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### **MEMORANDUM**

TO: Bob Bachner, Chair

Public Works & Environmental Concerns Committee (PWECC) Members

FROM: Carl Goldsmith, Public Works Director

William J. Heniff, AICP, Community Development Director

**MEETING DATE:** May 9, 2023

SUBJECT: Text Amendments to Chapter 97 of the Village Code – Cluster Mailbox

Units (CBU) in the Public Right-of-Way

### **EXECUTIVE SUMMARY**

To address issues pertaining to the installation and placement of Cluster Box Unit (CBU) mailboxes when required by the United States Postal Service (USPS), staff is recommending approval of text amendments to the Building Code (Chapter 150) to establish a developer obligation to install CBUs prior to the Village issuing a Certificate of Occupancy. Staff is also proposing separate text amendments to Chapter 97 of Village Code, which is under the review jurisdiction of the Public Works & Environmental Concerns Committee (PWECC), formalizing CBU placement provisions within Village Code.

At a May 3 meeting, the Board of Building Appeals (BOBA) considered text amendments establishing a developer obligation to install CBUs where required by the USPS as a precedent condition of issuance of a Certificate of Occupancy by the Village. Staff is now forwarding text amendments to Chapter 97 of Village Code, which is under the purview of the PWECC, to memorialize the USPS standards by reference within our local codes as a tool to assist builders in the design and placement of such boxes in developments.

### **BACKGROUND**

The USPS retains sole jurisdiction as to the means and mode of mail delivery to properties. Such delivery can include:

- 1. foot delivery to mailboxes affixed to the principal structure,
- 2. mail truck delivery to individual rural mailboxes abutting a street, or
- 3. where designated, CBU units placed within the parkway.

CBU units have been utilized by the USPS in varying forms since the early 1990's as a method to provide efficient and centralized delivery of mail to selected residential subdivisions and commercial properties. In Lombard, noted subdivisions with CBU units include, but are not limited to, Cimarron Townhomes, Lancaster Square Townhomes, Fairfield Glen Townhomes and Finley Park Subdivisions.



CMU at Fairfield Glen Townhomes



CMU at Finley Park Subdivision

Attached is the USPS Guide for Buildings and Developers pertaining to mailboxes. The Lombard Post Office provided staff with the Guidebook and staff will be offering it as a reference document to builders early in the development process, so that CBUs are properly placed into respective development plans. Inspection staff are also going to include a review of CBU placement in the review and punch list processes, where applicable.

### PROPOSED TEXT AMENDMENT – BUILDING CODE

Chapter 150 establishes Building Code requirements for permit approval and for completion of projects. Within this Chapter are other such cross-referenced requirements pertaining to external site provisions including access, landscaping, drainage, screening, and parking, to name a few. For house mailboxes and for stand alone rural mailboxes, installation of mailboxes is traditionally the responsibility to the homeowner. However, as CBUs serve a larger neighborhood, block or development, their installation is often considered as a type of neighborhood benefit and traditionally CBUs have been coordinated and installed by the respective project developer. Purchase and installation costs can vary, but generally will be within the \$3,000 to \$6,000 range for each CBU.

Staff was informed of a development in which Certificates of Occupancy were issued for a project, residents closed on the property and are living within the development. However, the builder has not installed a CBU for an extended period and the Village received a service request asking for Village engagement. Unfortunately, local codes do not have any mandates that a project developer install a CBU, and historically this has not been an issue until recently.

To help remedy this issue, BOBA recommended approval of the following amendment to Chapter 150, which would read as follows:

### 150.236 Mailboxes

For any development in which the United States Postal Service requires installation of Cluster Box Units (CBU) as the means of delivering mail to a given development, the developer shall be required to pay for and install required CMU mailboxes to serve the development. The CBU mailboxes shall meet the provisions set forth within the latest adopted version of the "United States Postal Service National Delivery Planning Standards: A Guide for Builders and Developers". The required installation shall occur prior to the issuance of a Certificate of Occupancy by the Village for a given building, property or development."

The Chapter 150 amendment does not need PWECC review and consideration and is being offered for reference purposes only.

### PROPOSED TEXT AMENDMENT – CHAPTER 97

PWECC reviews amendments to Chapter 97 of Village Code, which regulates Streets and Sidewalks. While many CBU units have been installed in Lombard, the USPS CBU provisions have not been codified. To memorialize past practice, the following code amendments (see proposed new Subsection 97.010 (D), with additions being underlined) are offered:

- § 97.010 Use and maintenance of parkway.
- (A) The village hereby grants a revocable permission for each property owner and/or resident to beautify the portion of the land owned by, or dedicated to the village and located between said owner's or resident's premises and the adjoining curb line (the parkway area); provided, however, that no encumbrance other than grass and/or those permitted by and planted under the provisions of Title 9, Chapter 99 of the Code of Ordinances are to be established on the parkway area, said establishment shall be done in accordance with all other applicable village codes and ordinances.
- (B) It shall be the duty of each owner of or person residing on property abutting on a parkway area to maintain the grass on the parkway by keeping its height at a level which complies with the Village Code. This duty shall extend only to grass and weed cutting and its imposition does not entail any further duties or responsibilities.
- (C) United States Postal Service approved mailboxes are permitted within the parkway area only under the following conditions:
  - (1) The front face of the mailbox, once mounted, shall be six inches to eight inches from the back of the curb, or if no curb is present, from the road pavement, unless otherwise approved by the Postmaster due to road and/or curb conditions.
  - (2) The distance from grade to the bottom surface of the mailbox shall be 41 inches to 45 inches, unless otherwise approved by the Postmaster due to road and/or curb conditions.

- (3) Mailbox and mailbox mounting structures shall provide a breakaway feature, as recommended by the Federal Highway Administration and the United States Postal Service, as follows:
- (a) The mailbox shall be mounted on a mounting structure of the following sizes and materials and no others:
- 1. A wood or plastic post of which the area of an average cross section may not be more than 16 square inches.
- 2. A metal post not more than two inches in diameter.
- (b) Permitted mounting structures shall be affixed as follows:
- 1. A wood or plastic post shall be embedded in crushed stone in a 12 inch diameter hole to a depth of 36 inches below grade.
- 2. A metal post shall be embedded 24 inches in concrete in a 36 inch hold of 12 inch diameter.
- 3. Mailboxes shall be securely affixed to the required mounting structure.
- 4. Residents should take all necessary precautions to prevent damage to any existing utility located in the parkway.
- 5. Any nonconforming mailbox or mailbox mounting structure shall be brought into compliance on or before November 15, 2002.

### (D) Mailbox Cluster Box Units

In locations in which the United States Postal Service requires the installation of Cluster Box Units (CBU) to serve residential or commercial properties, the design and installation shall conform to the provisions of the United States Postal Service National Delivery Planning Standards Guide for Builders and Developers.

### **ACTION REQUESTED**

Staff recommends that the PWECC recommend adoption of text amendments to Section 97 of Village Code as it pertains to Cluster Box Units.



# U. S. Postal Service National Delivery Planning Standards A Guide for Builders and Developers









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### 1 Introduction

The United States Postal Service<sup>®</sup> is proud to provide every new home and business with excellent, efficient mail delivery service. This guide will assist you in preparing your new development for mail service by planning locations and space for mail equipment early in the development process.

The U.S. Postal Service™ is responsible for establishing the method or "mode" of delivery for all new developments—both residential and commercial. The mode of delivery includes the following:

- Type of mailbox you will use.
- Location of the mailbox for each delivery address.

Centralized delivery is our preferred method of mail delivery. Centralized delivery equipment improves delivery efficiency and provides space for large mail items, including packages, which is a great benefit for customer. Freestanding, pedestal-style outdoor centralized mailboxes are called cluster box units or CBUs. CBUs are "package friendly" because they are designed to accommodate the majority of packages delivered through the U.S. Mail®. CBUs also include parcel lockers, which provide separate, locked storage for many packages.

Other types of centralized mailbox equipment are also available. Builders and developers or property owners are responsible for the purchase, installation, maintenance, repair, and replacement of mailbox equipment.

This guide provides information about the types of USPS-approved mailbox equipment options available commercially and information about other aspects of mail delivery planning that may apply to your specific development.

With more than 150 million households and businesses served daily—and another 1 million new delivery points added on average every year—it is imperative that the U.S. Postal Service make its mail delivery network more efficient while still delivering the service our customers expect. We appreciate your assistance in furthering that objective, while at the same time helping provide new customers with convenient mail delivery for their new homes and businesses.

We also want to connect you with local USPS® delivery planning individuals in your area—referred to as Growth Managers. Postal Service Growth Managers are available to assist you. Prior to submitting your master plan and plat to the local municipality and/or county for approval, you must arrange for a local USPS Growth Manager to review your development plans prior to commencing construction.

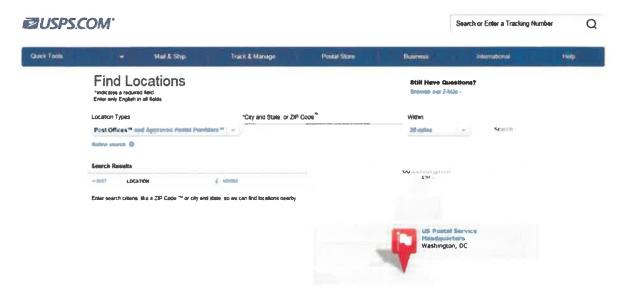
Thank you for reviewing the Postal Service's mail delivery-planning standards—we look forward to working with you!



# 2 Finding Your Growth Manager and USPS Online Resources

#### 2.1 Find a Post Office

The Postal Service lists all local Post Offices<sup>™</sup> on its website at: <u>www.usps.com</u>. To find the Post Office closest to your new development, search using the appropriate ZIP Code<sup>™</sup>.



### 2.2 Find Your Local USPS Growth Manager

Every area where the U.S. Postal Service provides mail delivery has a Postal Service employee assigned to help developers and builders with planning mail service for new development. These "new delivery planning" employees are referred to as Growth Managers.

To find the Growth Manager that covers your specific development's geographic location, send an email to: <u>Delivery.Growth@USPS.GOV</u>, or contact your Post Office and ask to speak to either the Postmaster or the person assigned to assist developers with planning new mail service.

### 2.3 USPS-Approved Mailbox Equipment

Mailboxes used in new construction projects can be one of the following two types of centralized mailbox equipment:

- 1. Pedestal-mounted USPS-approved CBU.
- 2. Wall-mounted USPS-approved STD-4C mailboxes (4C).



The Postal Service annually publishes a list of USPS-approved mailbox equipment and approved manufacturers in its *Postal Bulletin*.



http://about.usps.com/postal-bulletin/2017/pb22467/html/welcome.htm

You can also find the latest list of USPS-approved equipment and approved manufacturers at: <a href="http://about.usps.com/what-we-are-doing/current-initiatives/delivery-growth-management/welcome.htm">http://about.usps.com/what-we-are-doing/current-initiatives/delivery-growth-management/welcome.htm</a>

# 2.4 Delivery Planning Resources for Builders and Developers

The most current version of this guide will always be available on the webpage at: <a href="http://about.usps.com/what-we-are-doing/current-initiatives/delivery-growth-management/welcome.htm">http://about.usps.com/what-we-are-doing/current-initiatives/delivery-growth-management/welcome.htm</a>

The following links provide additional resources for builders and developers:

- Find a Post Office: https://tools.usps.com/go/POLocatorAction!input.action.
- Centralized Delivery/Residential Applications: <a href="http://about.usps.com/publications/pub265a.pdf">http://about.usps.com/publications/pub265a.pdf</a>.
- Centralized Delivery/Garden Apt Applications: <a href="http://about.usps.com/publications/pub265c.pdf">http://about.usps.com/publications/pub265c.pdf</a>.
- Centralized Delivery/Commercial Applications: <a href="http://about.usps.com/publications/pub265b.pdf">http://about.usps.com/publications/pub265b.pdf</a>.

# 3 General Planning Guidelines for Mailboxes in New Developments

#### 3.1 Letter Carrier Access to Deliver U.S. Mail

Centralized delivery is the Postal Service's preference for new addresses, whether residential or commercial. The customer is responsible for keeping the approach to his or her mailbox and adjacent area clear to facilitate delivery. You may provide curbside delivery only with prior approval from the Postal Service. Place curbside mail receptacles approved by the Postal Service where they protect the mail, can be safely and conveniently serviced by carriers without leaving their vehicles, and can be reasonably and safely accessed by customers. These receptacles must be on the right-hand side of the road in the direction of travel when required by traffic conditions, or when driving on the left-hand side of the road to reach the mail receptacle would violate traffic laws.

#### 3.2 Mailbox Locks and Keys

The Postal Service prohibits carriers from accepting keys for locks on private mail receptacles, buildings, or offices, except where an electromechanical door lock system or key keeper box is used.

CBUs have secure, locking mailbox and parcel locker compartments. Whether your new development is commercial or residential, the builder or property owner is responsible for providing lock and key service for cluster box units. The locks/keys for each of the compartments will be provided with the CBU. The Postal Service will furnish the "master access lock" that allows mail to be delivered. See 3.3.for more information.

Your local USPS Growth Manager will discuss specific requirements and processes appropriate for your new development as part of the overall coordination process related to establishing the mode of delivery for your new development.



### 3.3 USPS Master Access Lock

The Postal Service will furnish its own "master access lock" so that carriers have access to deliver the mail. This lock is not available to developers and builders to pre-install.

Your local USPS Growth Manager will coordinate installation of the "master lock" as part of the overall coordination process when starting new mail delivery for customers.

### 3.4 Safety Considerations

If curb delivery is approved by the Postal Service, posts and other supports for curbside mailboxes are owned and controlled by the customer. The owner of the property is responsible for ensuring that posts are neat and adequate in strength and size.

When installing centralized delivery equipment, such as CBUs or STD-4C (4C) equipment, the mailboxes must be safely located so that customers are not required to travel an unreasonable distance to obtain their mail. Typically, mailbox receptacles are located within 1 block of the residence.

When new developments, either residential or commercial, are in the design phase, developers or architects must meet with the USPS Growth Manager to ensure that safe and durable receptacles are properly specified and located in conformance with regulations. The Growth Manager will also meet with the builder at the appropriate time during the construction phase to review the physical mailroom installation and discuss coordination and timing of initiating mail delivery.

### 3.5 Customer and Carrier Accessibility Considerations

Curb delivery may only be provided with prior approval from the Postal Service if the carrier can efficiently, safely, and conveniently service the mailbox from the carrier's vehicle and if the customer can safely and easily access the mailbox.

Apartment house delivery requires that mailboxes be located reasonably close to the entrance in vestibules, halls, or lobbies. The carrier must also be able to service the boxes without interference from swinging or open doors. Consult with your local USPS Growth Manager early in the design process to ensure you select an appropriate location for the apartment building mailroom.

### 3.5.1 Placement of Outdoor Cluster Boxes

The local USPS Growth Manager or designee must approve the CBU mailbox sites and type of equipment. Cluster boxes must be safely located so that customers are not required to travel an unreasonable distance to obtain their mail and so there is sufficient access to mailbox locations with adequate space for carriers to deliver and customers to retrieve the mail. Typically, a mailbox receptacle will be located within 1 block of the residence.

### 3.5.2 Construction Accessibility Guidelines

Accessibility requirements and regulations, including those required to accommodate customers with disabilities, may vary by type of facility and governing jurisdiction. Always consult local building officials and codes for applicable accessibility requirements that apply to your specific development and mailbox project.



# 4 Single-point Residential Deliveries

New mail delivery planning for single-family residential developments typically falls into the following two primary categories:

- Site-constructed single family homes.
- Mobile or trailer homes.

### 4.1 Residential Single Family Site Constructed Development

During the design and planning phase (i.e., before plans and site plats are finalized with the appropriate planning/zoning authorities), developers and builders must notify the U.S. Postal Service of the planned development so that the Postal Service can determine the appropriate mode of delivery while considering input from the parties involved with the development.

Developers and builders must plan to install centralized mail delivery receptacles in new residential communities, which include secure parcel lockers.

New homes built or established within a block of existing homes can only receive the same type of mail delivery service as the older, existing homes after the Postal Service has completed an operational efficiency analysis. When new delivery replaces more than 1 block, delivery methods must comply with mode of delivery options for establishment and extension of delivery service, which is typically centralized mail service.

Your local USPS Growth Manager will work closely with you to determine the best approach to providing mail delivery service to customers in your new residential development. It is important that you contact the Growth Manager in your area as early as possible in your planning process.

### 4.2 Residential Mobile or Trailer Home Development

The delivery options for mobile or trailer home developments depend on whether the development is *permanent* or *transient* as determined by the Postal Service.

**Permanent Developments**—Permanent developments consist of managed mobile home parks or residential mobile home subdivisions with the following characteristics:

- · The lots are permanently assigned.
- The streets are maintained for public use.
- The conditions resemble those of a residential subdivision.

For permanent developments, the delivery options are either central, curbside, or sidewalk delivery. The Postal Service will determine and specify the type of mail delivery for any permanent mobile/trailer home development. The general practice of the Postal Service is to specify centralized delivery.

**Transient Developments**—Transient developments are mobile home, trailer, and recreational vehicle parks where the lots are temporarily occupied or rented and considered transient, short-term, or seasonal. For transient developments, the only option is delivery to a single point or receptacle designated by park management and approved by local Postal Service management. The single delivery point defined will be for the receipt of all mail from USPS; employees of the park will complete the subsequent distribution of mail and forwarding.

Whether your new mobile home development is permanent or transient, contact your local Growth Manager early in the process so that we can work with you in laying out the space plan for mail delivery for the residents of your new community.



# 5 Multi-point Residential Deliveries

### **5.1 Apartment Communities**

The following are important U.S. Postal Service guidelines for determining the location and composition of mail receptacles for apartment communities:

- a. All new or remodeled apartment houses must install USPS-approved 4C centralized mailbox equipment. There must be at least 1 parcel locker for every 10 mailbox compartments. The Postal Service requires no maximum number of parcel lockers to be installed—only the 1:10 parcel locker/mailbox minimum.
- b. Lock mail receptacles and parcel lockers in apartment buildings reasonably close to the entrance in vestibules, hall, or lobbies. The carrier must also be able to serve the boxes without interference from swinging or open doors.
- c. Exterior centralized mailboxes may also be an option. The Postal Service may authorize the installation of standard, approved apartment receptacles (4C or CBU) in exterior walls of buildings provided they are not installed directly on the street or a public sidewalk. Provide a canopy for outdoor mailbox installations. The canopy design and location must provide maximum protection from the weather, including driving rain, and provide adequate nighttime lighting.

### 5.2 Student Housing and Off-Campus Student Apartment Communities

Mail delivery protocols to student housing vary depending on the characteristics of the student housing community being served. Below are general guidelines for establishing new mail service.

Mail is delivered to dormitory buildings and residence halls when addressed to a specific building. Mail is delivered in bulk to a designated representative of the school or property in the building. The representative is responsible for further distribution to students/residents. The Postal Service will determine the proper mode of delivery to be established and may require that designees from the student housing property be identified to accept mail for each location prior to initiating delivery.

The Postal Service defines a dormitory building or residence hall as a building that consists of single or multi-room units that may share or have access to centrally located kitchens, bathrooms, showers, or social or common areas. Whether located on or off campus, and regardless of private ownership, such buildings are nevertheless dormitories and either the school or building owner is responsible for the final delivery of student mail. Post Office personnel do not distribute mail into apartment-type mailboxes for dormitories or residence halls.

As always, it is important to contact your local USPS Growth Manager early in the planning process to ensure understanding and requirements related to providing mail delivery for your new student housing development.



### 6 Non-Residential Deliveries

#### 6.1 Business and Industrial Parks

The following paragraphs provide important U.S. Postal Service guidelines for determining the location, type of mailbox receptacles and other requirements related to initiating new mail delivery for business and industrial parks:

The type and design of buildings included in the business and industrial park will govern the mode of delivery that is implemented. As with all new mail delivery planning, the location of the USPS-approved delivery equipment is subject to Postal Service approval. Delivery mode options for business parks are door, centralized, curbside, or sidewalk delivery. Door delivery will generally not be available for new delivery points. The primary options are as follows:

- a. <u>Centralized Delivery</u>. Centralized delivery service applies to all business office buildings, office complexes, and industrial and professional parks. If the U.S. Postal Service is delivering directly to the mailboxes, the type of equipment allowed for newly constructed buildings must either be USPS-approved CBUs or STD-4C (4C) wall-mounted receptacles.
- b. <u>Single-Point Delivery</u>. Single-point delivery is generally not available to new business park developments unless it is in the form of a bulk mail drop.

# 7 General Delivery Planning Information

### 7.1 Establishment of City Delivery Service

To establish city delivery service, consider a combination of mail delivery methods to provide regular and effective service to all residential and business sections of a community. Consider the establishment of city delivery service when the following requirements are met:

- a. Within the area to be served, there is a population of 2,500 or more or 750 possible deliveries.
- b. At least 10 percent of the building lots in the area to be served are improved with houses or places of business. Where a house or building and its yard or ground cover more than one lot, all lots so covered are considered improved. The streets are paved or otherwise improved to permit the travel of Postal Service vehicles at all times, without damage or delay.
- c. Streets are named and house numbers are assigned by the municipal authorities in accordance with Management Instruction DM-940-89-3, *Addressing Conventions*.
- d. Street signs are in place and house numbers are displayed.
- Rights-of-way, turnouts, and areas next to the roads and streets are sufficiently improved so that the installation, servicing, and accessing of mailboxes are not hazardous to the public or Postal Service employees.
- f. Satisfactory walkways exist for the carrier where required.

**Note:** During a new residential or commercial development's design and planning phase (i.e., before the developers and builders finalize plans and site plats with the appropriate planning/zoning authorities), developers and builders must notify the Postal Service so that the Postal Service can determine the appropriate mode of delivery while considering input from these parties.



Developers and builders should plan for centralized mail delivery installations for residential communities or business developments.

It is important to contact your local USPS Growth Manager while you are still in the design process so that we can collaborate with you to prepare the most efficient, effective plan to provide mail delivery for the customers who will live or work in your new development.

# 8 Inspection and Commencement of Mail Delivery Services

### 8.1 Mail Receptacles and Customer Obligations

Appropriate mail receptacles must be provided for the receipt of mail. The type of mail receptacle depends on the mode of delivery in place. Purchase, installation, maintenance, repair, and replacement of mail receptacles are the responsibility of the customer. Verify with the local Postmaster or Growth Manager, the appropriate locations for installation. The following apply:

- a. In locations where the Postal Service has determined that centralized delivery is appropriate, customers must install mail receptacles that comply with the USPS STD- 4C wall-mounted mail receptacles or USPSB1118, Postal Service specification, CBUs, to include secured parcel lockers.
- b. If curbline delivery is authorized, customers must erect curb-mounted receptacles that comply with USPS-STD-7C.
- c. If sidewalk delivery is authorized, customers must erect sidewalk-mounted receptacles that comply with USPS-STD-7C.

The Postal Service annually publishes a list of USPS-approved mailbox equipment and approved manufacturers in its *Postal Bulletin*.

http://about.usps.com/postal-bulletin/2017/pb22467/html/welcome.htm

You can find the latest list of USPS-approved equipment and approved manufacturers at: <a href="http://about.usps.com/what-we-are-doing/current-initiatives/delivery-growth-management/welcome.htm">http://about.usps.com/what-we-are-doing/current-initiatives/delivery-growth-management/welcome.htm</a>

### 8.2 Centralized Mail Receptacle Installation

You must consider many variables when installing centralized mailbox equipment. In addition to providing accessible locations, you must conduct proper foundation preparation and follow specific mounting procedures, to name a few requirements.

Appendices A through D of this guide provide sample diagrams of various CBU installations to help you understand space requirements, placement, etc.

**Note:** It is critical that you refer to the installation manuals furnished by each of the manufacturers for the specific USPS-approved centralized mailbox equipment purchased commercially.

For assistance with siting your outdoor centralized mail equipment, contact your local USPS Growth Manager so that the Postal Service can advise about the proper locations as you finalize plans for your new development.



# 9 Closing

Thank you for taking time to review this guide for planning mail delivery for new development.

We periodically update this guide—so be sure to check online for the latest version on the ABOUT.USPS.COM website at:

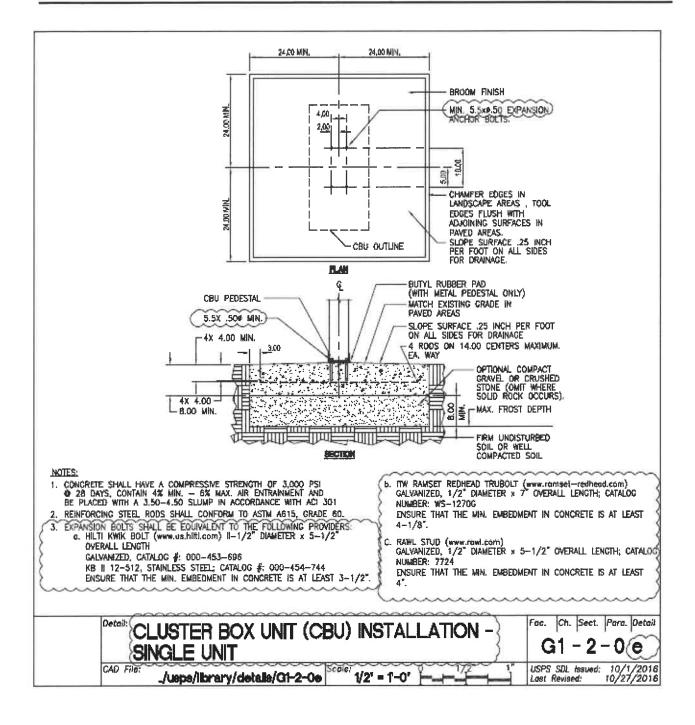
http://about.usps.com/what-we-are-doing/current-initiatives/delivery-growth-management/welcome.htm

**Reminder:** You can find the Growth Manager who covers your specific development geography by sending an email to: <u>Delivery.Growth@USPS.GOV.</u>

Or, you can contact your Post Office and ask to speak to the Postmaster or person assigned to assist developers with planning new mail service.

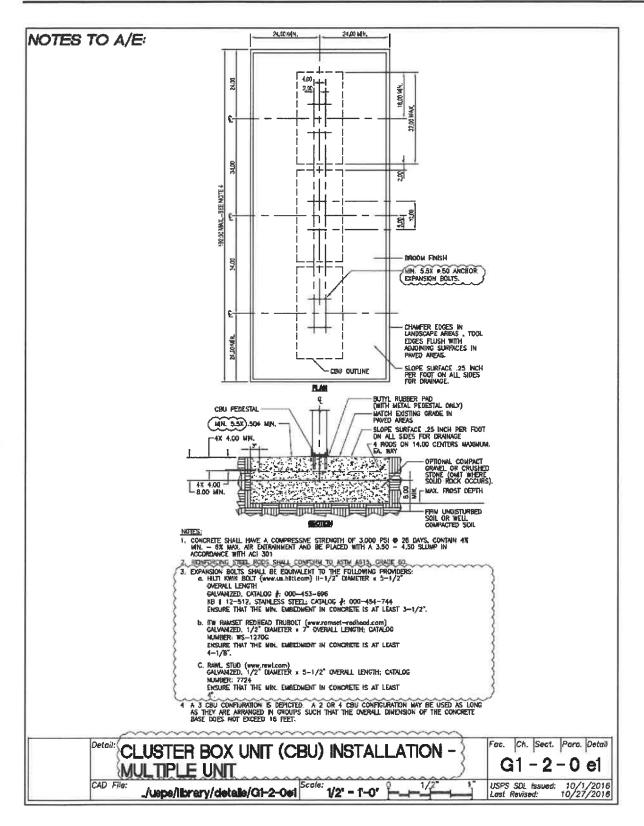


# **APPENDIX A – Cluster Box Unit Installation Single Unit**





# APPENDIX B – Cluster Box Unit Installation Multiple Unit

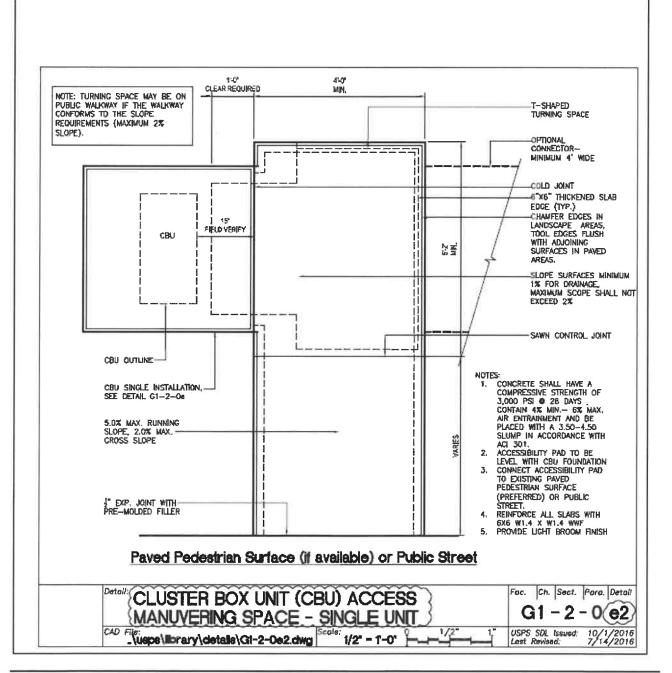




# APPENDIX C - Cluster Box Unit Access Maneuvering Space - Single Unit

### NOTES TO A/E:

 IF THE ACCESSIBLE ROUTE FROM THE CBU(s) CONNECTS WITH A STREET OR OTHER PAVED SURFACE AT A VERTICAL CURB, A CURB RAMP SHOULD BE INSTALLED IN ACCORDANCE WITH RE-4 REQUIREMENTS.





# APPENDIX D - Cluster Box Unit Access Maneuvering Space - Single Unit

### NOTES TO A/E:

 IF THE ACCESSIBLE ROUTE FROM THE CBU(s) CONNECTS WITH A STREET OR OTHER PAVED SURFACE AT A VERTICAL CURB, A CURB RAMP SHOULD BE INSTALLED IN ACCORDANCE WITH RE-4 REQUIREMENTS.

