2. Senior Matters, a 501(c)3 nonprofit, provides diverse educational and social programs. Senior Matters receives limited funding from the Town.
3. Valley Meals and More, formerly a program of Senior Matters, recently attained 501(c)3 status. They purchase and deliver meals from local restaurants to older adults and assist with transportation and minor household chores. They are expanding their food delivery.

¹ <https://worldpopulationreview.com/us-cities/carbondale-co-population>

² Jean Alberico, Garfield County Clerk

³ <https://www.Towncharts.com/Colorado/Demographics/Carbondale-Town-CO-Demographics-data.html>
<https://www.Towncharts.com/Colorado/Demographics/Carbondale-Town-CO-Demographics-data.html>

⁴ <https://worldpopulationreview.com/us-cities/carbondale-co-population>

4. Several other organizations provide services to older people in a wider area that includes Carbondale: Alpine Legal Services, the Retired Senior Volunteer Program (RSVP) and A Little Help.

CAFCI, a grassroots caucus of Carbondale's older residents, works on its own and with other organizations to strengthen the voices of Carbondale's older population by participating in Town planning and civic issues. The group is 100% volunteer and self-funds its minimal operating expenses. CAFCI's goal is to make the aging population more visible, vocal, inclusive and contributing in all areas of civic and social life. CAFCI will occasionally support or provide a service on behalf of policies it supports, but is primarily policy oriented.

In 2019, CAFCI initiated the effort for Carbondale to be recognized as an AARP Age-Friendly Community, and in July of that year, Carbondale officially became a member of the National AARP Network of Age-Friendly States and Communities⁵. The Network is an independent affiliate of the World Health Organization's (WHO) Age-Friendly Cities and Communities Program, an international effort launched in 2006 to help communities prepare for the growth of the older adult population.

CAFCI is the Town's connection to AARP/WHO, but the Town, not CAFCI, owns the Age-Friendly Community designation. It is important to note that this designation is aspirational.

Membership in the Network means that a community's elected leadership has made a commitment to actively work with residents and local advocates to ensure that the community becomes increasingly livable for people of all ages. This is accomplished by supporting features like walkable streets, accessible housing and transportation and providing access to key services and opportunities that enable residents to participate in community activities.

According to WHO/AARP, livable communities embody characteristics of equity and sustainability. Equity means the community is livable for all residents. Livable communities value diversity, fairness, dignity and equal opportunity and realize those acts in legislation, regulation, investment and acts of daily life. Components of livability must be equally available and accessible to all residents. Sustainability connotes that the components of livability are sustainable and include long-term, integrated systems that address the interdependent economic, environmental and social concerns of a community. A livable community is safe, has affordable and appropriate housing and transportation options and offers supportive community features and services that residents need to remain in their homes and communities as they age. Livable communities foster residents' engagement in civic, economic and social life.

CAFCI is guided by AARP's 8 Domains of Livability:⁶

⁵ <https://www.aarp.org/search/?q=age%20friendly%20communities&c=everywhere>

⁶ <https://www.aarp.org/content/dam/aarp/livable-communities/age-friendly-network/2021/8-Domains-of-Livability-022021.pdf>

- **Outdoor Spaces and Buildings.** People need public places to gather — indoors and out. These include green spaces, seating and accessible buildings (elevators, zero-step entrances, staircases with railings) that can be used and enjoyed by people of all ages and abilities.
- **Transportation.** Driving shouldn't be the only way to get around. Pedestrians need sidewalks and safe, crossable streets. Dedicated bicycle lanes benefit nondrivers and drivers alike. Public transit options can range from the large-scale (trains, buses, light rail) to the small (taxis, shuttles, ride share services).
- **Housing.** AARP surveys consistently find that most older adults want to reside in their current homes as long as possible and remain in their communities indefinitely. Doing so is more possible when homes are designed or modified for aging in place and a community has housing options suitable for differing incomes, ages and life stages.
- **Social Participation.** Regardless of a person's age, loneliness is often as debilitating as chronic illness or disease. Sadness and isolation can be combated by opportunities to socialize, availability of accessible, affordable and enjoyable social activities and ways of getting to them.
- **Respect and Social Inclusion.** Everyone of every age, ability, color and ethnicity wants to feel valued and respected. Responsibility for making this so starts rests with individuals, businesses and institutions and begins with government.
- **Work and Civic Engagement.** An age-friendly community has opportunities for residents to work for pay and/or volunteer their skills.
- **Communication and Information.** We now communicate in ways few could have imagined a decade ago. Age-friendly communities recognize that information needs to be shared through a variety of methods including, but not limited to, electronic.
- **Community and Health Services.** At some point, every person of every age gets hurt, becomes ill or simply needs some help. Although it's important that assistance and care are available nearby, it's essential that residents are able to access and afford the services required.

WHAT CAFCI DID IN 2020

Continuation of Projects Begun in 2018 & 2019

Bench Project: Heritage Park Care Center

Heritage Park Care Center residents told us they needed a bench to rest on under a shady tree when they walked the trail behind the center. CAFCI volunteers walked the trail with residents and located a suitable spot. A CAFCI steering committee member well versed in universal design helped the Town create an arrangement that featured two conversational benches and space for a wheelchair. The Building Department contacted Life Care Centers (corporate owners of Heritage) and obtained an easement for the property. The project was completed with the installation of two benches on July 24, 2020. This project took more than a year of cooperation among CAFCI, The Parks and Recreation and Building Departments, Life Care Centers, Heritage Park residents and two generous donors.

Bench Project: Rio Grande Trail - ARTway

In 2019, CAFCI used a modified version of the AARP Walk Audit to examine all priority corridors. We shared our observations about the ARTway with RFTA, and together, identified three locations appropriate for the placement of benches for people with mobility issues. At RFTA's suggestion, we submitted a proposal to them (Appendix A).

CAFCI initially wanted Carbondale Arts to commission artists to create designer benches along the ARTway, but RFTA said that artist benches would not be manageable for them. We then provided specifications for the benches that were installed along the ditch trail behind Heritage Park. RFTA hoped to install the benches in 2020., however, budgetary issues caused by Covid-19 have delayed the project. RFTA was able to position two benches on the trail behind Dos Gringos, but they did not install a cement pad to stabilize them, making these benches somewhat less accessible to people in walkers and wheelchairs. On March 6, 2021, CAFCI requested an estimate for installation with the hope that we could raise the money to complete the project. As of the writing of this document, RFTA informed us that their trail budget is just being organized and they will let us know if there is money to install hard surface under the benches near Dos Gringos this year.

8th Street Corridor

In 2019, CAFCI presented the findings of the modified version of the AARP Walk Audit to the Bike-Pedestrian-Trails (BPT) Commission, emphasizing that 8th street was, by far, the corridor in most urgent need of attention. The Commission recommended action on the 8th Street corridor to the Board of Trustees (BOT), and a design consultant was hired. CAFCI continued to be visible, vocal and contributing to this project by working to keep the needs of older adults prominent as the BPT and BOT worked on project design. This project was continued into 2021.

2020 Projects

As 2020 began, CAFCI was working on a Town-wide Senior Day. Participating organizations included The Parks and Recreation Department, Carbondale Library, Colorado Mountain College, Senior Matters and Carbondale Arts. Garfield County Senior Services provided funding for a catered luncheon to be hosted at the American Legion.

And then Covid-19 hit: everything - CANCELLED, CANCELLED, CANCELLED. When the Town closed its buildings at 5pm on Friday, March 13, CAFCI quickly refocused on how it could serve during the pandemic. CAFCI leaders met with the Town Manager Jay Harrington and Parks and Recreation staff to share what we thought older people would need to stay safe and provided a summary of known current resources as well as those in development. The Town turned its Parks and Recreation staff into its first Covid-19 emergency response team, and Mayor Dan Richardson established the Carbondale Emergency Task Force (CETF), comprising volunteers and professionals tasked with developing and coordinating resources to meet identified needs.

Care Calls

Because Covid-19 placed older adults at highest risk for severe illness or death, they were told to only leave their homes for critical and unavoidable reasons. During the early days of the

pandemic, CAFCI made calls to older residents to provide information, give them an opportunity to share their concerns and connect them with volunteers who would run errands such as grocery shopping and picking up medications.

Masks

On May 12, 2020, Carbondale enacted a masking ordinance and CAFCI embarked on a program to support this ordinance by ensuring that all residents could obtain masks at no cost. We received funding from Alpine and First Banks, Rocky Mountain Health Foundation, AARP Colorado and the Town via Covid-19 Cares Act funds. Local residents and the Rebekah Lodge contributed fabric and supplies, and several residents donated hand-crafted masks. CAFCI contracted with Carbondale garment workers who were financially impacted by Covid-19 to produce the masks, thus returning all donations to our local economy. We distributed 1400 masks to local schools; senior lunch sites; Crystal Meadows residents; Lift-Up; library staff; Carbondale Recreation and Community Center; John M. Fleet municipal pool; local nonprofit organizations, restaurants and businesses; Valley Meals and More; and individual residents.

Roaring Fork Age-Friendly Collaborative

For several years, Pitkin and Eagle counties have worked together to provide robust offerings to older adults in the Roaring Fork Valley, where the two counties meet. Pitkin and Eagle Counties became members of the AARP Network of Age-Friendly States and Communities in 2017. In 2020, they connected with CAFCI and the Town of Carbondale to foster regional collaboration. The thought behind creating such a collaborative was to help generate ideas on new programs and policies and to help break down the silos of individual municipalities and counties tackling the work alone. The Roaring Fork Age-Friendly Collaborative held its first meeting in January 2020. Thirty members make up the group and come from a variety of organizations that either serve older adults or have an interest in furthering age-friendly work in their communities. Meetings are held every other month and are focused on one of the eight domains of livability.

Hiring New Carbondale Chief of Police

CAFCI was invited to and participated in an interview panel for the hiring of a new Chief of Police.

Working with AARP Colorado

AARP has been supportive of and interested in CAFCI's grassroots work. Their organizational model, developed for more populous communities with paid staff focusing on older people, is not easily applicable to small rural communities. AARP has encouraged CAFCI to work within its framework (eight domains of livability) while developing a unique grassroots structure.

In February, CAFCI hosted an informal meeting of community leaders and Roberto Rey, Associate State Director, Multicultural Outreach AARP Colorado. The meeting offered invitees the opportunity to understand and ask questions about age-friendly communities and Lifelong

Colorado⁷, which promotes a state bottom-up, inclusive strategy to help build and support livable communities.

On May 13, CAFCI participated in a webinar sponsored by AARP Colorado featuring Carbondale along with Pitkin and Eagle counties as co-founders of the Roaring Age-Friendly Collaborative. CAFCI emphasized that because our geography connects us, a regional perspective makes us stronger. Our economies make us interdependent, and the region benefits by sharing resources and brain power. CAFCI focused on how a small rural community quickly built a Covid-19 response at the Town level through an active grassroots and government partnership.

On December 10, CAFCI participated in a Livable Communities Conference sponsored by AARP Colorado. This three-hour live conference on Colorado Age-Friendly Communities provided an update on the status of the pandemic in our state and presented best practices that communities were using to adapt. CAFCI presented along with Larimer county and Colorado Springs.

Strengthening Community Relationships

In addition to business meetings, we spent one meeting a month learning more about one another. We also invited and met various community leaders from government and nonprofit organizations to share different perspectives.

2021 PRIORITIES

The following priorities fall under four WHO/AARP Domains of Livability:

Work and Civic Engagement

Respect and Social Inclusion

Outdoor Spaces and Buildings

Communication and Information

Action steps have been determined, and specific members of the steering committee have assumed responsibility for each priority. Some of the more important action steps are listed below.

Domain: Work and Civic Engagement

Priority: Be active and contribute to all areas of civic and social life.

- Encourage older voices to make themselves heard as the Town moves ahead with an updated 10-year comprehensive plan.

⁷ <https://cdola.colorado.gov/lifelong-colorado-initiative>

- Continue working with senior residences to enable their residents to be involved with the greater Carbondale community.
- Continue providing input for 8th Street redesign and any new Town infrastructure projects.
- Monitor BOT meeting agendas. Attend and participate when issues related to the older population are discussed.
- Participate in the Mountain Voices Project and Garfield County Council on Aging to raise awareness about issues of aging on a regional level.
- Continue inviting community leaders to CAFCI steering committee meetings.
- Work with the Parks and Recreation Commission to further age-friendly facilities and programs for aging residents.
- Continue representing Carbondale’s older population at AARP national and state conferences and at other organizational meetings.

Domain: Respect and Social Inclusion

Priority: Pursue Intergenerational Opportunities

- Collaborate with Talk With Each Other (TWEQ), an organization that has hosted events that bring elders and teens together.
- Seek additional opportunities for addressing social isolation and encouraging social connection online during Covid-19.
- Participate actively in promised evaluations of Carbondale police department policies and culture

Priority: Engage with Latino Community

- Enlist Latino members to the steering committee, with the long-term goal of having a committee that reflects the Carbondale population.
- Strengthen relationships with the Latina/Latino community.
- On an ongoing basis and across all CAFCI priorities, advocate for civic inclusion by promoting simultaneous Spanish translation of municipal meetings and translation of public documents.

Domain: Outdoor Spaces and Buildings

Priority: Improve Safety and Mobility in Public Buildings and on Streets and Roads

- Dangerous crossings: Follow up with Carbondale Police Chief Kirk Wilson regarding flags at existing crossings that currently only have flashing lights.
- Dangerous sidewalks: Educate the public about the snow removal ordinance.
- Lighting of priority nighttime corridors: Work with the Town to expedite replacement/repair of nonfunctional lights.
- Universal design: Advocate for (usually low- or zero-cost) universal design features in all new Town projects.

- Bike and pedestrian safety: Work with RFTA and municipal departments on improving the use of audible signals by cyclists on the Rio Grande trail and throughout Town.
- Continue to work with RFTA regarding hard surfacing of 2 benches placed on the Rio Grande trail near Dos Gringos.
- Nature Park: Work with the Town to develop the park as a nature-friendly multi-user facility.

Domain: Communication and Information

Priority: Increase Awareness of CAFCI and Age-Friendly Concerns

- Publish a monthly column in the *Sopris Sun*, focusing on how to live into the aspiration of making Carbondale a more livable community for people of all ages.
- Contact KDNK regarding radio programming focused on issues of the older population.
- Raise awareness about issues of aging in Carbondale Facebook Groups.

APPENDIX: CAFCI PROPOSAL FOR BENCHES ALONG ARTWAY

Why Benches Matter

Whether you're 35 or 65, one of the keys to remaining mobile is incorporating walking into daily activities and thinking about walking as something you do as part of everyday life, not just as exercise.

Research shows that regular walking improves balance and coordination, builds muscle strength, maintains heart health, and staves off depression – all important factors in healthy aging. Healthier people can be more productive contributors to our vibrant community.

Older people and anyone seeking a healthy lifestyle or recovering from an injury or illness walk more when they live in pedestrian-friendly areas which are located near places they go to on a regular basis - such as bus stops, coffee shops, restaurants, places of worship, banks, grocery stores, pharmacies, and other services.

Public spaces that provide benches are important factors in increased mobility as well as mental and social well-being. The World Health Organization says that without benches, many older people and those with limited mobility feel trapped indoors — unable to travel to local shops and isolated from friends and family.

Situating Benches

RFTA is knowledgeable about ADA guidelines. However, Section 903 of the ADA and ABA Accessibility Guidelines for Buildings and Facilities does not specify ADA requirements for outdoor benches. People in wheelchairs face mobility challenges and don't typically transfer from their chair to an outdoor bench. Rather, they pull up next to or across from people sitting on benches. Benches that are permanently fixed and dimensionally restrictive limit choices for people in wheelchairs and risk isolating them rather than expanding choices and bringing them closer to the center of action.

Outdoor spaces and seating that line up people like birds on a wire limit interaction. On the other hand, interaction is facilitated by multiple bench configurations that include various seating types; exposure to and/or protection from sun, shade, wind, and views; and proximity to other people and activities.

To offer accessible opportunities for people, it's important to provide:

- Firm and stable ground surfaces with adequate and clear ground space to permit maneuverability in public spaces. (A minimum 30" x 48" clear ground space is required to accommodate a single stationary wheelchair with occupant.)
- Configurations that encourage interaction among people, such as benches that face each other or are at right angles to each other.

Proposal to RFTA from the Carbondale Age-Friendly Community Initiative (CAFCI)

On August 8, 2019, Nancy Peterson of the CAFCI Steering Committee walked the Rio Grande Trail ARTway with Brett Meredith of RFTA and Amy Kimberly of Carbondale Arts and identified possible bench sites from behind the Rec Center to DeRail Park (see photographs of three sites below). If these sites and the recommendations mentioned above are acceptable to RFTA, RFTA has agreed to provide the site pads. Additionally, Brett indicated that RFTA would make existing or new benches accessible, for example, by adding or using compacted gravel. CAFCI believes that it would also be beneficial for benches to face each other or be at right angles to each other to encourage interaction.

Site 1: Latino Folk Art Park

This photo shows existing access that, per Brett's suggestion, could be improved with compacted gravel. The bench created by an artist would be placed under the canopy, near any existing seating.



Site 2: Near the RFTA facility

This photo shows existing benches. A bench, created by an artist, could be placed to either face an existing bench or be at a right angle to an existing bench. In addition, accessibility to the benches would need to be improved.



Site 3: DeRail Park

The bench created by an artist will be located in the area shown in the right lower corner of the photograph.



Sequence of Events

The timeframe for the following tasks will be determined at a later date:

- CAFCI, with the assistance of Carbondale Arts, will propose ARTway bench locations to Brett.
- If these locations and suggested recommendations are acceptable to RFTA, Brett will provide a site map to Nancy, and Amy and will help her locate the benches on the map.
- CAFCI and Carbondale Arts will determine how benches will display sponsor names.
- CAFCI will fundraise to acquire the benches (\$1800/bench). Carbondale Arts has agreed to donate some funds.
- Carbondale Arts will put out a call for artists and coordinate publicity throughout the project.
- CAFCI will select three benches and review the choices with Carbondale Arts.
- Artists will build and decorate the benches.
- RFTA will prepare sites and install the benches.

The Bench - Info for Artists

Section 903 of the ADA and ABA Accessibility Guidelines for Buildings and Facilities does not specify ADA requirements for outdoor benches. However, a single ADA guideline for outdoor benches appears in The Revised Draft Guidelines for Accessible Public Rights-of-Way, which specifies a bench seat height of 17" minimum and 19" maximum above the ground or floor space. In addition, the Access Board has issued Advisory R307.6.3.2 which states, "Benches will be most useful if they have full back support and armrests to assist in sitting and standing."

The following ADA recommendations for indoor benches may also be applicable for outdoor benches: Seats and backs should be a minimum of 42" long. (Very high backs and deep seats without side arms can make it difficult for people with other disabilities to use benches.)

- Seat depth should be a minimum of 20" and a maximum of 24". (Seat depths should allow persons to bend their knees while sitting back in a bench seat.)
- Any bench materials used must be able to support a vertical or horizontal force of 250 pounds applied at any point on the seat, fastener, mounting device, or supporting structure.
- The surface of the seat must be slip-resistant and not accumulate water. In addition, a material that will not hold or intensify heat should be considered.

One manufacturer of outdoor ADA-compliant benches provides these measurements:

- Length: 48"
- Seat Height: 18-3/4"
- Seat Width: 20-1/8"
- Total Height: 32-1/2"

Please see the Forest Service Outdoor Recreation Accessibility Guidelines below for further design and placement considerations.

Thank you to everyone for their interest and cooperation in this project. Please send any questions, concerns, recommendations or comments to Nancy Peterson at honorablecat@icloud.com.



Design Tip

Use a rule of thumb to estimate firmness and stability.

What sort of surface is firm and stable? If the answer to both of the following questions is yes, the surface is probably firm and stable.

Could a person ride a narrow-tired bicycle across the surface easily without making imprints? (Bicycle tires are similar to the large rear wheels of a wheelchair.)

Could a folding stroller with small, narrow plastic wheels containing a 3-year-old be pushed easily across the surface without making imprints? (A stroller's wheels are similar to the front wheels of a wheelchair.)

While this method for determining firmness and stability isn't scientifically accurate, it has proven to be effective.



Design Tip

Provide appropriate walking surfaces for the setting.

A firm and stable surface does not always mean concrete and asphalt. The provision states that surface material should be appropriate to the setting and level of development. Some natural soils can be compacted so they are firm and stable. Other soils can be treated with stabilizers without drastically changing their appearance. Many surface materials that appear natural and that meet the firm and stable requirements also are available on the market. Investigate these options and use surface materials that are consistent with the site's level of development and that require as little maintenance as possible.



Construction Tip

Use better surface materials.

Generally, the following materials are more likely to provide firm and stable surfaces:

- Crushed rock (rather than uncrushed gravel)
- Rock with broken faces (rather than rounded rocks)
- A rock mixture containing a full spectrum of sieve sizes, including fine material (rather than a single size)
- Hard rock (rather than soft rock that breaks down easily)
- Rock that passes through a ½-inch (13-millimeter) screen (rather than larger rocks)
- Rock material that has been compacted into 3- to 4-inch (75- to 100-millimeter) -thick layers (rather than thicker layers)
- Material that is moist (not soggy) before it is compacted (rather than material that is compacted when it is dry)
- Material that is compacted with a vibrating plate compactor, roller, or by hand tamping (rather than material that is laid loose and compacted by use)





previously explained clear space, slope, and surface requirements, as well as the following connection requirements.

Accessible surfaces for pitching tents may or may not be at ground level. A level connection that meets outdoor recreation access route standards should be provided to ground-level tent floor surfaces. For above-grade platforms or raised tent pads, the outdoor recreation access route may either slope up to the same level as the tent floor surface or end at a clear space that is adjacent to and 17 to 19 inches (430 to 485 millimeters) lower than the tent floor surface. This height is suitable for transferring from a wheelchair to the tent surface.

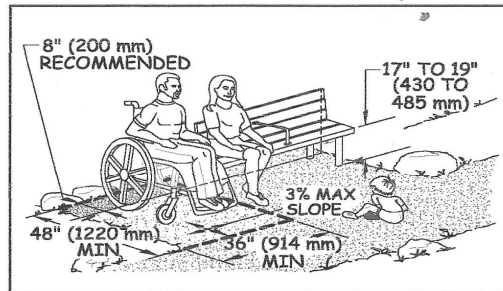


Figure 94—The requirements for benches.

Benches

Ensure that all benches provided along Forest Service trails or beach access routes or at Forest Service recreation sites (other than those inside a building or in an amphitheater) meet the following requirements. Connect at least 20 percent of benches at a Forest Service recreation area to the area's other major features by an outdoor recreation access route. Benches inside buildings must comply with sections F221.2.1.1, F221.2.2, and 903 of ABAAS. Benches in amphitheaters must comply with the requirements in ABAAS section F221 for assembly areas, including wheelchair spaces, companion seats, designated aisle seats, and lawn seating. Even if most benches in the amphitheater don't have back support, consider providing it at the designated aisle seats required by ABAAS, section F221.4.

Ensure that the front edge of the bench seat is 17 to 19 inches (430 to 485 millimeters) above the ground or floor space. When more than one bench is provided in a common area such as a scenic overlook, at least half of the benches must have back support that runs the full length of the bench.

Provide one armrest on at least half of the benches with back support. Consider the visitors who will use a particular area when deciding where to locate an armrest. For people who have difficulty standing up from a seated position, having an armrest can be helpful. However, armrests on both ends of the bench could prevent a person using a wheelchair from being able to transfer onto the bench. A compromise design is a bench with back support and one armrest placed in the middle of the bench. Figure 94 shows a bench that meets these requirements. Another option is to place a single armrest on the end of the bench farthest from the clear floor or ground space.

All parts of the bench must be able to withstand 250 pounds (1,112 newtons) applied vertically or horizontally at any point of the seat, fastener, mounting device, or supporting structure. This requirement is the same as the ABAAS requirement for bench strength in section 903.6.

Provide a clear floor or ground space that is 36 by 48 inches (915 by 1,220 millimeters) adjacent to one end of each bench. Do not allow this clear space to overlap the outdoor recreation access route, trail, or beach access route, so that using the bench or clear space doesn't limit travel past the bench and vice versa. Locate the clear space to provide shoulder alignment between a person sitting on the bench and a person seated in a wheelchair occupying the clear space, so that transfers to the bench are convenient and conversations between people on the bench and beside it are comfortable.

Shoulder alignment generally can be achieved by positioning the back of the bench so that it is 8 inches (200 millimeters) closer to the outdoor recreation access route, trail, or beach access route than the back of the required clear floor or ground space adjacent to the end of the bench (see figure 94).

Do not allow the slope of the clear floor or ground space to exceed 1:48 (2 percent) in any direction, except if the surface isn't paved or built with boards, the slope may be up to 1:33 (3 percent) when needed for proper drainage. The surface must be firm and stable and made from a material that is appropriate to the setting and level of development.

If a condition for exception in an alteration project at an existing site prohibits full compliance with a specific requirement for clear floor or ground space (surface, slope, size, or