



# Americans with Disabilities Act Transition Plan for Public Rights-of-Way

Prepared by Pierce County Planning & Public Works  
2019

**The Americans with Disabilities Act Notice:**

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), Pierce County will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

**Alternative Formats:**

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## Executive Summary

The Americans with Disabilities Act (ADA) of 1990 is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life. Title II of the ADA applies to State and local governments for programs, services and activities and prohibits discrimination against qualified individuals with disabilities.

Public agencies are required to conduct a Self-Evaluation of services, policies and practices as it relates to access for individuals with disabilities ([28 CFR § 35.105\(a\)](#)). Public agencies must also develop a Transition Plan to outline modifications and efforts that must be made to correct findings of non-compliance with ADA standards ([28 CFR § 35.150 \(d\)](#)).

This specific ADA Transition Plan focuses on county-owned facilities within the public road right-of-way in unincorporated Pierce County. Facilities addressed in the plan include existing sidewalks, curb ramps, pedestrian push buttons and driveway entrances that include ramps within the pedestrian access route. The ADA Transition Plan does not address constructing new non-motorized facilities as that is handled via other planning efforts. These efforts include the County's Six-Year Transportation Improvement Program which is the County's plans for capital improvements over the next six years as well as the Active Transportation Plan which focuses on non-motorized (active) improvements across the County.

The first step to developing the ADA Transition Plan was to analyze the inventory collected as part of the Self-Evaluation Report. This information was used to determine which facilities did not meet ADA standards. The county, with feedback from the community, created a scoring system based on the condition, location and priority for each facility in the inventory. This information was used to understand the overall state of the pedestrian network as it relates to ADA standards and determine where investments can be optimized to serve the most users.

Next, Pierce County determined the overall financial investment needed to bring county facilities into ADA compliance. This was done by assigning an estimated improvement cost to each non-compliant facility. Program cost information will be used to plan and schedule improvement projects. Based on Pierce County's findings, it would cost approximately \$100 million to improve existing non-compliant facilities documented in the 2018 data inventory.

Lastly, the county developed an ADA Improvement Program and allocated funding to make improvements each year to support projects prioritized by the methods of the ADA Transition Plan. The ADA Improvement Program supports Pierce County's ongoing commitment to provide equal access to all.

The ADA Transition Plan will be updated every five years to keep efforts focused on achieving improvements to access in the public right-of way. The updates will highlight progress made, refine priority areas for projects, and update the remaining program costs. The five year updates will include a formal public comment period to continue the collaborative partnership with our community.

# Introduction

## Transition Plan Need and Purpose

The Americans with Disabilities Act (ADA), enacted on July 26, 1990, is a civil rights law prohibiting discrimination against individuals on the basis of disability. ADA consists of five titles outlining protections in the following areas:

- I. Employment
- II. State and local government services
- III. Public accommodations
- IV. Telecommunications
- V. Miscellaneous provisions

Title II of ADA pertains to the programs, activities and services public entities provide. Pierce County must comply with this section of the act as it specifically applies to public service agencies. Title II of ADA provides that, "...no qualified individual with a disability shall, by reason of such disability, 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 such entity." ([42 U.S.C. § 12132](#); [28 CFR § 35.130](#))

As required by Title II of ADA, [28 CFR § 35.105](#) and [28 CFR § 35.150](#), Pierce County has conducted a self-evaluation of its facilities within public rights-of-way (lands owned by the county for public roadways) and has developed this Transition Plan detailing how we will ensure that all of those facilities are made accessible. Title II states that the Transition Plan must, at a minimum:

- Identify obstacles that limit accessibility of county facilities to individuals with disabilities.
- Describe the methods we will use to make facilities accessible.
- Specify a schedule for taking the steps necessary to achieve ADA compliance.
- Indicate the official responsible for implementing the plan.

This Transition Plan only addresses existing county-owned public rights-of-way. This plan does not address county-owned buildings, parks, privately-owned facilities or the facilities owned by the incorporated cities and towns of Pierce County. This plan also does not address constructing new non-motorized facilities as that is handled via other planning efforts.

## ADA and its Relationship to Other Laws

Title II of the ADA is companion legislation to two previous federal statutes and regulations: the [Architectural Barriers Acts of 1968](#) and [Section 504 of the Rehabilitation Act of 1973](#).

- The Architectural Barriers Act of 1968 is a federal law that requires facilities designed, built, altered or leased with federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.
- Section 504 of the Rehabilitation Act of 1973 is a federal law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any federal department or agency. Title II of ADA extended this

coverage to all state and local government entities, regardless of whether they receive federal funding or not.

## Agency Requirements

In addition to completing a Transition Plan, Pierce County must meet the general requirements of Title II. The county:

- Must operate services, programs, or activities so that, when viewed in their entirety, they are accessible to and useable by individuals with disabilities ([28 CFR § 35.150](#)).
- May not refuse to allow a person with a disability to participate in services, programs or activities simply because the person has a disability ([28 CFR § 35.130 \(a\)](#)).
- May not provide benefits or services to individuals with disabilities that are separate or different than those provided to others unless the separate or different measures are necessary to ensure that benefits and services are equally effective ([28 CFR § 35.130\(b\)\(1\)\(iv\) & \(d\)](#)).
- Must make reasonable modifications in policies, practices and procedures to ensure equal access to individuals with disabilities unless modifications would fundamentally alter the nature of the service, program or activity ([28 CFR § 35.130\(b\) \(7\)](#)).
- Must take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others ([28 CFR § 35.160\(a\)](#)).
- Must designate at least one responsible employee to coordinate ADA compliance ([28 CFR § 35.107\(a\)](#)). This person is often referred to as the "ADA Coordinator." The public entity must provide the ADA Coordinator's name, office address, and telephone number to all interested individuals.
- Must provide notice of ADA requirements. The notice must provide information about the provisions of Title II and its applicability to services, programs or activities ([28 CFR § 35.106](#)).
- Must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints ([28 CFR § 35.107\(b\)](#)) (See next section).

## Public Notice and Grievance Procedure

Under Title II of the Americans with Disabilities Act ([28 CFR § 35.106](#)), each agency is required to publish notice of its responsibilities with regards to the ADA. This public notice is provided in Appendix G and can also be found on the Pierce County webpage at [www.piercecountywa.gov/1222/ADA-Grievance-Process](http://www.piercecountywa.gov/1222/ADA-Grievance-Process).

In accordance with [28 CFR § 35.107\(b\)](#), the county has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizen complaints, concerns, comments, and other grievances. If users of Pierce County facilities and services believe the county has not provided reasonable accommodation, they have the right to file a grievance. This grievance procedure is outlined in Appendix G.

## Pierce County ADA Coordinator

In accordance with [28 CFR § 35.107\(a\)](#), Pierce County has identified an ADA Coordinator to oversee the county policies and procedures. Contact information for this individual is in Appendix G.

## Official Responsible for Public Rights-of-Way Transition Plan Implementation

This Transition Plan addresses county-owned public rights-of-way. [RCW 36.80.030](#) states, in part, that “The county road engineer shall... have supervision, under the direction of the board, of establishing, laying out, constructing, altering, improving, repairing [and] maintaining all county roads in the county.” To that end, the County Engineer for Pierce County is the official responsible, under [28 CFR § 35.150\(d\)\(3\)\(iv\)](#) for the implementation of Pierce County’s ADA Transition Plan for Public Rights-of-Way. The board in this context references the County Council.

## Public Involvement

Public participation was an important component of the development of this document. [28 CFR § 35.150\(d\)\(1\)](#) requires public entities to “provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the Transition Plan by submitting comments.”

Public surveys helped the county identify issues of greatest importance to people with disabilities in our community. The survey responses guided the development of our prioritization methods in this plan. The public had opportunities to comment on the ADA Public Rights-of-Way Self-Evaluation Report, which provides the foundation for the Transition Plan. The public had additional opportunity to comment on the draft Transition Plan prior to being considered for adoption by the Pierce County Council. All public comments were reviewed and incorporated into the final version of the Transition Plan as deemed appropriate prior to being considered for adoption by the Council.

A summary of our public outreach and involvement efforts is contained in our Self-Evaluation Report in Appendix A. Appendix B also provides a summary of the outreach conducted during the entire process.

Pierce County has a Transition Plan webpage at [www.piercecountywa.gov/ADAtransition](http://www.piercecountywa.gov/ADAtransition). Pierce County will continue to provide the latest information for projects and policy on the webpage. The webpage contains applicable documents, information on committee involvement and maps. In addition, the public can submit requests about accessibility issues in the public right-of-way.

## Self-Evaluation

### Overview

Pierce County is required, under Title II of the Americans with Disabilities Act (ADA) and [28 CFR 35.105](#), to evaluate our current services, policies, and practices to determine whether they comply with the requirements of the ADA. This process is called self-evaluation. Pierce County Planning and Public Works completed the ADA Public Rights-of-Way Self-Evaluation Report in October 2015. The report details how the county fulfilled the self-evaluation requirements for existing pedestrian facilities within county public rights-of-way. The report addresses only

transportation infrastructure in Pierce County’s public rights-of-way. It does not address the many other facilities and services of Pierce County government. The Self-Evaluation Report also fulfills the Transition Plan requirement of [28 CFR § 35.150 \(d\)\(3\)\(i\)](#); to identify physical obstacles in the public right-of-way that limit accessibility to individuals with disabilities.

The pedestrian facilities specifically addressed in the Self-Evaluation Report are sidewalks, curb ramps, pedestrian supporting elements of traffic control signals and driveway entrances that include ramps within the pedestrian access route. Any barriers to accessibility resulting from these facilities are identified within the ADA Public Rights-of-Way Self-Evaluation Report in Appendix A.

The body of the Self-Evaluation Report consists of four major sections. They are:

- **Policies and Practices:** This section reviews Pierce County Planning and Public Works policies and practices that may affect the accessibility of pedestrian facilities in county public rights-of-way.
- **Pedestrian Facility Inventory:** This section describes how the county collected information on the locations and measurements of pedestrian facilities in the public right-of-way. Additional information is contained in the Pedestrian Facilities Assessment Manual in Appendix A of the Self-Evaluation Report.
- **Inventory Findings:** This section includes maps of the locations of all facilities inventoried, as well as a statistical analysis of the measurements and their compliance with ADA standards.
- **Public Involvement and Outreach:** This section summarizes county efforts to reach out to members of the community with disabilities and seek their guidance to inform the writing of the Self-Evaluation Report and Transition Plan.

The county will update this information periodically as new facilities are constructed, existing facilities are improved, and county policies and/or practices change. These updates will ensure the inventory remains current as we make progress with the Transition Plan implementation. Appendix C contains the most current inventory of facilities and associated mapping since the publication of the Self-Evaluation Report. The information in Appendix C was used to develop the ADA Transition Plan. This information will continually change and be refined over the life of the program.

## ADA Standards

The 2011 Public Rights-of-Way Accessibility Guidelines (PROWAG) is the standard adopted by Pierce County per Public Works Department Policy No. 1302. The 2011 PROWAG was utilized for both the Self-Evaluation Report and the Transition Plan. The 2011 PROWAG is widely used as an ADA standard and best practice throughout the United States, even though a final ruling has not been made at a federal level. It is still unknown when this final ruling will occur.

## Methods Used to Improve Accessibility

Pierce County will maintain and improve accessibility of pedestrian facilities in the public right-of-way using a variety of methods and programs. The program that is expected to have the largest impact is the ADA Improvement Program. However, there are other programs in place that will also result in accessibility improvements in the public right-of-way.

### ADA Improvement Program

Pierce County is developing an ADA Improvement Program to implement the ADA Transition Plan by retrofitting and replacing existing pedestrian facilities with new accessible facilities. By design, the ADA Transition Plan only addresses existing facilities that are not ADA compliant, therefore, it does not include expansion of the sidewalk network. Projects in this program will be prioritized by the methods described in the Transition Plan. The projects developed through this program will be stand-alone ADA improvement projects and will be built by public contract. The goal of the ADA Improvement Program is to have a project each year. Once individual projects have been scoped, they will be incorporated into the Transportation Improvement Program (TIP). The TIP is the Six-Year Road Program for the county which identifies projects and programs the county intends to develop during that timeframe. The TIP is adopted annually by the County Council and County Planning Commission.

### Sidewalk Maintenance Program

The Pierce County Planning and Public Works Maintenance and Operations Division conducts routine maintenance of county sidewalks. These maintenance activities include vegetation trimming, crack filling, grinding vertical surface discontinuities, casting new concrete sidewalk panels, and maintaining asphalt pedestrian paths and multi-use paths in the public right-of-way. This program will generally address maintenance issues that appear over time as a result of the sidewalk or pedestrian path's age or usage. This program will not generally be used to correct non-compliant deficiencies in the original design and construction of sidewalk, such as steep cross slopes or narrow pedestrian access routes.

### Spot Safety Improvements

Pierce County anticipates that some limited improvements will be constructed by the Maintenance and Operations Division utilizing county forces work on rare occasion. It is anticipated that these improvements will generally be constructed as the result of a request by a member of the public who has a specific access issue. This method will not be used for large projects where many facilities are improved at once resulting from prioritization in this plan.

### Traffic Signal Improvements

Pierce County Planning and Public Works Traffic Operations employees operate and maintain the county's traffic signals. Pierce County forces will install many of the accessible pedestrian signal upgrades prioritized in this plan. Such projects will most likely focus on pedestrian push button replacements. Major signal modifications such as adding or relocating pedestrian push button poles will generally be part of a capital project developed as part of the ADA Improvement Program or as part of another major project. Major projects will be built by public contract.

## Roadway Resurfacing Programs

Pierce County preserves its roadways through extensive resurfacing programs. Some roadway resurfacing treatments result in alterations to crosswalks, which trigger requirements for accessible curb ramps. When determining whether a roadway resurfacing treatment constitutes an alteration of a pedestrian facility, Pierce County will follow the guidance of the [\*Department of Justice/Department of Transportation Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing\*](#) published in 2013 and the [\*Questions & Answers Supplement to the 2013 DOJ/DOT Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements To Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing\*](#) published in 2015. Many of the curb ramp upgrades the county have completed to date were constructed as a part of the annual asphalt overlay program.

## Road Improvement Projects

Pierce County constructs road improvement projects for a variety of reasons including, but not limited to, roadway capacity, traffic safety, new corridor connections, economic development, intersection improvements and non-motorized transportation. When a road improvement project alters an existing pedestrian facility, the pedestrian facilities are made ADA compliant to the maximum extent feasible within the project scope. Upcoming projects are identified in the TIP.

Road improvement projects often increase overall pedestrian accessibility by constructing new pedestrian facilities where none existed before. Pierce County recognizes the importance of expanding the sidewalk network and increasing its connectivity. The construction of sidewalks is generally required for any newly constructed or reconstructed roadway in the urban area of Pierce County per section 4-7 of the [\*Manual on Design Guidelines for Road and Bridge Construction in Pierce County\*](#).

## Developer Improvements

When private developments alter existing pedestrian facilities in the public right-of-way, Pierce County requires the developer to make those facilities accessible to the maximum extent feasible. Pierce County reviews development plans to ensure compliance with ADA standards. Developers must also comply with the [\*Manual on Design Guidelines for Road and Bridge Construction in Pierce County\*](#) for improvements and new construction within the public right-of-way.

## External Agency Coordination

Other agencies may construct or alter pedestrian facilities within Pierce County public rights-of-way. Examples of these agencies are utility companies, public transit agencies, the Washington State Department of Transportation (WSDOT) and neighboring jurisdictions. Pierce County reviews the design and construction of all facilities built by other agencies in the county public right-of-way to ensure compliance with ADA standards. Projects that alter existing pedestrian facilities are required to make those facilities accessible to the maximum extent feasible. Pierce County and Pierce Transit's interagency agreement designates Pierce Transit as the agency responsible for constructing and maintaining all Pierce Transit bus stops in the public right-of-way of Pierce County.

All programs and projects discussed in this section are required to make facilities ADA compliant to the maximum extent feasible. If it is technically infeasible to achieve full compliance with the 2011 PROWAG, the county will complete or require submittal of a Maximum Extent Feasible (MEF) document. Appendix H contains processes and supporting documentation for MEF consideration.

## Funding Opportunities

The ADA Improvement Program will utilize existing and prospective funding programs over time to achieve county-wide accessibility. ADA improvements will be funded either as stand-alone projects or as a component of another road improvement project. Programs and sources listed below are opportunities to fund ADA improvements. Local funding programs are expected sources of funding, whereas funding from federal and state programs is usually acquired through a grant competition.

### Local Funding Programs

**County Road Fund:** The primary source of transportation funding is the County Road Fund (CRF). The CRF is primarily made up of the road levy portion of the property tax and a portion of the State Motor Vehicle Fuel Tax (MVFT – the “gas tax”). The CRF provides funds for the Office of the County Engineer and the Maintenance and Operations Division to plan, improve, maintain and operate the county road system.

- **Property Tax (Road Levy):** In 2019, the county will collect a maximum of \$1.49 per \$1,000 of assessed valuation on property in the unincorporated areas of the county for roads. These monies go into the CRF and are used in the overall administration, engineering, construction, maintenance and operation of the public road and bridge system in unincorporated areas. One important use of CRF monies is to “match” funding from state or federal transportation improvement funding programs. The county expends more than half of the property taxes received by the CRF on maintenance and operations for the existing county roads and bridges.
- **Motor Vehicle Fuel Tax (Gas Tax – County Portion):** In the State of Washington, MVFT is currently 49.4 cents per gallon. It is shared among the cities, counties and the state Department of Transportation. This includes a dedication of a portion of the MVFT to grant programs managed by the County Road Administration Board (CRAB) and the Transportation Improvement Board (TIB). Between the Rural Arterial Program (RAP), the County Arterial Preservation Program (CAPP), and the regular county distribution, all administered by CRAB, counties receive a share approximately equal to 5.96 cents per gallon, plus a small amount from the Transportation Partnership Account (TPA) dedicated to CAPP. The county total share of the MVFT is approximately 16% of the net state fuel taxes collected. Based on the current revenue forecasts, the estimate for Pierce County’s share of MVFT for 2019 is \$12,174,000.

**Traffic Impact Fees (TIF):** The Pierce County Council, in Resolution R2001-43s, requested a Traffic Impact Fee (TIF) program and related regulations be developed. On October 3, 2006, pursuant to RCW 82.02.050, the Council passed Ordinances 2006-60s and 2006-61s, which authorize the county to charge TIF for land development actions. The effective date of the ordinance was January 1, 2007. It was later updated by Ordinance 2012-63. The TIF program was recently updated in November 2018 and became effective February 1, 2019 via Ordinance 2018-71s.

Impact fees are charges on new development to pay for capital improvements (such as parks, schools, roads, etc.) needed due to new development. TIF are collected to improve the transportation system to accommodate the increased travel demand caused by new development. Due to the restricted use of these funds, they will only be used on capital capacity roadway improvements that happen to include existing pedestrian facilities and will not be used for stand-alone ADA specific projects.

### Federal and State Funding Programs-Grant Opportunities

Grant funding is a crucial element of the overall financial plan of Planning and Public Works to deliver excellent public works services and facilities. As such, the county pursues a wide variety of external grant opportunities. Grant programs are often available on an annual or biannual basis depending on the grant agency's budget cycle. There is no guarantee that a grant program will have available funds every budget cycle. The applicable governing body at the state or federal level must allocate revenue toward a specific program or programs to make grant competitions possible. Once allocated, the grant funding is then administered by a state, federal or other agency, such as the TIB, WSDOT, the Federal Highway Administration (FHWA) or the Puget Sound Regional Council (PSRC). PSRC is a metropolitan planning organization for the region. PSRC members include King, Pierce, Snohomish and Kitsap counties, the region's cities and towns, port districts, transit agencies and tribes. The purpose of the PSRC is to make coordinated decisions about transportation, growth management and economic development on a regional level.

There are various eligibility requirements and criteria that differ among the grant funding programs. Table 1 contains a summary of each funding program that may have the potential to improve accessibility as part of a project. Local participation can come from several sources including the CRF, a school district's funds through allocation, levy or bond, developer funds, TIF, or a private contribution by an individual or a corporation.

Table 1- Grant Program Overview

<b>Funding Program</b>	<b>Description</b>	<b>Local Financial Match</b>
(TIB) Urban Sidewalk Program- State Funds	This program funds design and construction of sidewalks on roadways with a Federal Functional Classification of Urban Principal Arterial, Urban Minor Arterial, or Urban Collector Arterial. Counties with federal urban areas and cities over 5,000 in population in Washington State can apply. This program does not fund a right-of-way phase.	A minimum 20% match is required
(TIB) Complete Streets- State Funds	The Complete Streets award is flexible money given to any city or county in Washington State that has an adopted complete streets ordinance and shows an ethic of planning and building streets that use context sensitive solutions to accommodate all users, including pedestrians, transit users, cyclists, and motorists.	No match is required
(WSDOT) Pedestrian and Bicycle Program- State and/or Federal funds	The purpose of this program is to improve conditions for biking and walking and encourage “complete street” type projects that safely meet the needs of bicyclists, pedestrians, public transportation users and motorists. All public agencies in Washington State are eligible to apply.	No match is required but preference is given to projects that provide matching funds
(WSDOT) Safe Routes to Schools (SRTS)- State and/or Federal funds	The purpose of the SRTS program is to increase the number of children walking and biking to school safely. All projects must be within two miles of a primary, middle, or high school (K-12). All public agencies in Washington are eligible to apply.	No match is required but preference is given to projects that provide matching funds
Congestion Mitigation and Air Quality Improvement Program (CMAQ)- Federal Funds Administered by PSRC and Local Counties	The CMAQ program was implemented to support surface transportation projects and other related efforts that contribute to air quality improvements and provide congestion relief. A portion of the CMAQ funds are allocated regionally through the Puget Sound Regional Council (PSRC) to eligible agencies and the remaining portion is allocated within Pierce County through the Pierce County Regional Council (PCRC). CMAQ funds are typically available at the regional and county levels for project competitions.	A minimum 13.5% local match is required
Surface Transportation Block Grant Program (STBG)- Federal Funds Administered by PSRC and Local Counties	The STBG program supports funding for transportation enhancements, operational improvements, highway and transit safety improvements, surface transportation planning, capital and operating costs for traffic management and control, carpool and vanpool projects, development and establishment of management systems, participation in wetland mitigation and wetland banking, bicycle facilities, and pedestrian walkways. STBG funds are typically available at the regional and county levels for project competitions.	A minimum 13.5% local match is required
Transportation Alternatives Program (TAP)- Federal Funds Administered by PSRC and FHWA	This program provides funding for infrastructure projects that improve non-driver access to public transportation and enhanced mobility. Programs and projects defined as transportation alternatives include, but are not limited to, on and off-road pedestrian and bicycle facilities. All public agencies, school districts, local education agencies and tribal governments are eligible to apply.	A minimum 13.5% match is required

## ADA Improvement Program Funding

Currently, the county has programmed \$1,135,000 in CRF to be available on an annual basis specifically for implementing accessibility-related improvement projects. This programmed amount of funding is subject to change depending on actual revenues, Pierce County Council actions, and other factors. Each year the county will work to complete as many improvements as possible with this funding, based on the prioritization of facilities and areas. Approximately \$100,000 of the \$1,135,000 annual programmed amount will be set aside for citizen requests in case of an immediate need. The county has flexibility to adjust this amount as needed.

## Prioritization

After collecting a detailed inventory of existing facilities as part of the Self-Evaluation data, the county needed a way to compare these facilities for deficiencies and ultimately determine a process for planning improvement projects.

Pierce County developed a method to score each inspected facility for comparison. The facility prioritization system was created by reaching out to members of the public and by researching studies and standards developed by other agencies. Public involvement is summarized in the Self-Evaluation Report in Appendix A and Appendix B.

The facility prioritization system consists of point-based scores in three categories: condition, location and priority. Every pedestrian facility in the inventory will receive a condition score and a location score. Condition and location scores are each assigned on a scale of 0-100. The priority score is a combination of the condition score and the location score. The priority score has a maximum value of 200.

Geographic Information System (GIS) software is used for data collection and assigning condition, location and priority scores to each facility. GIS allows the county to efficiently develop and maintain the ADA Transition Plan and the Self-Evaluation data. GIS has the ability to store, analyze and present data spatially to show patterns and trends.

### Condition Score

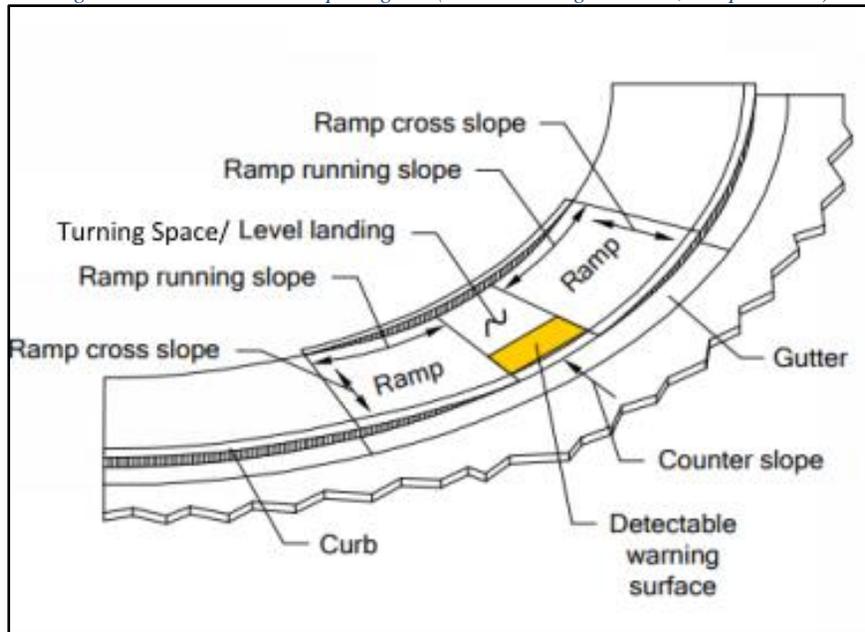
The condition scoring system is unique for each type of pedestrian facility. The condition score is designed to be a measure of how difficult a facility is to use for a person with disabilities. A higher condition score means there are more deficiencies with that facility. Condition is calculated using data measured and recorded in the Self-Evaluation inventory described in Appendix A. The condition scoring of deficiencies are assessed against standards in the 2011 PROWAG released by the United States Access Board. A point value of zero is associated with the ADA compliant condition for each criterion.

The scoring systems for curb ramps, sidewalks, driveways and accessible pedestrian signals are not designed to be directly comparable to each other. The curb ramp category has the greatest total number of measurements used to assign points for condition deficiencies. Out of all the facilities measured, curb ramps are the most complex for defining and comparing barriers to access. Sidewalks and driveways have similar data elements to curb ramps but are comprised of fewer physical measurements to denote compliance and assign condition deficiency points. Pedestrian push buttons or accessible pedestrian signals (APS) provide a different type of accessibility as an operable part of traffic signal systems. The assignment of condition deficiency points for pedestrian push buttons is largely based on operability and spatial relationship to other components of that specific signalized intersection. Each facility type is described separately for condition scoring.

## Curb Ramps

The curb ramp condition category has 100 possible points since there were so many metrics collected. Figures 1 and 2 illustrate condition scoring elements of curb ramps. Missing curb ramps function as a separate scoring category since they are automatically a barrier to access. Missing curb ramps also have the potential of 100 points in the condition category. Tables 2 and 3 display the point system used to assign a condition score to each curb ramp or missing curb ramp.

*Figure 1-Parallel Curb Ramp Diagram (WSDOT Design Manual, Chapter 1510)*



*Figure 2- Perpendicular Curb Ramp Diagram (WSDOT Design Manual, Chapter 1510)*

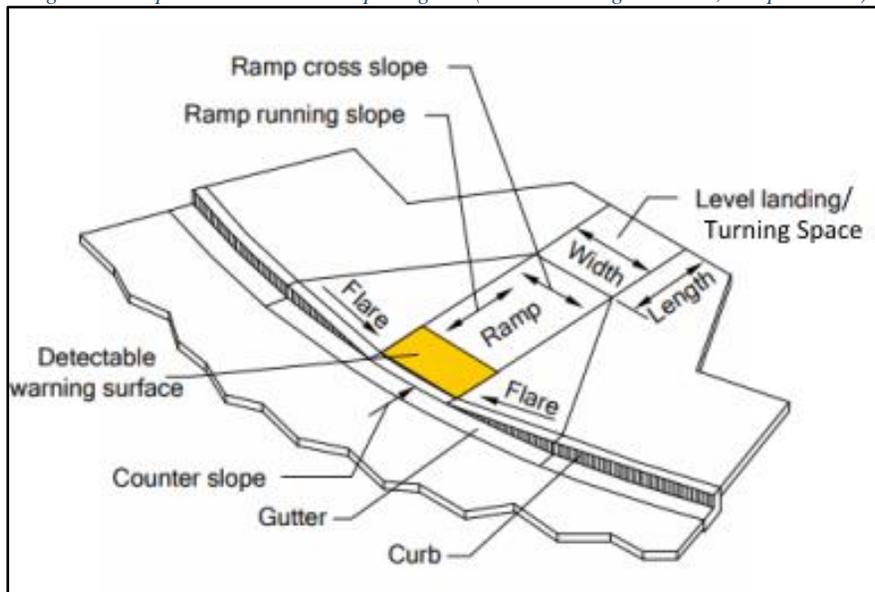


Table 2- Curb Ramp Condition Scoring

<b>Curb Ramp Condition Scoring Category</b>	<b>Points</b>
<b>Ramp Obstruction:</b>	
obstruction present	15
obstruction not present	0
<b>Ramp Width:</b>	
width < 3.0'	10
width 3.0' - 3.9'	4
width >= 4.0'	0
<b>Ramp Cross Slope:</b>	
cross slope > 5%	10
cross slope 3.6% - 5%	4
cross slope 2.1% - 3.5%	2
cross slope <= 2.0%	0
<b>Ramp Running Slope:</b>	
running slope > 10%	10
running slope 8.4% - 10%	6
running slope <= 8.3%	0
<b>Turning Space Presence and Dimensions:</b>	
no turning space present	10
smallest dimension < 3.0'	6
smallest dimension 3.0' - 3.9'	3
smallest dimension >= 4.0'	0
<b>Turning Space Steepest Slope:</b>	
steepest slope > 5.0% or no turning space present	10
steepest slope 3.6% - 5.0%	4
steepest slope 2.1% - 3.5%	2
steepest slope <= 2.0%	0
<b>Counterslope:</b>	
grade break > 15%	8
grade break 13.4% - 15.0%	6
grade break <= 13.3% and counterslope > 5.0%	1
counterslope <= 5%	0
<b>Flared Side Slope:</b>	
flare slope > 10.0%	5
flare slope <= 10.0%	0

<b>Detectable Warning Surface</b>	
no detectable warning surface, or mesh type	6
truncated domes placed incorrectly	5
truncated domes formed from ramp concrete	3
ADA compliant detectable warning surface	0
<b>Grade Break and Gutter Transition:</b>	
gutter transition lip > 1/4"	8
grade break not perpendicular and flush and transition lip 0" - 1/4"	4
grade break perpendicular and flush	0
<b>Ramp Position in Clear Space:</b>	
ramp has no clear space	8
ramp has clear space, but is not aligned with crosswalk	4
ramp has clear space and is aligned with the crosswalk	0

*Table 3- Missing Curb Ramp Condition Scoring*

<b>Missing Curb Ramp Condition Scoring</b>	<b>Points</b>
Missing ramp with no alternative route	100
Missing ramp with alternative route	75

## **Sidewalks**

The sidewalk condition score has a maximum of 50 points based on measurements at this time. This score was doubled for the purpose of the ADA Transition Plan so the condition scoring and location scoring held equal weight for the priority score. During future data collection, additional measurements will be logged and incorporated into the condition scoring. Table 4 displays the point system used to assign a condition score to each sidewalk segment.

*Table 4- Sidewalk Segment Condition Scoring*

<b>Sidewalk Segment Condition Scoring Category</b>	<b>Points</b>
<b>Sidewalk Segment Width:</b>	
width < 4.0'	20
width 4.0' - 4.9'	10
width >= 5.0'	0
<b>Sidewalk Segment Worst Cross Slope:</b>	
cross slope > 8.3%	15
cross slope 8.3%- 5%	10
cross slope 3.6% - 5%	4
cross slope 2.1% - 3.5%	2
cross slope <= 2.0%	0
<b>Sidewalk Segment Average Cross Slope:</b>	
cross slope > 5%	15
cross slope 3.6% - 5%	8
cross slope 2.1% - 3.5%	4
cross slope <= 2.0%	0

## **Driveways**

Table 5 displays the point system used to assign a condition score to each driveway entrance. The maximum amount of condition points for a driveway entrance is 50 at this time. The score was doubled for the purpose of the ADA Transition Plan so the condition scoring and location scoring held equal weight for the priority score.

*Table 5- Driveway Entrance Condition Scoring*

<b>Driveway Entrance Condition Scoring Category</b>	<b>Points</b>
<b>Narrowest Driveway Width:</b>	
width < 3.0'	20
width 3.0' - 3.9'	10
width >= 4.0'	0
<b>Steepest Driveway Ramp Cross Slope:</b>	
cross slope > 5%	10
cross slope 3.6% - 5%	4
cross slope 2.1% - 3.5%	2
cross slope <= 2.0%	0
<b>Steepest Driveway Entrance Cross Slope:</b>	
cross slope > 5%	10
cross slope 3.6% - 5%	4
cross slope 2.1% - 3.5%	2
cross slope <= 2.0%	0
<b>Steepest Driveway Ramp Running Slope:</b>	
running slope > 10%	10
running slope 8.4% - 10%	6
running slope <= 8.3%	0

### Accessible Pedestrian Signals

Table 6 displays the point system used to assign a condition score to each pedestrian push button. The maximum condition score for a pedestrian push button is 100. The criteria of push button APS status tracks whether the push button meets the operational and physical characteristics for accessible pedestrian signals.

*Table 6- Pedestrian Push Button Condition Scoring*

<b>Pedestrian Push Button Condition Scoring Category</b>	<b>Points</b>
<b>Push Button APS Status:</b>	
no APS	50
ADA compliant APS	0
<b>Height of Push Button:</b>	
button height >48" or < 36"	30
button height 36" - less than 40"	10
button height 40"- 48"	0
<b>Distance Between Push Button and Edge of Curb:</b>	
distance > 10' or < 1.5'	10
distance 6.1' - 10.0'	5
distance 1.5' - 6.0'	0
<b>Distance Between Push Buttons:</b>	
same pole	10
distance 0.0'-9.9'	5
distance >= 10.0'	0

## Location Score

The location score is based on the types of services that each pedestrian facility provides access to and the amount of use it is likely to experience based on its location. Pedestrian facilities that serve areas with a high concentration of services, transportation, and employment will receive a higher score than facilities in low-density residential areas.

The location score is calculated using the same methods for all facility types. GIS software was used to determine how many services are within walking distance of the facility. Different point values are assigned to various types of services that can be accessed within 0.25 miles of the pedestrian facility. The 0.25-mile distance comes from a transit planning best practice for how far an average person is willing to walk to a bus stop. This ensures pedestrian facilities that provide access to a large number or variety of services will score higher. The higher-scoring facilities are likely to be used more frequently and expected to provide the greatest public benefit by removing barriers to access.

Title II of the ADA [28 CFR § 35.150 \(d\)\(2\)](#) in part states that the ADA Transition Plan shall give “priority to walkways serving entities covered by the Act, including state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.” Those priorities, along with the guidance the county received from our public outreach efforts, were used to develop the location scoring system in Table 7.

Table 7- Location Scoring Category

Location Scoring Category	Points for Each Type Within 0.25 mi.
<b>Population Density of People with Disabilities (facility in census tract, not within 0.25 mi.)</b>	
1st quartile of census tracts (400-1956 people with disabilities/sq.mi.)	20
2nd quartile of census tracts (185-399 people with disabilities/sq.mi.)	10
<b>Zoning (facility in zone, not within 0.25 mi. )</b>	
Urban centers and mixed-use districts	10
High density residential zones	5
Rural centers	5
<b>Transportation</b>	
Transit centers, park & ride lots, ferry terminals	10
Standard bus stops	5
<b>Government Offices</b>	
Licensing centers, voting centers, police stations	10
Post offices, libraries, fire stations	8
Ballot drop boxes, other government offices	5
<b>Health</b>	
Hospitals, mental health facilities, alternate care facilities	10
<b>Eldercare and Group Living Facilities</b>	
Nursing homes, convalescent hospitals, retirement homes, other group living facilities for elderly people	10
<b>Education</b>	
Universities, technical schools, K-12, private, others	8
<b>Child Care</b>	
Child care centers	5
<b>Parks &amp; Recreation:</b>	
Recreation centers, community centers	8
Parks, playfields, piers, playgrounds, trails, others	5

The point values assigned to each facility can be duplicative if there is more than one school, hospital, etc. within a 0.25 mile buffer zone. The location score for each facility type was scaled to be on a 100 point scale. Scaling was done separately for curb ramps, sidewalks, driveways and accessible pedestrian signals to keep facility types consistent. Appendix D contains a visual example of how the location buffers were applied in GIS.

## Priority Score

The priority score is meant to be a measure and way to compare non-compliant pedestrian facilities. The priority score is an efficient way to see the major needs and requirements across the entire county for each facility type and efficiently develop improvement projects. Priority scores will be used to identify geographically-compact project locations where ADA improvement projects are anticipated to provide the greatest benefit to people with disabilities and others who use accessible facilities. Project prioritization is separate from facility prioritization and discussed in a subsequent section.

The priority score is calculated by adding the condition and location scores together, giving equal weight to each category. For example, two curb ramps with equal condition scores are located in different areas of the county. The first curb ramp is located in a rural neighborhood, over a half mile away from any other attraction. The second curb ramp is near a government building and provides access to a bus stop. Based on the priority scoring, the second curb ramp facility near the government building and bus stop will have a higher priority score.

## Priority Scoring Results

After completing the analysis for existing facilities that do not comply with ADA standards, the following figures show the overall priority score ranges for each facility type. In three of the four facility categories, the majority of the non-compliant facilities have a priority score of less than 49.

Figure 3- 2018 Facility Quantity by Priority Score (APS, Curb Ramps and Driveways)

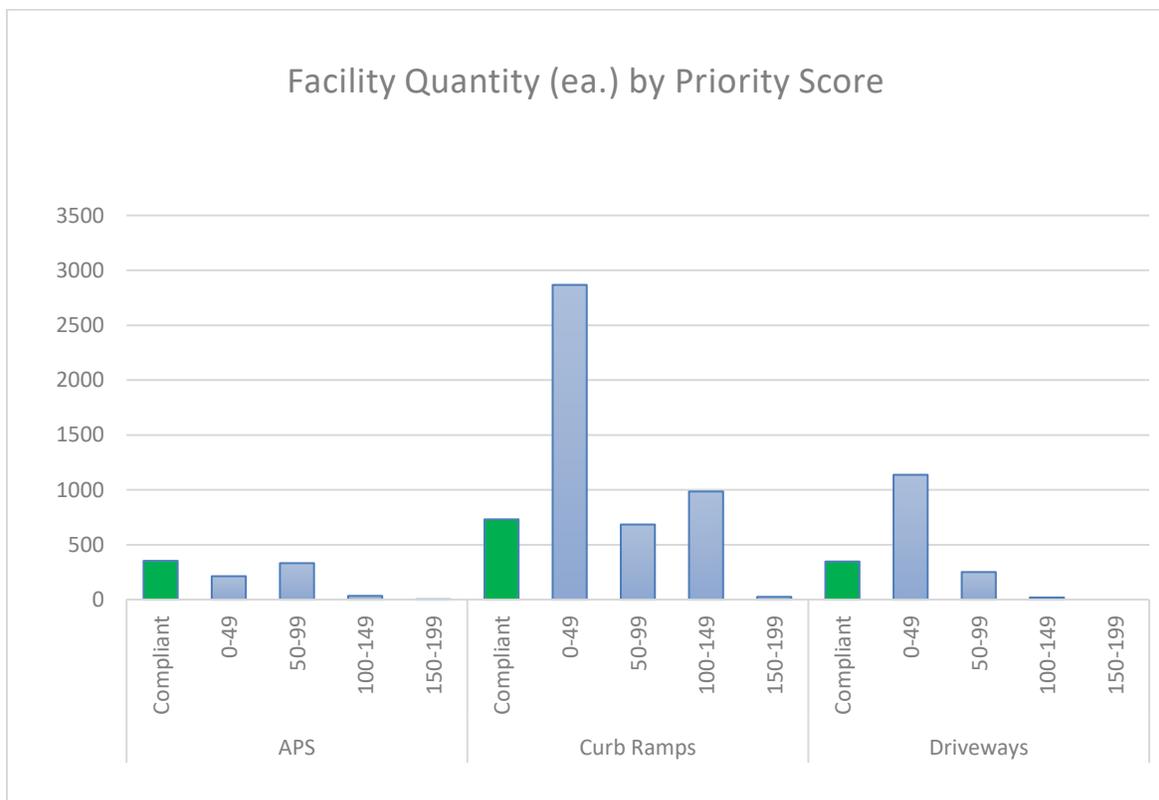
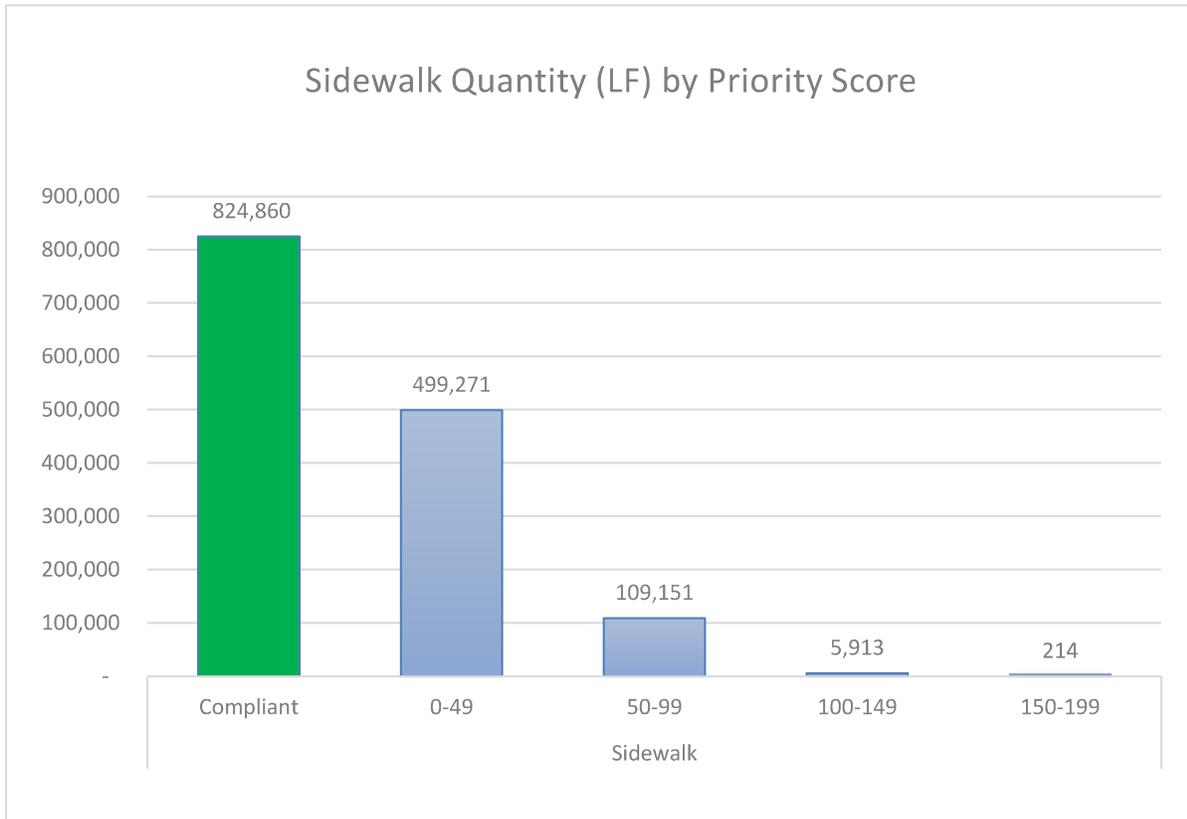


Figure 4- 2018 Sidewalk Quantity by Priority Score



### Project Prioritization

GIS can be used to determine if or where patterns exist. The facility priority score data was used to show relationships to the existing county transportation network. Spatial analysis highlights high density areas of the worst conditions which have relationships to the most locations. Utilizing this data provides the most efficient approach of targeting areas across the county to improve facilities using the annual ADA Improvement Program budget. This data will be used to bundle project areas for targeted funding limits as part of the annual ADA Improvement Program. Proposed projects can be compared to other county or adjacent jurisdiction projects for overlap in scope or scheduling.

The approach of utilizing the priority score to scope and bundle projects does mean that some facilities with lower priority scores that fall within a proposed project area may get improved before those with higher scores in another part of the county. Creating ADA improvement projects that are geographically compact confers many benefits compared to an alternative approach where many individual facilities are constructed in disconnected places or dispersed across the county. When many accessibility barriers are removed in an area at once, the benefits compound as pedestrian networks are opened to people with a variety of disabilities, rather than just one or two destinations at a time.

In addition to network benefits, strategically bundling project areas will result in less construction disruption to a community. This means the disruption can occur once, within a reasonable time period, rather than over the course of many years as individual facilities rise to the top of the list according to their priority score. By bundling projects in one area, Pierce County may realize efficiencies related to construction contracts and project costs by concentrating work in one area instead of at multiple project sites across the county. If work areas are dispersed, the cost for mobilization can be significantly higher and could result in fewer pedestrian facilities being brought into compliance for the same investment.

Pedestrian push button improvement work may be done separately if work entails button replacement only. However, it could be funded at the same time as other improvements along the pedestrian access route or with major signal work. In many cases, the location of the accessible pedestrian push button can be greatly influenced by the design of other pedestrian infrastructure such as sidewalks, curb ramps and the location of crosswalks.

Examples of spatial data analysis, project selection processes and the most current project list are included in Appendix D.

### Public Input for Project Consideration

Another way to address barriers to access, concurrent to the prioritization approach using the priority score, is through citizen requests. Citizen requests will be considered and addressed annually for inclusion in project designs and construction contracts where feasible. There may be a few areas in the county that need to be addressed as soon as possible and do not fall within in the high scoring prioritization areas. A certain amount of funding will be allocated annually to address immediate needs of the public. These are typically needs beyond the capability of the Sidewalk Maintenance Program or Spot Safety Improvements. In the case citizen requests are not received, the funding allocated for such request could be rolled into an existing or upcoming project to address additional facilities.

Citizens can use the Request for Action form at [www.piercecountywa.gov/sidewalkrfa](http://www.piercecountywa.gov/sidewalkrfa) to submit accessibility concerns as they relate to the public right-of-way. To better manage accessibility requests, a category of “Sidewalk Accessibility” was added to the problem drop-down selection. Appendix F contains detailed information for submitting a request.

## Cost

For the purpose of the ADA Transition Plan, a cost model was developed to calculate estimated unit costs for achieving accessibility over time. Bid items, quantities, and costs were analyzed based on similar, recently constructed projects to develop this model. In addition to the construction contract cost, the model includes costs for the preliminary and final engineering phases, right-of-way phase, and construction engineering oversight as appropriate.

Cost categories were developed for each type of facility to address constructability based on the existing measurements of the Self-Evaluation data. Low, Mid and High Impact Levels were developed to better refine the anticipated cost to replace each facility. A curb ramp may cost more to construct in one location than another due to existing conditions, right-of-way acquisition or connection to adjacent infrastructure.

### Accessible Pedestrian Push Buttons/Accessible Pedestrian Signals

Low Level Impact cost for pedestrian push buttons would entail upgrading the push button and push button controllers where the push button locations are already physically correct for the crossing. The High Level Impact cost considers the relocation of poles to be in an ADA compliant location for the intersection as it relates to the configuration of each crossing. The High Level Impact cost also includes the push button controller and accessible push button. The pedestrian push button costs is for button equipment and/or pole only and does not include associated curb ramp or sidewalk alterations.

### Curb Ramps/Sidewalk/Driveways

Low Level Impact cost considers replacing a facility, like-in-kind, with minimal grading or reconfiguration work. Low Level Impact cost does not require additional right-of-way and the fix is relatively straight forward. A Mid Level Impact cost considers mitigation of obstructions, reconfiguration, some grading and some design effort. Mid Level Impact cost does not require right-of-way acquisition. High Level Impact cost considers projects where right-of-way acquisition is anticipated, improvement requires significant grading, extensive paving, or any combination thereof. A High Level Impact cost includes design efforts, right-of-way acquisition, survey and utility coordination.

### Missing Curb Ramps

The Mid Level Impact cost for curb ramps was used for implementing all missing curb ramps.

The Impact costs were calculated per lineal foot or per each for all facilities in the Low, Mid and High Level Impact categories as shown in Table 8. An inflation rate was also applied to the unit cost data since the plan assumes projects would be constructed starting in 2020 and beyond. Currently, project identification is underway for 2019 and 2020 design efforts.

Appendix E contains unit cost derivation information and cost model assignment assumptions for GIS. Unit costs were assigned to each non-compliant facility based on a variety of measured conditions logged as part of the Self-Evaluation data.

Table 8- Unit Costs (2020)

Rebuild Existing Pedestrian Push Button Costs		
Low Level Impact	Total Estimate per Push Button	\$1,250
High Level Impact	Total Estimate per Push Button	\$6,000
Rebuild Existing Sidewalk Costs		
Low Level Impact	Total Estimate per Lineal Foot	\$104
Mid Level Impact	Total Estimate per Lineal Foot	\$124
High Level Impact	Total Estimate per Lineal Foot	\$141
Rebuild Existing Driveway Entrance Costs		
Low Level Impact	Total Estimate per Driveway Entrance	\$3,542
Mid Level Impact	Total Estimate per Driveway Entrance	\$5,546
High Level Impact	Total Estimate per Driveway Entrance	\$6,420
Rebuild Existing Curb Ramps Costs		
Low Level Impact	Total Estimate per Curb Ramp	\$3,455
Mid Level Impact	Total Estimate per Curb Ramp	\$5,170
High Level Impact	Total Estimate per Curb Ramp	\$20,195

After unit costs were derived, Low, Mid and High Impact costs were applied using GIS modeling. A unit cost was assigned to each non-compliant facility based on the inspected condition of that facility and the assumed repairs for each defect or combination of defects. The model output is summarized in Table 9 in 2020 dollars and serves as a planning and forecasting tool. The costs will be further refined with each iteration of the program. This model does allow the county to plan for funding needs and schedule improvements to correct known deficiencies and barriers to access.

It should be noted that during the preliminary engineering phase of each selected project, a determination will be made if other requirements or design features such as a stormwater treatment facility, bicycle lanes, paved shoulders, or additional lane width need to be included based on the applicable county standards and/or planning documents. If that is the case, costs would likely increase and the project scope would likely require another source of matching funding.

The total cost by facility type and impact level shown in Table 9 is for the most current inventory included in Appendix C. The amount of facilities has changed from the initial data collection contained in the Self-Evaluation Report in Appendix A, as additional data collection efforts were conducted to reflect the completion of road improvement projects and development improvement projects. The information is based on a snapshot in time but gives a reasonable baseline for the ADA Transition Plan and required improvements. This information will frequently change based on updated cost information and completed projects each year.

Table 9- Summary of Costs for the ADA Transition Plan

Accessible Pedestrian Push Buttons			
Impact	Amount (ea.)	Cost/ ea.	Total
Low Level	188	\$1,250	\$ 235,000
High Level	393	\$6,000	\$ 2,358,000
Total Non-Compliant	581	Total APS Cost	\$ 2,593,000
Curb Ramps			
Impact	Amount (ea.)	Cost/ ea.	Total
Low Level	2586	\$3,455	\$ 8,934,630
Mid Level	239	\$5,170	\$ 1,235,630
High Level	494	\$20,195	\$ 9,976,330
Total Non-Compliant	3319	Total Curb Ramps Cost	\$ 20,146,590
Missing Curb Ramps			
Impact	Amount (ea.)	Cost/ ea.	Total
Mid Level	1242	\$5,170	\$ 6,421,140
Total Non-Compliant/Missing	1242	Total Missing Cost	\$ 6,421,140
Driveways			
Impact	Amount (ea.)	Cost/ ea.	Total
Low Level	599	\$3,542	\$ 2,121,658
Mid Level	493	\$5,546	\$ 2,734,178
High Level	315	\$6,420	\$ 2,022,300
Total Non-Compliant	1407	Total Driveway Cost	\$ 6,878,136
Sidewalk			
Impact	Amount (LF)	Cost/LF	Total
Low Level	581,366	\$104	\$ 60,462,064
Mid Level	22,042	\$124	\$ 2,733,208
High Level	11,141	\$141	\$ 1,570,881
Total Non-Compliant	614,549	Total Sidewalk Cost	\$ 64,766,153
Total Cost All Facilities			\$ 100,805,019
Adjustment for Overlap of Sidewalks/Driveways			\$ (4,755,296)
<b>Total Cost for ADA Transition Plan</b>			<b>\$ 96,049,723</b>

## Schedule

It is expected to take Pierce County many years of budgeted resources to upgrade all existing facilities identified in the ADA Transition Plan to meet ADA standards. The plan provides a foundation for this work but will require continuous updates in the future.

Overall cost data was utilized to develop a tentative schedule. An average cost was calculated in Table 10 for each facility type to create a target range of improvements that are realistic for each year of the program. The curb ramp cost average was applied to both missing and non-compliant curb ramps for this effort. An average was used to streamline cost levels and scheduling.

*Table 10- Average Facility Unit Cost for Scheduling Only*

Facility	Average Improvement Cost
APS (ea.)	\$4,463
Curb Ramp (ea.)	\$6,070
Driveway (ea.)	\$4,889
Sidewalk (LF)	\$105

The target schedule in Table 11 is based on 2020 average cost data and the county programming approximately \$1,135,000 to be available on an annual basis for implementing accessibility-related improvement projects. The target schedule also considers the number of curb ramps, sidewalk sections, driveway entrances and accessible pedestrian push buttons that can reasonably be designed or constructed per year. The ranges are for ADA improvement projects and do not include other types of projects.

*Table 11- Estimated Improvements Each Year*

Estimated Amount of Design and Construction Possible Each Year			
Curb Ramps (ea.)	APS (ea.)	Driveways (ea.)	Sidewalks (LF)
40-60	16-64	15-30	500-2500

Table 12 shows five-year improvement ranges since this plan is an extensive, long-range program. This schedule will be updated with subsequent ADA Transition Plan revisions, which are anticipated at five-year intervals. In five years, at that time of the update, production rates for design and construction of facilities and cost forecasting can be validated and refined for the remaining work.

Table 12- Target Improvements Schedule

Target Improvement Schedule					
Year Range	Curb Ramps (ea.)	APS (ea.)	Driveways (ea.)	Sidewalks (LF)	Anticipated Program Funding
2020-2024	200-300	80-320	75-150	2500-12500	\$5,675,000
2025-2029	200-300	80-261	75-150	2500-12500	\$5,675,000
2030-2034	200-325	0-80	75-150	2500-12500	\$5,675,000
2035-2039	200-325	0-80	75-150	2500-12500	\$5,675,000
2040-2044	200-325	0-80	75-150	2500-12500	\$5,675,000
2045+	3000-3500	0-200	650-1100	550,000-600,000	\$67,674,723

Concurrent to the ADA Improvement Program, major roadway rehabilitation projects, pavement overlay projects and frontage improvements related to private development projects will also bring facilities into ADA compliance. The county’s overlay program typically averaged about 44 curb ramp replacements per year between 2015 and 2019. These other program efforts will be monitored and logged separately as they will cut down the overall schedule in this plan. It is challenging to determine or approximate these benefits since the efforts vary greatly by year. For the sake of this plan, other improvements are not included in the scheduling/programming to allow the most conservative analysis of the effort needed to achieve accessibility throughout the county’s public rights-of-way.

A challenge for the overall improvement schedule is optimizing the timing of projects. County staff will work to balance the ADA Improvement Program efforts with projects that are included as part of the Six-Year Transportation Improvement Program (TIP). ADA project planning will also need to consider timing of other projects such as private development, utility franchise work or projects constructed by adjacent jurisdictions.

This design and construction schedule may be altered at any time at Pierce County’s discretion, based on changes in guidance from the United States Access Board, federal policy, Pierce County policy, manpower and/or the funding climate. The schedule is only a target and is expected to continually change as there are many factors than can influence these goals. Some project years may vary from what is listed in the target ranges based on project locations, severity of corrections, community support or a change in funding.

## Monitoring Progress

Pierce County intends the ADA Transition Plan to be a living document, with updates at five-year intervals to keep up with the ever-changing needs of the community. As the main body of the document is updated, a new schedule will be identified. With each main body update, an official public comment period will be established to continue public outreach and involvement in the county's ADA Improvement Program.

Self-Evaluation data will be maintained and updated annually to capture recent project improvements and other efforts making facilities in the public right-of-way ADA compliant. The Pierce County Maintenance and Operations Division typically collects known changes from projects within a year and updates the inventory to reflect the most recent data. The inventory will be re-analyzed after these updates are completed to determine patterns of need as it relates to the complete facility inventory and priority scores.

Pierce County's ADA Transition Plan will be made available to the public at [www.piercecountywa.gov/ADATransition](http://www.piercecountywa.gov/ADATransition) or by request to the ADA Public Rights-of-Way Transition Plan Lead. Projects and major accomplishments will also be highlighted on the webpage as part of the ADA Improvement Program to keep the community informed and involved.

## **Appendix A – ADA Public Rights-of-Way Self-Evaluation Report, 2015**

The Self-Evaluation Report is available at [www.piercecountywa.gov/ADATransition](http://www.piercecountywa.gov/ADATransition).

## **Appendix B – Public Involvement Summary**

During the development of the Self-Evaluation Report and the Transition Plan, there were many opportunities for public involvement. The Pierce County Accessible Communities Advisory Committee (PCACAC) was instrumental in providing guidance and ideas for the plan. Meetings with the PCACAC and public surveys also provided insight for ranking condition and relationships of facilities as well as setting priorities for implementing corrections as part of the Transition Plan. Public surveys were discussed in Appendix A of the Self-Evaluation Report and were utilized to determine the priority scoring method.

Some of the more recent meetings with PCACAC included discussion about the items listed below:

- Pierce County's webpage
- Coordination/advisement on ADA design
- How to prioritize sidewalk improvements that provide access to a transit route
- A goal of fixing curb ramps and pedestrian push buttons at the same time
- Accessible wayfinding signage for routes once determined
- Permit review for ADA compliance prior to issuance
- Condition scores used to prioritize project concepts for the Transition Plan
- ADA Improvement Program annual funding
- C Street South ADA Improvements funded by a Complete Streets grant. The work was completed in 2018.
- Curb ramps addressed by preservation projects
- ADA Transition Plan status and the official public comment period

Table 1 summarizes public involvement opportunities as part of the entire ADA transition planning process and includes the completion of the official public comment period.

Table 1-Public Participation

Public Participation		
Type	Location	Date
Organization Meeting	Pierce County Coordinated Transportation Coalition	9/24/2014
*Public Meeting	Bonney Lake Regional Justice and Municipal Center, Bonney Lake	11/6/2014
*Public Meeting	Sprinker Recreation Center, Tacoma	11/12/2014
Organization Meeting	Multiple Sclerosis Support Group, Tacoma Area Coalition for Individuals with Disabilities	11/14/2014
Organization Meeting	Pierce County Accessible Communities Advisory Committee (PCACAC)	11/17/2014
*Public Meeting	Pierce County Central Maintenance Facility, Spanaway	11/18/2014
*Public Meeting	Pierce College Puyallup, Puyallup	11/20/2014
Survey	N/A	2014
Organization Meeting	PCACAC	8/17/2015
Organization Meeting	PCACAC	1/25/2016
Organization Meeting	PCACAC	1/9/2018
Organization Meeting	PCACAC	Summer 2019
Organization Meeting	Pierce County Transportation Advisory Commission (TAC)	Summer 2019
* Public Comment Period for the Draft Transition Plan	Provide comments via Pierce County webpage, survey or by contacting Pierce County ADA Transition Plan Lead	1-30 August 2019
* Indicates advertisement completed/planned via the county website, TV/radio outlets, newspapers and/or social media.		

Pierce County held an official public comment period during August 2019. News releases, social media and various avenues of outreach were used to achieve a wide distribution of the information and opportunity to comment. The official public comment period also involved an online open house in attempt to reach more people since the plan itself is very detailed. The online open house was designed to provide an overview of the entire transition planning process with ample detail on the overall findings as well as the proposed next steps for the county. The Transition Plan and the online open house are both published on the ADA Transition Plan webpage. As part of the public comment period, a survey and general form were included on the webpage to solicit feedback.

Efforts taken to make sure individuals and groups had ample awareness and opportunity to comment included sharing information by:

- Notice published in The News Tribune
- News Article on Pierce County Webpage-  
<https://www.piercecountywa.org/CivicAlerts.aspx?AID=4319>
- Press Releases
- Outreach through interested groups and other county departments
- Facebook
- Twitter thread
- One-page handout

As a result, there were many shares/reposts by others and a few articles published.

- Puyallup Watershed Initiative Active Transportation Community of Interest-
  - <https://mailchi.mp/117463d82b4e/524lfljrm-1769729?e=7475c34c3c>
- South Sound Business-
  - <https://southsoundbiz.com/pierce-county-seeks-public-input-in-making-pedestrian-walkways-ada-accessible/>
- The Suburban Times-
  - <https://thesubtimes.com/2019/08/03/public-comment-sought-on-draft-plan-to-bring-pedestrian-facilities-into-ada-compliance/>

During the official public comment period, Pierce County received 16 survey responses and three responses via general forms on the ADA Transition Plan webpage. Public comments were also provided during the August Pierce County Transportation Advisory Commission (TAC) meeting. A summary of the feedback is discussed in Tables 2 and 3 and in the text that follows.

**Survey**

*Table 2-Survey Responses*

Question Text	Yes	No
Have you read Pierce County's draft ADA Transition Plan for Public Rights-of-Way or reviewed the online open house about the draft plan?	14	2
Do you feel the draft plan addresses all necessary aspects of accessibility for pedestrian facilities within the public right-of-way?	11	3
Have you visited our ADA Transition Plan webpage?	13	2
Was the information helpful?	12	1

The survey responses represented the following zip codes:

- 98335
- 98349
- 98391
- 98402
- 98405
- 98406
- 98409
- 98418
- 98445
- 98466
- 98467

The survey contained two questions to better understand the audience that chose to participate. These two questions were posed as a check all that apply.

*Table 3-Survey Audience and Notification*

Which of the following best describes you? (Check all that apply)	Responses
Individual with a disability	1
Family member, friend, or caregiver to a person with a disability	4
Employee of a transportation-related organization	2
Employee/member of an organization that supports individuals with disabilities	5
Other	2
How did you find out about the public comment period for the draft plan? (Select all that apply)	Responses
New article	2
Pierce County Planning and Public Works Facebook	1
Pierce County Facebook	3
Pierce County website	2
Information from an organization I am part of	3
Other	5

Tacoma-Pierce County Health Department and Center for Independence were identified as being specific participants for the selection of “employee/member of an organization that supports individuals with disabilities” as part of the survey. Individuals responding as finding out about the public comment opportunity “from an organization I am part of” gave recognition to Pierce County Accessible Communities Advisory Committee, Center for Independence and ForeverGreen Trails. Individuals that found out about the opportunity through other means mentioned the Pierce County e-mail notice, South Sound Business and Twitter.

A few questions were posed to obtain opinions and ideas on the plan.

The responses to the question of what information or changes would you like to see are listed below:

- Additional information on sidewalk gaps (rather than just focusing on existing sidewalks).
- It's rather horrifying to realize it will take 50 years to bring Pierce County into compliance. I'd like to see it happen faster - and I do appreciate targeting high use areas sooner than later.
- I have not tested 508 compliance issues but, assume that the site is accessible electronically. I am impressed with our County's emphasis on being welcoming and accessible. Discussions and awareness about Universal Design (UD) would help better inform our community to the benefits for everyone when using UD.
- Rural areas also have need of safe motorized wheelchair ADA and ADA and able-bodied non-motorized transport. The study completely ignores those needs. Rural roadways MUST be repaired and rebuilt to accommodate the above.
- It would be good to consider where pedestrian collisions are occurring when determining projects and signals that automatically notify pedestrians when they can cross (versus only notifying when the button is pushed). !

The survey also asked if there was anything you would like to add. The responses included:

- Increase funding to speed up implementation - this should be a top transportation priority of the County. I'm concerned that by leaving out parts of the County without existing sidewalk, this will further increase transportation disparities by siloing funding to areas with existing pedestrian facilities. Please ensure that signal work does not require pushing a pedestrian button to activate the pedestrian signal, when doing signal work - please ensure bicycle detection is addressed (<https://apps.leg.wa.gov/RCW/default.aspx?cite=47.36.025>), consider comprehensive solutions to increase pedestrian safety - included protected pedestrian phases, limiting right turns on red, and strategies to reduce crossing distances.
- no
- Having your Accessible Communities Advisory Committee involved with the plan is smart. They may be aware of other funding opportunities that can benefit the Whole Community in Pierce County.
- Inclusion of rural (non UGA) areas of Pierce County in the study. Rural areas also need safe motorized wheelchair ADA and ADA and able-bodied non-motorized transport facilities (sidewalks or AT LEAST very wide paved shoulders--not the 18" and a ditch model that most county rural roads have).
- no
- Great job on the plan and the online open house - lots of great information - thank you!

### **General Form**

General comments and questions were submitted through online forms on the Transition Plan webpage. The paraphrased information submitted included:

- Expressed appreciation for increasing accessibility and the preference of parallel type curb ramps for balance issues.
- Expressed appreciation of the extensive plan and wished that it covered an incorporated city. Plan made individual feel like a valuable citizen of the county. The individual shared a personal experience traveling as a pedestrian, to convey how meaningful ADA improvements are for individuals with disabilities.
- Concerns for installing sidewalk where missing, near schools (especially Franklin Pierce High School and Ford Middle School) and near higher density housing (Monterra Apartments) and connections to schools. Consideration was requested for making pedestrian improvements at Golden Given and 112 ST S to support population growth.

### **TAC Meeting**

General comments and suggestions during discussion with the TAC at the August 2019 meeting included:

- Consideration of safety and crash data in future analysis for priority scoring of facilities.
- Examine the potential for pedestrian recall operations at locations of high activity so people do not need to push a button to cross and the ability to add extra crossing time as applicable.
- The group would like to be aware of remaining actions as the draft Transition Plan is considered by Pierce County Council in fall of 2019.

### **Conclusions and Changes**

Based on feedback and discussions held during the official public comment period, a few updates were made to the Transition Plan.

Scope clarification was added to the executive summary and introduction to explicitly state the intent of the plan as it relates to other pedestrian/non-motorized network improvements. Since the ADA Transition Plan does not address new pedestrian infrastructure or gaps in the sidewalk network, references were added to point to existing County planning documents that do address these types of improvements. Hopefully the clarification will guide future readers regarding intent of the document and the ADA Improvement Program. This feedback shows that advocacy is strong in the Puget Sound Region for non-motorized improvements.

A hard copy form was also requested to provide options for the public to submit a Request for Action to address accessibility issues in the public right-of-way. The form was developed and added to the plan under Appendix F- Accessibility Facility Requests.

The County plans to utilize the ADA Transition Plan webpage to share information about projects, processes and celebrate our progress as we move forward. The webpage is intended as an open portal for communication as it relates to accessibility and Pierce County public right-of-way.

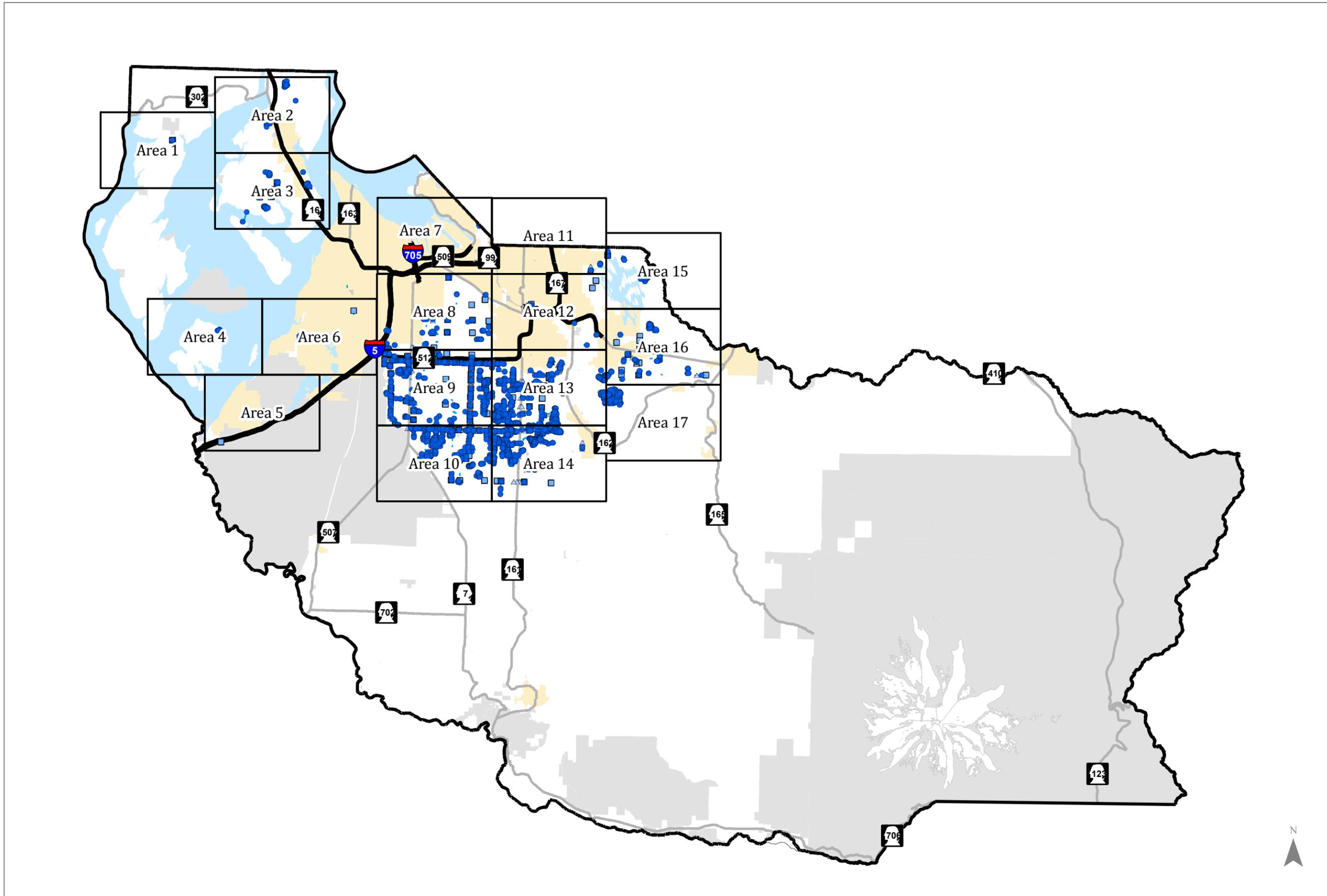
## **Appendix C –Current Facility Inventory and Mapping**

Pierce County’s ADA Public Rights-of-Way Self-Evaluation Report was completed in October 2015, prior to the completion of the ADA Transition Plan. This appendix is the update/continuation of data collected for that report. Table 1 breaks out the amount of facilities by compliance, priority score and improvement costs. The subsequent maps illustrate the inventory by facility types collected.

*Table 1- 2018 Facility Inventory with Priority Score and Improvement Costs*

Facility	Compliant	Priority Score	Quantity (ea.)	Sum of Cost
Accessible Pedestrian Signals (APS)	No	0-49	213	\$1,202,000
		50-99	332	\$1,246,250
		100-149	34	\$132,750
		150-199	2	\$12,000
	Yes		353	
	Subtotal Non-Compliant			581
Facility	Compliant	Priority Score	Quantity (ea.)	Sum of Cost
Curb Ramps <sup>1</sup>	No	0-49	2867	\$16,905,115
		50-99	684	\$4,439,610
		100-149	985	\$5,093,755
		150-199	25	\$129,250
	Yes		731	
	Subtotal Non-Compliant			4561
Facility	Compliant	Priority Score	Quantity (ea.)	Sum of Cost
Driveways	No	0-49	1137	\$5,412,576
		50-99	251	\$1,360,080
		100-149	19	\$105,480
		150-199	0	\$0
	Yes		347	
	Subtotal Non-Compliant			1407
Facility	Compliant	Priority Score	Quantity (LF)	Sum of Cost
Sidewalks	No	0-49	499,271	\$52,323,238
		50-99	109,151	\$11,670,013
		100-149	5,913	\$742,728
		150-199	214	\$30,174
	Yes		824,860	
	Subtotal Non-Compliant			614,549

1. Includes missing curb ramps identified with data set

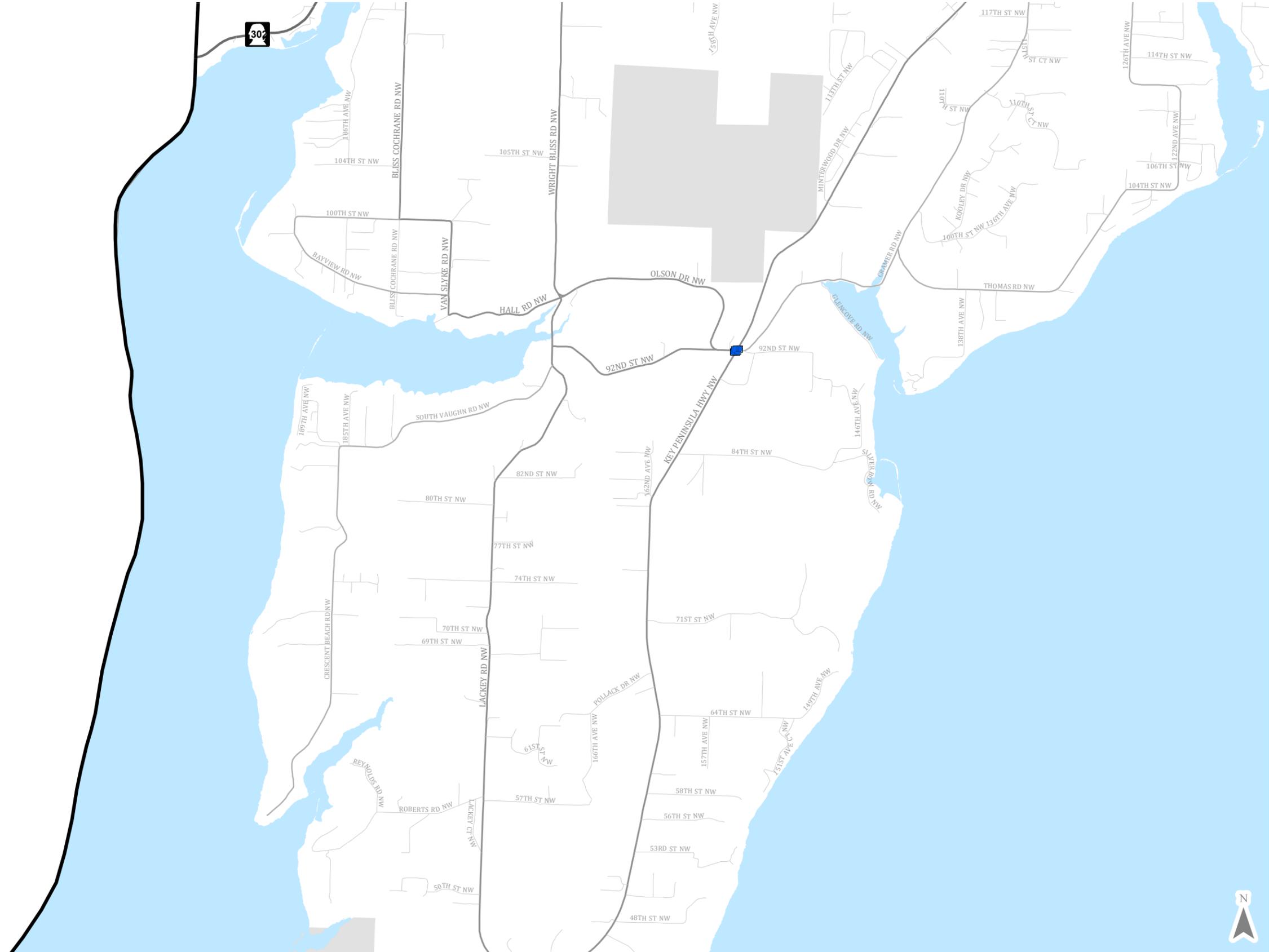


Facilities

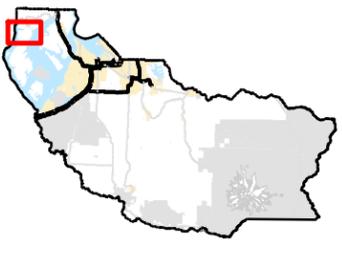
- Curb Ramp
- △ Driveway
- Accessible Push Button
- Sidewalk

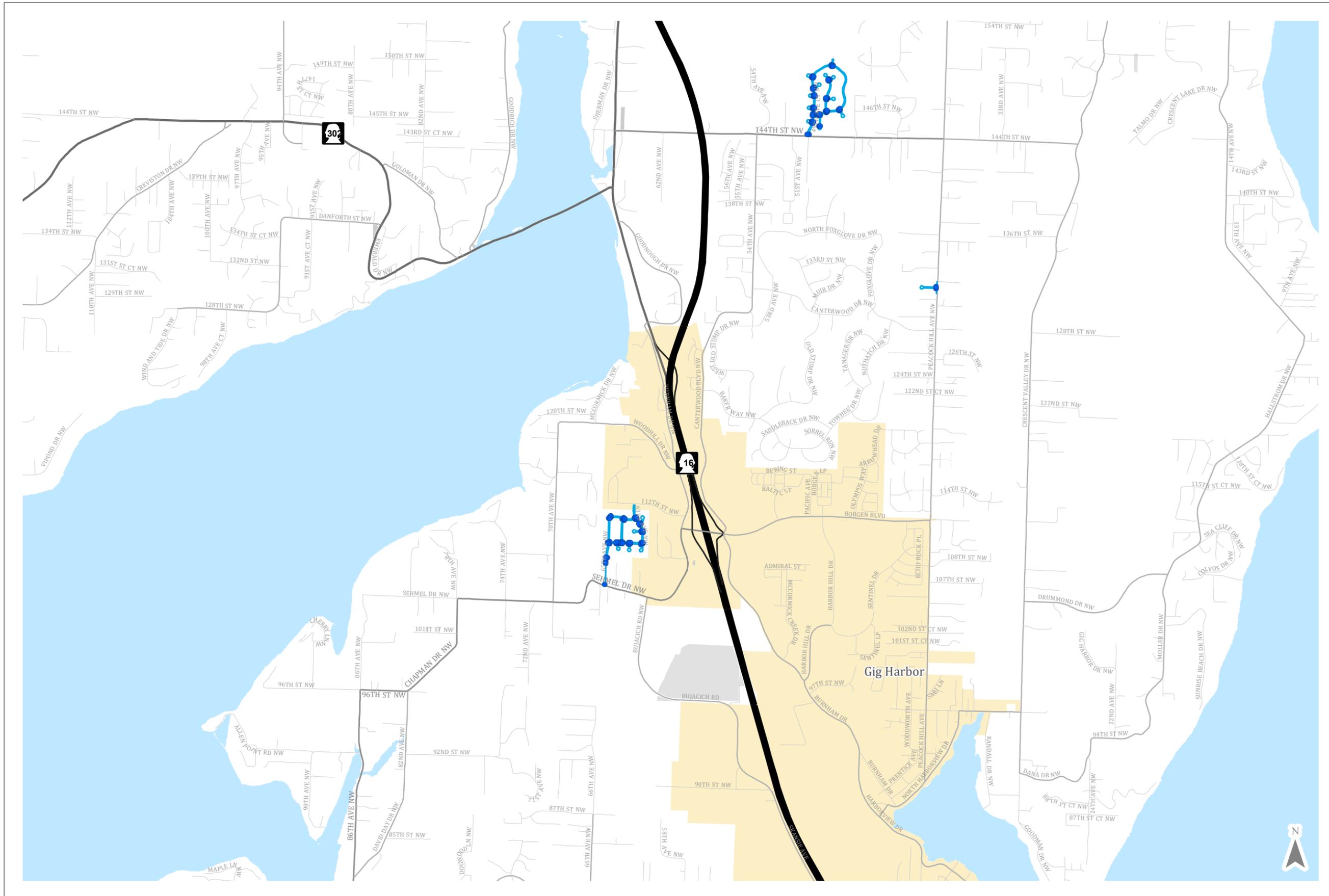
- Interstate Highways
- Limited Access State Highways
- Other State Highways
- Cities
- Puget Sound
- Federal and State Lands
- WSDOT Land





- Facilities**
- Curb Ramp
  - ▲ Driveway
  - Accessible Push Button
  - Sidewalk
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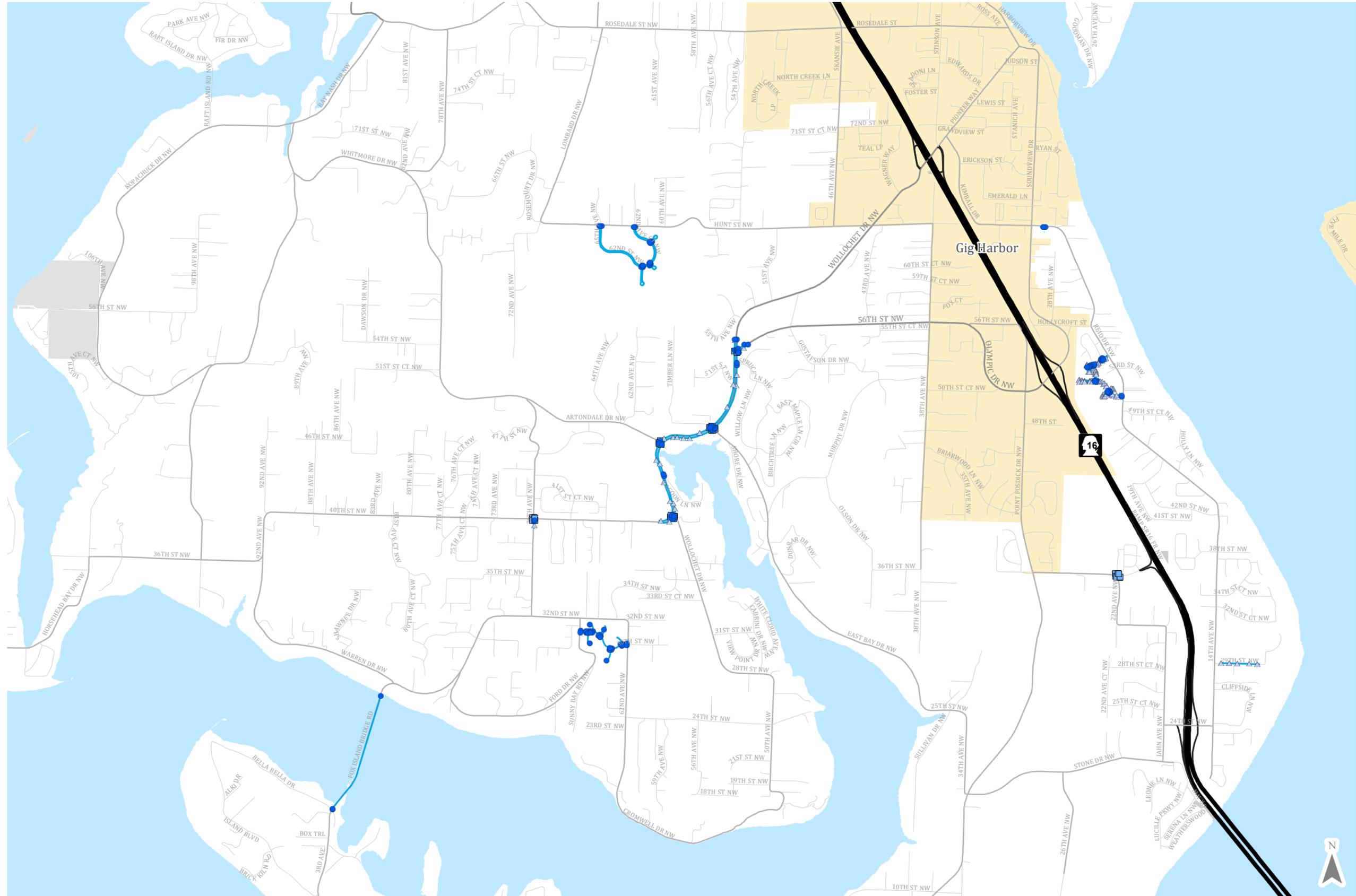


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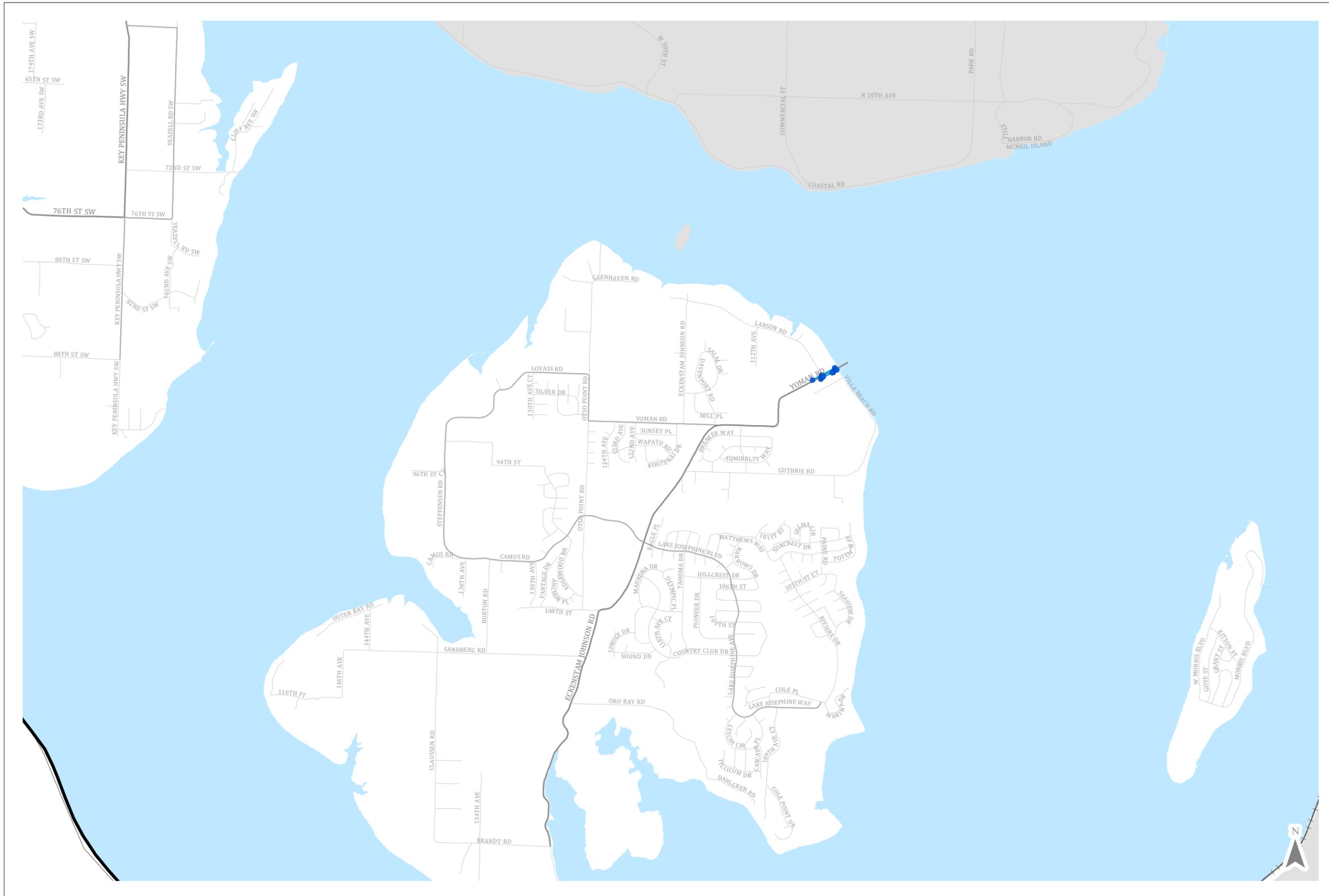


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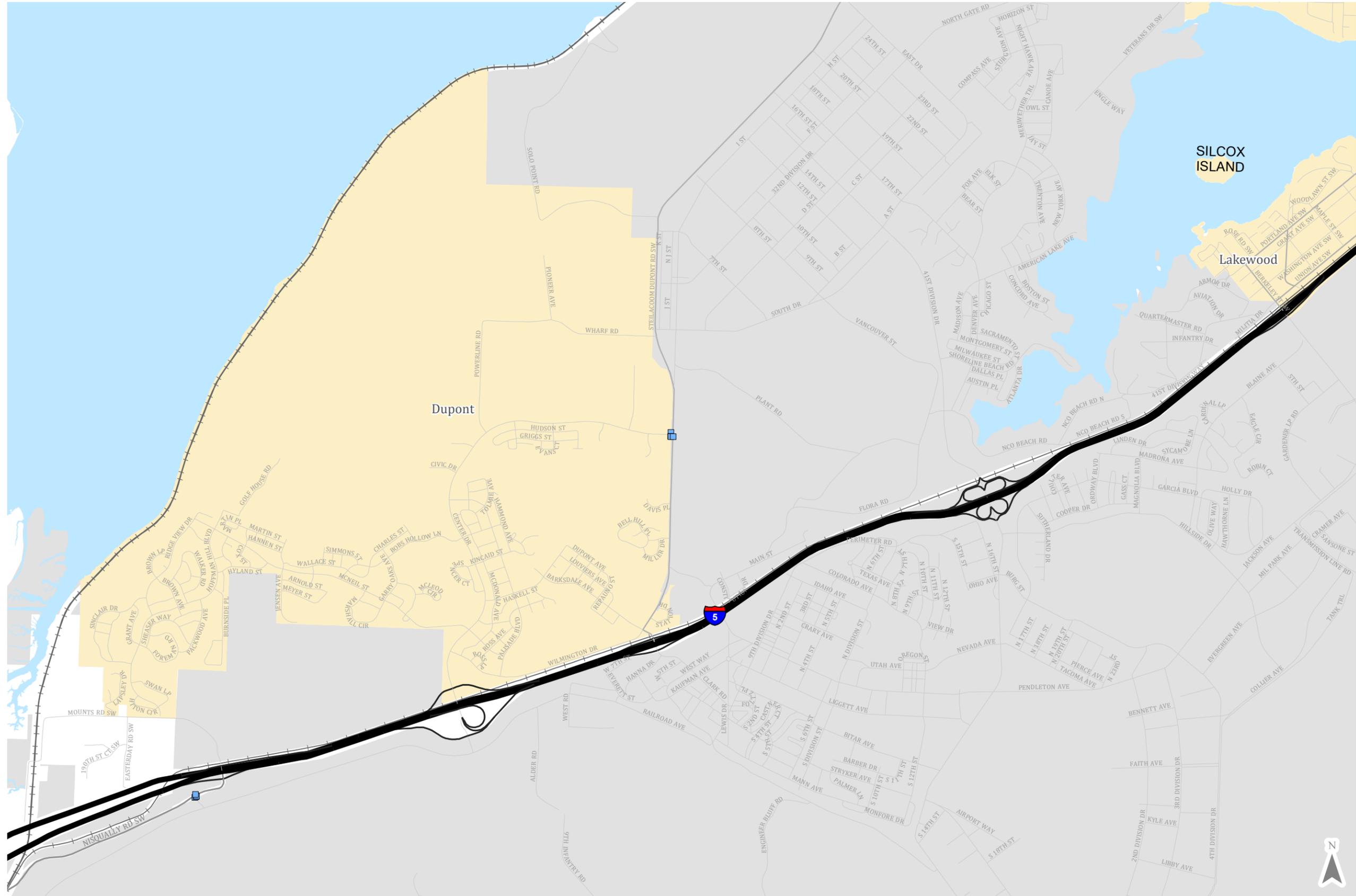


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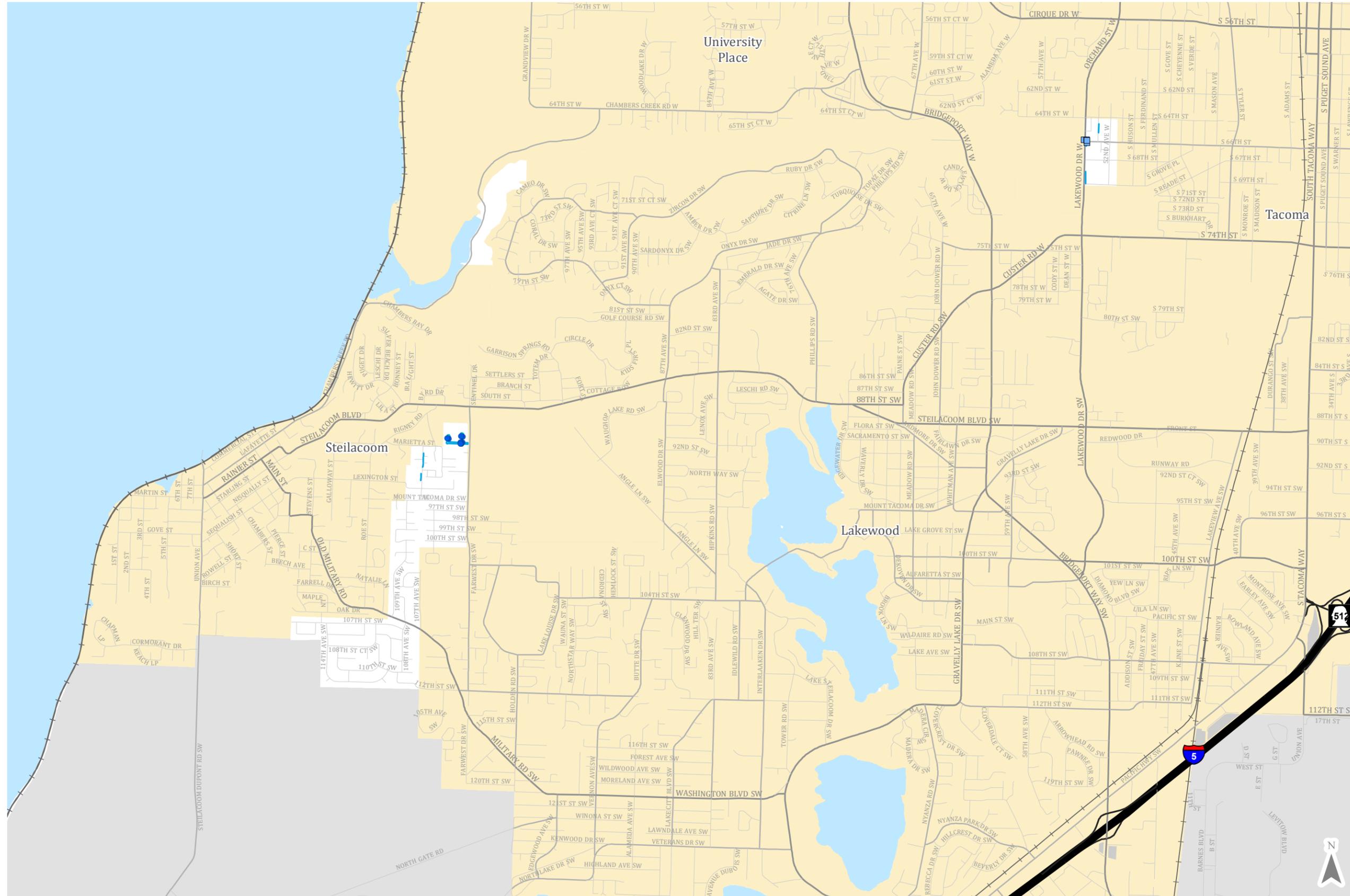


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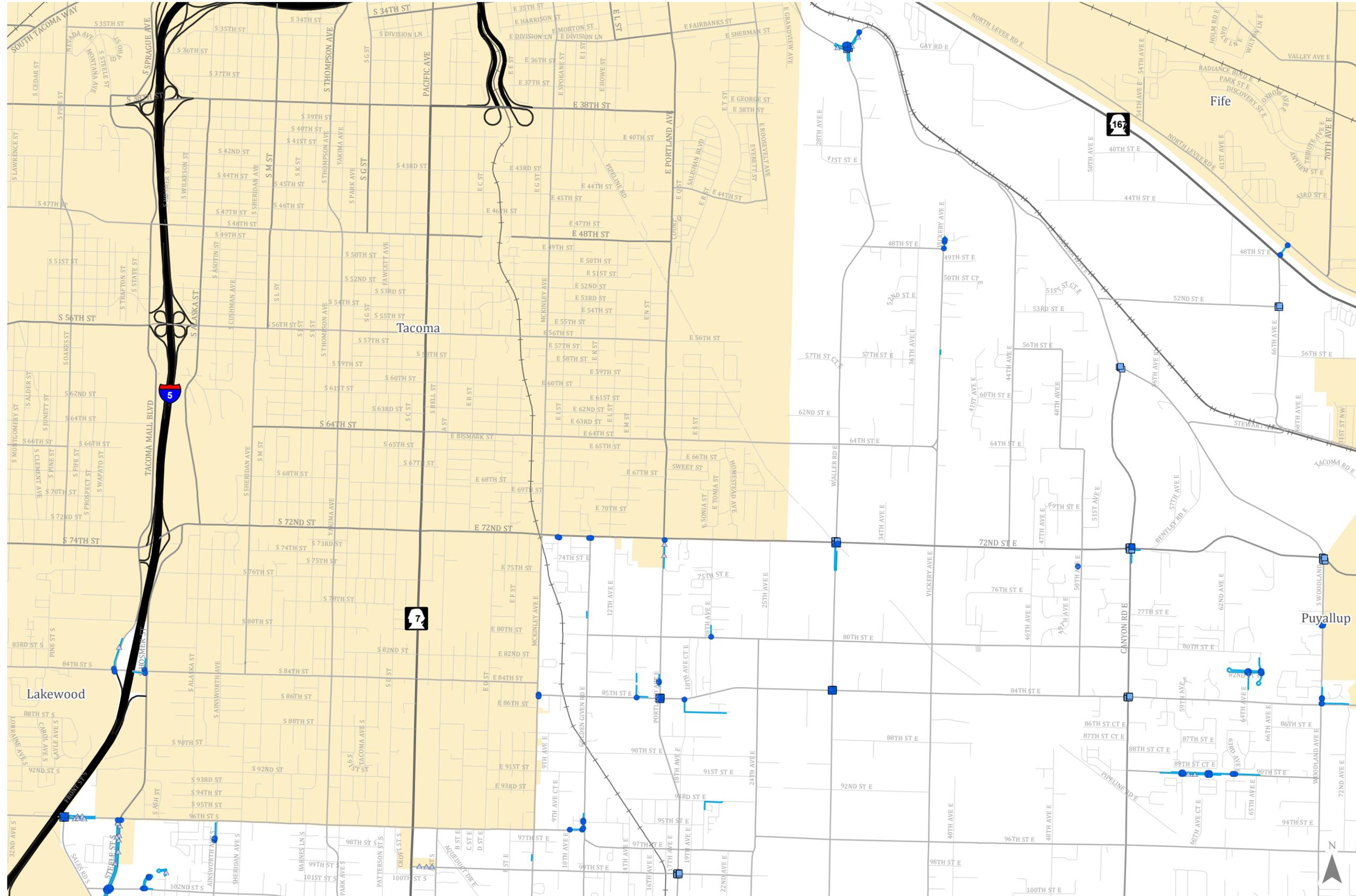


Facilities

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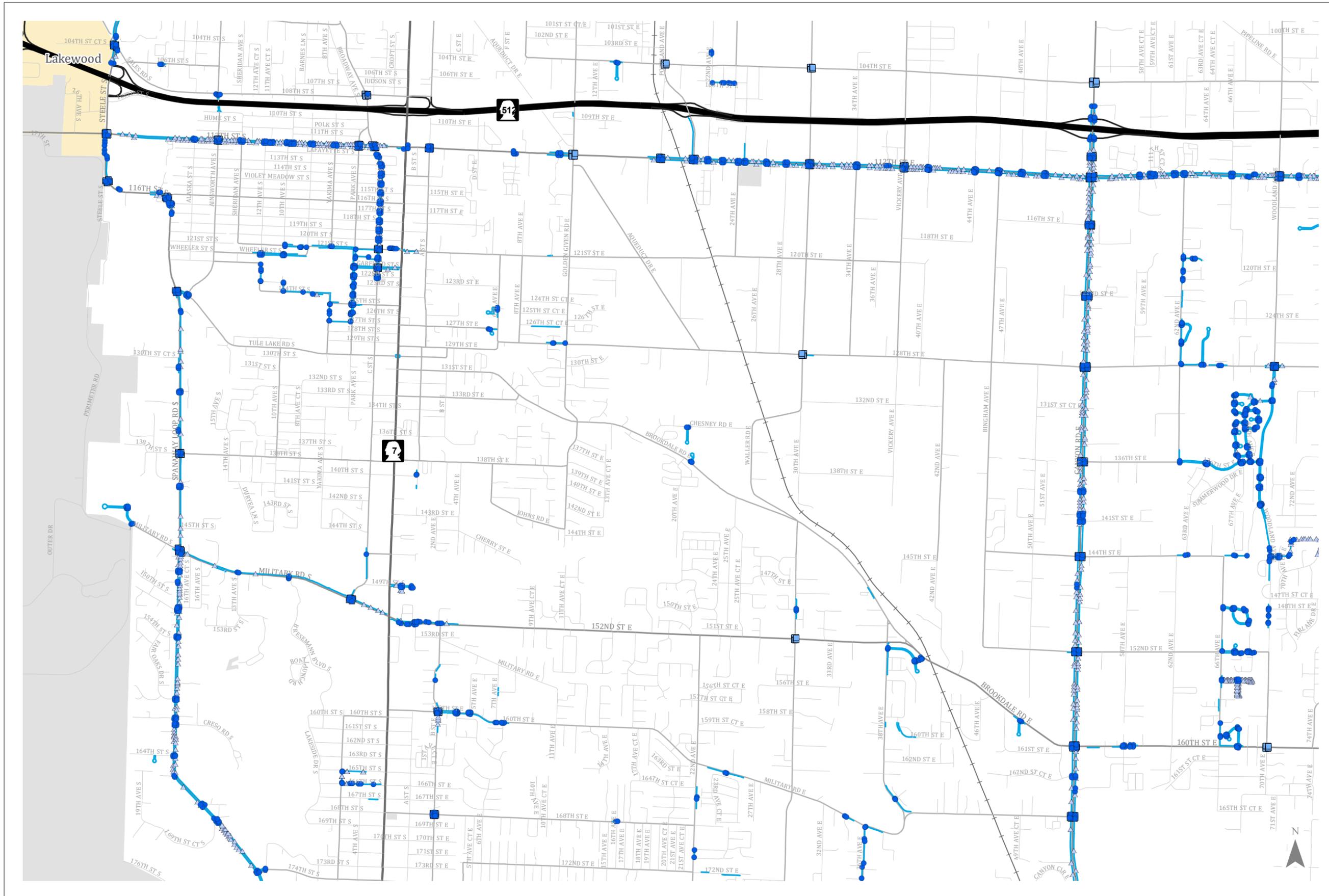
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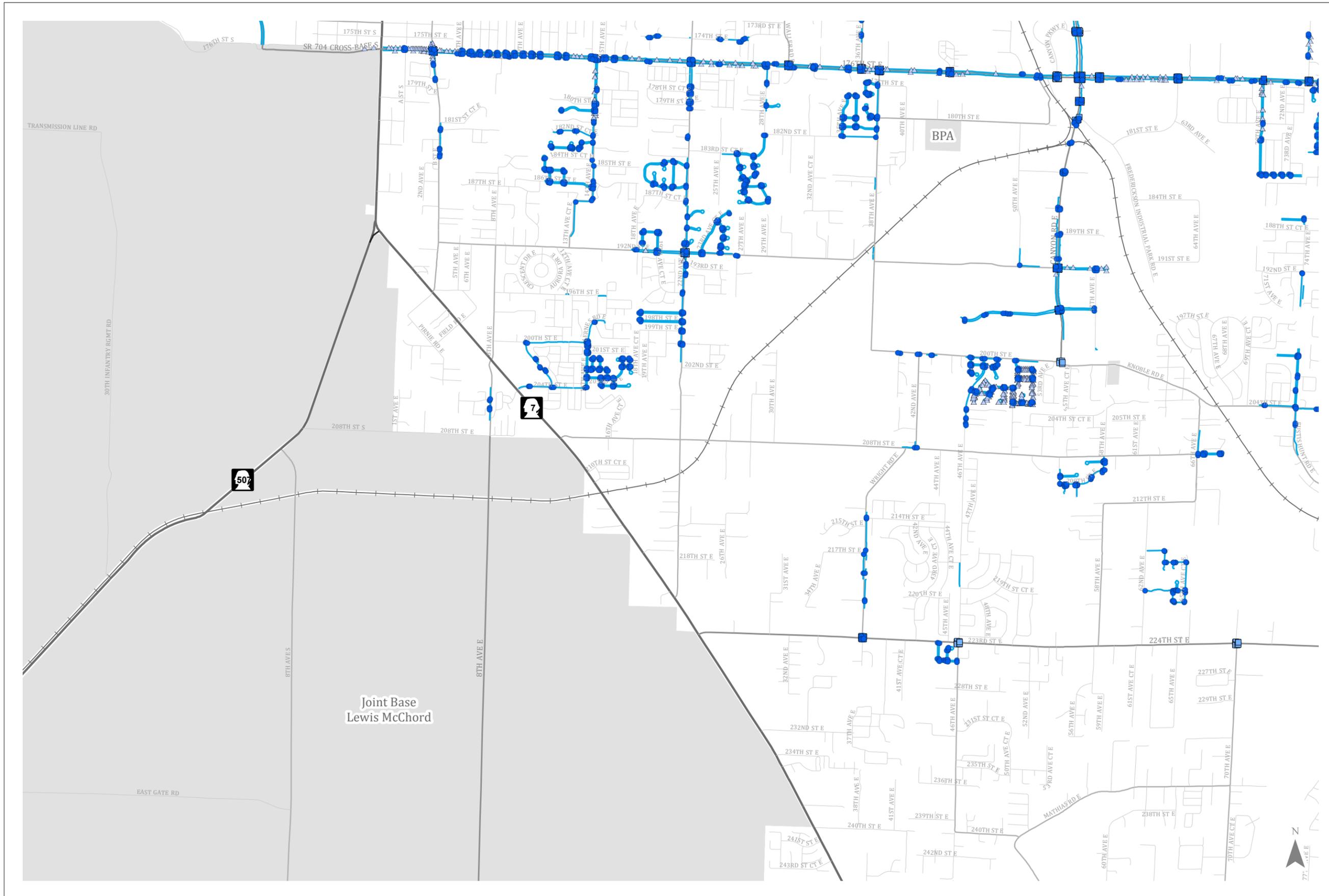




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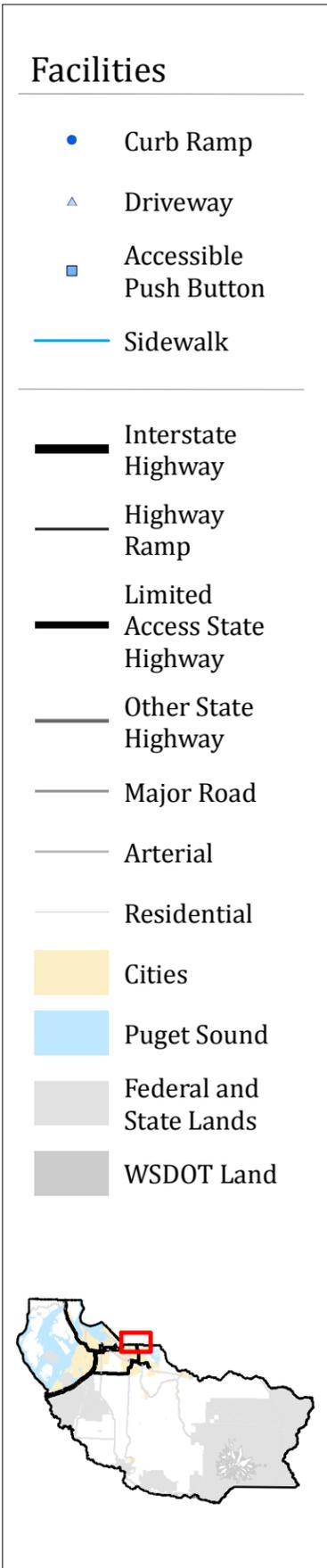
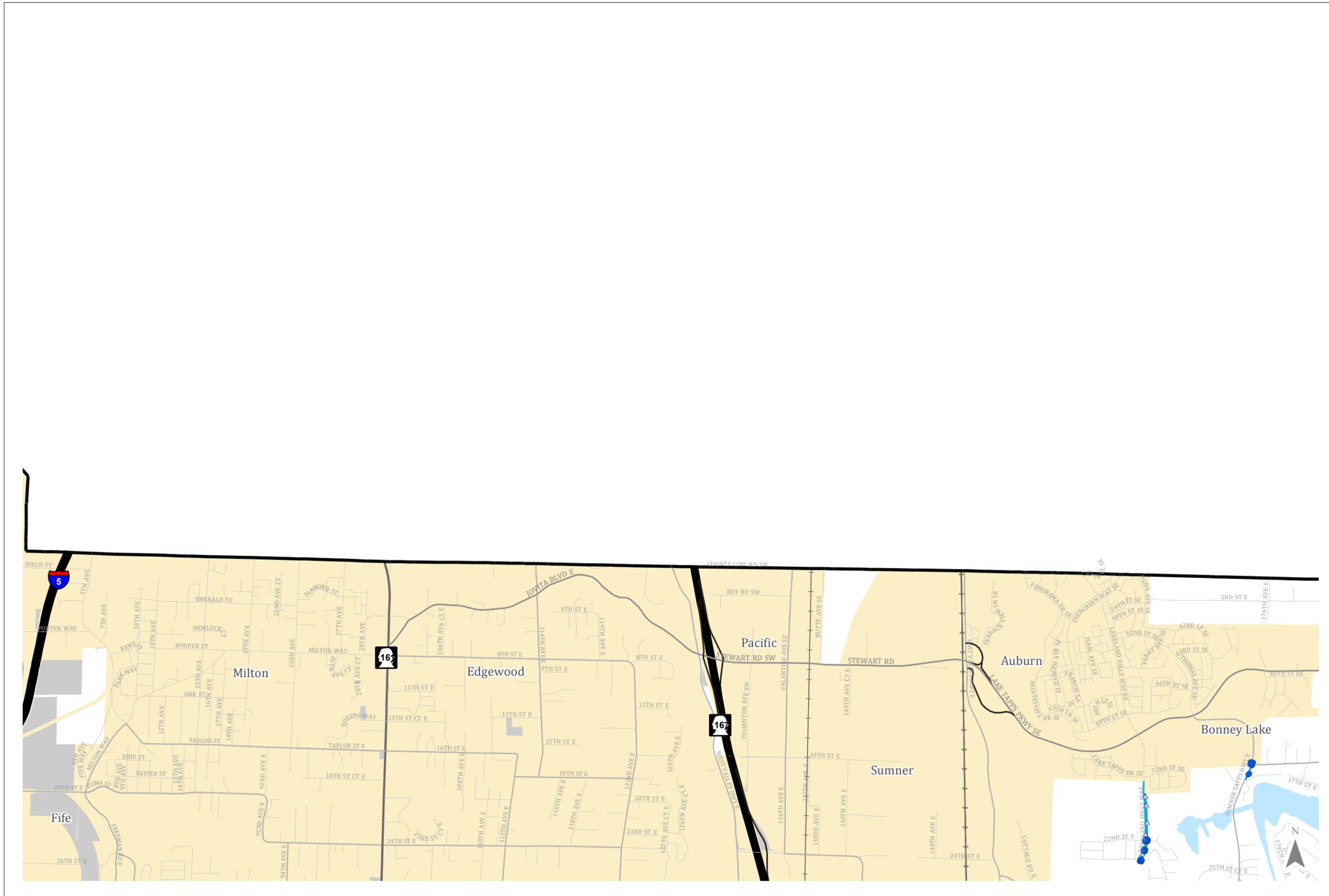


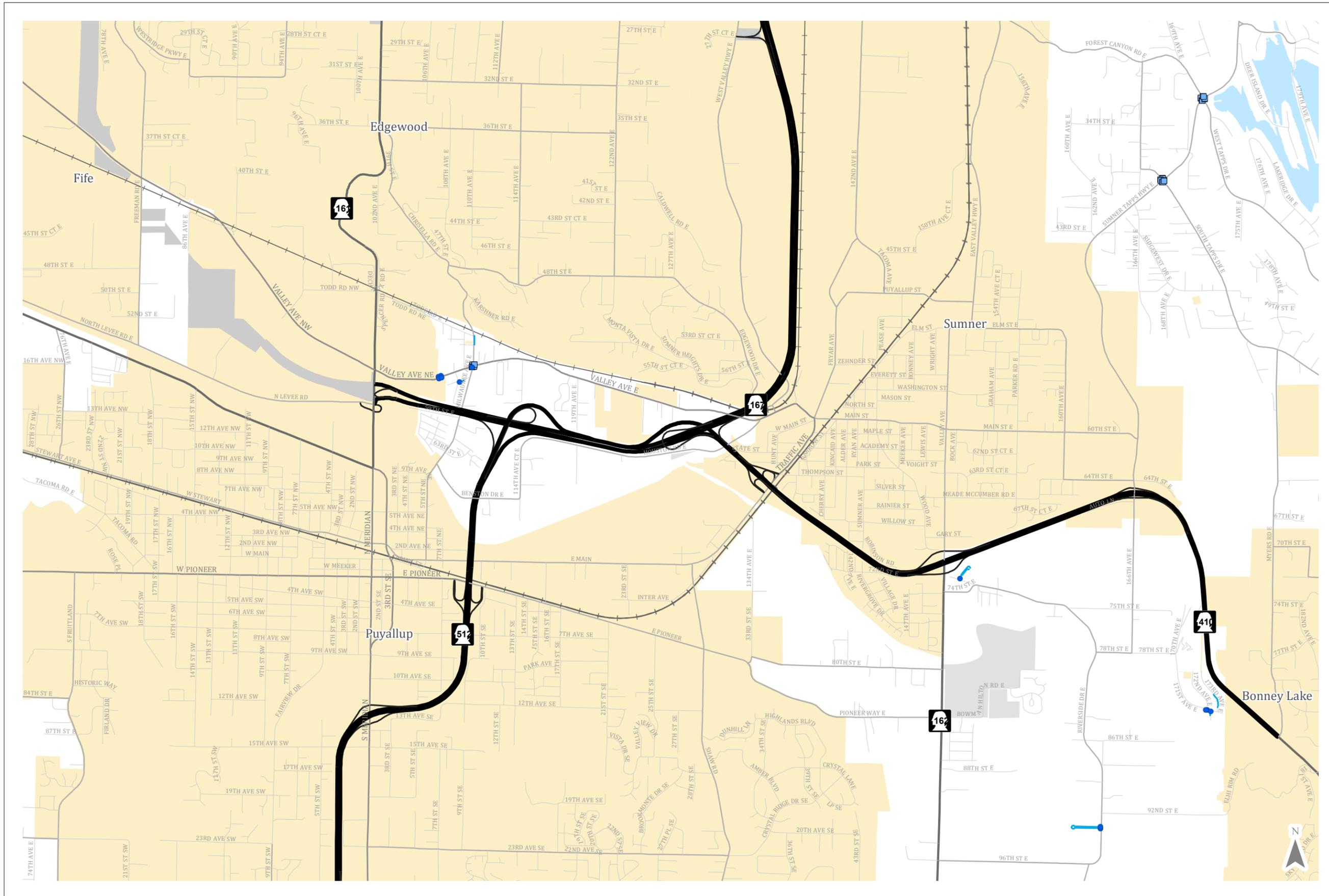
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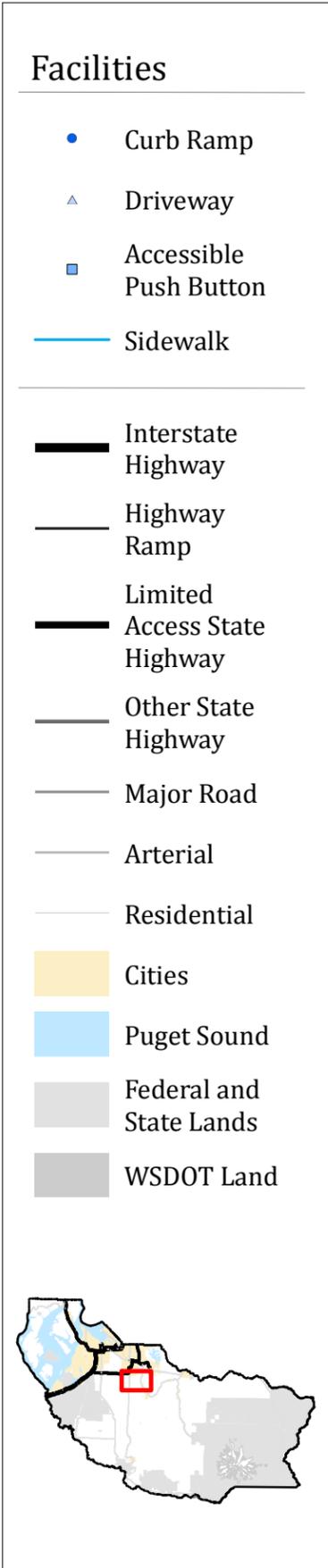
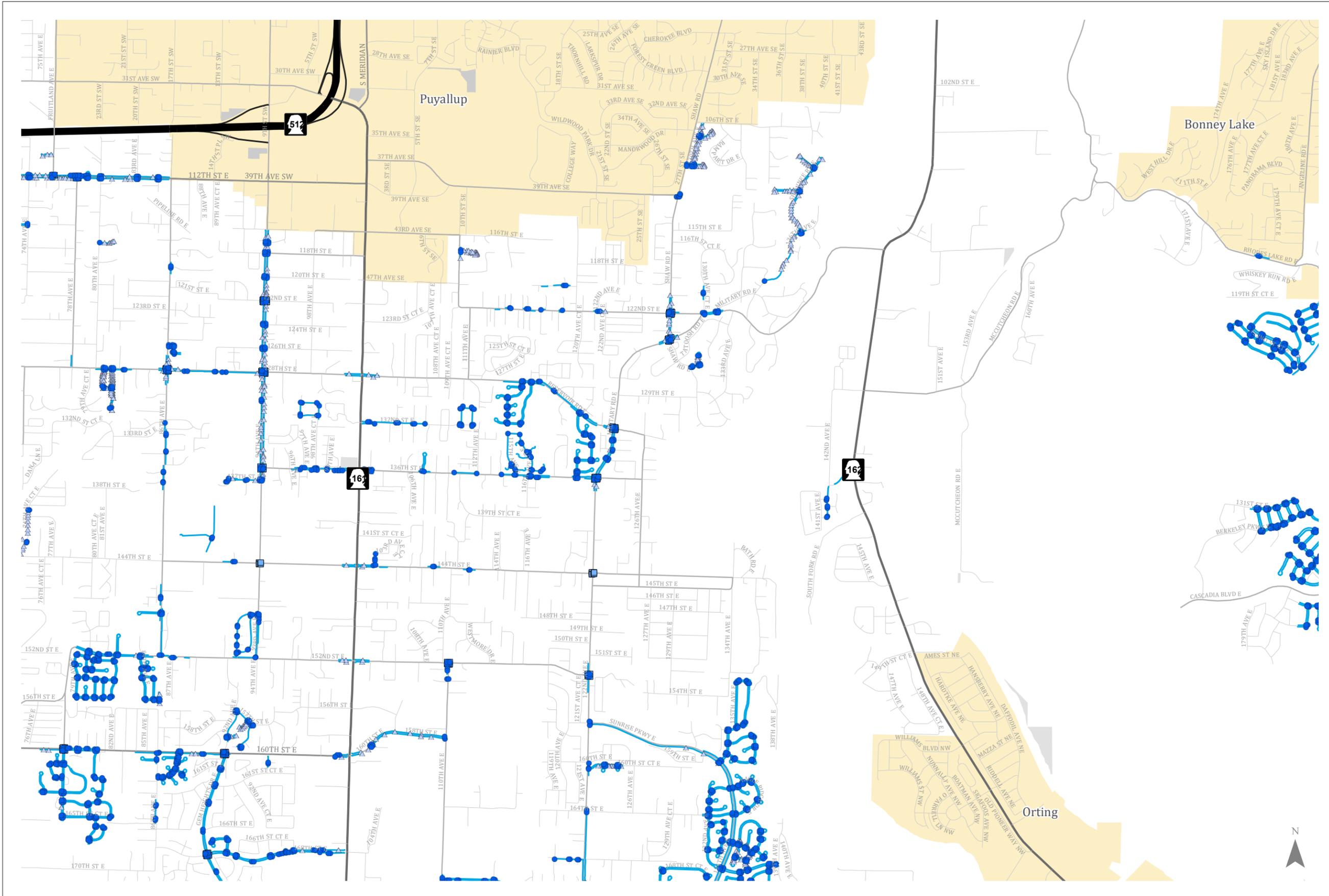


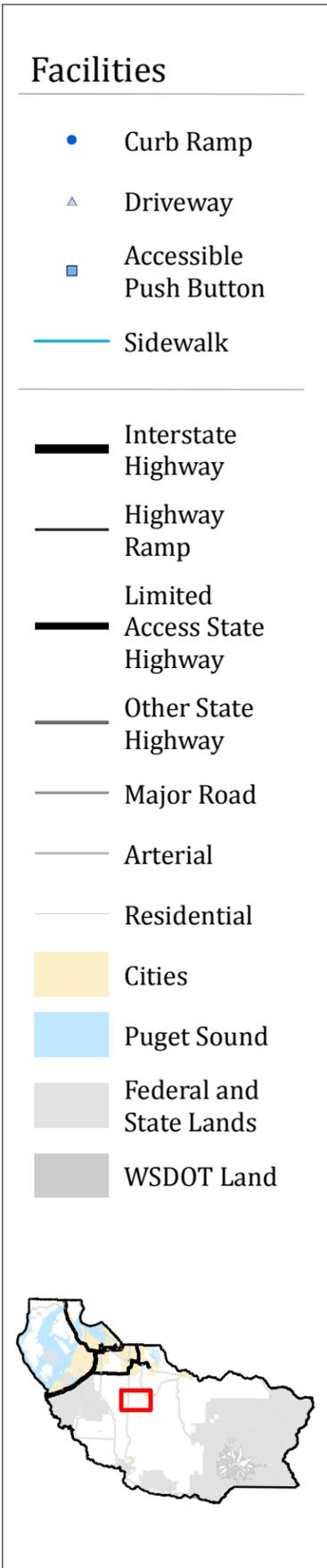
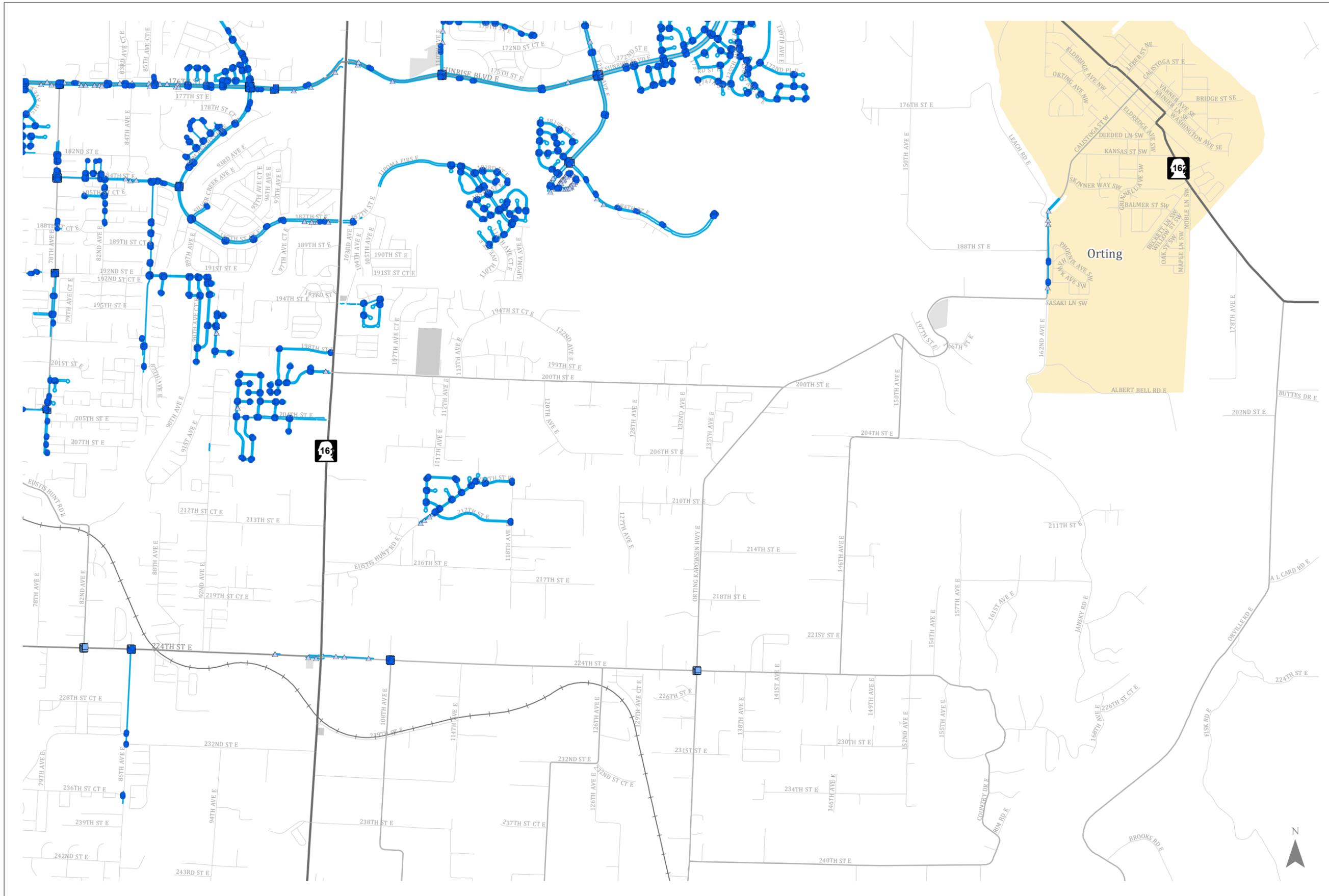
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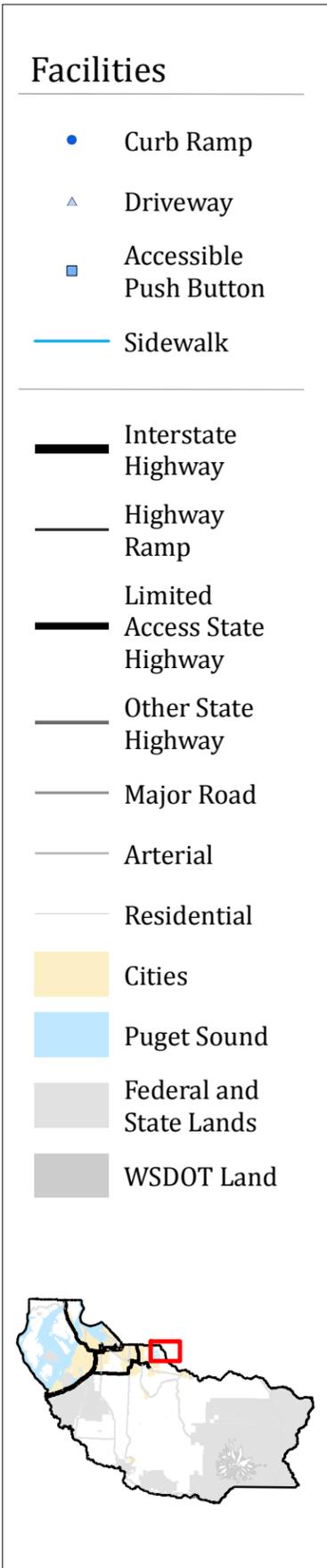
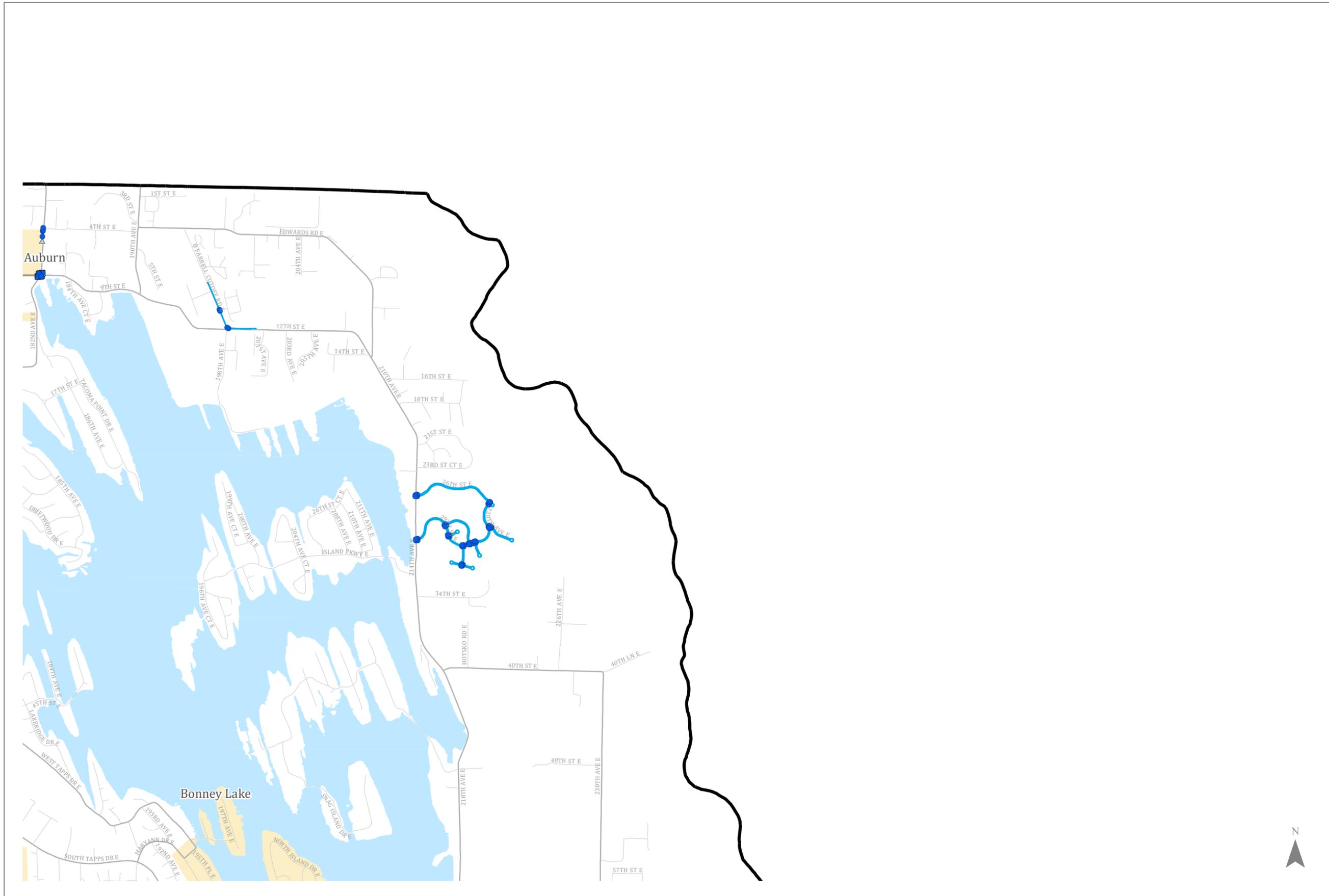
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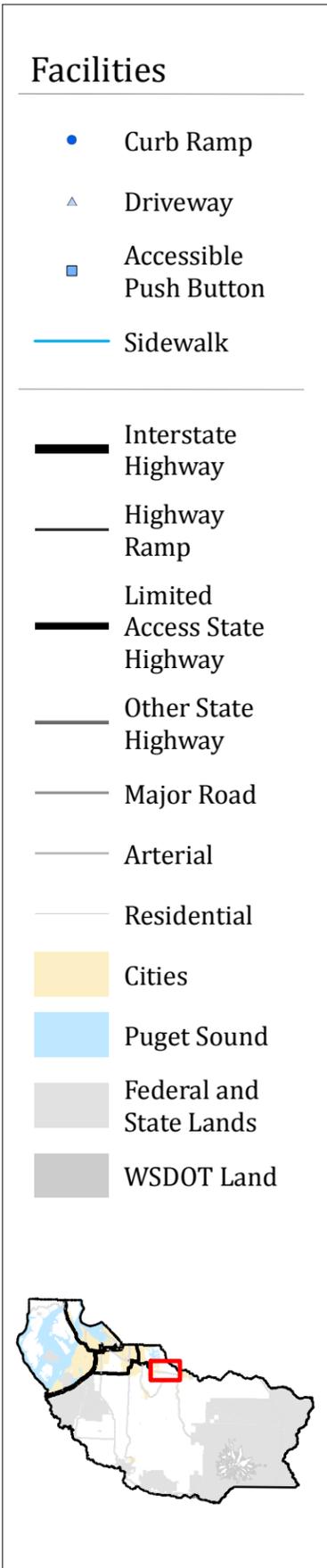
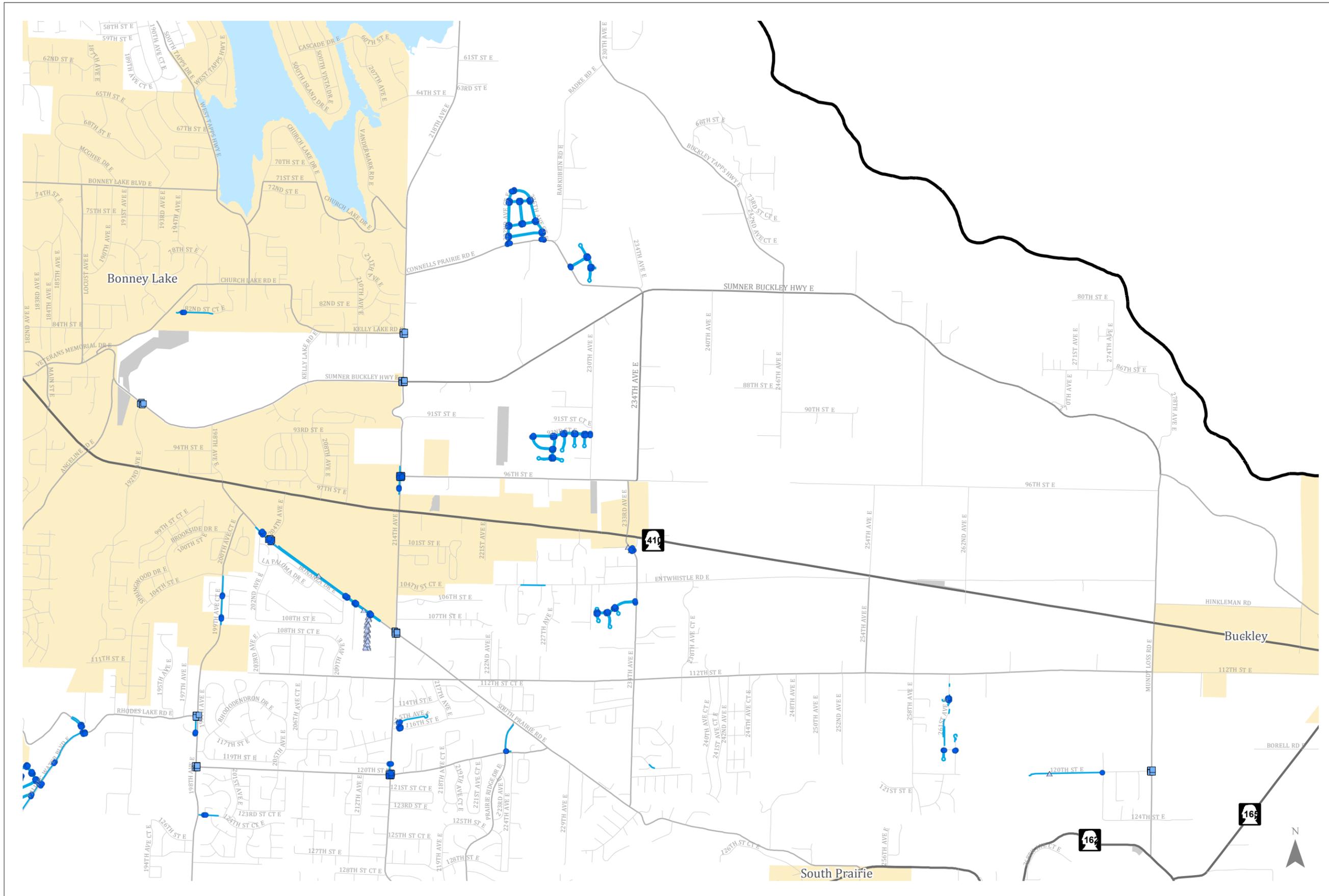
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## **Appendix D- GIS Analysis and Priority Mapping**

## Data Fields

Tables 1- 4 show the information collected during the Self-Evaluation Phase. This data will continue to be collected and maintained as part of the ADA Transition Plan efforts. It is possible that new data fields will be added to capture other existing characteristics that impact accessible travel. As additional data is collected, the data queries created to determine if a facility is ADA compliant will be updated. These queries are shown in Table 5.

*Table 1- APS/Pedestrian Push Button Data Fields*

<b>APS/PEDESTRIAN PUSH BUTTON FIELD DESCRIPTIONS</b>			
<b>Field Names</b>	<b>Field Descriptions</b>	<b>Potential Values</b>	<b>Page # In Assessment Manual</b>
OBJECTID	Unique number to identify each button	integers	n/a
Road_Num	Road log number	road log number of roadway closest to button	n/a
MP	Milepost on road log	milepost of intersection	n/a
Intersection	Names of intersecting roadways	road names	n/a
Pole	Starting northernmost at northeast corner poles numbered clockwise	integers (1-8)	n/a
Sign_Size	Pedestrian crossing sign size	5 X 7.5, 9 X 12	n/a
Crossing	Is the crosswalk marked or unmarked?	M, UM	n/a
Cross_Type	Crosswalk marking type	E, L, UM, N/A	n/a
Ramp_Spacing	Distance between ramps, null = single ramp	measured (ft.), null	n/a
PB_Spacing	Distance between push buttons, 0 = Same Pole, null = only one button on corner	measured (ft.), 0, null	n/a
Cor_to_cor	Ramp serves crossing between two corners, numbered 1-4, starting in the northeast and continuing clockwise	integer-integer (1-4)	n/a
Dist_to_top_ramp	Distance between push button and top of the ramp	measured (ft.)	n/a
Dist_to_curb	Distance between push button and edge of curb	measured (ft.)	n/a
PPB_Height	Height of center of push button	measured (in)	n/a
Head_Height	Height of bottom of pedestrian signal head	measured (ft.)	n/a
APS	APS present	NO/YES	n/a
Meets_MUTCD	APS compliance with MUTCD Standards	NO/YES	n/a
Crossings	Number of crossings	integers (1-4)	n/a
Num_PPB_Poles	Number of poles at intersection	integers (1-8)	n/a

Table 2- Curb Ramp Data Fields

CURB RAMP FIELD DESCRIPTIONS			
Field Names	Field Descriptions	Potential Values	Page # In Assessment Manual
SURFACE_TY	Sidewalk material or non-standard finish	ASPHALT/CONCRETE/ OTHER	21
SLOPE_TYPE	Ramp type	MEDIAN/OTHER/ PARALLEL/PERP_TYPE1/ PERP_TYPE3/MISSING	19
DETECTABLE	What is the detectable warning type?	ATTACHED/FORMED/ MESH/NONE	20
DETECT_WAR	Is the detectable warning placement correct?	NO/YES	21
TURNING_SP	Does it have a turning space?	NO/YES	n/a
TURNSPACE	Turning space constrained?	NO/YES	25
OBSTRUCTIO	Is the ramp obstructed?	NO/YES	26
MID_BLOCK_	Is it a mid-block crossing?	NO/YES	n/a
GRADE_BREA	Is the transition from roadway to ramp perpendicular and flush?	NO/YES	30
GUTTER_TRA	Is there a bump greater than 1/4" at the gutter transition?	(0-1/4") / (1/4" +)	30
MARKED_CRO	Crosswalk markings	NONE/ONE/TWO	28
RAMP_IN_CRO	Is the ramp located in the crosswalk?	NO/YES	29
RAMP_CLEAR	Does the ramp have clear space?	NO/YES	34
RETURN_CUR	Does the ramp include pedestrian curb?	NO/YES	33
RETURN_CU2	Is the pedestrian curb a trip hazard?	NO/YES	33
R_INTERX_C	Right intersection control type	NONE/STOP_CONTROL/ TRAFFIC_SIGNAL/YIELD/ CONTROL	35
L_INTERX_C	Left intersection control type	NONE/STOP_CONTROL/ TRAFFIC_SIGNAL/YIELD/ CONTROL	35
DATE_COLLE	Date collected	date (MM/DD/YYYY)	n/a
R_RMP_RUN	Right ramp run length	measured (ft.)	31
R_RMP_WI	Right ramp width	measured (ft.)	32
L_RMP_RUN	Left ramp run length	measured (ft.)	31
L_RMP_WI	Left ramp width	measured (ft.)	32
TURNSPCRUN	Turning space run length	measured (ft.)	24
TURNSPCWI	Turning space width	measured (ft.)	24
R_RMP_R_SL	Right ramp run slope	measured (%)	31
R_RMP_XS	Right ramp cross slope	measured (%)	32
L_RMP_R_SL	Left ramp run slope	measured (%)	31
L_RMP_XS	Left ramp cross slope	measured (%)	32
TURNSP_RSL	Turning space run slope	measured (%)	24
TURNSP_XS	Turning space cross slope	measured (%)	24
R_FLR_SL	Right flare slope	measured (%)	34
L_FLR_SL	Left flare slope	measured (%)	34
COUNT_SL	Counter slope	measured (%)	27
R_XWALK_SL	Right crosswalk running slope	measured (%)	30
R_XWALK_XS	Right crosswalk cross slope	measured (%)	30
L_XWALK_SL	Left crosswalk running slope	measured (%)	30
L_XWALK_XS	Left crosswalk cross slope	measured (%)	30
COMPLIANT	Based on measured values or project status, is the ramp ADA compliant?	NO/YES	n/a
SWRAMPID	Permanent ramp ID number used to identify ramp in ADA Transition Plan	SW0-SWXXXX	n/a
GLOBALID	Additional ID information from the software / data entry process	n/a	n/a
OBJECTID	GIS ID number (number is used by GIS software, it is not permanent and may change as data is updated)	given numeric value	n/a

Table 3- Driveway Data Fields

<b>DRIVEWAY FIELD DESCRIPTIONS</b>			
<b>Field Names</b>	<b>Field Descriptions</b>	<b>Potential Values</b>	<b>Page # In Assessment Manual</b>
Collection	Date data was gathered	date	n/a
AssetID	Unique ID of the feature	integer	n/a
DW_Cross_1	Length of driveway pedestrian path	measured (ft.)	n/a
DW_Run	Width of driveway pedestrian path	measured (ft.)	n/a
DW_Cross_S	Running slope of driveway pedestrian path	measured (%)	n/a
DW_Run_Slo	Cross slope of driveway pedestrian path	measured (%)	n/a
DW_Run_2_	Second width of driveway pedestrian path (driveway over 50')	measured (ft.)	n/a
DW_Cross_2	Second length of driveway pedestrian path (driveway over 50')	measured (ft.)	n/a
DW_Run_S_1	Second cross slope of driveway pedestrian path (driveway over 50')	measured (%)	n/a
DW_Cross_3	Second running slope of driveway pedestrian path (driveway over 50')	measured (%)	n/a
R_Ramp_Cro	Width of the right driveway ramp	measured (ft.)	n/a
R_Ramp_Run	Length of the right driveway ramp	measured (ft.)	n/a
R_Ramp_C_1	Right ramp cross slope	measured (%)	n/a
R_Ramp_R_1	Right ramp running slope	measured (%)	n/a
L_Ramp_Cro	Width of the left driveway ramp	measured (ft.)	n/a
L_Ramp_Run	Length of the left driveway ramp	measured (ft.)	n/a
L_Ramp_C_1	Left ramp cross slope	measured (%)	n/a
L_Ramp_R_1	Left ramp running slope	measured (%)	n/a

Table 4- Sidewalk Data Fields

<b>SIDEWALK FIELD DESCRIPTIONS</b>			
<b>Field Names</b>	<b>Field Descriptions</b>	<b>Potential Values</b>	<b>Page # In Assessment Manual</b>
Collector	Person collecting information	initials	n/a
COMMENTS	Comments on any anomalies encountered during inventory	text comments	n/a
Decorative	Does sidewalk have a decorative pattern?	NO/YES	n/a
Direction	Side of road sidewalk is located on	N/W/S/E	n/a
FromDescri	Approximate beginning location for measurements	text cross street	n/a
Length	Length of sidewalk segment measured	measured (ft.)	n/a
OBJECTID	Object ID number	numeric value	n/a
PERVIOUS	Is the sidewalk pervious?	NO/YES	10
ROAD_NAME	Road name	text name of road	n/a
RLOG	Road log number	text road log	n/a
SidewalkID	Separate ID number	numeric value	n/a
SURFACE	Sidewalk surface material	ASPHALT/CONCRETE/OTHER	9
ToDescri	Approximate ending location for measurements	text cross street	n/a
WIDTH	Sidewalk width	measured (in.)	9
Xslope1[2,3...]	Cross slopes collected every 200' or less	measured (%)	11

## GIS Analysis Specifics

GIS was used to analyze facility measurements and spatial relationships to known locations. Curb ramps, driveways and APS were collected as point features while sidewalks were collected as linear features. Missing curb ramps were also identified as point features for future analysis.

A few assumptions were made when utilizing this data. Queries were developed to separate out facilities that are “likely to be ADA compliant” based on existing measurements obtained and the interpretation of the 2011 PROWAG. The “likely to be ADA compliant” queries are listed in Table 5. These queries will be further refined as additional data is collected or if the governing standards change. Missing curb ramps were already defaulted as non-compliant features.

If maximum extent feasible documentation is on file or if projects were recently completed, these facilities were assumed to be compliant and queried out/set aside. The reason for querying these facilities out is so they do not impact the priority analysis or generate a cost assignment for improvement since this was already incurred. These newly improved facilities will be inspected as part of the next data maintenance cycle.

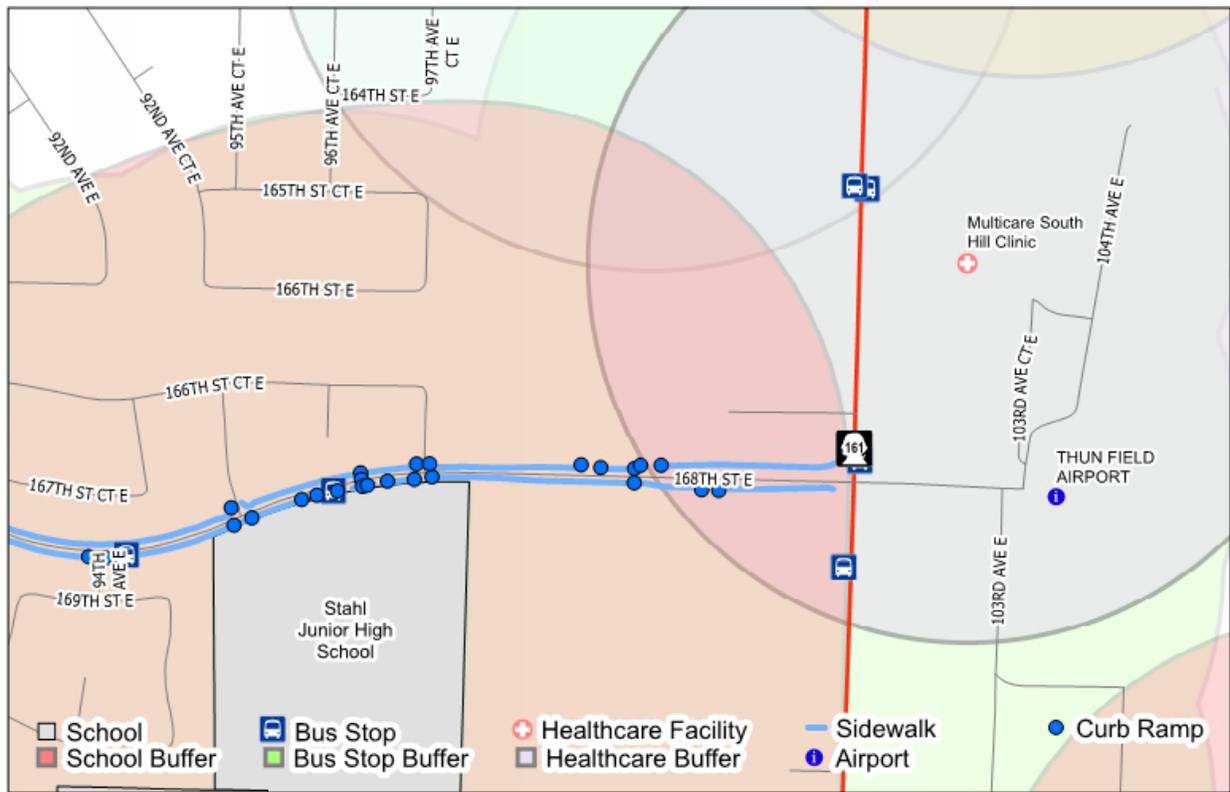
Table 5- Compliance Query

FACILITY TYPE	QUERY FOR COMPLIANCE
Accessible Pedestrian Signals (APS)	APS = 'YES' AND PPB_Height >= 40 AND PPB_Height <=48 AND Dist_to_curb >= 1.5 AND Dist_to_curb <=10
Curb Ramp	( "DETECTABLE" = 'ATTACHED' ) AND( "DETECT_WAR" = 'YES' ) AND( "TURNING_SP" = 'YES' ) AND( "TURNSPACE_" = 'NO' ) AND( "OBSTRUCTIO" = 'NO' ) AND( "GRADE_BREA" = 'YES' ) AND( "GUTTER_TRA" = '0-1/4' ) AND( "MARKED_CRO" = 'NONE' OR ( "MARKED_CRO" = 'ONE' AND "RAMP_IN_CR" = 'YES' ) OR ( "MARKED_CRO" = 'TWO' AND "RAMP_IN_CR" = 'YES' )) AND( "RAMP_CLEAR" = 'YES' ) AND( "RETURN_CUR" = 'NO' OR ( "RETURN_CUR" = 'YES' AND "RETURN_CU2" = 'NO' )) AND( "R_RMP_WI" >= 4 OR "R_RMP_WI" = 0 ) AND( "L_RMP_WI" >= 4 OR "L_RMP_WI" = 0 ) AND( "TURNSPCRUN" >= 4 ) AND( "TURNSPCW" >= 4 ) AND( "R_RMP_R_SL" <= 8.3 OR "R_RMP_WI" = 0 ) AND( "R_RMP_XS" <= 2 OR "R_RMP_WI" = 0 OR ( "MID_BLOCK_" = 'YES' AND "SLOPE_TYPE" = 'PERP_TYPE1' )) AND( "L_RMP_R_SL" <= 8.3 OR "L_RMP_WI" = 0 ) AND( "L_RMP_XS" <= 2 OR "L_RMP_WI" = 0 ) AND( "TURNSP_RSL" <= 2 ) AND( "TURNSP_XS" <= 2 OR "MID_BLOCK_" = 'YES' ) AND( "R_FLR_SL" <= 10 OR "R_FLR_SL" = 0 ) AND( "L_FLR_SL" <= 10 OR "L_FLR_SL" = 0 ) AND( "COUNT_SL" <= 5 ) OR MEF = 'YES' OR Project_Name IS NOT NULL
Driveway	( DW_Run >= 4 ) AND( "DW_Run_Slo" <= 2 ) AND( "DW_Run_2__" >= 4 OR "DW_Run_2__" = 0 ) AND( "DW_Run_S_1" <= 2 OR "DW_Run_2__" = 0 ) AND( "R_Ramp_Cro" >= 4 ) AND ( "R_Ramp_R_1" <= 8.3 OR "R_Ramp_Run" >= 15 ) AND( "R_Ramp_C_1" <= 2 ) AND( "L_Ramp_Cro" >= 4 ) AND ( "L_Ramp_R_1" <= 8.3 OR "L_Ramp_Run" >= 15 ) AND( "L_Ramp_C_1" <= 2 )
Sidewalk	WIDTH >= 60 AND "Max_xslope" <=2 AND ( "Xslope1" <=2 AND "Xslope2" <=2 AND "Xslope3" <=2 AND "Xslope4" <=2 AND "Xslope5" <=2 AND "Xslope6" <=2 AND "Xslope7" <=2 AND "Xslope8" <=2 AND "Xslope9" <=2 AND "Xslope10" <=2 AND "Xslope11" <=2 AND "Xslope12" <=2 AND "Xslope13" <=2 AND "Xslope14" <=2 AND "Xslope15" <=2 AND "Xslope16" <=2 AND "Xslope17" <=2 AND "Xslope18" <=2 AND "Xslope19" <=2 AND "Xslope20" <=2 AND "Xslope21" <=2 AND "Xslope22" <=2 AND "Xslope23" <=2 AND "Xslope24" <=2 AND "Xslope25" <=2 )

Since sidewalks are linear features instead of points, assumptions were made to calculate the non-complaint lengths as a proportion of the overall facility/segment length and fairly apply a unit cost for correction. Mapping shows the entire feature as non-compliant if any measurement along the segment was not compliant for cross slope tolerance.

Each facility was analyzed for measured characteristics and known ADA standards and assigned points for overall condition. Each facility was analyzed for its location as it relates to other attractions within a quarter mile radius and assigned points. Figure 1 illustrates how buffering analysis is used to calculate the location scores.

Figure 1- Location Buffering of Facilities



Priority scores (condition score plus location score) were analyzed for spatial patterns and to see where the highest areas of need are occurring in the county based on collected data. Tools in GIS can be used to analyze this data efficiently when considering projects.

Figures 2-3 are examples of ways to display patterns or trends spatially across the county. These examples use priority scores for density analysis with adjusting symbology to show information for a certain facility. Optimized hot spot analysis can be used as well for all facilities as points using priority score for analysis. Cluster and corridor-type patterns are further considered for ADA project planning. These clustered areas are likely to change over time and move around the county as projects are completed over the life of the program. Once data is updated to reflect compliance, other problematic areas will be highlighted for project consideration.

Figure 2- Density Mapping for All Facilities Overlaid by Curb Ramps Shown by Priority Score

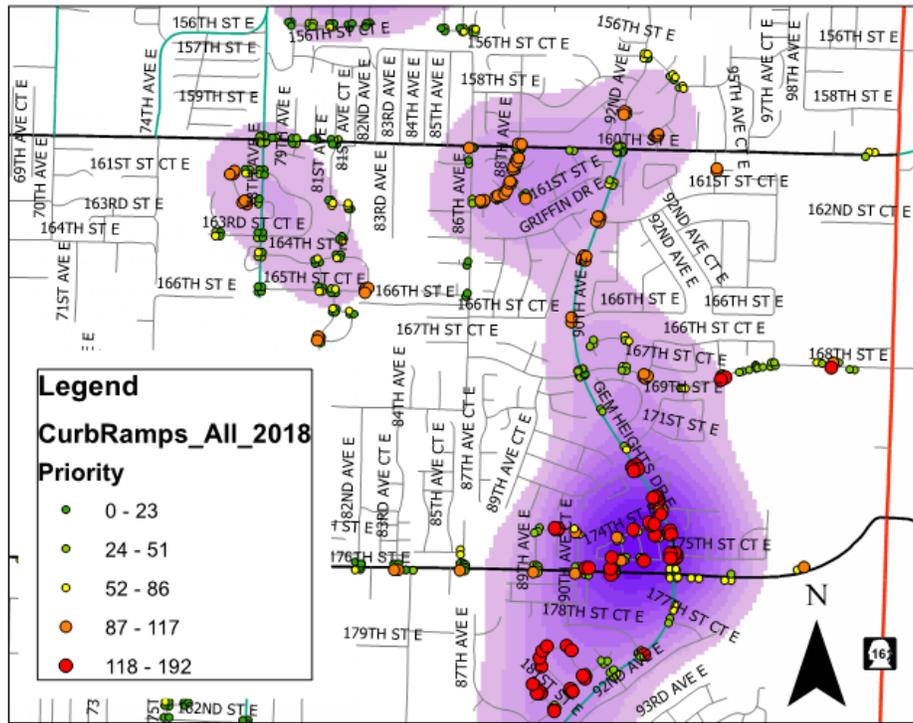
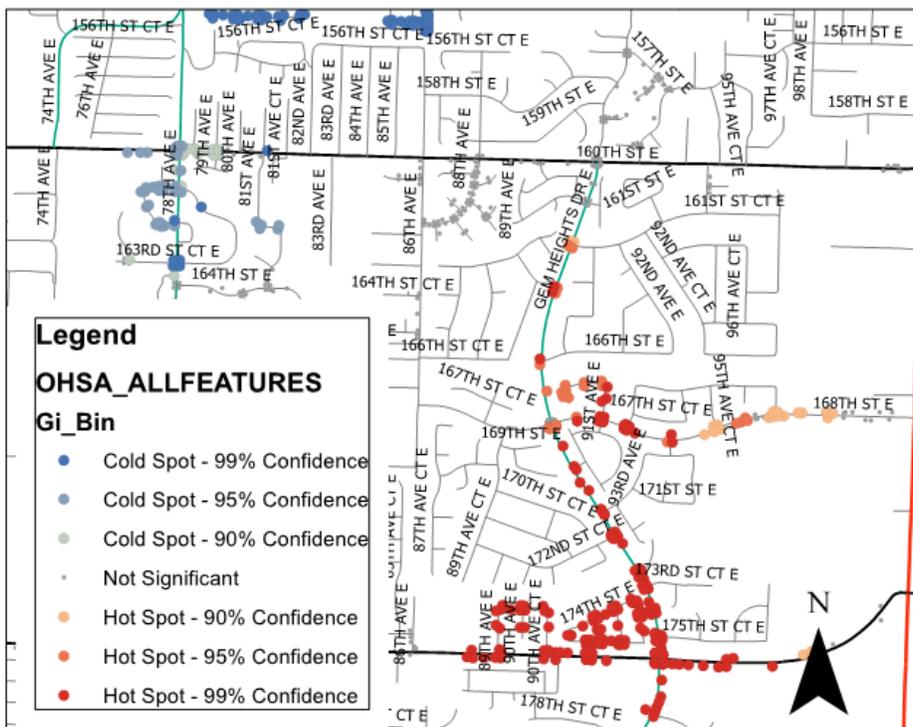


Figure 3-Optimized Hot Spot Analysis for All Facilities by Priority Score



## GIS Analysis for Project Selection

GIS can be used to assist will project selection. Data can be analyzed and displayed in a variety of ways to show patterns and relationships for priority score, condition score or just a relationship to the existing transportation network. GIS allows the ADA Self-Evaluation data to be compared to other planned projects or specific land uses.

It is important to evaluate proposed ADA improvements while considering other programs and projects. In some cases, needed ADA improvements are already covered by other scoped or funded projects. If a decision is made to make ADA improvements near an adjacent project, these improvements will need to be timed appropriately for design, funding and community impact.

Listed below are elements we will consider when identifying projects. The priority score is designed to drive the focus areas and locations for projects. However, estimated costs, corridor impacts, and project timing may also play a role on what each project includes or when it occurs.

1. Priority score and public requests
2. Estimated cost of project and available funding
3. Other projects/programs/private development activities
4. Grant opportunities
5. Construction timing
6. Relationship and anticipated benefit to defined centers and corridors
7. Safety
8. Right-of-way acquisition
9. Utility conflicts and coordination
10. Geographic equity, as reasonable

In some cases, identified projects may need to be delayed due to corridor widening or relationships to upcoming planned projects. This may also be the case if a proposed project is competitive for grant funding. If grant funding is awarded to the county, that could leave additional program funding so that more improvements can be completed.

Another benefit of GIS tools is the ability to track completed work and improvements at each facility. Once projects are completed and data is updated, analysis can be repeated in GIS with new information. Each iteration will allow the county to track and compare the areas needing improvement on a regular basis as well as tracking the success of the ADA Improvement Program or other projects. Each time the data modeling is re-run, we can see the most current priorities.

This iterative data analysis and prioritization process allows for flexibility when planning projects. The goal is to maintain a short project list since regular updates of the Self-Evaluation data will drive better decisions on where to invest. A short-range project list is being developed in lieu of a comprehensive project list for the entire program. We anticipate continual balancing and rebalancing of the ADA Improvement Program efforts with other county projects and programs, private development, and projects led by other jurisdictions.

## ADA Projects

Table 6 shows the most current ADA focused projects. This list will be updated annually as part of the Transition Plan updates. Similar information will be made available at [www.piercecountywa.gov/ADAtransition](http://www.piercecountywa.gov/ADAtransition).

Table 6- Current ADA Projects

Project Name	Location	Status
C Street South-ADA Improvements	C Street S (112 ST S to Wheeler ST S)	Completed in 2018
ADA Improvement Program-2019	Neighborhood area, west of 35 AV E, along 180 ST E and 177 ST E.	Design Complete/ Construction Contract Awarded for 2019
Gem Heights Drive E- ADA Improvements 2020	Gem Heights Drive E (168 ST E to north of 176 ST E)	TIB Complete Streets Grant Award- Start Design in 2019

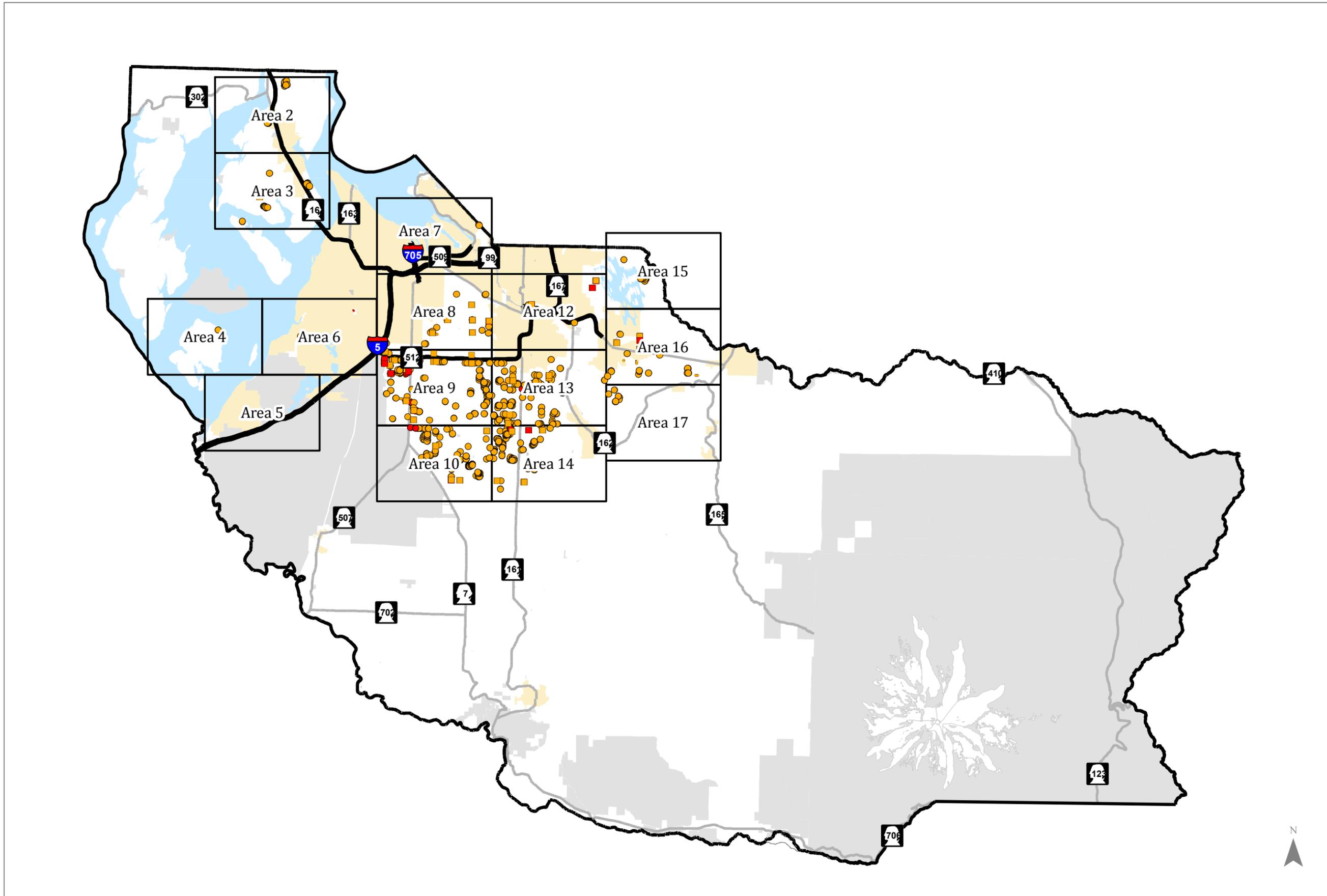
## Challenges for Prioritization of Missing Curb Ramps

There can be challenges with using the facilities with the highest priority scores to develop projects. Missing curb ramps were logged to keep track of the overall crossing facilities and for a planning/budgeting standpoint. In many cases there might be a missing curb ramp with a high priority score but if installed would not connect to network components. Some of these facilities, although high scoring, would need to be installed at a time where it might make sense to do so from a network perspective. These missing curb ramps will be built/implemented as the network develops and is reasonable to do so.

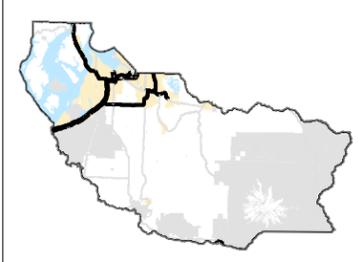
In other cases, a higher priority would be given to a location where a missing curb ramp was identified and network connections surrounding the missing ramp/legal crossing exists.

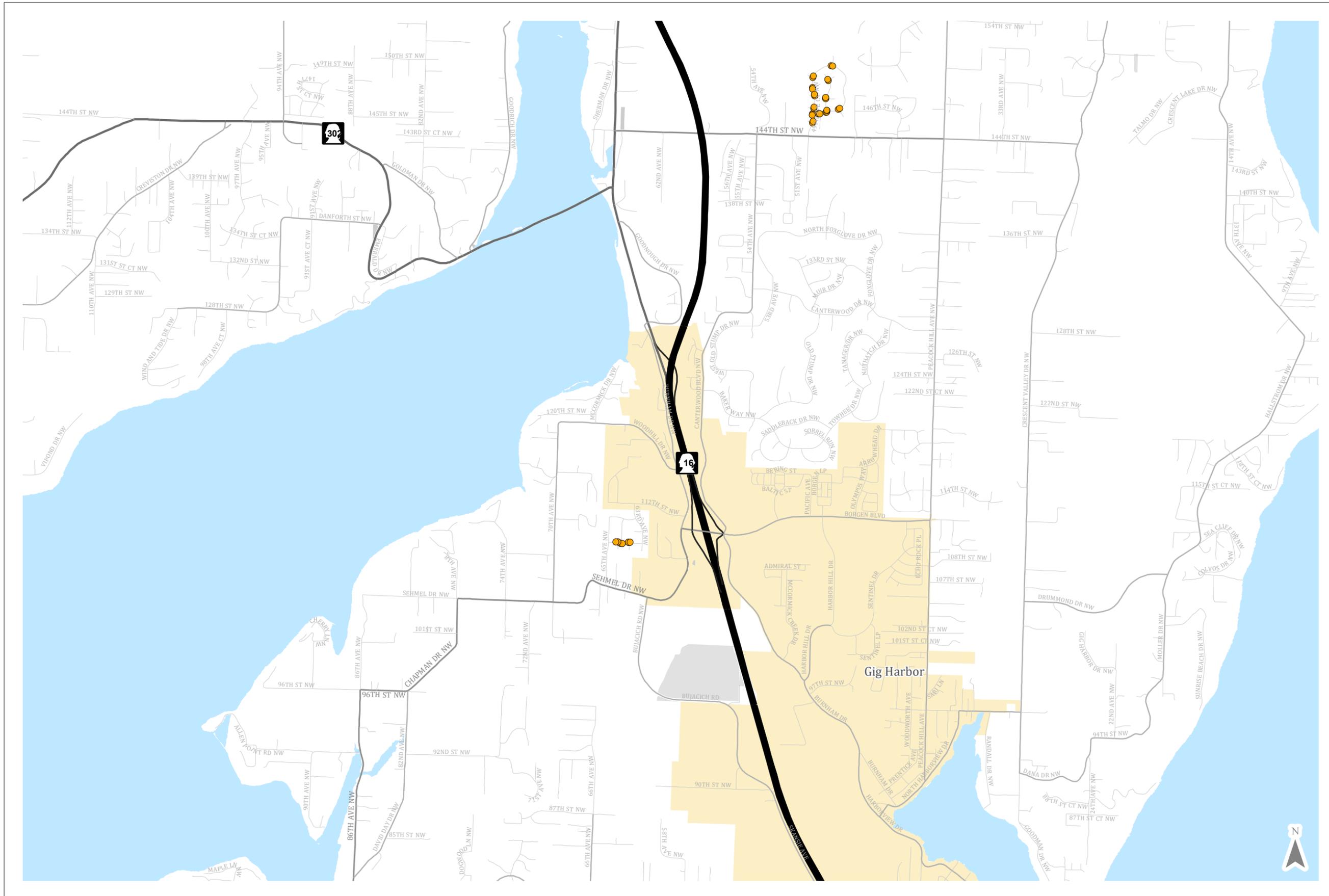
## Mapping of Priority Score for Highest 50% of Non-Compliant Facilities

Since the county inventoried thousands of facilities, determining what mapping to include to show findings was a challenge. After experimenting with a variety of options, the top 50% of non-compliant facilities was highlighted based on priority score to show trends without overwhelming each map. This mapping approach draws awareness to areas that show a higher need for an improvement project.



- Facilities**
- Accessible Push Button Priority Score
- Medium
  - High
- Curb Ramp Priority Score
- Medium
  - High
- Driveway Priority Score
- ▲ Medium
  - ▲ High
- Sidewalk Priority Score
- Medium
  - High
- Interstate Highways
- Limited Access State Highways
- Other State Highways
- Cities
- Puget Sound
- Federal and State Lands
- WSDOT Land





### Facilities

Accessible Push Button Priority Score

- Medium
- High

Curb Ramp Priority Score

- Medium
- High

Driveway Priority Score

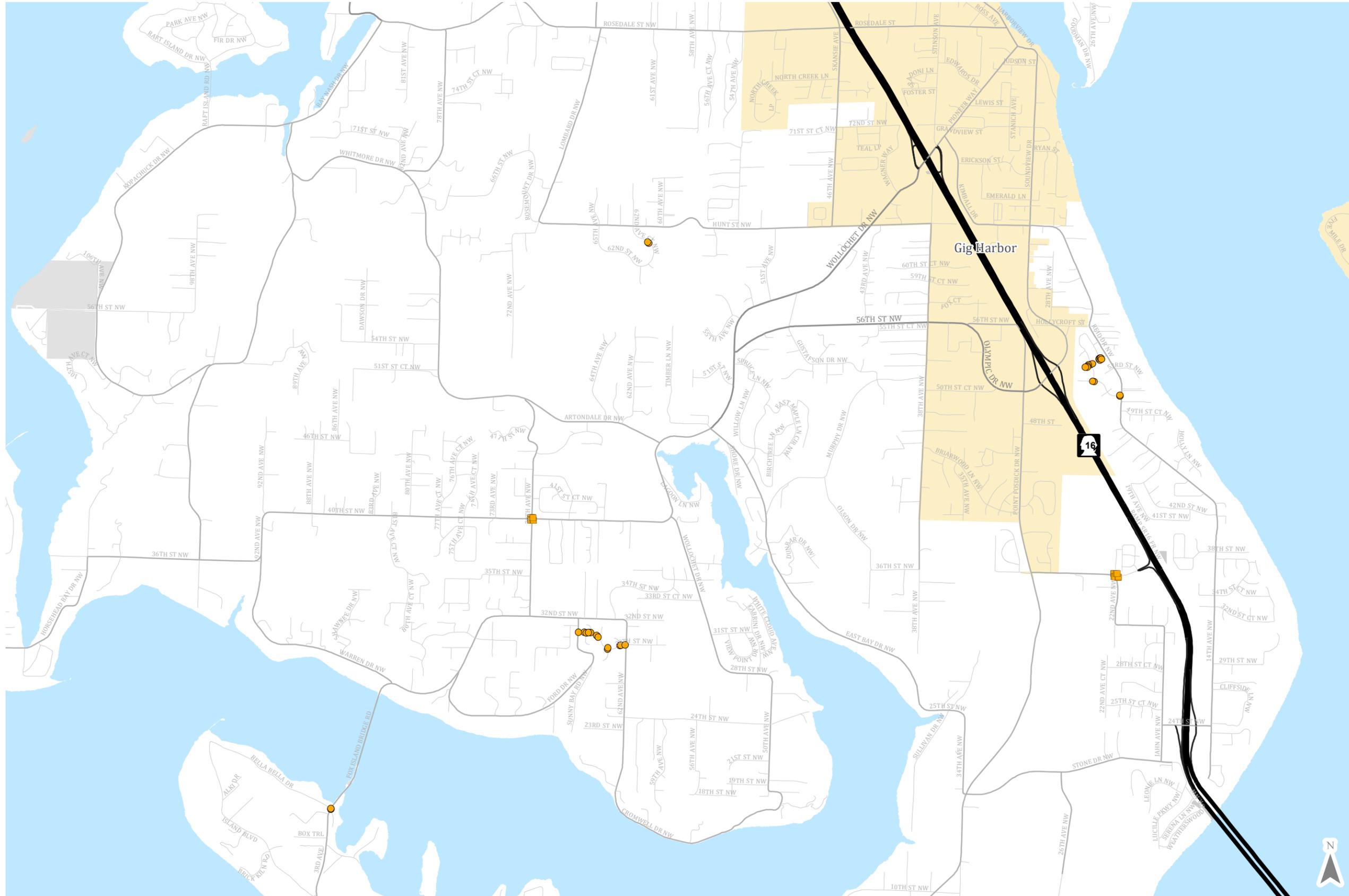
- ▲ Medium
- ▲ High

Sidewalk Priority Score

- Medium
- High

- Interstate
- Highway
- Limited Access
- State Highway
- Other State Highway
- Major Road
- Arterial
- Residential
- Cities
- Puget Sound
- Federal and State Lands
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Accessible Push Button Priority Score

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Curb Ramp Priority Score

- Medium
- High

Driveway Priority Score

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- ▲ High

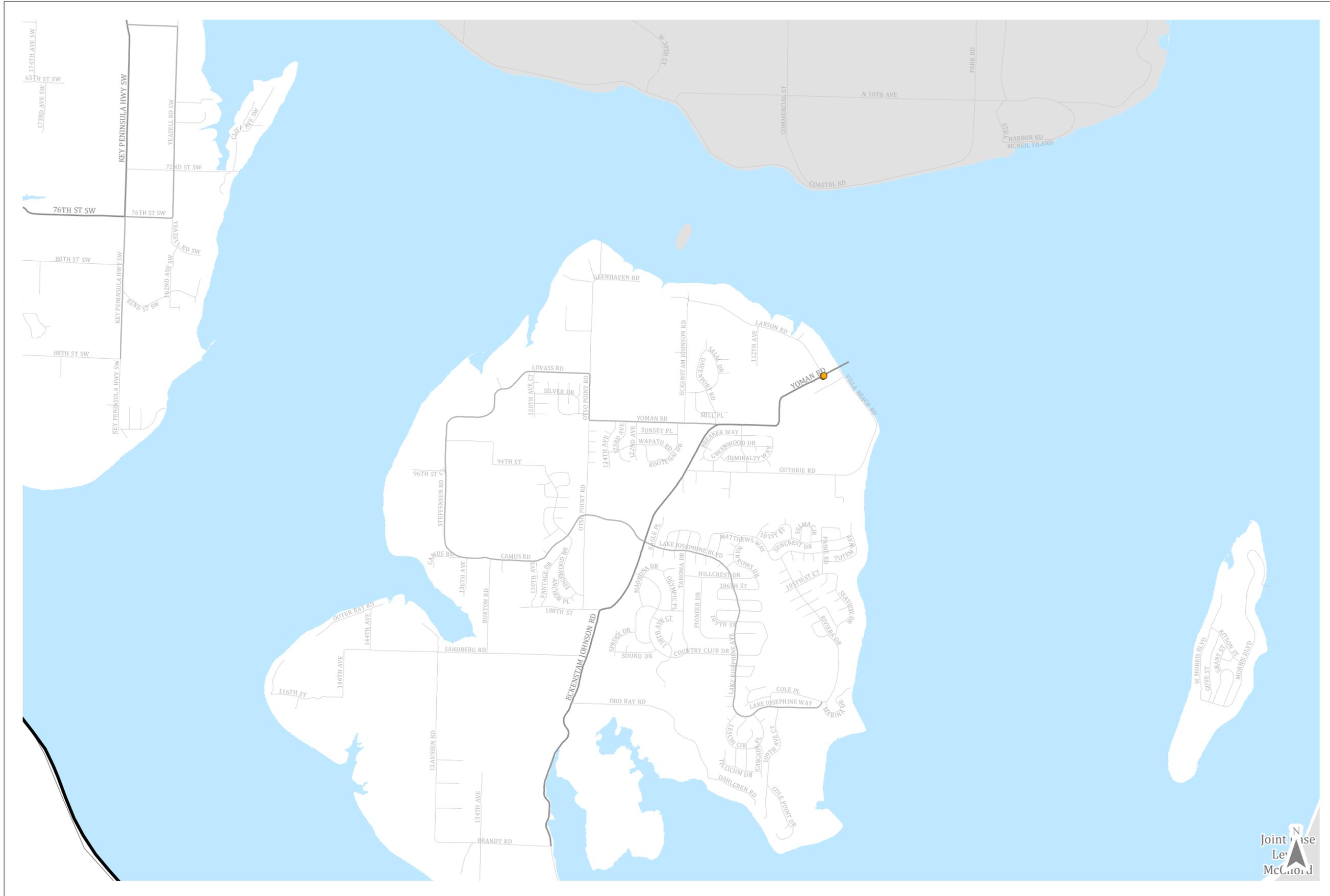
Sidewalk Priority Score

- Medium
- High

- Interstate
- Highway
- Highway Ramp
- Limited Access State Highway
- Other State Highway
- Major Road
- Arterial
- Residential

- Cities
- Puget Sound
- Federal and State Lands
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### Facilities

Accessible Push Button Priority Score

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Curb Ramp Priority Score

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Driveway Priority Score

- ▲ Medium
- ▲ High

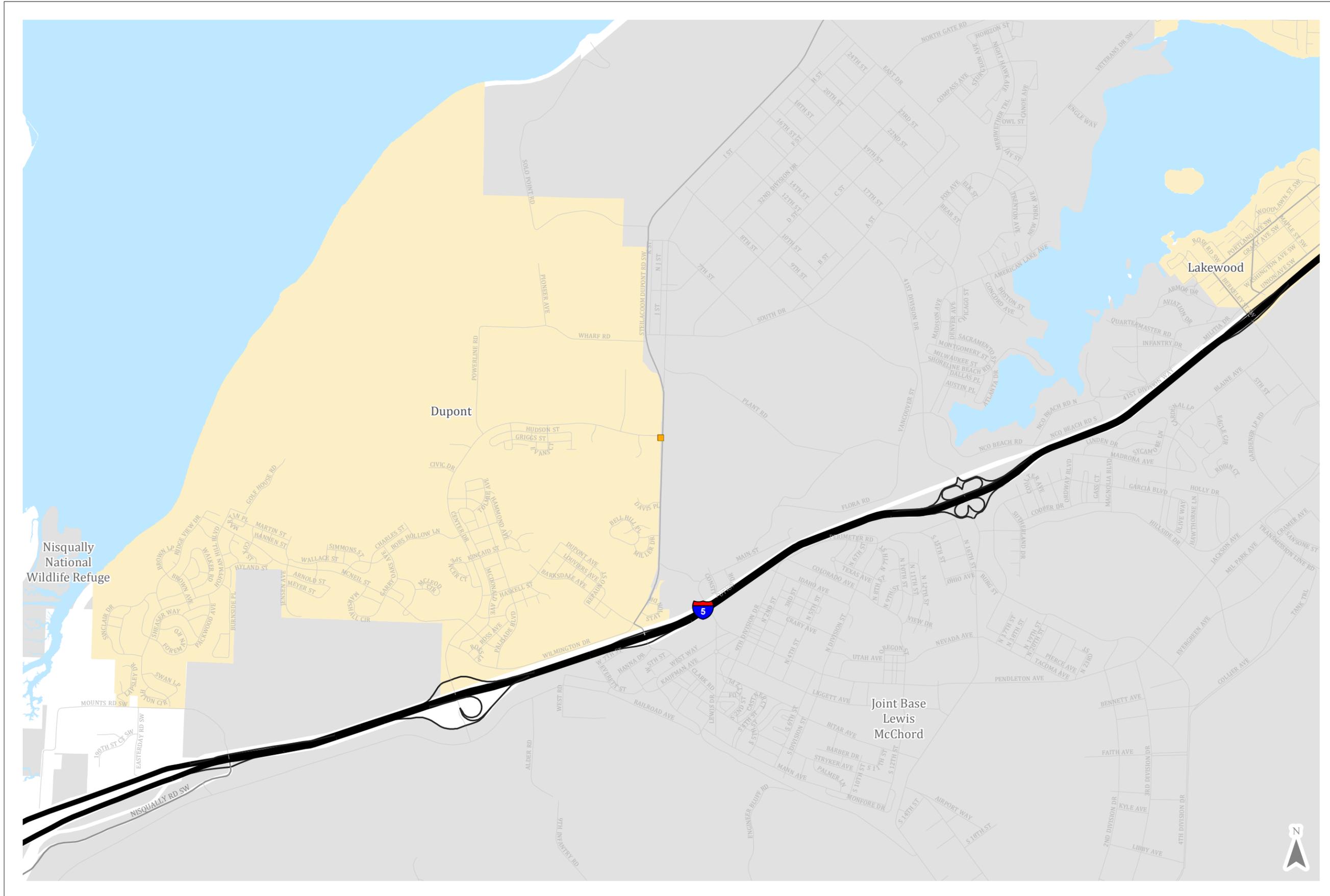
Sidewalk Priority Score

- Medium
- High

- Interstate
- Highway
- Highway Ramp
- Limited Access State Highway
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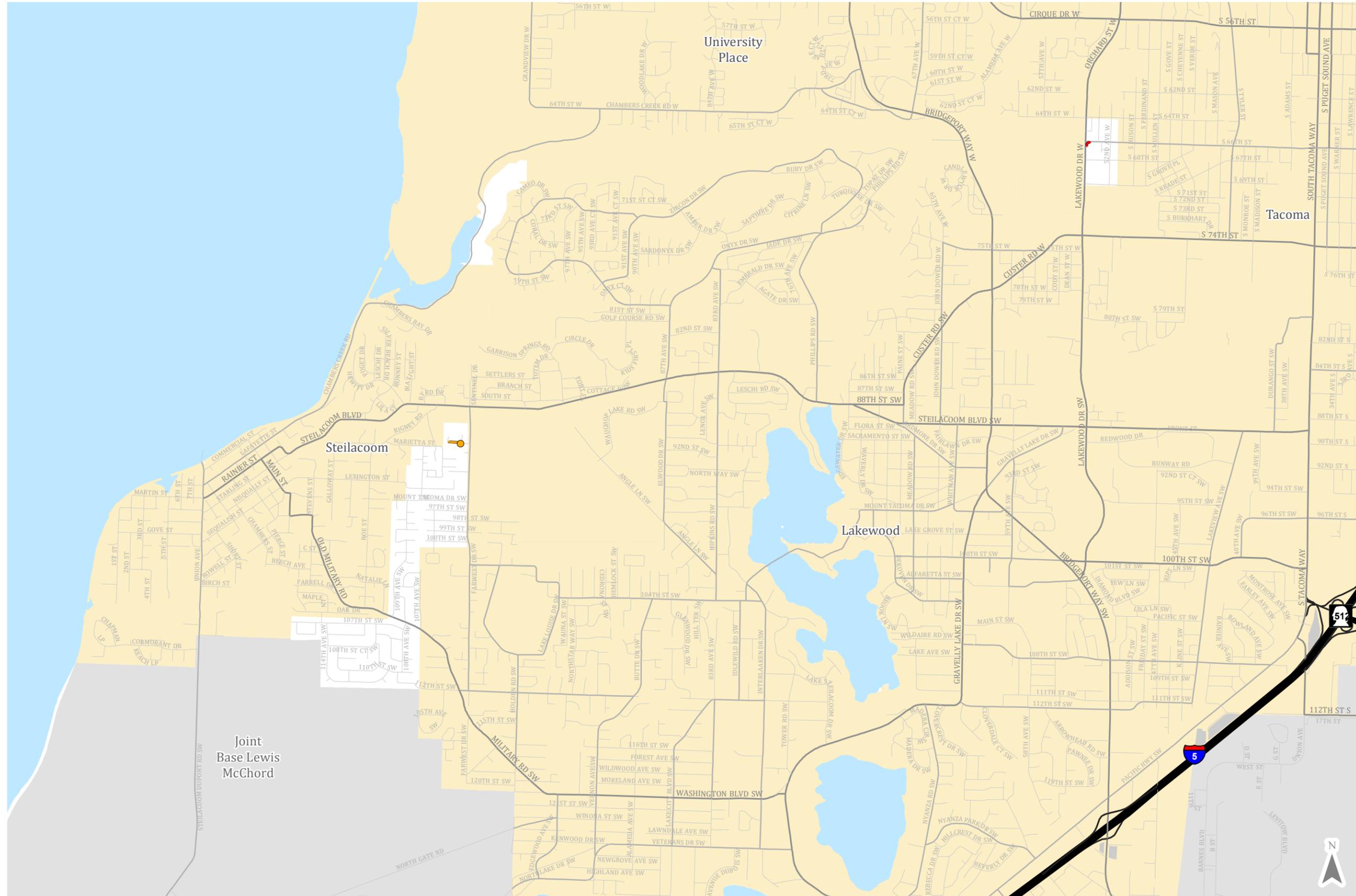


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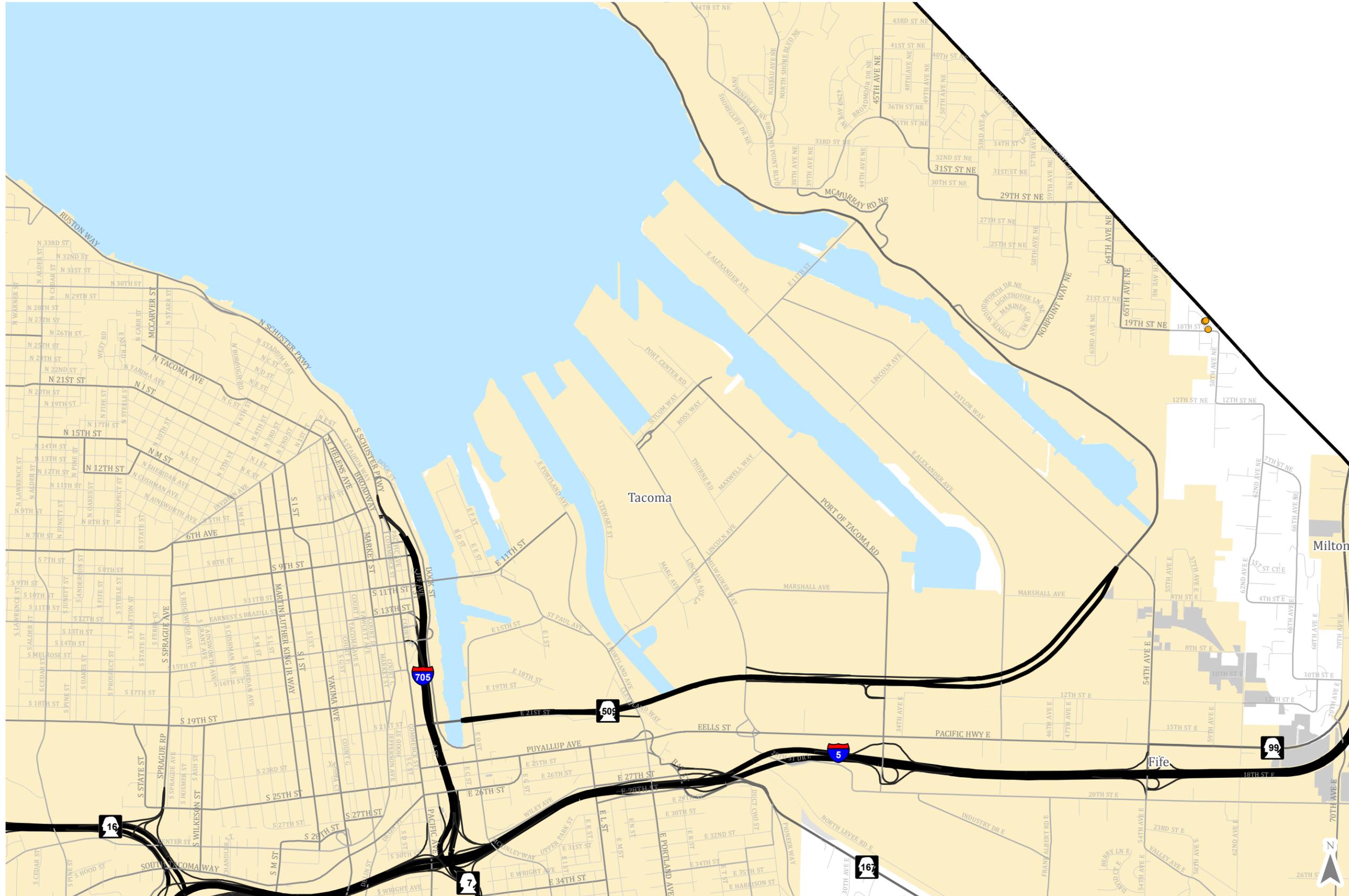
Sidewalk Priority Score

- Medium
- High

- Interstate Highway
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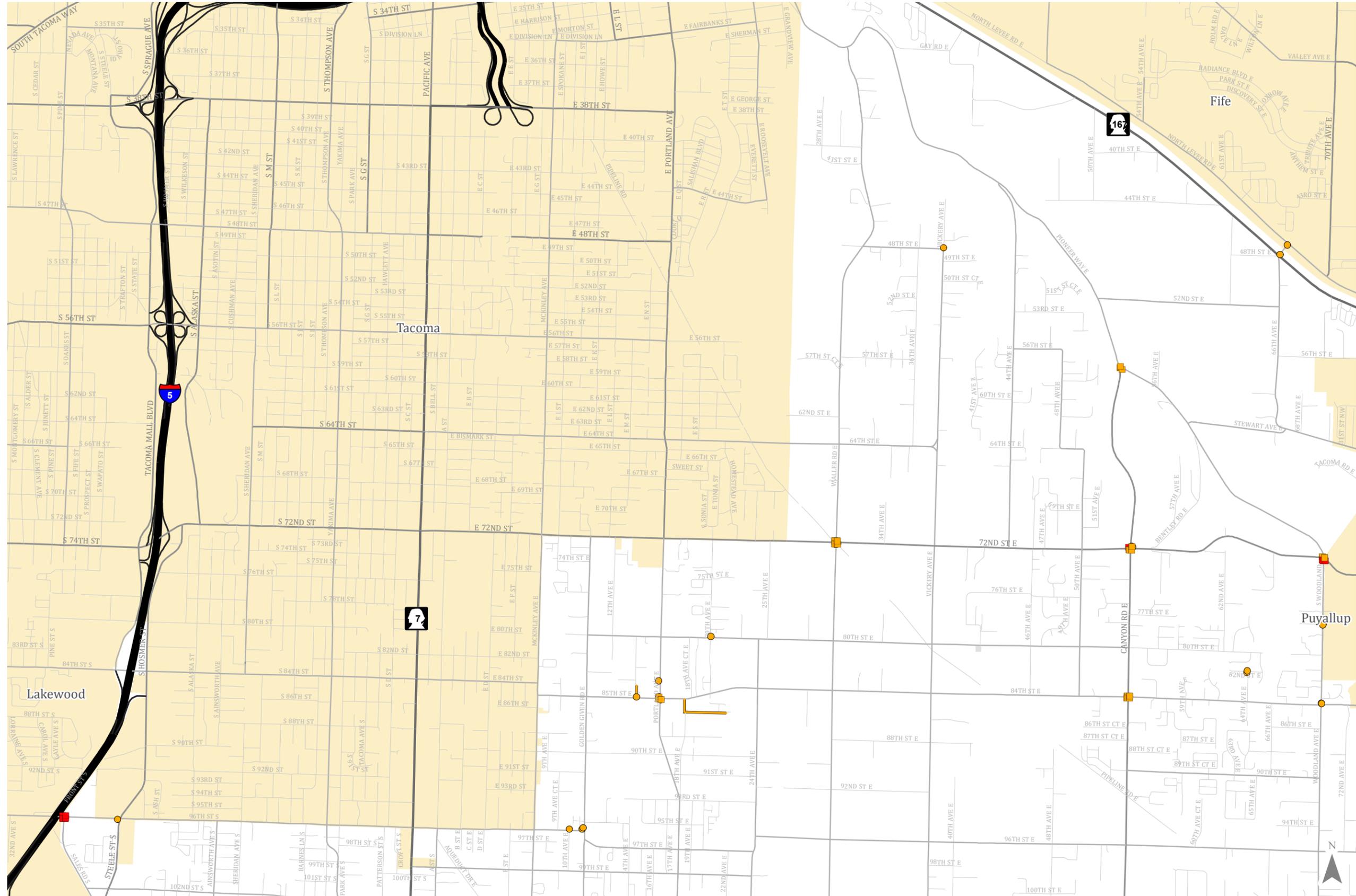
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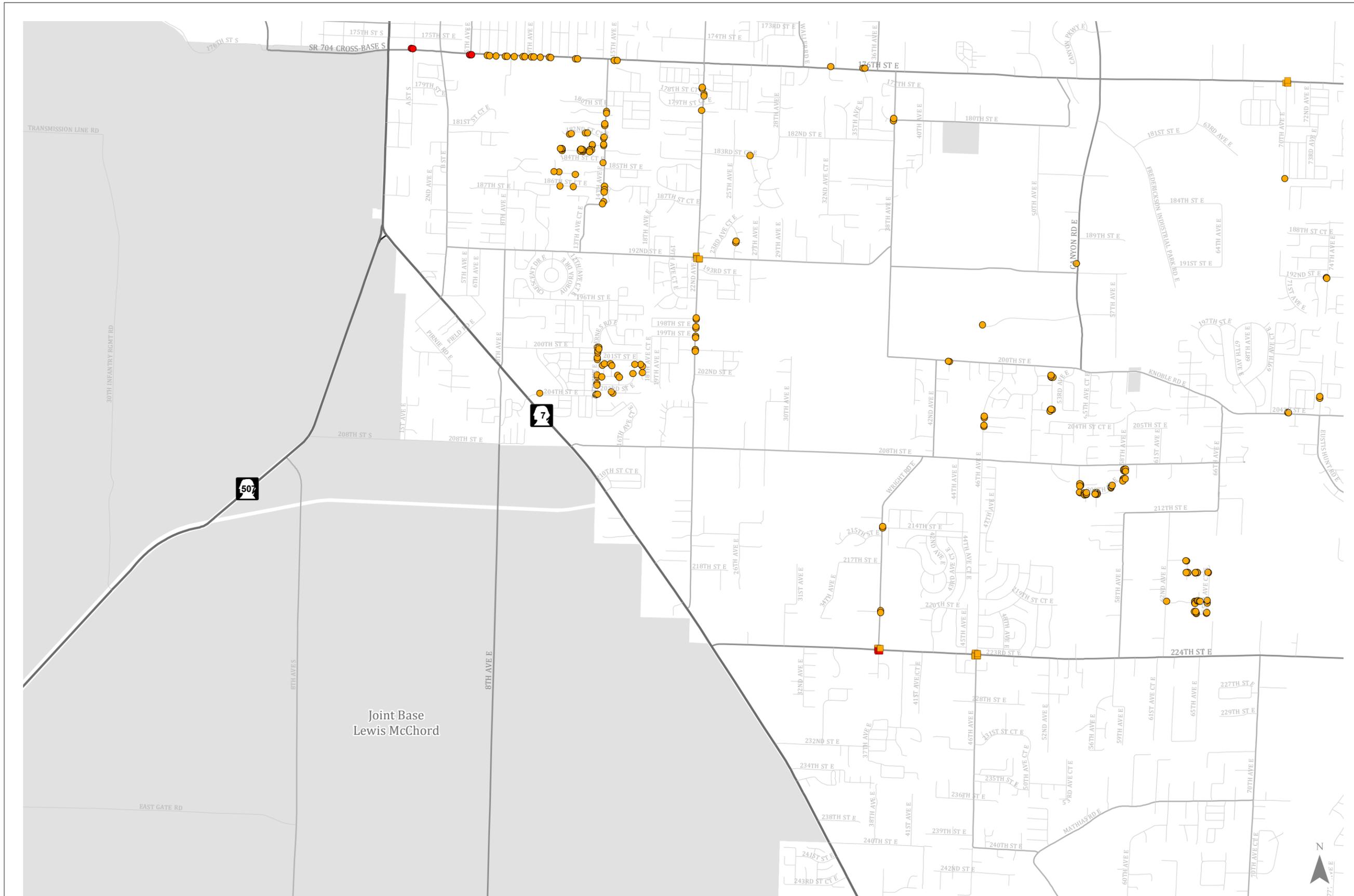
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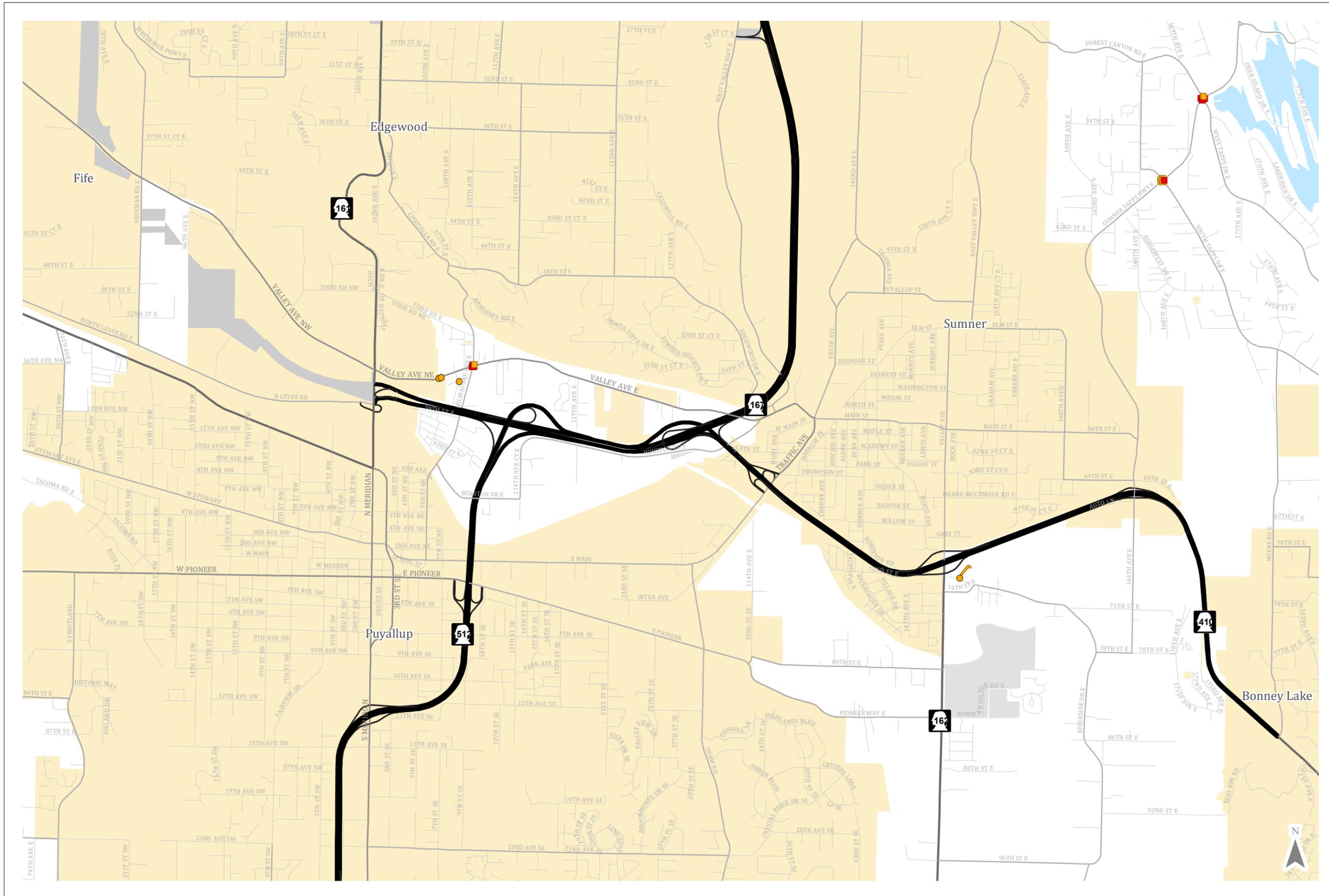
Sidewalk Priority Score

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- High

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Driveway Priority Score

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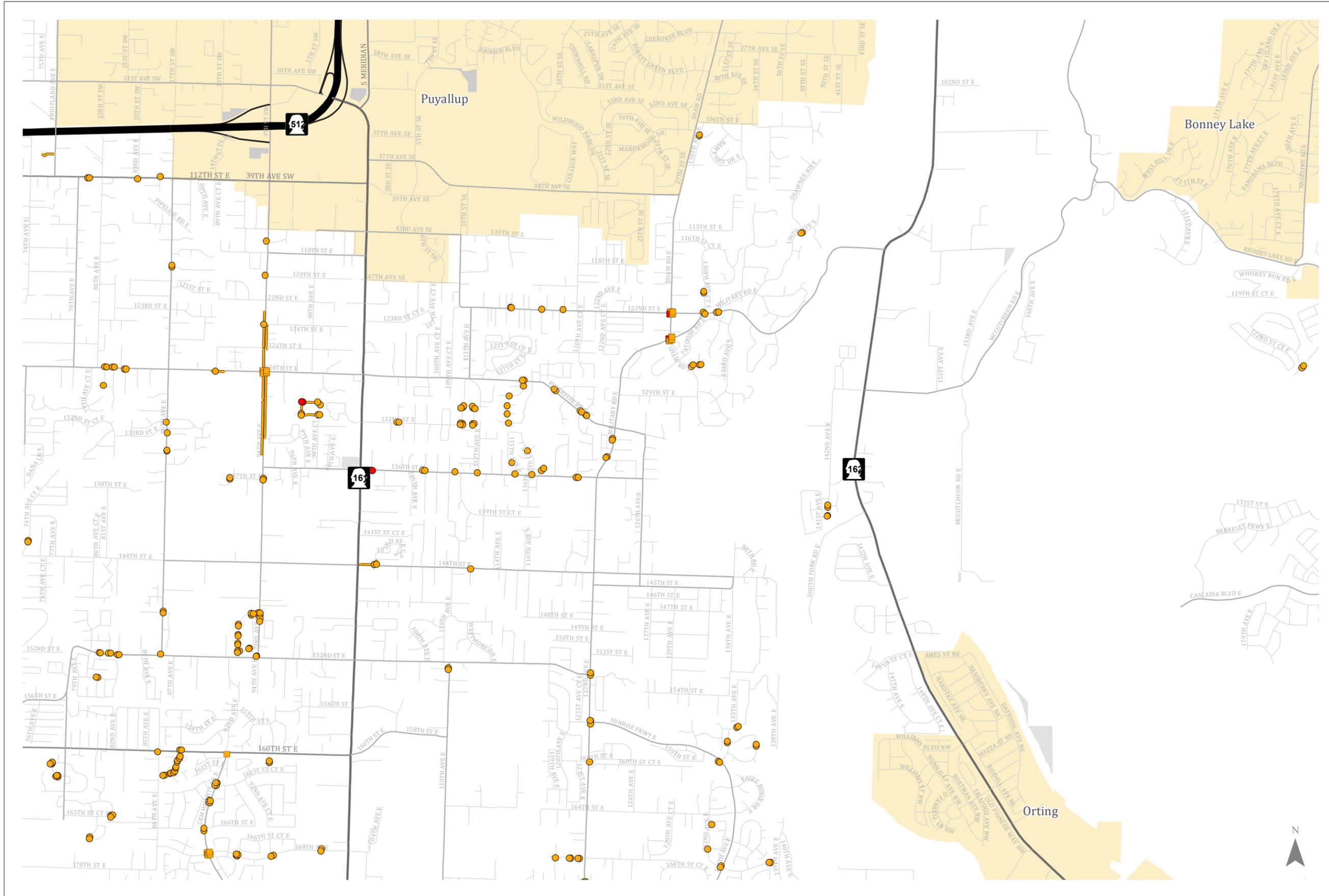
Sidewalk Priority Score

- Medium
- High

- Interstate
- Highway
- Highway Ramp
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Accessible Push Button Priority Score

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Curb Ramp Priority Score

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- High

Driveway Priority Score

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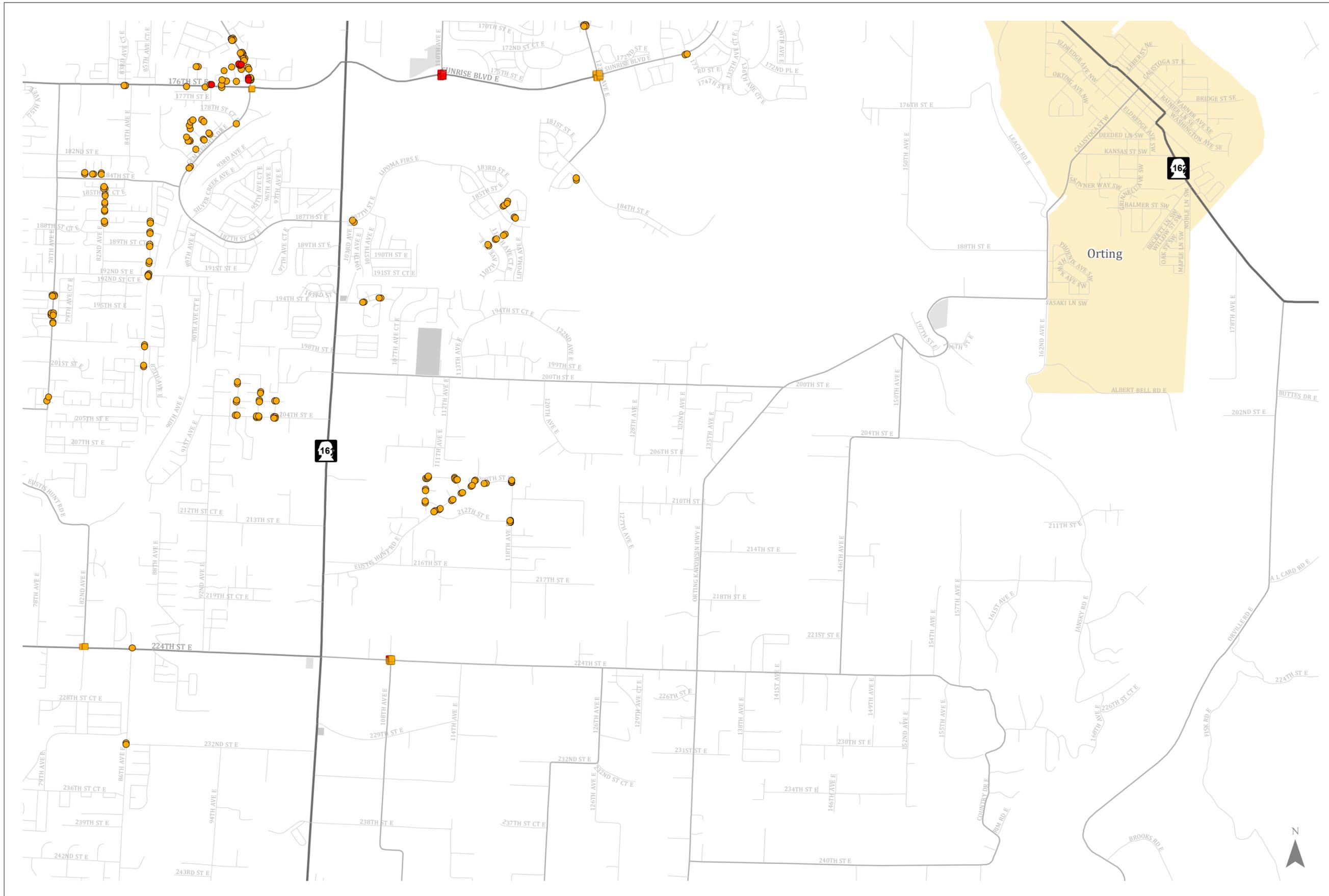
Sidewalk Priority Score

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- Interstate
- Highway
- Highway Ramp
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- Major Road
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#### Facilities

Accessible Push Button Priority Score

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Curb Ramp Priority Score

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Driveway Priority Score

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- ▲ High

Sidewalk Priority Score

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- High

Interstate Highway

Highway Ramp

Limited Access State Highway

Other State Highway

Major Road

Arterial

Residential

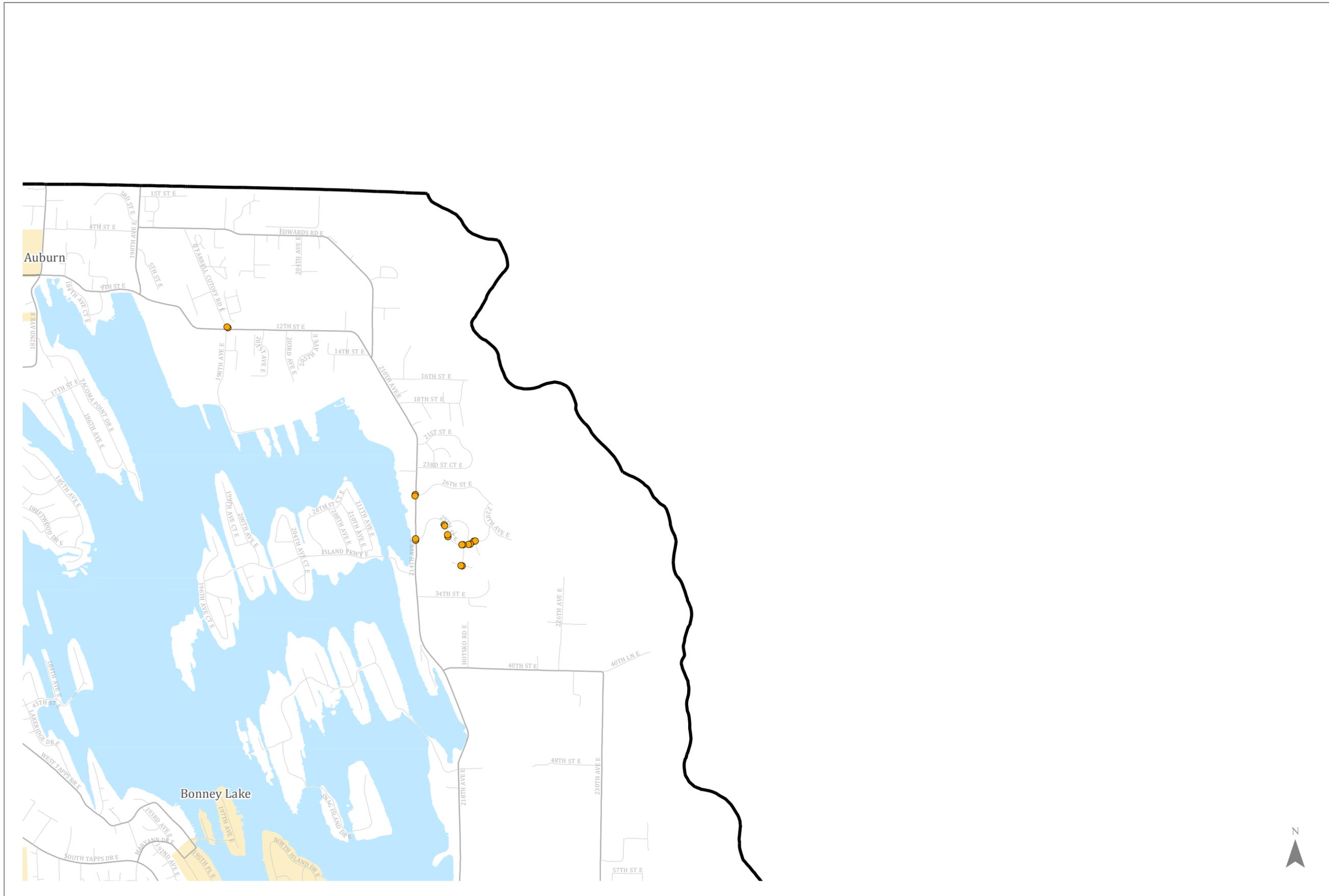
Cities

Puget Sound

Federal and State Lands

WSDOT Land





#### Facilities

Accessible Push Button Priority Score

- Medium
- High

Curb Ramp Priority Score

- Medium
- High

Driveway Priority Score

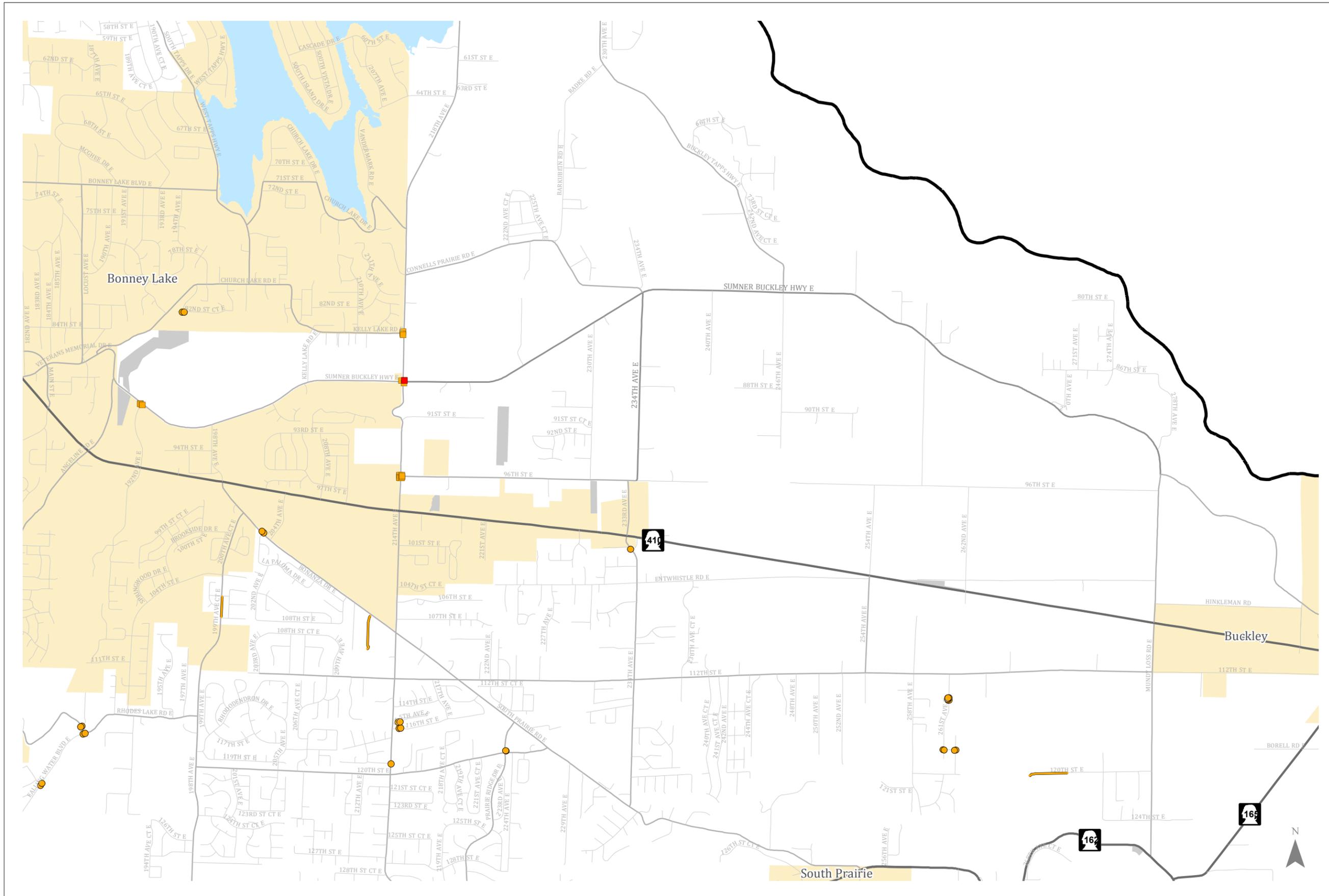
- ▲ Medium
- ▲ High

Sidewalk Priority Score

- Medium
- High

- Interstate
- Highway
- Highway Ramp
- Limited Access State Highway
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### Facilities

Accessible Push Button Priority Score

- Medium
- High

Curb Ramp Priority Score

- Medium
- High

Driveway Priority Score

- ▲ Medium
- ▲ High

Sidewalk Priority Score

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### Facilities

**Accessible Push Button Priority Score**

- Medium
- High

**Curb Ramp Priority Score**

- Medium
- High

**Driveway Priority Score**

- Medium
- High

**Sidewalk Priority Score**

- Medium
- High

---

**Roads**

- Interstate Highway
- Highway Ramp
- Limited Access State Highway
- Other State Highway
- Major Road
- Arterial
- Residential

**Other Features**

- Cities
- Puget Sound
- Federal and State Lands
- WSDOT Land



## **Appendix E –Cost Analysis and Program Funding**

## Cost Unit Price Information

Construction costs for upgrading facilities can vary depending on each individual improvement and conditions of each project site. Costs can also vary based on the type and size of project the improvements are associated with.

In 2015, an internal project was completed to determine the programmatic unit costs for sidewalk, driveway and curb ramp improvements that would be appropriate to use for the ADA Transition Plan. The information was developed from cost analysis of past county road projects and Washington State Department of Transportation (WSDOT) construction bid tabs over the previous two years. Basic right-of-way costs were derived from the per square foot estimates provided by the Pierce County Office of the County Engineer Division's Right-of-Way group for the 2015 Transportation Plan Update (TPU) cost model. This information was compiled into estimates on a per lineal foot (LF) or per upgrade/replacement basis. Exhibits B through D in Tables 1-3 are the result of this analysis.

The 2015 unit cost information was converted to 2020 unit costs using an inflation rate of 3% per year shown in Tables 4-7 for the assigned costs. Each non-compliant facility was run through a cost model and assigned an improvement cost based on the severity of the anticipated improvement as described in Tables 4-7.

The Pierce County Office of the County Engineer Division's Traffic Section provided 2020 unit cost data of approximately \$1,250 per push button for replacement and \$6,000 per push button if pole relocation was also required for the pedestrian push button to be ADA compliant. Unit costs can vary depending on the size of the project scope and other factors.

This appendix is one of the areas that will need to be re-evaluated when the ADA Transition Plan is updated to make sure the unit costs are still relevant for projections and project planning. At that time, there will be additional historical cost data to refine this process.

Table 1- Sidewalk Unit Cost (2015) Internal Study

EXHIBIT B - SIDEWALK COSTS					
<b>Low Level Impact</b>					
ITEM NO.	QUANTITY	UNITS	ITEM DESCRIPTION	UNIT PRICE	AMOUNT
1	1	L.F.	REMOVAL OF SIDEWALK	\$30.00	\$30.00
2	1	L.F.	5' CEMENT CONC. SIDEWALK	\$33.50	\$33.50
3	1	L.S.	PREPARATION & CLEANUP	\$0.50	\$0.50
4	1	L.S.	TRAFFIC CONTROL & OTHER	\$5.00	\$5.00
5	1	L.S.	Design/Permitting/Inspection/Contract Admin @ 30%		\$20.70
<b>TOTAL ESTIMATE PER LINEAL FOOT</b>					<b>\$89.70</b>
<b>Mid Level Impact</b>					
ITEM NO.	QUANTITY	UNITS	ITEM DESCRIPTION	UNIT PRICE	AMOUNT
1	1	L.F.	REMOVAL OF SIDEWALK	\$30.00	\$30.00
2	3	C.F.	GRADING: Cut/Fill	\$2.00	\$6.00
3	1	L.F.	6' CEMENT CONC. SIDEWALK	\$40.00	\$40.00
4	1	L.S.	PREPARATION & CLEANUP	\$0.50	\$0.50
5	1	L.S.	TRAFFIC CONTROL & OTHER	\$5.50	\$5.50
6	1	L.S.	Design/Permitting/Inspection/Contract Admin @ 30%		\$24.60
<b>TOTAL ESTIMATE PER LINEAL FOOT</b>					<b>\$106.60</b>
<b>High Level Impact</b>					
ITEM NO.	QUANTITY	UNITS	ITEM DESCRIPTION	UNIT PRICE	AMOUNT
1	1	L.F.	REMOVAL OF SIDEWALK	\$30.00	\$30.00
2	3	C.F.	GRADING: Cut/Fill	\$2.00	\$5.00
3	1	L.F.	5' CEMENT CONC. SIDEWALK	\$33.50	\$33.50
4	1	L.S.	PREPARATION & CLEANUP	\$0.50	\$0.50
5	1	L.S.	TRAFFIC CONTROL & OTHER	\$5.00	\$5.00
6	1	S.F.	R/W ACQUISITION	\$20.00	\$20.00
7	1	L.S.	Design/Permitting/Inspection/Contract Admin @ 30%		\$28.20
<b>TOTAL ESTIMATE PER LINEAL FOOT</b>					<b>\$122.00</b>

Table 2- Driveway Unit Cost (2015) Internal Study

EXHIBIT C - DRIVEWAY ENTRANCE COSTS					
<b>Low Level Impact</b>					
ITEM NO.	QUANTITY	UNITS	ITEM DESCRIPTION	UNIT PRICE	AMOUNT
1	30	L.F.	REMOVAL OF SIDEWALK	\$30.00	\$900.00
2	20	S.Y.	CEMENT CONC. APPROACH	\$65.00	\$1,300.00
3	1	L.S.	PREPARATION & CLEANUP	\$50.00	\$50.00
4	1	L.S.	TRAFFIC CONTROL & OTHER	\$100.00	\$100.00
5	1	L.S.	Design/Permitting/Inspection/Contract Admin @ 30%		\$705.00
<b>TOTAL ESTIMATE PER DW ENTRANCE</b>					<b>\$3,055.00</b>
<b>Mid Level Impact</b>					
ITEM NO.	QUANTITY	UNITS	ITEM DESCRIPTION	UNIT PRICE	AMOUNT
1	45	L.F.	REMOVAL OF SIDEWALK	\$30.00	\$1,350.00
2	30	S.Y.	CEMENT CONC. APPROACH	\$65.00	\$1,950.00
3	0.4	Ton	HMA FOR APPROACH	\$200.00	\$80.00
4	1	L.S.	PREPARATION & CLEANUP	\$100.00	\$100.00
5	1	L.S.	TRAFFIC CONTROL & OTHER	\$200.00	\$200.00
6	1	L.S.	Design/Permitting/Inspection/Contract Admin @ 30%		\$1,104.00
<b>TOTAL ESTIMATE PER DW ENTRANCE</b>					<b>\$4,784.00</b>
<b>High Level Impact</b>					
ITEM NO.	QUANTITY	UNITS	ITEM DESCRIPTION	UNIT PRICE	AMOUNT
1	45	L.F.	REMOVAL OF SIDEWALK	\$30.00	\$1,350.00
2	30	S.Y.	CEMENT CONC. APPROACH	\$65.00	\$1,950.00
3	3.3	Ton	HMA FOR APPROACH	\$200.00	\$660.00
4	1	L.S.	PREPARATION & CLEANUP	\$100.00	\$100.00
5	1	L.S.	TRAFFIC CONTROL & OTHER	\$200.00	\$200.00
6	1	L.S.	Design/Permitting/Inspection/Contract Admin @ 30%		\$1,278.00
<b>TOTAL ESTIMATE PER DW ENTRANCE</b>					<b>\$5,538.00</b>

Table 3- Curb Ramp Unit Cost (2015) Internal Study

EXHIBIT D - REBUILD EXISTING RAMP COSTS					
<b>Low Level Impact</b>					
ITEM NO.	QUANTITY	UNITS	ITEM DESCRIPTION	UNIT PRICE	AMOUNT
1	8	L.F.	REMOVAL OF SIDEWALK	\$30.00	\$240.00
2	1	EA	CURB RAMP TYPE 1, 2, OR 3	\$2,000.00	\$2,000.00
3	1	L.S.	PREPARATION & CLEANUP	\$50.00	\$50.00
4	1	L.S.	Design/Permitting/Inspection/Contract Admin @ 30%		\$687.00
<b>TOTAL ESTIMATE PER RAMP</b>					<b>\$2,980.00</b>
<b>Mid Level Impact</b>					
ITEM NO.	QUANTITY	UNITS	ITEM DESCRIPTION	UNIT PRICE	AMOUNT
1	15	L.F.	REMOVAL OF SIDEWALK	\$30.00	\$450.00
2	1	EA	CURB RAMP TYPE 1, 2, OR 3	\$2,000.00	\$2,000.00
3	12	L.F.	CEMENT CONC. CURB AND GUTTER	\$30.00	\$360.00
4	6	S.Y.	CEMENT CONC. SIDEWALK	\$60.00	\$360.00
5	0.3	Ton	HMA FOR APPROACH	\$200.00	\$60.00
6	1	L.S.	PREPARATION & CLEANUP	\$200.00	\$200.00
7	1	L.S.	Design/Permitting/Inspection/Contract Admin @ 30%		\$1,029.00
<b>TOTAL ESTIMATE PER RAMP</b>					<b>\$4,460.00</b>
<b>High Level Impact</b>					
ITEM NO.	QUANTITY	UNITS	ITEM DESCRIPTION	UNIT PRICE	AMOUNT
1	100	L.F.	REMOVAL OF SIDEWALK	\$30.00	\$3,000.00
2	1	EA	CURB RAMP TYPE 1, 2, OR 3	\$2,000.00	\$2,000.00
3	14	C.Y.	ROADWAY EXCAVATION	\$100.00	\$1,400.00
4	28	TON	GRAVEL BORROW INCL. HAUL	\$30.00	\$840.00
5	14	C.Y.	EMBANKMENT COMPACTION	\$15.00	\$210.00
6	8	TON	CRUSHED SURFACING BASE COURSE	\$50.00	\$400.00
7	6	TON	HMA CL. 1/2 IN. PG 64-22	\$180.00	\$1,080.00
8	100	L.F.	CEMENT CONC. TRAFFIC CURB AND GUTTER	\$30.00	\$3,000.00
9	LUMP SUM	L.S.	UTILITY COORDINATION	\$1,000.00	\$1,000.00
10	LUMP SUM	L.S.	SURVEYING	\$500.00	\$500.00
11	65	S.Y.	CEMENT CONC. SIDEWALK	\$60.00	\$3,900.00
12	1	EACH	ADJUST CATCH BASIN	\$500.00	\$500.00
13	1	L.S.	PREPARATION & CLEANUP	\$1,500.00	\$1,500.00
14	1	L.S.	TRAFFIC CONTROL & OTHER	\$2,500.00	\$2,500.00
15	100	S.F.	RAW ACQUISITION	\$20.00	\$2,000.00
16	1	L.S.	Design/Permitting/Inspection/Contract Admin @ 30%		\$6,549.00
<b>TOTAL ESTIMATE PER RAMP</b>					<b>\$30,380.00</b>
<b>[Factoring in the max. extent feasible= (30,380+4460)/2]-TOTAL ESTIMATE PER RAMP</b>					<b>\$17,420.00</b>

Table 4-2020 Sidewalk Unit Cost and Assignment Details

SIDEWALK	High Level	Mid Level	Low Level
<p>Improvement Assumptions and GIS Query</p> <p>*The unit cost for sidewalks were only applied to the estimated non-compliant proportion of the facility length.</p>	<p>Sidewalk widening requires right-of-way purchase averaging 1.0' for the full length of sidewalk, width of new sidewalk is 5', no structural work required (bridges with sidewalk, or retaining walls will be addressed on an individual basis later).</p> <p>Applies to a non-compliant sidewalk section with a width less than 5'.</p>	<p>Construct regular 6' sidewalk with slight grading, but no right-of-way issues.</p> <p>Applies to a non-compliant sidewalk section with a width greater than 6'.</p>	<p>Construct regular 5'-6' sidewalk with no right-of-way or grading issues.</p> <p>Applies to a non-compliant sidewalk section with a width greater than or equal to 5' and a width less than or equal to 6'</p>
Assigned Cost (LF)	\$141	\$124	\$104

Some of the data for sidewalk lengths and driveway facilities seemed to overlap. In order to adjust the cost to fix the issue, the non-compliant driveways that were within 25' of a non-compliant sidewalk were analyzed. A length was calculated for the potential double-counted section and subtracted from the overall sidewalk repair cost. This was assumed using the low impact linear foot cost for this adjustment. The reason for reducing sidewalk instead of driveway is the facility will likely be replaced by a driveway.

Table 5- 2020 Driveway Unit Cost and Assignment Details

<b>DRIVEWAYS</b>	High Level	Mid Level	Low Level
Improvement Assumptions and GIS Query	<p>The full width of the driveway approach and both ramps need to be replaced due to cross slope. Driveway reconstruction is assumed to have impacts outside of right-of-way requiring reconstruction easements. Assume paving of approximately 10' to match.</p> <p>Applies to a non-compliant driveway with a cross slope greater than 5%.</p>	<p>Full width of approach and both ramps need to be replaced due to cross slope. Impacts from approach replacement are not expected to extend beyond right-of-way. Assume 2' paving to match.</p> <p>Applies to a non-compliant driveway with a cross slope greater than 2% but less than or equal to 5%.</p>	<p>Both ramps need to be replaced due to some minor issues, the approach is fine, no work outside existing right-of-way.</p> <p>Applies to a non-compliant driveway with a cross slope less than 2%.</p>
Assigned Cost (ea.)	\$6,420	\$5,546	\$3,542

Table 6- 2020 Curb Ramp Unit Cost and Assignment Details

<b>CURB RAMPS</b>	High Level	Mid Level	Low Level
Improvement Assumptions and GIS Query	<p>Fixing the ramp will require significant regrading of one half of one leg of an intersection (the other half will be assigned to the cost of the ramp directly opposite of it) to fix crosswalk slopes. Assume moderate property acquisition (no full purchases or relocations) or small retaining walls. Assume paving of one half of the road (15' wide, 100' long) and full replacement of all curb, gutter and sidewalk around curb return.</p> <p>Applies to a non-compliant ramp with a crosswalk cross slope greater than or equal to 5.5% without stop control or crosswalk cross slope greater than or equal to 3.0% with stop control.</p>	<p>Ramp must be moved away from an obstruction necessitating a custom and complex ramp design. Assume extra design cost, replacing full curb return, curb, gutter and sidewalk, no right-of-way needed, no intersection regrading required, and only minimal paving of 2' directly adjacent to replaced gutter.</p> <p>Applies to non-compliant ramp with an obstruction or no turning space present, crosswalk cross slopes less than 5.5% without stop control and less than 3.0% with stop control.</p> <p>*Applies to all missing curb ramp locations.</p>	<p>Straightforward ramp replacement. Existing ramp is removed. New ramp is built with no significant design challenges or impacts to surrounding area.</p> <p>Applies to a non-compliant ramp with no obstructions, turning space present with the crosswalk cross slopes less than 3% for the controlled approach or less than 5.5% for uncontrolled or signal controlled approach. Designed to include any other non-compliant curb ramps not assigned by High and Mid Level criteria.</p>
Assigned Cost (ea.)	\$20,195	\$5,170	\$3,455

Table 7- 2020 APS Unit Cost and Assignment Details

APS	High Level	Mid Level	Low Level
Improvement Assumptions and GIS Query	<p>Push button pole requires relocation to comply with the MUTCD for the crossing. Includes the installation of the accessible push button and programming.</p> <p>Applies to non-compliant APS facilities with a distance to the curb that is greater than 10' or less than 1.5'.</p>	N/A- Only a high and low levels exist for this facility group.	<p>Installation of an accessible push button and programming.</p> <p>Applies to non-compliant APS facilities with a distance to the curb that is between 1.5' and 10'.</p>
Assigned Cost (ea.)	\$6,000		\$1,250

# Program Funding



# 2019-2024 TRANSPORTATION IMPROVEMENT PROGRAM

ROAD PROJECTS

	Project Phase	Prior Expend.	2019 ANNUAL PROGRAM				2019 Total	2020 Future Allocation				2021 Future Allocation				2022- 2024 Future Allocation				2019 - 2024 TOTAL
			Revenue Sources in \$1,000's					Revenue Sources in \$1,000's				Revenue Sources in \$1,000's				Revenue Sources in \$1,000's				
			Local	Federal	State	Other		Local	Federal	State	Other	Local	Federal	State	Other	Local	Federal	State	Other	
<b>Project Title:</b> <b>ADA IMPROVEMENT PROGRAM - 2019</b>  <u>Limits:</u> -Various Locations  <u>Scope Description:</u> -Improve accessibility of curb ramps  <u>Other project information:</u> Priority Group: <b>MP</b> Work Class: <b>4</b> CRP: <b>5881</b> Est. Total Cost: <b>250</b> Map ID: <b>Not on Map</b> Fully funded: <b>Yes</b> Map Page No.: <b>N/A</b> Council District: <b>3</b> Length (miles): <b>N/A</b> Elements: <b>G</b>	PE																			
	FE	50	20	CRF																20
	ROW																			
	CON		150	CRF																150
	<b>Total</b>	<b>50</b>	<b>170</b>																	<b>170</b>
<b>Project Title:</b> <b>ADA PROGRAM - 2019-2024</b>  <u>Limits:</u> -Countywide  <u>Scope Description:</u> -Develop a transition plan to prioritize repair, reconstruct or retrofit pedestrian facilities to bring them into compliance with federal law.  <u>Other project information:</u> Priority Group: <b>MPGM</b> Work Class: <b>3</b> CRP: <b>5850</b> Est. Total Cost: <b>6,400</b> Map ID: <b>Not on Map</b> Fully funded: <b>Yes</b> Map Page No.: <b>N/A</b> Council District: Length (miles): <b>N/A</b> Elements: <b>G,I,U</b>	PE	35																		
	FE	89	135	CRF			135	CRF		135	CRF			405	CRF					810
	ROW																			
	CON	363	100	CRF			1,000	CRF		1,000	CRF			3,000	CRF					5,100
	<b>Total</b>	<b>487</b>	<b>235</b>				<b>1,135</b>			<b>1,135</b>				<b>3,405</b>						<b>5,910</b>
<b>Project Title:</b> <b>BIRCH WY E</b>  <u>Limits:</u> -Mountain Side Dr E to the White River  <u>Scope Description:</u> -Culvert replacement  <u>Other project information:</u> Priority Group: <b>PRSV</b> Work Class: <b>4</b> CRP: <b>5838</b> Est. Total Cost: <b>1,400</b> Map ID: <b>668</b> Fully funded: <b>No</b> Map Page No.: <b>6</b> Council District: <b>1</b> Length (miles): <b>0.11</b> Elements: <b>B,D</b>	PE	97																		
	FE		101	CRF			18	CRF												119
	ROW																			
	CON																			
	<b>Total</b>	<b>97</b>	<b>101</b>				<b>18</b>			<b>18</b>										<b>119</b>

## **Appendix F – Accessible Facility Requests**

Citizens can utilize the ADA Transition Plan webpage to submit accessibility concerns about facilities in the public right-of-way. The report form includes fields for a phone number, location of the issue, and a drop down menu to select the problem. When picking a problem, select “Sidewalk Accessibility.” An additional box is available to provide a description of the issue, along with a check box if the requestor would like to be contacted.

Figures 1 and 2 show the ADA Transition Plan webpage with the “Report a Sidewalk Accessibility Issue” button as well as information needed after selecting the button/link. Providing ample detail in the request can be beneficial for the county to understand the issue and develop a solution.

A hard copy form is also provided in this appendix if written submission is preferred.

**ADA Transition Plan webpage:** [www.piercecountywa.gov/ADAtransition](http://www.piercecountywa.gov/ADAtransition)

**Request form:** [www.piercecountywa.gov/sidewalkrfa](http://www.piercecountywa.gov/sidewalkrfa)

Figure 1- ADA Transition Plan Webpage with Sidewalk Accessibility Button

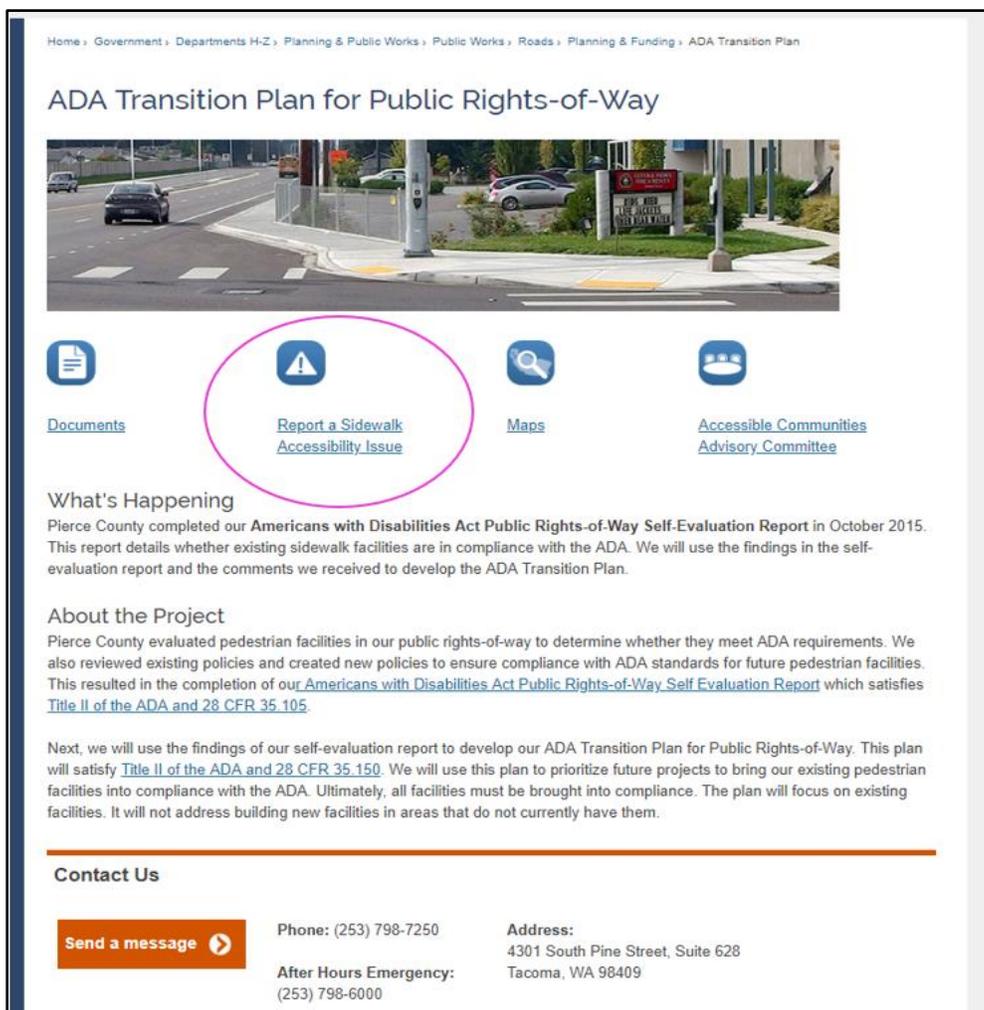


Figure 2- Request for Action from ADA Transition Plan Webpage



**Pierce County Planning & Public Works  
Transportation & Planning Division**

**Request for Action**

---

**Your Information ( required \*)**

Name:

\*Phone:  ex. (253) 555-5555

Alternate Phone:  ex. (253) 555-5555

Address:

City:

State: WA

Zip:

E-mail:

---

**Site Information**

Same As Originator

Parcel Number:

\*Site Address:

Cross Street:

\*City:

State: WA

Zip:

\*Proximity to the Road:

---

**Problem**

\*Please select problem type.

Additional Info:

---

Would you like to be contacted regarding this concern?



## Sidewalk Accessibility Request for Action

---

### Your Information (required\*)

Name:

\* Phone:  ex. (253) 555-5555

Alternate Phone:  ex. (253) 555-5555

Address:

City:

State:

Zip:

E-mail:

---

### Site Information

Same As Above

Parcel Number:

\* Site Address:

Cross Street:

\* City:

State:

Zip:

---

### Problem

Describe the concern:

---

Would you like to be contacted regarding this concern?

---

**Mail completed form to:**  
Pierce County Planning and Public Works  
Attn. Courtney Pompa  
2702 S 72nd St., Suite 109  
Tacoma, WA 98409

## **Appendix G – ADA Contact Information, Public Notice and County Grievance Procedure**

## ADA Title II Coordinator

Name: Martha Keogh

Address: Pierce County Human Resources  
4301 S Pine St.  
Suite 200  
Tacoma, WA 98409

Phone: (253) 798-2909

Fax: (253) 798-7489

TTY: (253) 798-3965

Relay Service: (800) 833-6384

E-mail: [martha.keogh@piercecountywa.gov](mailto:martha.keogh@piercecountywa.gov)

## ADA Public Rights-of-Way Transition Plan Lead

Name: Courtney Pompa

Address: 2702 South 42nd Street  
Suite 109  
Tacoma, WA 98409

Phone: (253) 798-2288

Fax: (253) 798-4233

E-mail: [Courtney.pompa@piercecountywa.gov](mailto:Courtney.pompa@piercecountywa.gov)



## NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), **Pierce County Government** will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

**Employment:** Pierce County Government does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the ADA. Please refer to [Pierce County's Equal Employment Opportunity Chapter 3.16](#).

**Effective Communication:** Pierce County Government will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Pierce County Government programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

**Modifications to Policies and Procedures:** Pierce County Government will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in Pierce County Government offices, even where pets are generally prohibited. Refer to [Service Animal Questions](#).

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of Pierce County Government, should contact the County's ADA Coordinator as soon as possible but no later than 48 hours before the scheduled event. See contact information listed below.

The ADA does not require Pierce County Government to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Pierce County Government will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

Complaints that a program, service, or activity of Pierce County Government is not accessible to persons with disabilities should be directed to:

ADA Coordinator, Pierce County Human Resources  
950 Fawcett Avenue, Suite 200, Tacoma WA  
98402-5603 253/798-2909 TDD 253/798-3965  
[PCHumanResources@co.pierce.wa.us](mailto:PCHumanResources@co.pierce.wa.us)

DOJADAGrievanceStatement.doc; Revised: 2015; 2017

# Grievance Procedure under The Americans with Disabilities Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by Pierce County Government. The Pierce County Government [Equal Employment Opportunity Policy](#) governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain specific information about the alleged discrimination. Also, the written complaint needs to be submitted **as soon as possible but no later than 60 calendar days after the alleged violation**. For additional information about the grievance process, please refer to the following:

[Notice under the Americans with Disabilities Act](#)  
[Questions & Answers Regarding the Grievance Process](#)

In order to assist Pierce County in obtaining the necessary information for your complaint, please follow these steps:

**Step 1** - Complete Pierce County's [ADA Complaint Grievance Intake form](#)

**Step 2** - Review your completed form – make sure you provided all the requested information. Attach any additional information you believe is pertinent.

**Step 3** - Sign and date the form

**Step 4** - Submit the form and any attachments to:

ADA Coordinator  
Pierce County Human Resources Department  
950 Fawcett Avenue, Suite 200  
Tacoma WA 98402-5603

**OR**

[PCHumanResources@co.pierce.wa.us](mailto:PCHumanResources@co.pierce.wa.us)

**Special Note:** Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

Within 15 calendar days after receipt of the complaint, the County's ADA Coordinator or designee will meet if feasible or confer by other means with the complainant to

discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting or contact, County's ADA Coordinator or designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of Pierce County Government and offer options for substantive resolution of the complaint.

If the response by the County's ADA Coordinator or designee does not satisfactorily resolve the issue, the complainant or designee may appeal the decision within 15 calendar days after receipt of the response to the Pierce County Human Resources Director or designee. The Human Resources Director or designee will immediately notify the County Executive regarding the ADA grievance appeal received. Please complete the [ADA Complaint Grievance Appeal form](#) and attach a copy of your initial complaint and grievance response from the County's ADA Coordinator and forward to:

Pierce County Human Resources  
Department Attn: Human Resources  
Director  
950 Fawcett Avenue, Suite 200  
Tacoma WA 98402-5603

**OR**

[PCHumanResources@co.pierce.wa.us](mailto:PCHumanResources@co.pierce.wa.us)

Within 15 calendar days after receipt of the appeal, the designated individual by the County Executive will meet or confer with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting or contact, the designated individual will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints and appeals received by Pierce County will be retained for at least three years.

**Appendix H –Design Standards, Procedures and Policies**

## Design Standards

Pierce County has a [Manual on Design Guidelines and Specifications for Road and Bridge Construction](#) as well as [standard drawings](#) in place to achieve ADA compliance for the public right-of-way. The design guidelines and standard drawings are utilized as a basis to meet ADA standards for county projects, developer projects or other projects taking place in the county. The design standards are reviewed on a regular interval and updated as necessary with new practices or as the ADA guidelines are refined. These guidelines and standard drawings are developed to comply with the 2011 PROWAG.

**Design Manual:** [www.co.pierce.wa.us/6223/Design-Manual](http://www.co.pierce.wa.us/6223/Design-Manual)

**Standard Drawings:** [www.piercecountywa.gov/1745/Standard-Drawings](http://www.piercecountywa.gov/1745/Standard-Drawings)

## Design Procedures

Aside from the design standards, the county has design procedures in place to efficiently reach ADA compliance for curb ramp design. A Pierce County Planning and Public Works Department's Procedure for Designing and Constructing Curb Ramps was adopted as an internal checklist to achieve ADA compliance.

In addition to the department's procedure, the WSDOT Design Manual procedures are another resource that can be followed for projects as they relate to pedestrian travel in the public right-of-way. Chapter 29 of WSDOT Local Agency Guidelines (LAG) is another resource for designing and working to achieve ADA compliance for public rights-of-way.

**WSDOT Design Manual:** [www.wsdot.wa.gov/Publications/Manuals/M22-01.htm](http://www.wsdot.wa.gov/Publications/Manuals/M22-01.htm)

**WSDOT LAG, Chapter 29:** [www.wsdot.wa.gov/publications/manuals/fulltext/M36-63/Lag29.pdf](http://www.wsdot.wa.gov/publications/manuals/fulltext/M36-63/Lag29.pdf)

# Procedure

## Designing and Constructing Curb Ramps

Approved By: Leticia M. Neal, P.E. and Jerry Bryant, P.E.

Effective Date: 9/27/2012

Revision Date: 8/24/2016

### Purpose:

Define coordination within the Office of the County Engineer divisions when designing and constructing curb ramps. The tasks involved will be completed during all phases of the project.

<b>Preliminary/Final Engineering Phase</b>	
<b>Design</b>	<ol style="list-style-type: none"> <li>1. <b>Designs</b> curb, gutter, ramps, sidewalks and landings to be:               <ul style="list-style-type: none"> <li>• <u>Sidewalks</u> – 1.5% cross slope.</li> <li>• <u>Curb/Gutter</u> –                   <ul style="list-style-type: none"> <li>○ The curb shall be designed to be depressed at the ramp or landing flush with the gutter at the flow line.</li> <li>○ Depressed curb shall be sloped at 2% towards the gutter.</li> </ul> </li> <li>• <u>Curb Ramps/Landings</u> –                   <ul style="list-style-type: none"> <li>○ <u>Curb Ramps</u>: 7.5% running slope and 1.5% cross slope.</li> <li>○ <u>Perpendicular Ramps (Type 1 PC)</u>: Ramps shall start at back of curb.</li> <li>○ <u>Parallel Ramps (Type 2 PC)</u>: Landing shall start at back of curb.</li> <li>○ <u>Landings</u>: 1.5% running and cross slope.</li> <li>○ <u>Flares (Type 1 PC)</u>: 9.5%, measured parallel to curb.</li> <li>○ Designing slopes less than ADA maximum allowable will compensate for staking and construction tolerances. However, using a ramp slope less than the ADA maximum will lengthen the ramp lengths. The landings will remain the same size.</li> </ul> </li> <li>• <b>Documents</b> ADA Curb Ramps design and location in <a href="#"><u>Maximum Extent Feasible (MEF) Curb Ramps Documentation</u></a> and <b>Includes</b> in project file.</li> </ul> </li> <li>2. <b>Designs</b> all ramp locations and provides details in contract plans. Detailed information shall include:               <ul style="list-style-type: none"> <li>• Station, offset, and elevation at PCs, PTs, and 1/4 points that are not near the other ramp points at both the flow line and back of walk lines.</li> <li>• Station, offset, and elevations at all corners of the ramps, landings, and flared sides.</li> <li>• Add station, offset, and elevation for any additional points needed to describe grade breaks and ensure ramps that comply with ADA to the Maximum Extent Feasible (MEF)</li> <li>• Elevations at pole base locations.</li> <li>• Use <i>Angled Back of Sidewalk</i> and <i>Radial Back of Sidewalk</i> charts, below, to show this information.</li> <li>• Fill out <a href="#"><u>Maximum Extent Feasible (MEF) Curb Ramps Documentation</u></a>, to be signed by the County Engineer.</li> </ul> </li> </ol>
<b>Design Project Lead</b>	<ol style="list-style-type: none"> <li>3. <b>Provides</b> curb ramp design information to Survey and Construction Sections Supervisors, via memorandum.               <ul style="list-style-type: none"> <li>• Curb ramp design should include all elements in Item No. 2.</li> <li>• Memorandum includes a deadline for feedback.</li> <li>• Entire plan set may not be necessary for this review.</li> <li>• Include the Special Provision describing a two-stage pour method in the content documents.</li> </ul> </li> </ol>
<b>Survey/ Construction Design</b>	<ol style="list-style-type: none"> <li>4. <b>Provides</b> feedback on the design information, via memorandum, to Design.</li> <li>5. <b>Includes</b> the following language on the ramp detail plan sheet:               <ul style="list-style-type: none"> <li>• As-built curb and gutter elevations shall be verified by the Contractor and Pierce County prior to ramp/sidewalk construction.</li> </ul> </li> <li>6. <b>Includes</b>, in Construction plans, graphic display of trapezoidal shape at signal/luminaire poles when Standard Drawings PC.J1.2, PC.J1.3, PC.J1.4, and PC.J1.9 apply.</li> </ol>



# Procedure

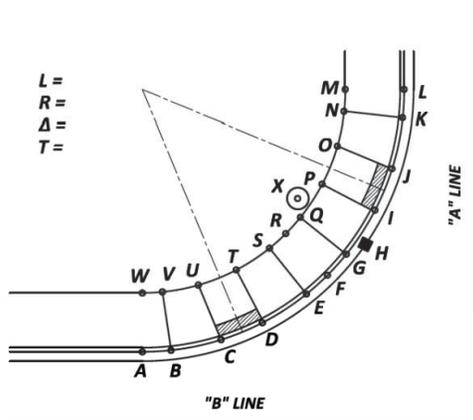
## Designing and Constructing Curb Ramps

Approved By: Leticia M. Neal, P.E. and Jerry Bryant, P.E.

Effective Date: 9/27/2012

Revision Date: 8/24/2016

Drawing: R:\PROGRAMS\CAE\_RESOURCES\ADMIN\PROCEDURES\STANDARD\PLANS\SHEETS\RAMPTEMPLATEDWG Layout Tab: LAYOUT1  
 Date: 04/22/2015 Time: 09:27:21 AM Plotted by: MOWINS



### RADIAL BACK OF SIDEWALK

**Note:** Elevation "X" is to the top of the pole foundation and not the top of sidewalk.

Use in combination with applicable details of Standard Drawings Sections F and J.

Alternate method to label points use "Number-Alignment letter (1-A)"

INTERSECTION POINT TABLE				
POINT	"A" LINE	"B" LINE	ELEV.	NOTE
A				FLOWLINE
B				RAMP, FLOWLINE
C				RAMP, FLOWLINE
D				RAMP, FLOWLINE
E				RAMP, FLOWLINE
F				FLOWLINE
G				RAMP, FLOWLINE
H				CB
I				RAMP, FLOWLINE
J				RAMP, FLOWLINE
K				RAMP, FLOWLINE
L				FLOWLINE
M				TOP OF SW
N				RAMP, TOP OF SW
O				RAMP, TOP OF SW
P				RAMP, TOP OF SW
Q				RAMP, TOP OF SW
R				TOP OF SW
S				RAMP, TOP OF SW
T				RAMP, TOP OF SW
U				RAMP, TOP OF SW
V				RAMP, TOP OF SW
W				TOP OF SW
X				TOP OF SIGNAL POLE FOUNDATION

# Policy Memo Adopting the 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way



Department Policy #1302  
Effective Date: 11/6/2015  
Last Revised:

Approved:

A blue ink signature of Brian J. Ziegler, P.E., written over a horizontal line.

Brian J. Ziegler, P.E., Director

## ADA Standards for Pedestrian Facilities in the Public Right-of-Way

Pierce County Public Works adopts the *Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way*, published July 26, 2011, as our Americans with Disabilities Act (ADA) standard for the public road right-of-way. This document is also known as Public Rights-of-Way Accessibility Guidelines (2011 PROWAG). All Pierce County Public Works manuals, standard drawings, and procedures shall comply with 2011 PROWAG where they concern pedestrian facilities in the public right-of-way.

PROWAG is a federal rule making proposed by the Architectural and Transportation Barriers Compliance Board (Access Board). The Federal Highway Administration (FHWA) supports its use. FHWA has pedestrian access oversight responsibilities over Federal, State, and local agencies that build and maintain roadways. The 2011 PROWAG has not been formally adopted by the Department of Justice (DOJ). When a final version of the guidelines is formally adopted by either DOJ or FHWA, this policy will be re-evaluated.

The 2011 PROWAG will guide development of pedestrian facilities in Pierce County's public road right-of-way to help ensure they are readily accessible to and usable by pedestrians with disabilities.

## Accessible Pedestrian Signal Policy

Pierce County has an Accessible Pedestrian Signal Policy in place to guide decisions for signal systems as it relates to ADA compliance. The policy reads:

*“Accessible Pedestrian Signals (APS) shall be installed and provided for existing signals for any substantive modification beyond normal maintenance issues. Examples of this would include new signal phasing (such as a new left turn phase or right turn overlap phase), the addition or deletion of a pedestrian phase, or the addition of a new lane.”*

## Maximum Extent Feasible (MEF) Procedures

There will be occurrences where meeting ADA standards is virtually impossible. In these instances, ADA standards will be met to the maximum extent feasible. This information will need to be documented to show efforts made and explain the limitation of meeting the standards. Maximum extent feasible (MEF) documentation will vary slightly by format but will be similar in content across county departments, utility providers, adjacent jurisdictions or private development projects.

When pursuing an MEF request, the requesting organization or department will need to document efforts made and explain why ADA standards cannot be met using the current outlined process. The expectations are that significant engineering efforts were exhausted, and the proposed solution contained within the requested MEF is reasonable for all ages and abilities. The internal county MEF process differs slightly from the private development process as the internal process is very detailed and acts as a compliance check. The county process for requesting an MEF starts with the following template on the next page. The county process highlights compliance and non-compliance of facilities. The MEF process for private development requires the engineer of record to only discuss facilities where ADA compliance wasn't possible and requires the engineer to stamp the request

Once received, the MEF request will be reviewed by applicable Pierce County staff. If the request is reasonable, staff will recommend approval of the MEF request to the County Engineer. If the County Engineer approves the MEF, then the project will continue as proposed. This process is similar for Development Engineering but approved by the county's Development Engineering Manager instead of the County Engineer. All approved MEF requests will be provided to the Office of the County Engineer to be tracked.

When updating Self-Evaluation data, a facility with an approved MEF will be treated as a compliant facility and not tracked as an asset to address with the ADA Transition Plan. This information will be managed as part of the Self-Evaluation data in GIS and the approval documentation will be retained as part of the project records and the ADA Transition Plan.

**PIERCE COUNTY PLANNING AND PUBLIC WORKS  
OFFICE OF THE COUNTY ENGINEER DIVISION  
TRANSPORTATION IMPROVEMENT SECTION**

**Maximum Extent Feasible (MEF) Curb Ramp Documentation**

**Project Description**

**Roadway Parameters**

Roadway	Road Class		Speed (mph)		Design Year ADT	Truck %
	Pierce County	Federal	Design	Posted		

**Existing Pedestrian Facilities**

- general description
- identify significant pedestrian generators if any

**Pedestrian Design Standards** – cover the following subjects

- discuss the criteria that apply to the pedestrian elements of the project that will be built to the Maximum Extent Feasible
- include reference(s) to the appropriate PROWAG sections(s) that cannot be met [including revision date]

**Proposal** - cover the following subjects

- What features will remain that meet ADA guidelines
- What features are being built to ADA guidelines
- What features are being built to the maximum extent feasible

**Justification**

- discuss what constraints / challenges there are to meet full ADA design

**Attachments**

- Vicinity map
- MEF Spreadsheet for Evaluating Existing Curb Ramps and Crosswalks and Documenting New Curb Ramps and Cross Walks. (Note: This spreadsheet must individually identify and evaluate the ADA characteristics of each existing ramp and crosswalk. Also, the spreadsheet must individually identify and document the ADA characteristics of each new ramp and crosswalk.)
- Plan sheets

**Approving Signature**

\_\_\_\_\_  
Brian D. Stacy, P.E., County Engineer

\_\_\_\_\_  
Date

## **Public Road ADA Maximum Extent Feasible Documentation Review Request for Private Development**

### A. Instructions

1. Maximum Extent Feasible (MEF) Documentation Review Requests shall only be made for altered facilities. MEF Documentation Review Request shall not be made for new facilities.
2. MEF Documentation Review Requests shall be submitted to Development Engineering staff any time that it is not technically feasible to design an altered pedestrian facility in the public right-of-way to fully comply with accessibility standards.
3. All features of a pedestrian facility that can be made accessible, shall be made accessible.
4. All features of a pedestrian facility that cannot be made fully accessible shall be designed to comply with accessibility standards to the maximum extent feasible.
5. MEF Requests shall not be approved where there is an attempt to justify acceptance of pedestrian facilities that were improperly designed or constructed.
6. Submit one MEF Documentation Review Request per application to the extent practicable. The supporting documentation can include multiple pedestrian facilities to be reviewed for the same project.
7. MEF documentation shall:
  - a. Clearly identify the location of each pedestrian facility that does not meet all accessibility standards.
  - b. Reference all accessibility standards that cannot be met for each pedestrian facility
  - c. Describe the circumstances that make it technically infeasible to full comply with each accessibility standard that cannot be met.
  - d. Document design alternatives that were considered in an attempt to comply with accessibility standards.
  - e. Describe how the proposed design meets accessibility standards such as the 2011 PROWAG or Pierce County Standard Drawing to the maximum extent feasible. How is this design the most accessible design that could be built at the proposed location?
  - f. Attach drawings, calculations, or other data to substantiate the request.
8. MEF documentation shall be stamped and signed by a professional engineer licensed to practice in the state of Washington.
9. The County Development Engineering Manager shall have sole authority to approve or deny MEF Documentation Review Requests.

### B. Definitions

“Accessible” refers to pedestrian facilities in the public right-of-way that comply with the Americans with Disabilities Act and the “accessibility standards”.

“Accessibility standards” refers to the standards and guidelines in the following documents:

- *Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right of Way (PROWAG)*, United States Access Board, 2011
- *ADA Standards for Accessible Design (ADAAG)*, United States Department of Justice, 2010

“Altered facility” refers to an existing facility in the public right-of-way that is changed in a way that affects or could affect pedestrian access, circulation, or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of an existing facility.

“Facility” means all or any portion of buildings, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

“New facility” means a proposed facility in the public right-of-way where none currently exists. This generally relates to construction of a new roadway where no road currently exists, or a new pedestrian access route in its own right-of-way. Building new sidewalk facilities adjacent to an existing road is considered an alteration of the existing roadway.

#### C. Request

Use attached standard format



# Pierce County

Department of Planning and Public Works

## MEF Review Request

Requestor's Name \_\_\_\_\_

Company Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone # (\_\_\_\_) \_\_\_\_\_ Fax # (\_\_\_\_) \_\_\_\_\_

Project Name \_\_\_\_\_

P. C. Development Engineering File No. \_\_\_\_\_

Site Development Application No. \_\_\_\_\_

Must be signed, stamped, and dated by a Professional Engineer.

### Project Description-

#### Existing Pedestrian Facilities – cover the following subjects

- Specify existing pedestrian facilities such as sidewalks, paths, push buttons, etc.
- Identify significant pedestrian generators near project if any

#### Pedestrian Design Standards – cover the following subjects

- Discuss the accessibility standards that apply to the pedestrian elements of the project that will be built to the Maximum Extent Feasible
- Include reference(s) to the appropriate PROWAG sections(s) that cannot be met [including revision date].

#### Proposal – cover the following subjects

- What features will remain that meet accessibility standards.
- What features are being built to accessibility standards.
- What features are being built to the maximum extent feasible.

**Justification** – cover the following subjects

- Describe the circumstances that make it technically infeasible to fully comply with each accessibility standard that cannot be met.
- Document design alternatives that were considered in an attempt to comply with accessibility standards.
- Describe how the proposed design meets accessibility standards to the maximum extent feasible. How is this design the most accessible design that could be built at the proposed location?

---

**List of Attachments**

- Vicinity map
  - Plan sheets
- 

**Approving Signature**

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Mitch Brells, P.E., Development Engineering Manager

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Date

## Other Design Considerations for Crossings

Data was collected as part of the Self-Evaluation Report for missing curb ramps at locations where a legal crossing could exist per [RCW 46.04.160](#). It was valuable to capture that data for analysis as part of the ADA Transition Plan and determine where major barriers to access might exist. [RCW 46.04.160](#) identifies “Crosswalk” as the portion of the roadway between the intersection area and a prolongation or connection of the farthest sidewalk line or in the event there are no sidewalks then between the inspection area and a line ten feet therefrom, except as modified by a marked crosswalk. [RCW 35.68.075](#) describes that a curb ramp serving one end of a crosswalk, shall be matched by another ramp at the other end of the crosswalk unless there is no curb or sidewalk at the other end of the crosswalk.

The number of missing curb ramps will evolve over time as curb ramps are constructed or missing ramps/crossings are determined to be unnecessary. A reason for this could be legally closing crossings for safety reasons to all pedestrians. Safety reasons could include a crossing being too close to a signalized intersection, access management or sight distance. No pedestrian shall cross a roadway at an unmarked crosswalk where an official sign prohibits such crossing per [RCW 46.61.240 \(6\)](#). In the event of prohibiting pedestrians from crossing, signage to restrict the crossing will be posted and comply to the guidelines in the [Manual on Uniform Traffic Control Devices](#) for Pedestrian Crossing Signs. Closing a crossing applies to all pedestrians and does not require curb ramps for that directional crossing. It is also a requirement to provide a detectable feature such as a chain, landscaping strips or other barrier at these locations. As determinations are made to close a crossing, the Self-Evaluation data will be updated to reflect the change.

**Appendix I – Glossary of Terms**

**Accessible facility:** A facility in the public right-of-way that complies with the Americans with Disabilities Act.

**Accessible Pedestrian Signals (APS):** Technology that communicates information about pedestrian signal timing in a non-visual format such as audible tones, speech messages, and/or vibrating surfaces.

**Alteration:** A change to an existing facility in the public right-of-way that affects or could affect pedestrian access, circulation, or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of an existing facility.

**Americans with Disabilities Act (ADA):** This civil rights legislation was passed in 1990 and became effective July 1992. The ADA sets design guidelines for accessibility to public facilities, including sidewalks and trails, by individuals with disabilities.

**Americans with Disabilities Act Accessibility Guidelines (ADAAG):** Also known as the 2010 ADA Standards for Accessible Design, the guidelines contain scoping and technical requirements for accessibility to buildings and public facilities by individuals with disabilities.

**Architectural Barriers Act (ABA):** This federal law requires facilities designed, built, altered or leased with federal funds to be accessible. The ABA marks one of the first efforts to ensure access to the built environment.

**Code of Federal Regulations (CFR):** An annual codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government.

**Cross Slope:** The grade that is perpendicular to the direction of pedestrian travel.

**Crosswalk:** Also known as a pedestrian street crossing, a crosswalk is a designated pedestrian access route across a roadway. Crosswalks are defined in Washington State law by [RCW 46.04.160](#). Crosswalks may be marked or unmarked.

**Curb Ramp:** A ramp that cuts through or is built up to the curb. Curb ramps can be perpendicular or parallel, or a combination of parallel and perpendicular.

**Detectable Warning Surface:** A surface feature, built in or applied to the pedestrian circulation path, to indicate the boundary between pedestrian and vehicular routes where there is a flush rather than curbed connection. Detectable warning surfaces help to warn people with visual impairments of potential hazards.

**Driveway:** A vehicular path serving as an access point to a public roadway from an adjacent property.

**Facility:** All or any portion of buildings, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

**Federal Highway Administration (FHWA):** A branch of the US Department of Transportation that administers the Federal-aid Highway Program and provides stewardship over the construction, maintenance and preservation of the nation's highways, bridges and tunnels.

**Grade:** A slope expressed as a ratio of rise to run, usually expressed in percent.

**Grade Break:** The line where two surface planes with different grades meet.

**Pedestrian Access Route (PAR):** A continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path.

**Pedestrian Circulation Route (PCR):** A prepared exterior or interior surface provided for pedestrian travel in the public right-of-way.

**Public Rights-of-Way Accessibility Guidelines (PROWAG):** A document, developed by the United States Access Board, which contains scoping and technical requirements to ensure that facilities for pedestrian circulation and use located in the public right-of-way are readily accessible to, and usable by, pedestrians with disabilities.

**Public Right-of-Way:** Public land or property, usually in interconnected corridors, that is acquired for or dedicated to transportation purposes.

**Revised Code of Washington (RCW):** The Revised Code of Washington is the compilation of all permanent laws of the State of Washington now in force.

**Running Slope:** The grade that is parallel to the direction of pedestrian travel.

**Sidewalk:** A portion of the public right-of-way between the roadway and the adjacent property that is improved and intended for use by pedestrians.

**The Rehabilitation Act, Section 504:** This section prohibits discrimination by any program or activity conducted by the federal government.

**Transportation Improvement Program (TIP):** The Transportation Improvement Program outlines Pierce County's future plans for transportation improvement projects and programs. The TIP is the primary budget work plan for building transportation improvement projects in Pierce County.

**United States Access Board (Access Board):** The Access Board is an independent federal agency that promotes equality for people with disabilities. The Access Board develops and maintains design criteria for the built environment, transit vehicles, telecommunications equipment, medical diagnostic equipment, and information technology. It also enforces accessibility standards that cover federally funded facilities. The Access Board is structured to

function as a coordinating body among federal agencies and to directly represent the public, particularly people with disabilities.

**United States Department of Justice (DOJ):** This federal executive department is responsible for the enforcement of the law and administration of justice.

**Vertical Surface Discontinuities:** Vertical differences in level between two adjacent surfaces.

## Appendix J – References

## **Laws and Codes**

Americans with Disabilities Act, U.S. Access Board

<https://www.access-board.gov/the-board/laws/americans-with-disabilities-act-intro>

Architectural Barriers Act of 1968, U.S. Access Board

<https://www.access-board.gov/the-board/laws/architectural-barriers-act-aba>

Code of Federal Regulations Title 28 Part 35-Nondiscrimination on the Basis of Disability in State and Local Government Services, Office of the Federal Register

<https://www.ecfr.gov/cgi-bin/text-idx?SID=065a5f0ae6b8f4df56a78305da57c4ce&mc=true&node=pt28.1.35&rgn=div5>

Revised Code of Washington (RCW)

<https://app.leg.wa.gov/RCW/default.aspx>

RCW 35.68.075- Curb ramps for persons with disabilities-Required-Standards and Requirements

RCW 36.80.030 - Duties of engineer

RCW 46.04.160-Crosswalk

RCW 46.61.240- Crossing at other than crosswalks

Section 504 of the Rehabilitation Act, U.S. Access Board

<https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/144-public-rights-of-way-guidelines/regulatory-assessment/724-introduction>

## **Report Formatting/Templates/Examples**

*ADA Best Practices Tool Kit for State and Local Governments*

<https://www.ada.gov/pcatoolkit/abouttoolkit.htm>

*ADA Transition Plan Template*, Ohio Department of Transportation

<http://www.dot.state.oh.us/Divisions/Planning/LocalPrograms/LTAP/Pages/ADA-Transition-Plan.aspx>

## Standards/Design Guidance

*Department of Justice/Department of Transportation Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing*, USDOJ and USDOT, July 2013  
<https://www.ada.gov/doj-fhwa-ta.htm>

*Manual on Uniform Traffic Control Devices, (MUTCD) for Streets and Highways* 2009 Edition, USDOT, FHWA <https://mutcd.fhwa.dot.gov/>

*Public Right-of-Way Accessibility Guidelines (PROWAG)*, U.S. Access Board, July 26, 2011  
<https://www.access-board.gov/attachments/article/743/nprm.pdf>

*QUESTIONS & ANSWERS Supplement to the 2013 DOJ/DOT Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements To Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing*, USDOJ and USDOT, December 2015  
<https://www.ada.gov/doj-fhwa-ta-supplement-2015.html>

*Design Manual*, M 22-01.16, Pedestrian Facilities Chapter 1510, WSDOT  
<https://www.wsdot.wa.gov/publications/manuals/fulltext/M22-01/1510.pdf>

*Local Agency Guidelines Manual*, Chapter 29, 2019, WSDOT  
<https://www.wsdot.wa.gov/publications/manuals/fulltext/M36-63/Lag29.pdf>

*Manual on Design Guidelines and Specifications for Road and Bridge Construction in Pierce County*, Pierce County  
<https://www.co.pierce.wa.us/6223/Design-Manual>

*Pierce County Standard Drawings*, Pierce County  
<https://www.co.pierce.wa.us/1745/Standard-Drawings>

*Standard Plans for Road, Bridge, and Municipal Construction (Standard Plans)*, M-21-01, WSDOT  
<https://www.wsdot.wa.gov/Design/Standards>