

City of Duvall

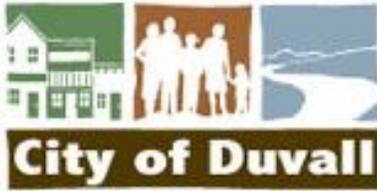
ADA TRANSITION PLAN



SEPTEMBER 2018

City of Duvall

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CITY OF DUVALL

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Executive Summary

This Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan establishes the City of Duvall's ongoing commitment as an all-inclusive community to providing equal access for all. In developing this plan, the City has undertaken a comprehensive evaluation of its right-of-way facilities and programs to determine what types of access barriers exist for individuals with disabilities. This plan will be used to help guide future planning and implementation of necessary accessibility improvements.

Both the Self-Assessment and the Transition Plan are federally mandated requirements of Title II of the ADA legislation. Title II requires that all government agencies provide equal access to programs and services they offer. While the ADA applies to all aspects of government services, this document focuses exclusively on public rights-of-way which include sidewalks, curb ramps and pedestrian push buttons. The City is required to complete a self-assessment but, with less than 50 employees, is not required to complete a transition plan. However, in efforts to create a more inclusive and accessible environment, this document was created.

This Plan summarizes the Self-Assessment, which includes an accessibility assessment of pedestrian facilities as well as practices and procedures which relate to them such as curb ramp design standards. It also contains a Transition Element, which identifies a schedule for the removal of barriers and identifies how the City will address requests for accommodations in a consistent manner.

Based upon the self-assessment, planning-level cost estimates and available financial resources, the City anticipates the removal of maintenance barriers including, but not limited to, horizontal and vertical discontinuities along with obstacles, within the first five years of the Plan's adoption.

The City's objective is to remove high priority structural barriers associated with sidewalks and curb ramps over the next 20 years, in association with the Transportation Improvement Program (TIP) projects summarized in the City's Transportation Plan (City of Duvall, 2017). In addition, the City is committed to ensuring continued ADA compliance for all capital improvement projects, private development, and any other right-of-way construction projects.

1 Introduction

1.1 Plan Requirements

The Americans with Disabilities Act (ADA) was enacted on July 26, 1990, and provides comprehensive civil rights protections to persons with disabilities in the areas of employment, state and local government services, and access to public accommodations, transportation, and telecommunications.

State and local government agencies are required to have an ADA self-assessment and transition plan when they grow beyond a threshold of 50 full-time equivalent employees. The City does not meet this minimum and is only obligated to implement an ADA self-assessment. However, in efforts to create a more inclusive and accessible environment, the City developed this ADA Transition Plan. Accessibility requirements extend to all public facilities; however, the scope of this Plan is focused solely on accessibility within the public right-of-way. Lack of an ADA Transition Plan can prompt legal action from the Department of Justice, which oversees federal ADA compliance or can result in loss of Federal Highway Administration grants for transportation projects.

There are five titles or parts to the ADA of which Title II is most pertinent to travel within the public right-of-way. Title II of the ADA requires Public Entities to make their existing “programs” accessible “except where to do so would result in a fundamental alteration in the nature of the program or an undue financial and administrative burden.” Public rights-of-way are part of the City’s program.

This effort was initiated by the City of Duvall to satisfy the requirements of ADA Title II Part 35, Subpart D – Program Accessibility § 35.150 (d)(3) which states:

The plan shall, at a minimum—

- i. Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- ii. Describe in detail the methods that will be used to make the facilities accessible;
- iii. Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year;
- iv. Indicate the official responsible for implementation of the plan.

The US Access Board is an independent federal agency created in 1973 to ensure access to federally funded facilities.

The US Access Board’s Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way, or PROWAG, was published for comment in 2011 but has not been adopted. Despite this delay, many cities currently use the 2011 proposed guidelines as their standards. When PROWAG is eventually adopted by United States Department of Justice (USDOJ), it will become an amended section to the 2010 ADA Standards, which is the document where all federal ADA standards are collectively documented. The facilities evaluated under this Plan were compared to the 2011 PROWAG.

Other City facilities such as buildings, playgrounds, and pools are subject to Title II program accessibility requirements but are governed under other ADA standards, not the PROWAG.

1.2 Plan Structure

The structure of this Plan was organized to closely follow federal ADA transition plan requirements. This includes:

Chapter 2- Documents self-assessment findings including physical barriers as well as practices or design standards that result in accessibility barriers.

Chapter 3- Public engagement efforts.

Chapter 4- Describes both programs and mechanisms the City will use to remove accessibility barriers and identifies detailed recommendations the City should implement to remove accessibility barriers moving forward. One of these recommendations includes appointment of an official responsible for implementation of this Transition Plan.

Chapter 5- Outlines a schedule for the transition plan, including prioritization of projects, planning level cost estimates and potential funding sources.

Chapter 6- Provides the City with a location to store important and evolving Plan information such as where and how this Plan should be accessible, annual performance tracking, identification of the official responsible, and other items that will change over time.

Chapter 7- References

Best practices were identified and incorporated throughout the planning process beginning with the Scope of Work.

Several appendix items are included separately:

Appendix A – Open House Materials

Appendix B – Barrier Audit

Appendix C – Cost Estimate Backup

Appendix D – Maximum Extent Feasible Documentation Template

Appendix E – Grievance Process

Appendix F – Accessible Pedestrian Signals (APS) Policy

Appendix G – Data Collection Inventory

2 Self-Assessment

Title II of the Americans with Disabilities Act (ADA) requires that jurisdictions evaluate services, programs, policies, and practices to determine whether they are in compliance with the nondiscrimination requirements of the ADA.

This section describes the data collection process and resulting inventory of sidewalk and curb ramp facilities within the City's rights-of-way. Transpo Group and City staff worked in coordination throughout the self-assessment process to inventory the existing sidewalk and curb ramp facilities in both a cost-effective and accurate way. The inventory and self-assessment are described in the following sections.

2.1 Policy

The City primarily addresses requirements for planned pedestrian facilities in the Public Works Development and Design Standards (PWDDS, City of Duvall, 2013), Transportation Element (2017), City of Duvall Complete Streets Policy (City of Duvall, 2016), and in the City of Duvall Municipal Code (DMC). To determine what ADA programs, policies, and practices are currently being implemented, the previously mentioned sources as well as Puget Sound Regional Council (PSRC) Transportation 2040 (PSRC, 2010) and Countywide Planning Policies (King County, 2012) were reviewed.

2.1.1 Method

The documents mentioned above were reviewed for content involving existing ADA programs, policies, and practices including any PSRC or county requirements that may be in place. ADA-related content was then

compiled to see how they compare to one-another. ADA practices and designs are discussed in section 2.2.

2.1.2 Findings

The DMC contains one code pertaining to ADA compliance and design. DMC 14.44.140 states that pedestrian circulation, access and design should be usable by mobility impaired persons and shall be designed and constructed to be easily located by the sight impaired pedestrian by either grade change, texture or other equivalent means. The City's Complete Streets Policy (City of Duvall, 2016) also addresses requirements for ADA accessibility and "creation of complete streets that will result in increased access, mobility, and health for all users". In addition, intent to address citywide ADA concerns can also be found in other documents, such as the Transportation Element of the City's Comprehensive Plan. Policy TI.11 of the Transportation Element specifically states that ADA improvements shall be expanded throughout the City's transportation system. The Transportation Element number 1 goal is to provide transportation infrastructure that enhances the quality of life in existing and new neighborhoods, is safe, and is functional for all users.

2.2 Practices and Design Standards

Practices and design standards that meet ADA standards are essential to ensure new or improved pedestrian facilities are accessible and that these improvements contribute to the removal of barriers throughout the City. This section

summarizes a review of City practices and design standards for barriers and includes major findings of this work. Complete documentation of this work can be found in Appendix B. The audit was conducted in August of 2017.

2.2.1 Method

The City maintains adopted PWDDS for pedestrian facilities. These standards are used for City funded projects as well as privately designed and constructed projects within the public right-of-way. Street design standards included in the PWDDS (City of Duvall, January 2013) were audited for compliance with ADA guidelines found in Public Rights-of-Way Accessibility Guidelines (US Access Board, 2011), Washington State Department of Transportation (WSDOT) Design Manual (WSDOT, 2013), and WSDOT Field Guide for Accessible Public Right-of-Way (WSDOT, 2012).

2.2.2 Findings

As a result, the audit identified a number of changes to the current City standards are recommended to comply with ADA requirements. These recommendations are grouped into four categories: Sidewalks, Crosswalks, Curb Ramps, Signals, and Other Pedestrian Areas and can be found in Appendix B.

2.3 Physical Barrier

2.3.1 Data Collection

The self-assessment included a robust data collection effort that included five different attributes for sidewalks, 20 attributes for curb ramps, 13 attributes for signal push buttons, three for crosswalks, and eight attributes for barriers/hazards. Attributes were collected in the field with a team of two trained staff that covered ADA facilities

within the City over a four-week period. The following sections describe the methodology for collecting the self-assessment data.

2.3.1.1 Geodatabase Development

Transpo Group and City staff developed an aerial-photo based geodatabase in April and May 2017. The geodatabase included mapped sidewalk and other Pedestrian Accessible Route (PAR) features within City rights-of-way. The geodatabase included physical and barrier attributes to be utilized during field data collection at the City's sidewalks, curb ramps, and signal push-buttons.

2.3.1.2 Field Training

Transpo Group trained IDAX staff to conduct data inventory using hand-held data tablets with the Geographic Information System (GIS) geodatabase information.

IDAX staff then conducted field and data collection in August 2017 under Transpo Group supervision to ensure consistent and accurate measurement of sidewalk and curb ramp as well as proper recording of information using a GIS database.



Data collection in the field

2.3.1.3 Process

Data collection staff were provided hand-held data tablets with the Collector application for GIS installed, tape measure (to measure sidewalk and curb ramp dimensions), and a smart level to efficiently and accurately measure sidewalk and curb ramp slopes. For sidewalks, cross-slopes were measured at each end of the segment and once in the middle. The predominant sidewalk width was recorded for the length of the block from one intersection to the next. In addition, a separate database was developed to inventory specific sidewalk barriers including:

- Horizontal and Vertical Discontinuities
- Fixed, Movable, or Protruding Objects
- Non-Compliant Driveways

Each existing curb ramp or street corner with missing curb ramps were recorded individually. The worst measure for accessibility was recorded when measures of the same attribute, such as a flare slope (each ramp has two flares), differed at a ramp. The physical inventory included;

- over 29 miles of existing sidewalks
- approximately 573 curb ramps
- approximately 24 signal push-buttons
- approximately 306 crosswalks

2.3.1.4 Quality Control

Pre-planning for the physical inventory effort included the identification of regular quality control and evaluation of the raw data. Initial review of the raw data was completed by Transpo Group. Data discrepancies or errors, including missing data, were identified and coordinated with staff to re-inventory problem areas. As with all manual data collection, a few small inconsistencies occurred, mainly regarding default values when inputting inventory. Secondary data collection efforts to replace questionable or missing data were conducted and addressed the most significant issues.

2.3.2 Findings

The following sections detail the primary barriers inventoried and analyzed for ADA compliance. State and Federal regulations dictate that curb ramps and sidewalks be ADA compliant. The findings conclude that a majority of the pedestrian curb ramp and sidewalk facilities need improvement to meet requirements.

2.3.2.1 Curb Ramps

The majority of the existing curb ramps are non-compliant based on current ADA requirements. The data surveyed for verifying curb ramp compliance was divided into two overarching categories: major non-compliant and minor non-compliant. The findings conclude that most of the curb ramps in the City are non-compliant based on major non-compliance criteria (Figure 2-1 and Figure 2-2). Major non-compliance is often primarily attributable to three core criteria:

- The ramp width is too narrow (Figure 2-3)
- The ramp running and cross slope are too steep (Figure 2-4 and 2-5)
- Receiving curb ramp is missing (Figure 2-6)

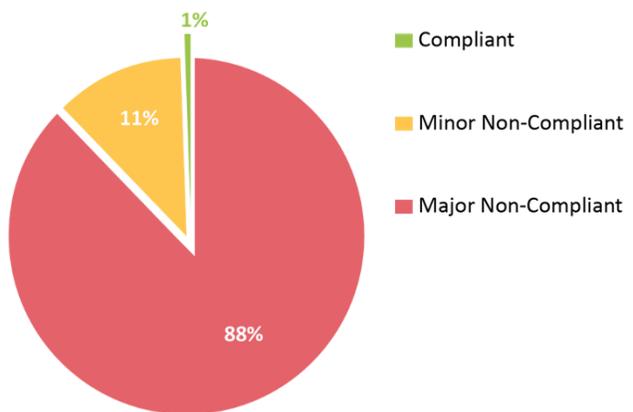
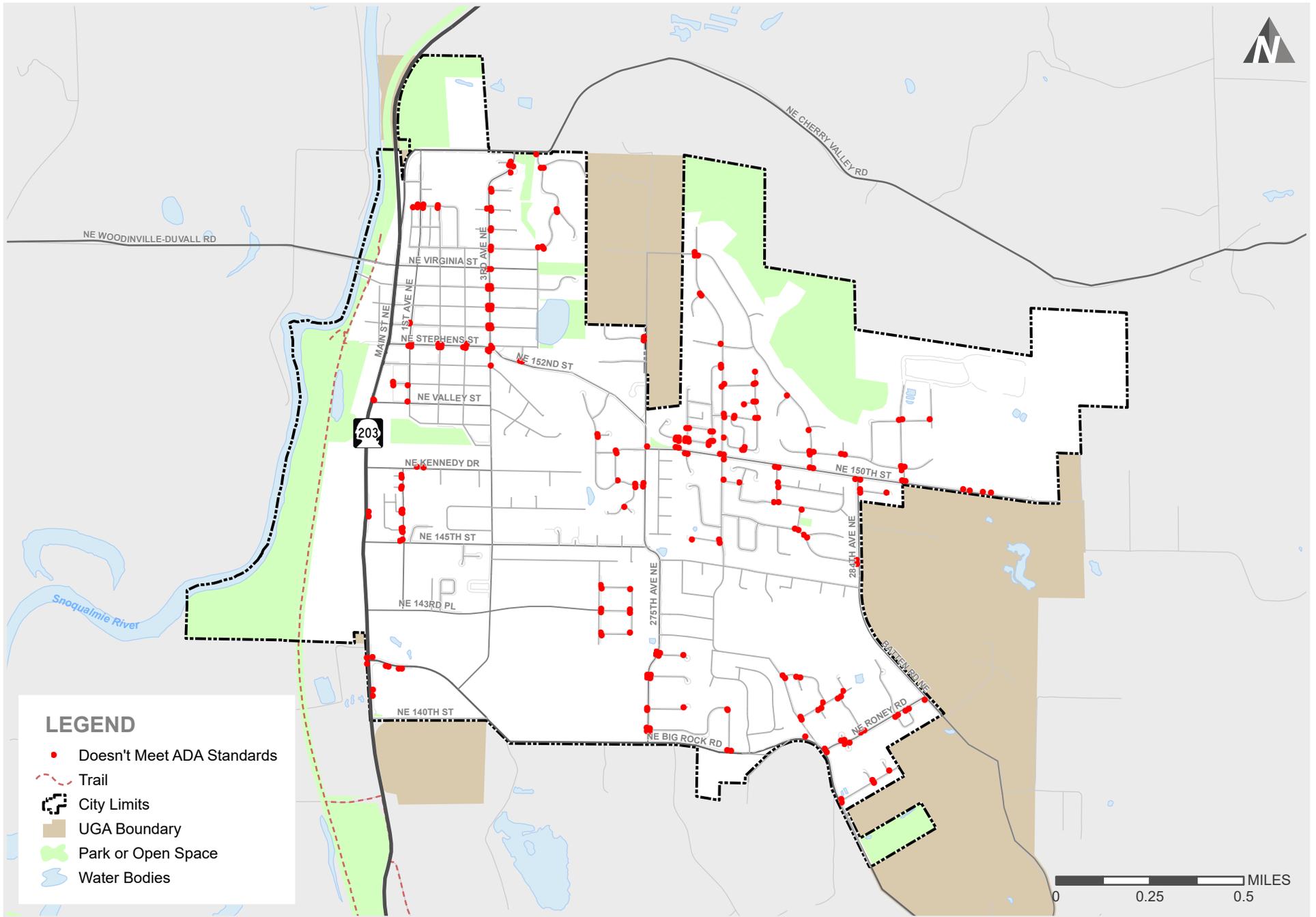


Figure 2-1 Locations with substandard ramp landings, ramp widths, or ramp slopes



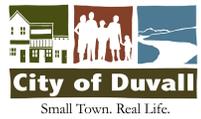
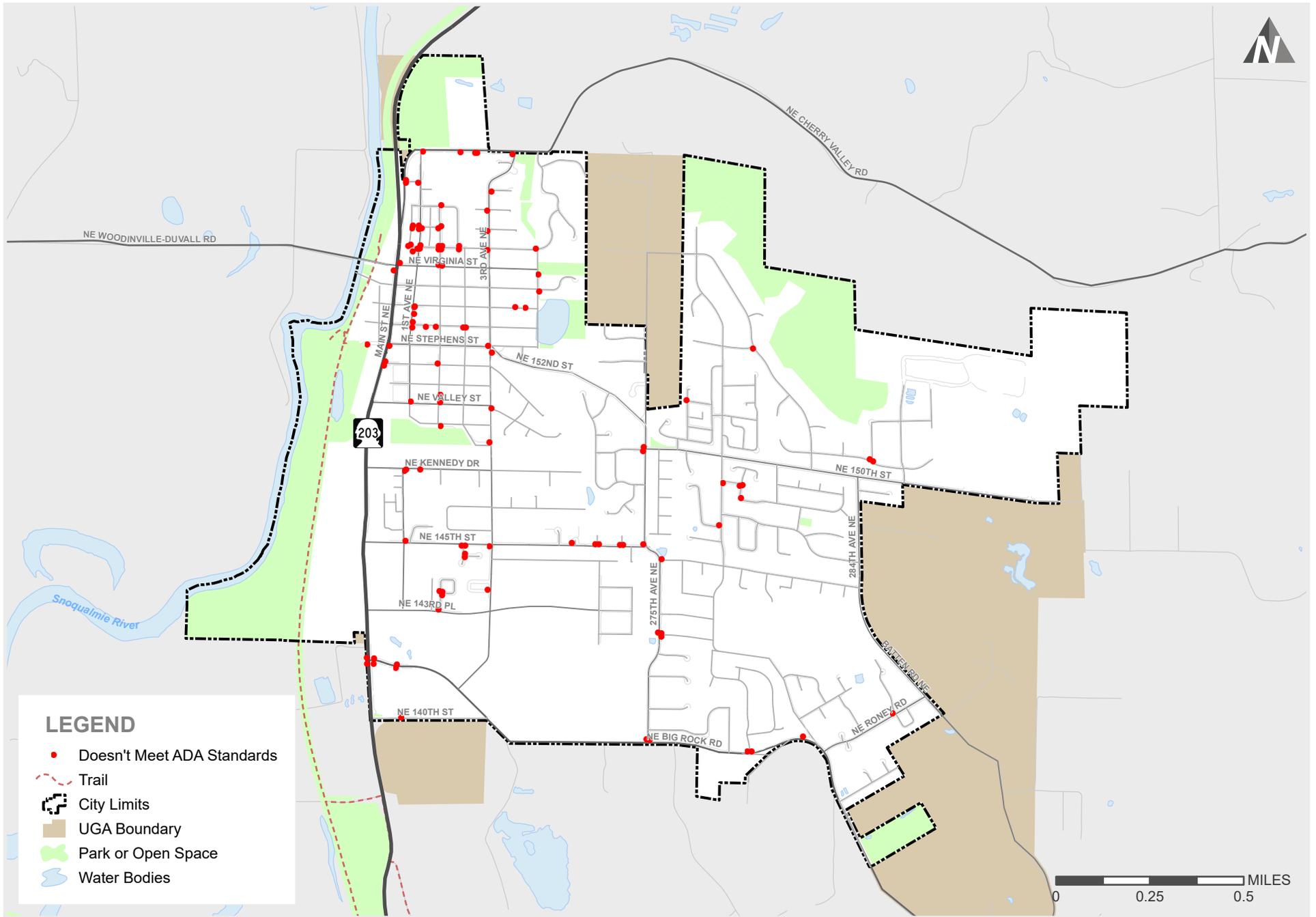
Curb Ramp Width

City of Duvall ADA Transition Plan

FIGURE



2-3



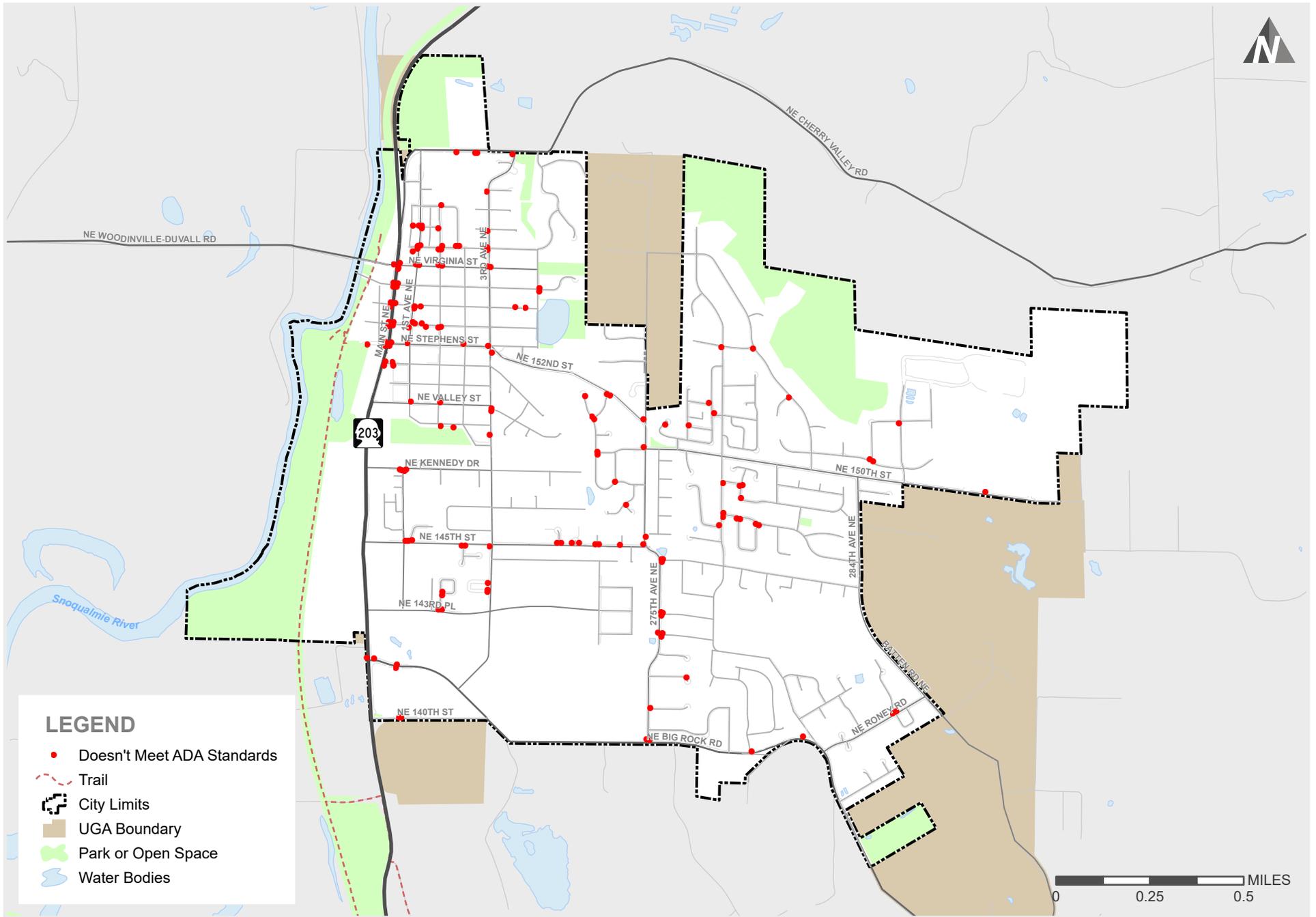
Curb Ramp Running Slope

City of Duvall ADA Transition Plan

FIGURE



2-4



Curb Ramp Cross Slope

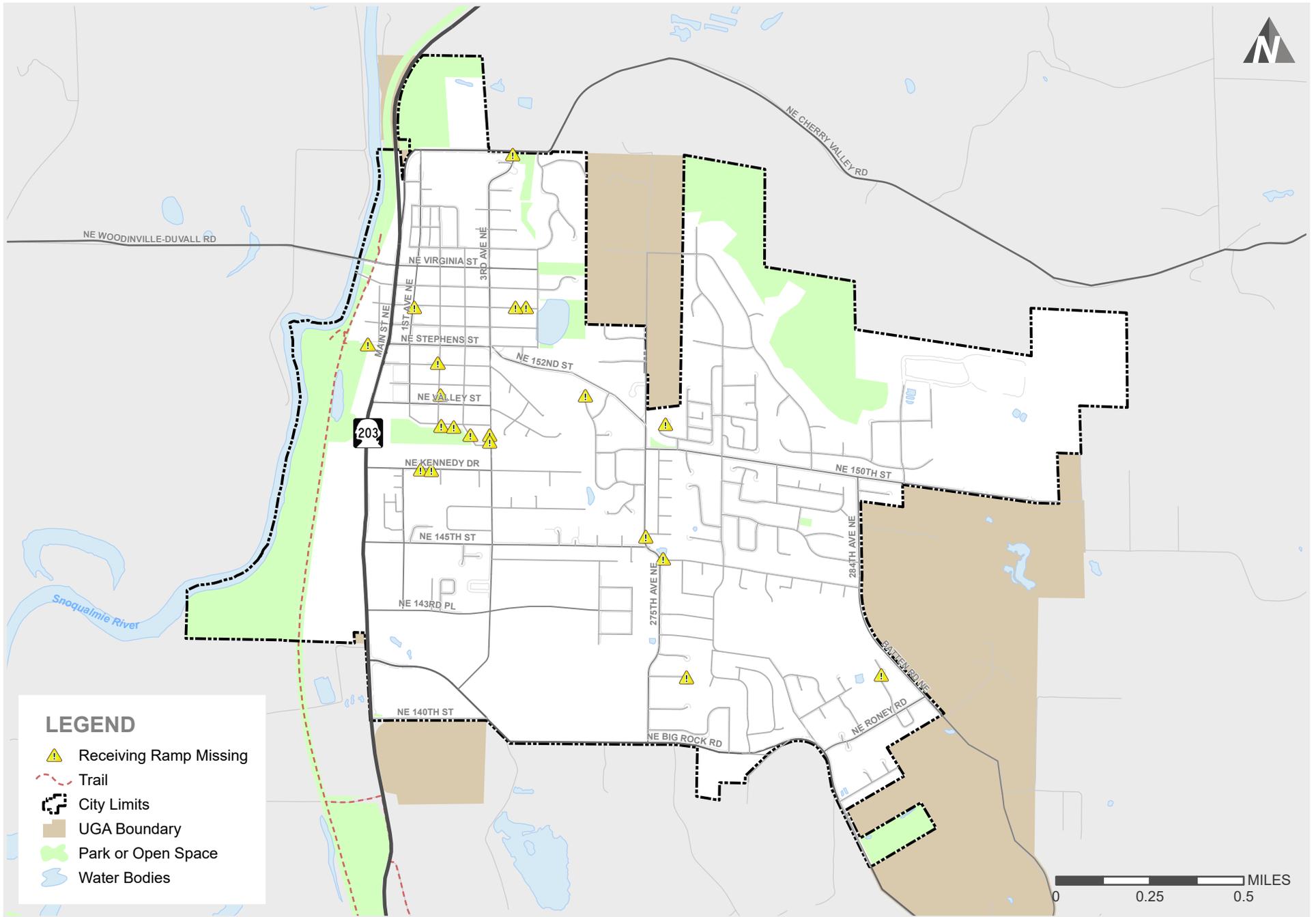
City of Duvall ADA Transition Plan

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FIGURE

transpogroup

2-5



2.3.2.2 Sidewalks

Several miles of sidewalks in the City of Duvall are non-compliant based on ADA requirements. Non-compliance is often primarily attributable to:

- The sidewalk width is too narrow (Figure 2-8)
- The cross slope of the sidewalk is too steep (Figure 2-9)
- The sidewalk has fixed/non-fixed barriers and other discontinuities that impede required usable pedestrian space (Figure 2-10)
- Non-compliant driveways intersect the sidewalk (Figure 2-11)

Figure 2-7 demonstrates the percentage of compliant and non-compliant sidewalk segments throughout the City. Sidewalk segments were categorized as ‘major non-compliant’ if the segment included:

- two or greater non-compliant cross slopes;
- inadequate width; or
- poor surface condition.

All other sidewalks that had a non-compliant issue were considered ‘minor non-compliant.’

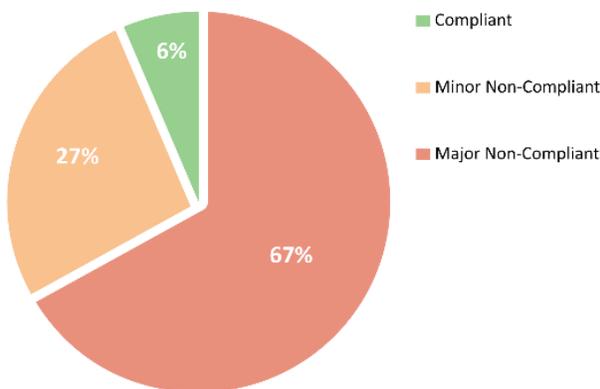


Figure 2-7 Locations with substandard cross slope, horizontal discontinuity, vertical discontinuity, fixed objects, moveable objects, protruding objects, sidewalk widths, or surface condition.

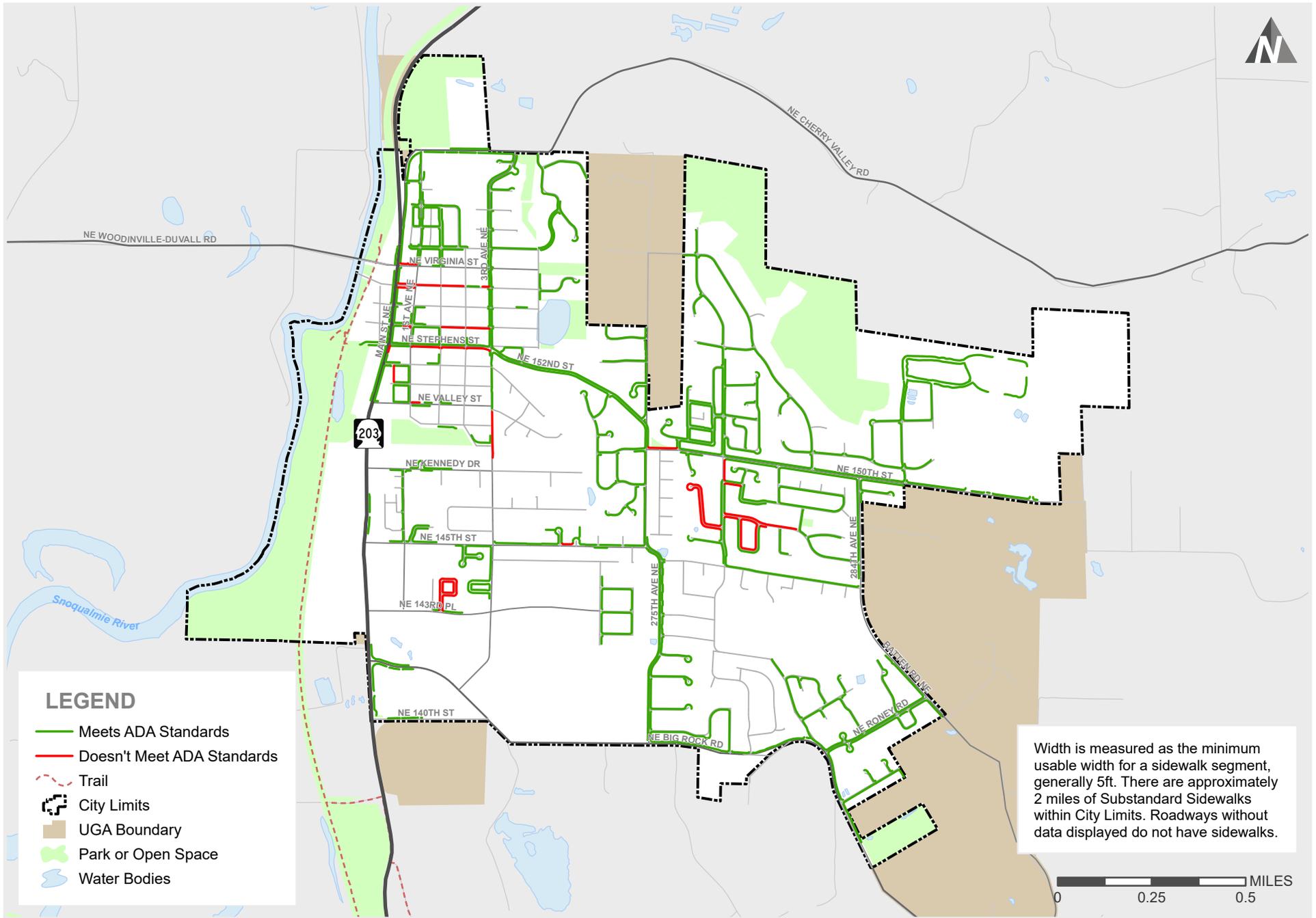
2.3.2.3 Signal Push Buttons

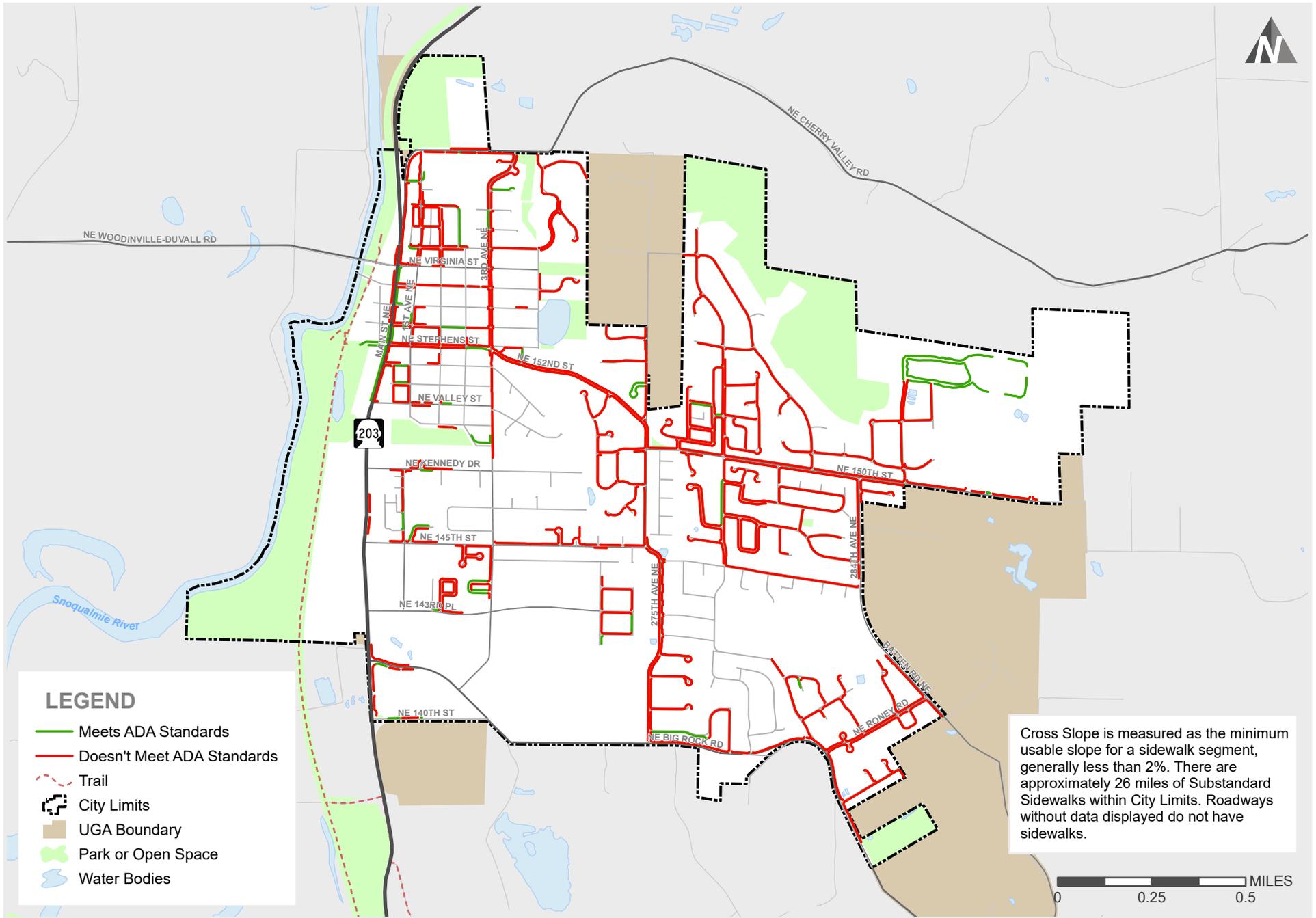
Accessible Pedestrian Signals (APS) and Push Buttons are an integrated system that communicates to pedestrians in a visual, audible, and vibrotactile manner. All pedestrian signal push buttons in the City are non-APS (Figure 2-12) and therefore, are not compliant with current ADA requirements. The requirement to use APS-style push buttons is relatively new and the lack of compliance is due to the time of installation pre-dating when the requirement was put into place.

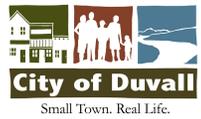
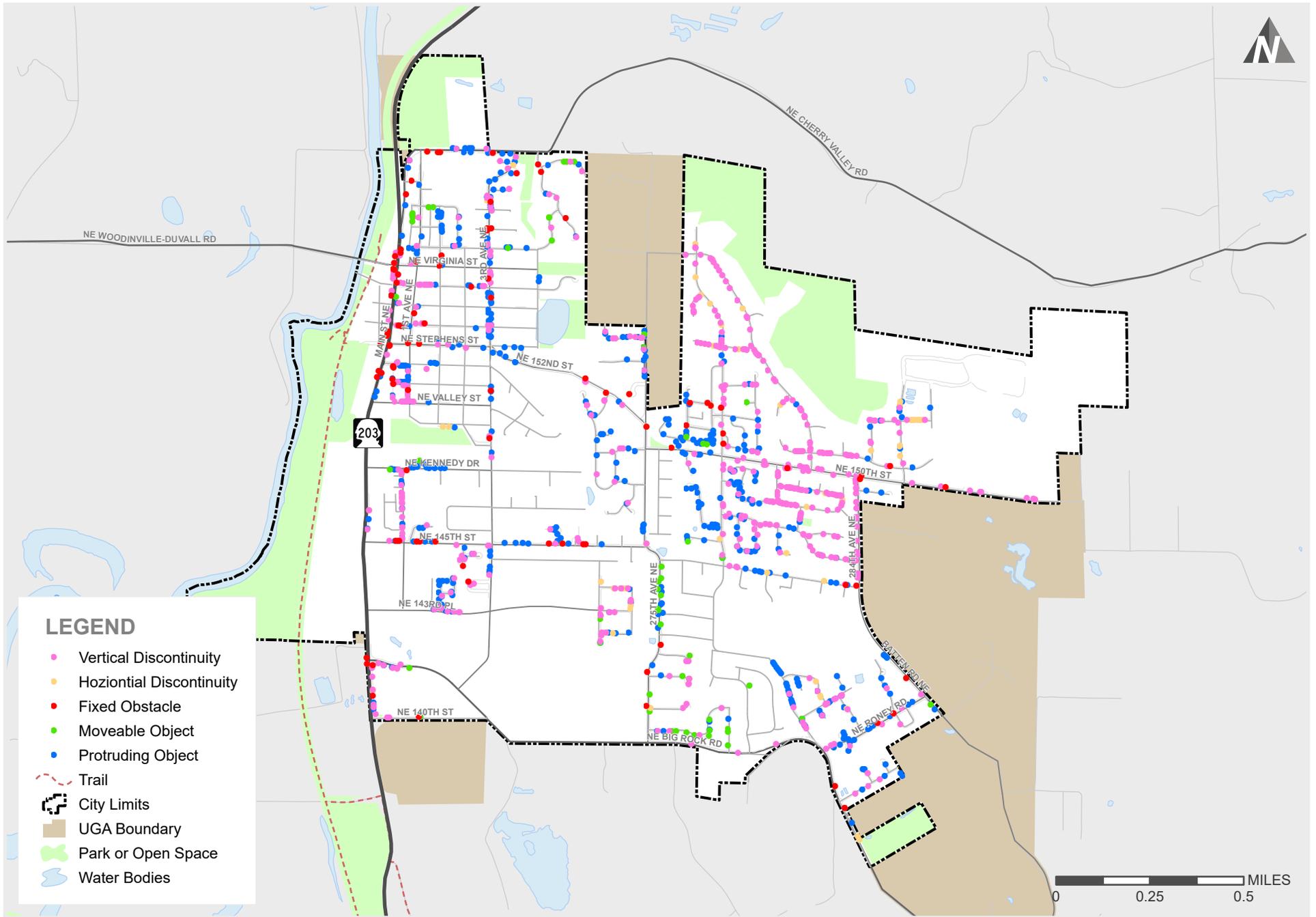
An APS policy was developed as part of this Transition Plan and is included in Appendix F.

2.3.2.4 Crosswalks

Locations of marked and unmarked crosswalks throughout the City were identified. The marked crosswalks were categorized according to their surrounding features. Figure 2-13 shows the locations of these marked crosswalks. Marked crosswalks were placed into the following categories, at a signal, at a stop sign, on a school walking route, or other. For crosswalks that are at both a signal or stop sign and on a school walk route were symbolized according to their intersection control. Most of the marked crosswalks are on an intersection approach that is stop controlled with a few of the crosswalks located at the signalized intersections along Main St.

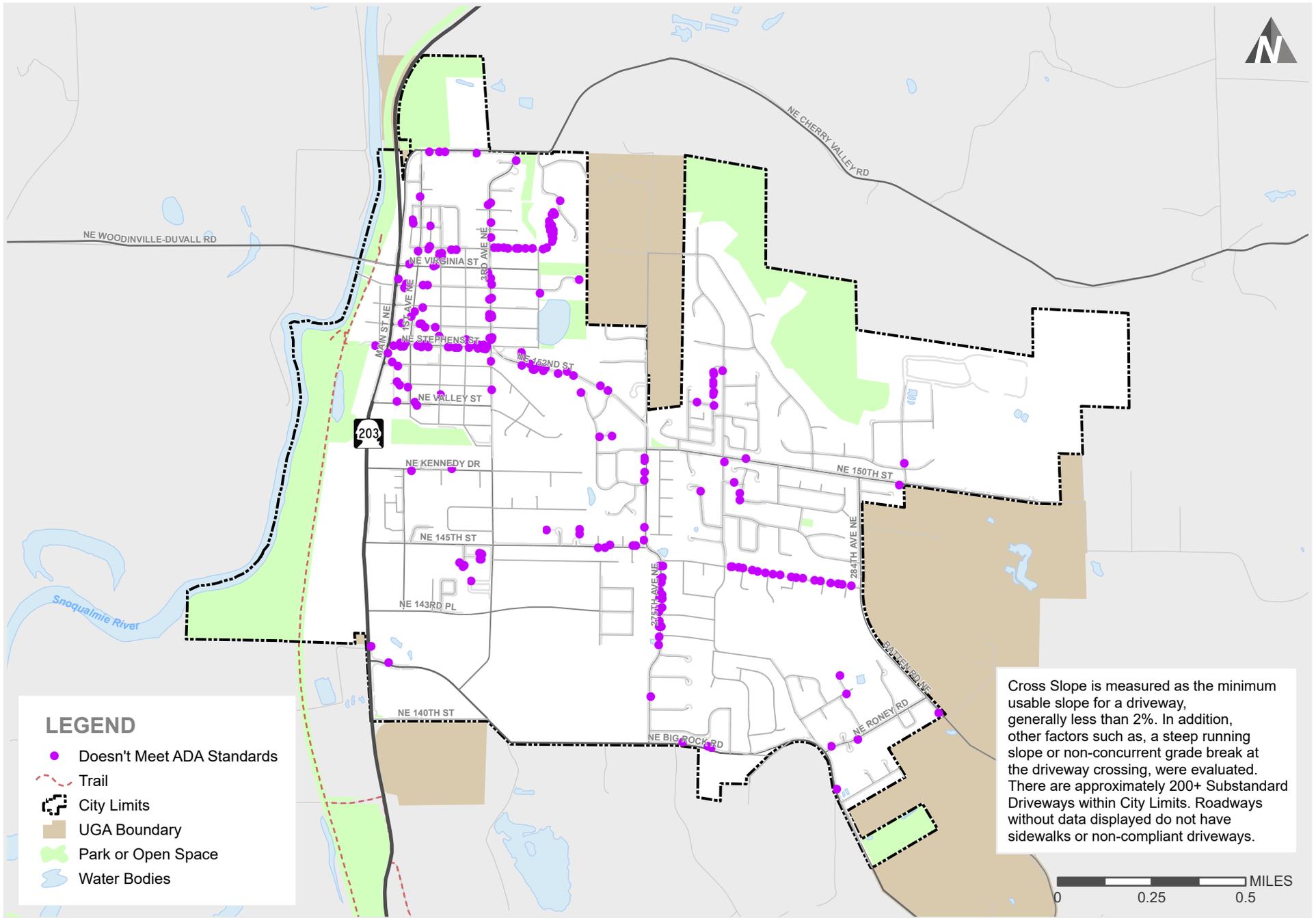






Sidewalk Barriers

City of Duvall ADA Transition Plan

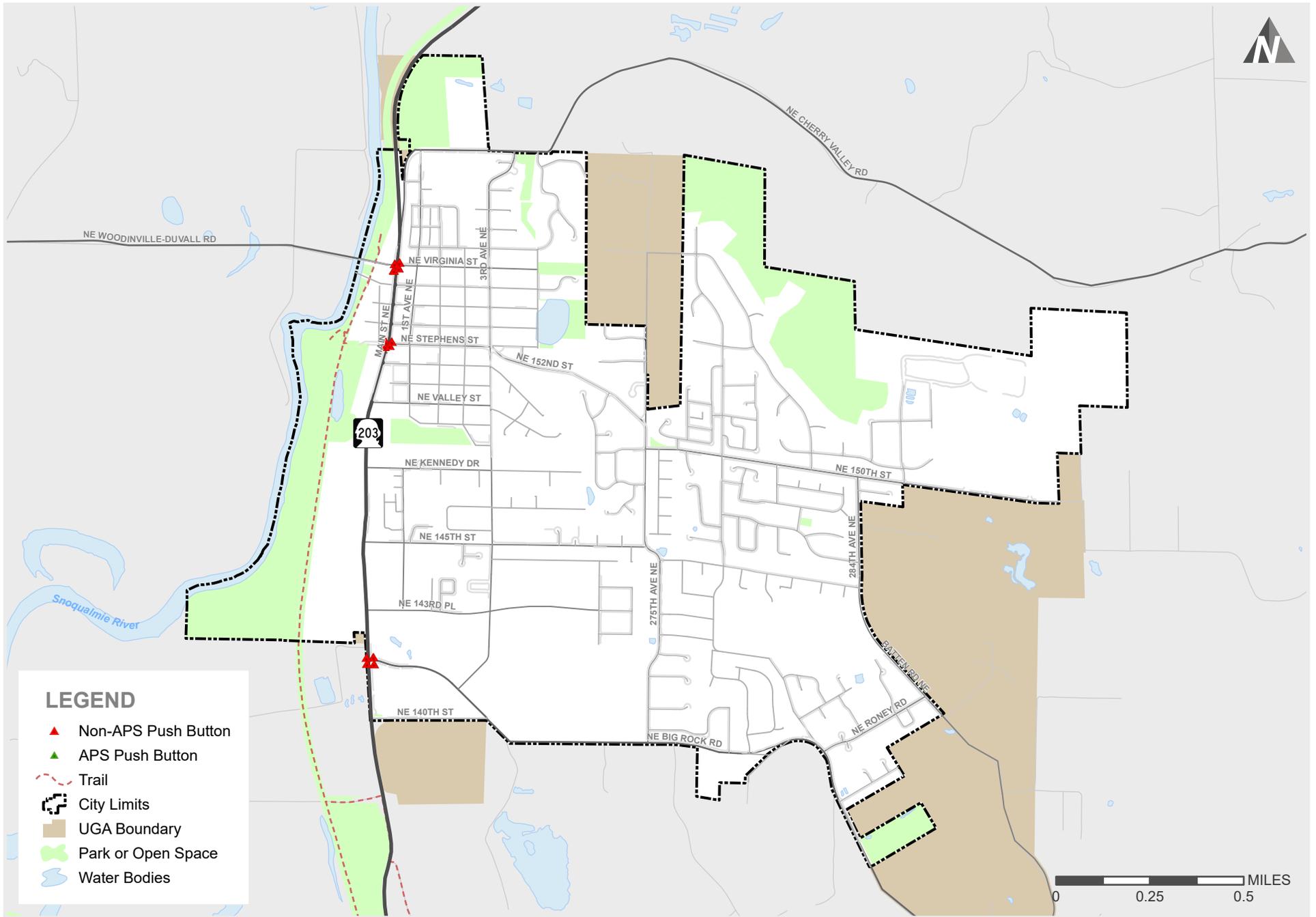


Non-Compliant Driveways along Sidewalk

City of Duvall ADA Transition Plan

FIGURE

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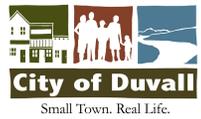
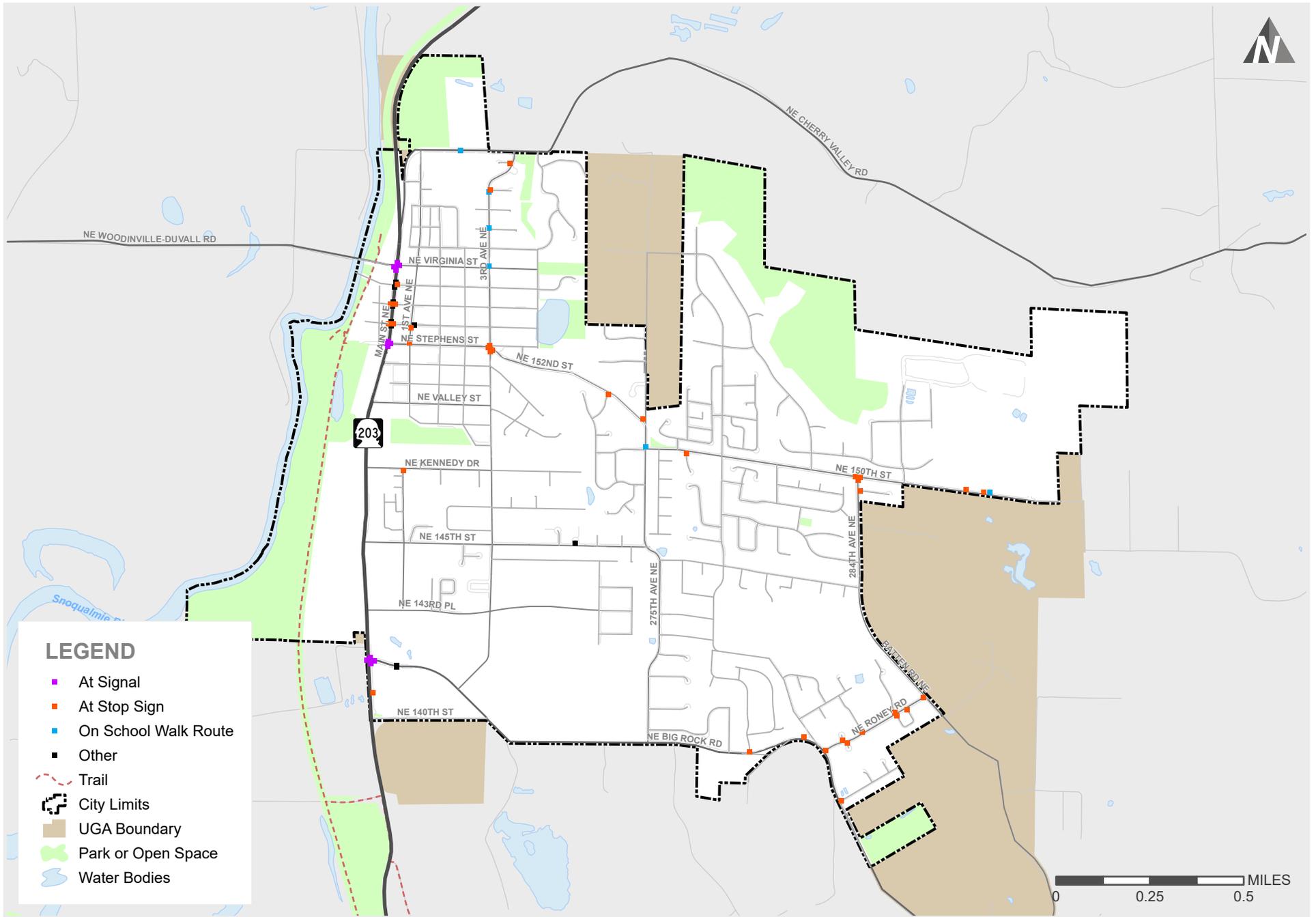
Signal Push Buttons: APS and Non-APS

City of Duvall ADA Transition Plan

FIGURE



2-12



Marked Crosswalk Location

City of Duvall ADA Transition Plan

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FIGURE



2-13

3 Stakeholder Engagement

Public and stakeholder input is an essential element in the Transition Plan development and the self-evaluation processes. ADA implementing regulations require public entities to provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process and development of the Transition Plan by submitting comments (28 CFR 35.105(b) and 28 CFR 35.150(d)(1)). There were three primary goals for the public outreach activities prior to adopting the plan:

- Meet Title II requirements for public comment opportunity.
- Inform the public about the City's Plan and processes regarding removal of barriers to accessibility within the right-of-way. Provide information to assist interested parties to understand the issues faced by the City, alternatives considered, and planned actions.
- Obtain public comment to identify any errors or gaps in the proposed accessibility Transition Plan for the public rights-of-way, specifically about prioritization and grievance processes.

3.1 Engagement Methods

3.1.1 Transportation Open House

A Transportation Open House event was held on May 17, 2017 at the Riverview Education Service Center in Duvall. The objective of this event was to engage the community on a variety of transportation

related issues and included presenting the federal requirements for ADA planning and educating participants on the City's ADA Transition Plan development. Activities included a combination of presentations and interactive displays to obtain community input on issues and priorities.

An interactive exercise was conducted as part of the open house activities. Maps of the City showing the self-assessment data and major landmarks were displayed, and participants were asked to identify areas of concern. The purpose of the exercise was to identify key themes to move forward in development of the Plan. Participants were asked to select their highest priorities related to physical obstacles and key destinations. This exercise provided valuable input on the perspectives of the users and facilitated discussion regarding the Plan priorities.

3.1.2 Project Website and E-mail address

The City developed a website, <http://www.duvallwa.gov/DocumentCenter/View/4646>, for easy on-line access to project information and ways to provide feedback. The Draft and Final ADA Transition Plan documents are also available on the website. A project e-mail address, transportation@duvallwa.gov, was also set up, allowing people to submit comments directly via e-mail.

3.2 Meeting ADA Standards

Per 28 CFR 35.150(d)(1), public involvement is required as follows: A public entity shall 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. A copy of the Transition Plan shall be made available for public inspection.

The Draft City of Duvall Transition Plan was made available for public review and comment for a period beginning (month and date) and ending (month, date, year). A link to the draft plan was provided on the City's project website.



ADA Transition Plan Station at the May 2017 Transportation Open House

The City also distributed copies of the DRAFT Plan to viewing locations around the

City including City Hall and the Public Works and Building Department office. Alternate accessible formats of the document were made available upon request, including Braille, large font, or audible versions. The City issued a Citywide press release and social media posts announcing the availability of the document.

A letter was sent to the disability groups and parties of record within the City announcing the availability of the DRAFT Plan and directing interested stakeholders to the City's website and viewing locations.

Title VI Nondiscrimination Law

Title VI of the Civil Rights Act of 1964 is a Federal statute and provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. This includes matters related to language access or limited English proficient (LEP) persons.

The City of Duvall ADA Transition Plan public participation process included translation service upon request for Open House materials, DRAFT Plans, and open discussions. Additionally, the Open House was specifically held at the Riverview Education Service Center because the building has better accessibility than other City buildings and is in close proximity to cultural destinations of LEP communities.

4 Barrier Removal

Removal of accessibility barriers within the public right-of-way is the primary purpose of ADA Transition Plans. The following section documents the primary methods of barrier removal and contains recommended changes to City policies, practices and design standards to comply with state and federal requirements related to ADA accessibility in the public right-of-way.

4.1 Barrier Removal Methods

The City can utilize several methods to remove accessibility barriers in the public right-of-way. These methods range from stand-alone projects, removal of barriers as part of other City roadway projects, and removal of barriers as part of private development projects. For these methods to be effective, City practice and design standards must comply with federal ADA guidance. If they are not, new or reconstructed pedestrian facilities may not be constructed to accessibility standards resulting in costly revision and increased duration to remove accessibility barriers.

4.1.1 Capital Projects

The Transportation Improvement Program (TIP) defines and shows funding for the City's transportation projects ranging from minor street widening to street extension projects. A variety of short and long-range plans, studies and individual requests help identify projects which are then included and prioritized. The City updates and adopts its TIP annually and coordinates with other jurisdictions, WSDOT, and the community at-large with regards to timing and project priorities.

Pedestrian improvements (new or replaced) are generally included as part of these street improvements. TIP projects developed as part of the Transportation Plan Update (City of Duvall, 2017) specifically identify and address accessibility barriers documented within this Plan.

4.1.2 Street Maintenance and Operations Program

The Street Maintenance and Operations Program (TIP Project O-2) is used to preserve and enhance the City's existing and planned transportation system. The program provides the City with a systematic approach for evaluating arterials and local roadways for pavement conditions, signage, sight distance restrictions, and other similar issues. Many of these projects will be required to remove ADA barriers like non-compliant curb ramps.

4.1.3 Non-Motorized Improvement Program

The Non-Motorized Improvement Program (TIP Projects N-1 to N-3) include specific projects that are not associated with a specific roadway project. This program will allow the City to fill in missing gaps in sidewalks or pathways that are needed to provide a continuous route to parks, commercial areas, and other pedestrian destinations.

4.1.4 Citywide Sidewalk Improvement Program

The Citywide Sidewalk Improvement Program (TIP Project C-1) is an annual program to construct various sidewalk missing links not associated with a specific TIP project. The program will allow the City to fill in missing gaps in sidewalks or

pathways that are needed to provide a continuous route to parks, commercial areas, and other pedestrian destinations. The program can also be used to construct ADA ramps, school routes, or other projects to improve existing sidewalks.

4.1.5 Safe Routes to School

The Safe Routes to School Improvement Program (TIP Project C-2) includes pedestrian, bicycle, and safety improvements that are located along Riverview School District Walking Routes. These improvements are specifically identified as high-priority improvements to promote school accessibility and safety. This pedestrian-centric funding program can be leveraged to remove accessibility barriers along school walking routes.

4.1.6 Stand-Alone ADA Projects

As identified in the transition schedule, the City has committed to dedicated funding for ADA barrier removal projects targeted for removal of high-priority barriers as identified in the self-evaluation (TIP Project O-3). The City already funds ADA improvements as a part of other projects, but by creating a dedicated funding stream for ADA barrier removal, investments can be targeted to those locations where improvements are most needed, rather than where projects are funded.

4.1.7 Utility Upgrades or Repairs

Utility upgrades or repairs to water, sewer, communication or electrical systems can impact the pedestrian network. The City works internally and with utility partners to ensure that pedestrian facilities are rebuilt to be ADA compliant if altered by projects.

4.1.8 Private Development

Even with a variety of City funded accessibility improvements, it will take many years to remove accessibility barriers or address sidewalk gaps. Redevelopment of

properties such as construction of new housing, commercial buildings, or major remodels can provide a valuable boost to barrier removal efforts. The City's design standards for frontage improvements will help insure facilities built by private development are accessible.

4.2 Barrier Removal Recommendations

An assessment of City policies, practices and design standards, as documented in Chapter 2, was conducted to understand the process that results in barriers to accessibility in the public right-of-way. This assessment was informed through a review of adopted City plans, field observations, discussions with City staff and a detailed design audit (see Appendix B).

The recommendations included below were developed in response to this assessment and have been written in such a way that recommended actions are clearly identified and progress on each specific recommendation can be easily tracked and updated.

Recommendation I: Update City design to match the PROWAG guidance

Status: Completed with Plan adoption

A detailed audit of the City's PWDDS using the PROWAG, WSDOT Design Manual (July 2013) and WSDOT Field Guide (2012) was conducted to inform Chapter 2. This audit, which is included in Appendix B, recommends several specific changes to the City's Design Guidelines including additional construction tolerances or more details defining maximum slopes. Recommendations for the design of sidewalks, crosswalks, curb ramps, signals and other areas such a work zones are also identified. Adopting design standards from another agency that meet PROWAG standards satisfies this

requirement. WSDOT ADA guideline implementation is promulgated with adoption of this Plan in accordance with PWDDS Section 1-1.01 (Standard Specifications).

**Recommendation 2:
Identify an official responsible for
Transition Plan implementation in the
Public Works Department**

Status: Completed with Plan adoption

The Director of Public Works has been identified as the official responsible (see Section 6.1 for more information). This position, often referred to as the “ADA Coordinator”, is one of the four major federal requirements for every ADA Transition Plan. The ADA Coordinator is responsible for facilitating City transition planning such as responding to grievance requests.

**Recommendation 3:
Adopt a Citywide APS policy**

Status: Pending

Accessible Pedestrian Signal (APS) policies serve as a means for cities to be consistent with ADA requirements at traffic signals. The APS policy covers the location and means of communication for APS devices that “communicate information about pedestrian timing in nonvisual formats such as audible tones, verbal messages, and/or vibrating surfaces”, Manual on Uniform Traffic Control Devices (MUTCD). The recommended APS policy is included in Appendix F.

**Recommendation 4:
Educate City staff, consultants, and
contractors on PROWAG standards**

Status: On-going

Transition plans are often a learning experience for City staff, consultants, and contractors alike since they change existing practices and expectations. The City should

use updates to the PWDDS as an opportunity to teach and learn about accessibility and the barriers that those with limited mobility or vision impairment experience when traveling in the City’s public right-of-way. Education can take many forms which include, but are not limited to: review of updated design standards with key individuals such as field inspectors and contractors, development and review of City specific design standards or checklists with City Engineers, or training from groups that serve those with disabilities.

**Recommendation 5:
Clarify and enforce requirements
around accessibility through
construction zones**

Status: On-going

Work zones should provide the same level of accessibility as permanent pedestrian facilities covered by ADA requirements. Pedestrian accessibility must be maintained in areas of street construction and maintenance. The City should review standards and policies to ensure that alternative walking routes are secured within designated work zones.

**Recommendations 6:
Develop a standard grievance process
for barriers in the public right-of-way**

Status: Pending City Approval

Public entities subject to Title II of the ADA are required to adopt and publish a grievance procedure as part of their Transition Plan. A grievance process allows community members to formally report denial of access to a City facility, program, or activity on the basis of disability. It is recommended that the City adopt a grievance process that is easy to initiate, transparent and responsive.

A process could include a two-step approach to comply with the requirement for grievance procedures. The first step of the process would be to file a “Request for

Service” and the second step to file for a “Grievance”.

A Request for Service allows the public to request accommodations or barrier removal. A request should be possible in-person, by telephone, by mail, or via e-mail and should be recorded in the Public Works Maintenance Management System (MMS). Information on how to file this should be easily accessible. The recording of the request is critical for recordkeeping and to evaluate the Department’s response to ADA-related requests.

The second step, a Grievance, is used to report denial of access to a City facility, activity, or program. A Request for Service should be required prior to submitting a grievance. The City should then acknowledge, review the filing, and respond within a set number of days upon receipt. A clear process for appeal of a Grievance decision should be communicated if a denial is issues.

**Recommendation 7:
Develop a consistent and centralized
MEF documentation database**

Status: Underway

Maximum Extent Feasible (MEF) is a policy that dictates that alterations to the public right-of-way that could affect the usability of a facility must be made in an accessible manner to the maximum extent feasible. ADA Standards for Accessible Design (2010) dictates that:

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

The City should adopt a MEF documentation process and standard template for the documentation of maximum extent feasible efforts when addressing new or altered construction. This documentation should be stored in a centralized location and be linked to the City’s GIS ADA self-assessment database to ensure consistency of data.

Consolidation of past MEF records is also recommended to allow the City to identify if pedestrian facilities in the GIS self-assessment were subject to an MEF, and should therefore be removed from the City’s list of barriers. A template example has been provided in Appendix D.

**Recommendation 8:
Develop performance measures and
processes to track removal of barriers**

Status: Pending

The primary purpose of an ADA transition plan is to develop a plan for removal of accessibility barriers. In order to show progress towards this requirement, the City should develop a process of tracking barrier removal on a year by year basis. It is recommended that the City actively updated the GIS ADA self-assessment database developed for this Plan, tracking how and when ADA barriers are removed. This data can be used to provide annual updates on progress and demonstrate to the public as well as federal regulators that the City is making progress to meet Title II requirements.

**Recommendation 9:
Begin to work on other Title II
required elements such as public
buildings and parks**

Status: Pending

Title II, “protects qualified individuals with disabilities from discrimination on the basis of disability in services, programs, and activities provided by State and local government entities,” and extends beyond

accessibility within the public right-of-way. The City should develop a course of action for meeting other Title II requirements such as removal of barriers in public buildings, programs and parks.

5 Implementation

5.1 Approach

Development of an implementation plan and transition schedule included three steps once the Citywide barrier assessment was complete. First, all pedestrian facilities with an identified barrier were prioritized based on two factors:

- the severity of the barrier;
- and the proximity that facility to public destinations.

Next, a planning level cost estimate was developed to provide an estimate of the financial resources needed to remove all barriers. Finally, a schedule was developed based on the annual financial resources the City Council has allocated to barrier removal. The following chapter describes these steps in more detail.

5.2 Prioritization

To focus City efforts toward facilities that pose the largest barrier within the public right-of-way, an analysis of the accessibility of each pedestrian facility and its proximity to public destinations such as schools, libraries, parks, transit, and buildings was completed. The result of this analysis is a prioritized list of projects, with the highest benefit projects identified for removal first.

To complete this assessment, a multi-criteria analysis was conducted to determine which facilities do not meet existing sidewalks and curb ramp standards. Each attribute collected in the field was compared against PROWAG requirements as outlined in Chapter 2.

If the facility does not meet PROWAG criteria or is located near public destinations,

points were assigned, with the number of points dependent on the relative importance or proximity. Sidewalks or curb ramps with poor PROWAG compliance and several proximate destinations received a high score and are prioritized for removal, while PROWAG compliant ramps far from public destinations have a score of zero. Missing sidewalks or curb ramps were assigned the greatest number of points.

5.2.1 Accessibility Index Score

A number of criteria were used to establish the extent to which each pedestrian facility did or did not present a barrier to accessible mobility. Table 5-1 shows these criteria, the threshold used to identify them as a barrier, and the score used to indicate the severity of each barrier relative to each other.

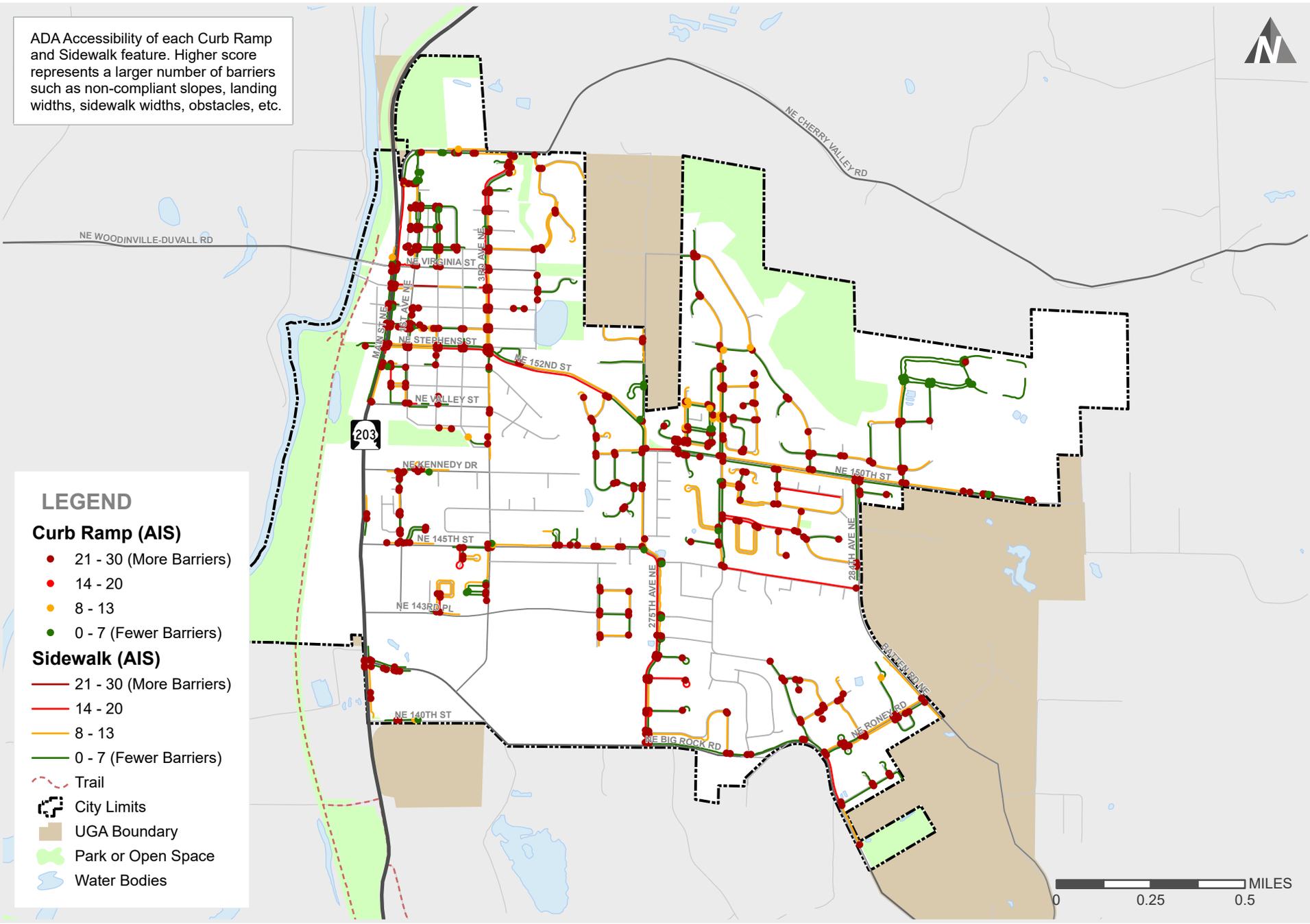
Facilities with a higher Accessibility Index Score (AIS) presented a large accessibility barrier and are shown in Figures 5-1 and 5-2 as red dots or lines. Facilities with fewer or no barriers are shown as green.

Table 5-1 Accessibility Index Score Value

ACCESSIBILITY INDEX SCORE	CRITERIA	THRESHOLD	SCORE
Sidewalks	Width	< 48 inches	5
	Cross Slope	> 2%	4
	Condition	< Average	3
	Vertical Discontinuity	> ¼ inch	3
	Horizontal Discontinuity	> ½ inch	3
	Fixed Obstacles	Present	3
	Moveable Obstacles	Present	3
	Protruding Obstacles	Present	3
	Non-Compliant Driveways	Present	3
	Maximum Sidewalk (AIS) Score		
Curb Ramps (Max. Score)	Ramp Width	< 48 inches	30
	Ramp Running Slope	> 8.3% or >5% (Blended)	30
	Ramp Running Cross Slope	> 2%	30
	Asphalt or Other Type	Non-Compliant Type	30
Curb Ramps	Accessible Path	No	2
	Turning Space	None or <4ft x 4ft	5
	Turning Space Cross Slope	>2%	3
	Flare Slope	>10%	2
	Receiving Ramp	No	2
	Truncated Domes (DWS)	No	3
	Truncated Domes (DWS Placement)	Other than Back of Curb	1
	Truncated Domes (DWS Depth)	<2 feet	1
	Truncated Domes (DWS Width)	Less than Full Width	1
	Grade Break	Not Concurrent	2
	Counter Slope	> 2%	2
	Lip	> ¼ inch	2
	End in Crosswalk	No	2
	Roadway Clear Space	<4ft x 4ft	2
Maximum Curb Ramp (AIS) Score			30

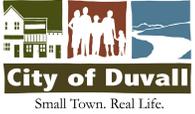
ACCESSIBILITY INDEX SCORE	CRITERIA	THRESHOLD	SCORE	
Signal Push Buttons	Push button less than 10 feet from crosswalk	No	3	
	Push button less than 5 feet from the extension of the crosswalk line	No	2	
	Distance between push buttons on the same corner greater than 10 feet	No	1	
	Reach depth from push button to the landing is less than 10 inches	No	2	
	Mounting height of push button from landing area is between 42 inches and 48 inches	No	2	
	Push button size meets minimum 2-inch diameter with visual contrast from housing	No	1	
	Directional arrow on push button face, housing or mounting & push button with parallel orientation to crosswalk direction	No	2	
	Audible indication of WALK interval in tone or speech	No	3	
	Locator tone operates during DON'T WALK and flashing DON'T WALK intervals	No	3	
	Level clear space provided at push button (min. 30"X48") landing area provided with less than a 2% cross slope in any direction	No	2	
	Locator Tone and Tactile Arrow provided	No	3	
	Push button Force more than 5 pounds	No	3	
	APS	No	3	
	Maximum Signal Push Button (AIS) Score			30

ADA Accessibility of each Curb Ramp and Sidewalk feature. Higher score represents a larger number of barriers such as non-compliant slopes, landing widths, sidewalk widths, obstacles, etc.



LEGEND

- Curb Ramp (AIS)**
- 21 - 30 (More Barriers)
- 14 - 20
- 8 - 13
- 0 - 7 (Fewer Barriers)
- Sidewalk (AIS)**
- 21 - 30 (More Barriers)
- 14 - 20
- 8 - 13
- 0 - 7 (Fewer Barriers)
- - - Trail
- ⊞ City Limits
- UGA Boundary
- Park or Open Space
- Water Bodies



Accessibility Index Score Composite (Curb Ramp - Sidewalk)

City of Duvall ADA Transition Plan

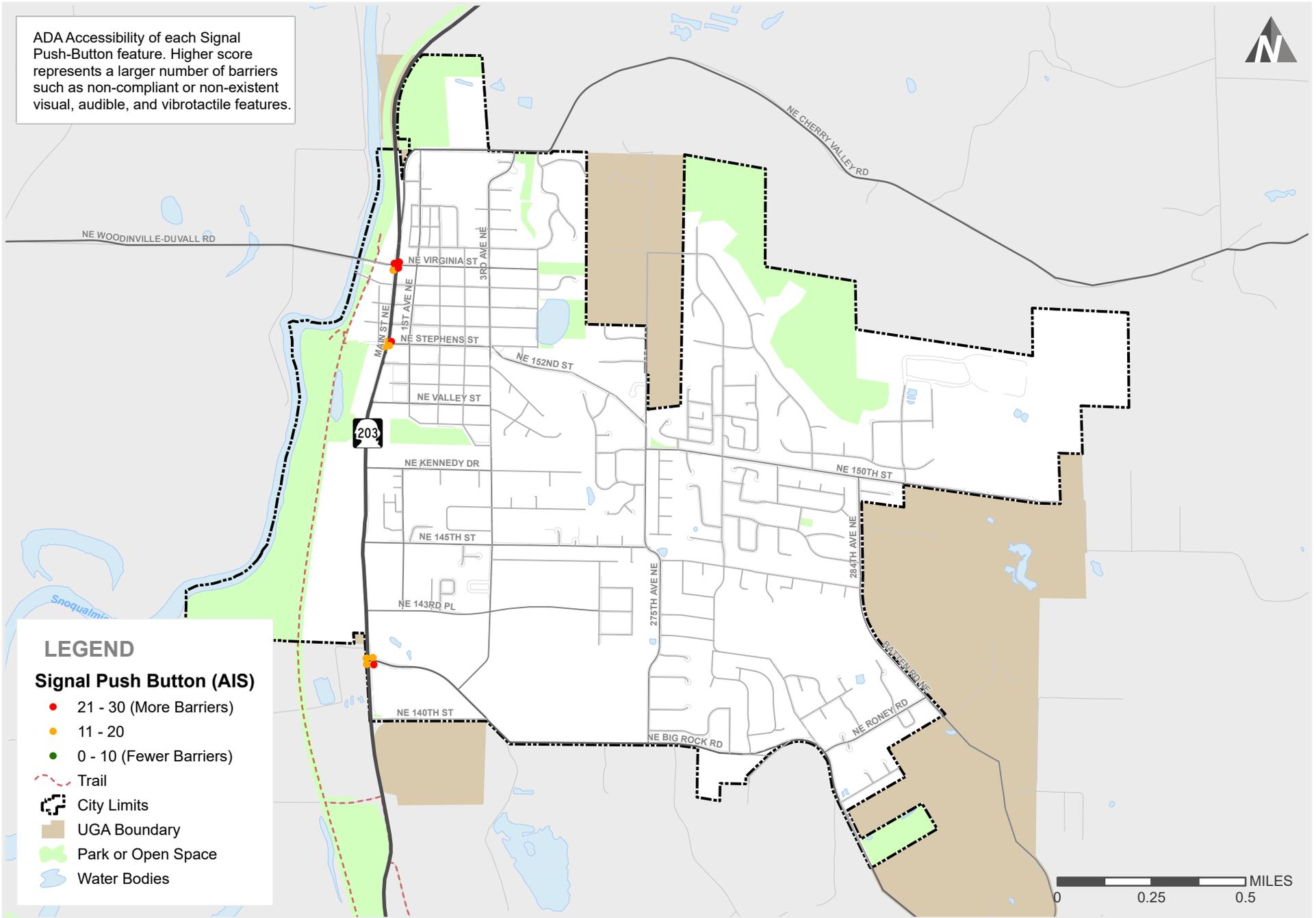
transpogroup

FIGURE

5-1

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ADA Accessibility of each Signal Push-Button feature. Higher score represents a larger number of barriers such as non-compliant or non-existent visual, audible, and vibrotactile features.



Accessibility Index Score Composite (Signal Push Button)

City of Duvall ADA Transition Plan

FIGURE



5-2

5.2.2 Location Index Score

A number of destinations were used to identify high priority pedestrian facilities within the City. This was done by identifying public destinations such as public buildings, transit, and parks while also identifying

pedestrian facilities within close proximity to one or more of these destinations.

Pedestrian facilities within the identified proximity were assigned points based on each destination they were close to, as shown in Table 5-2. This measure is called the Location Index Score (LSI).

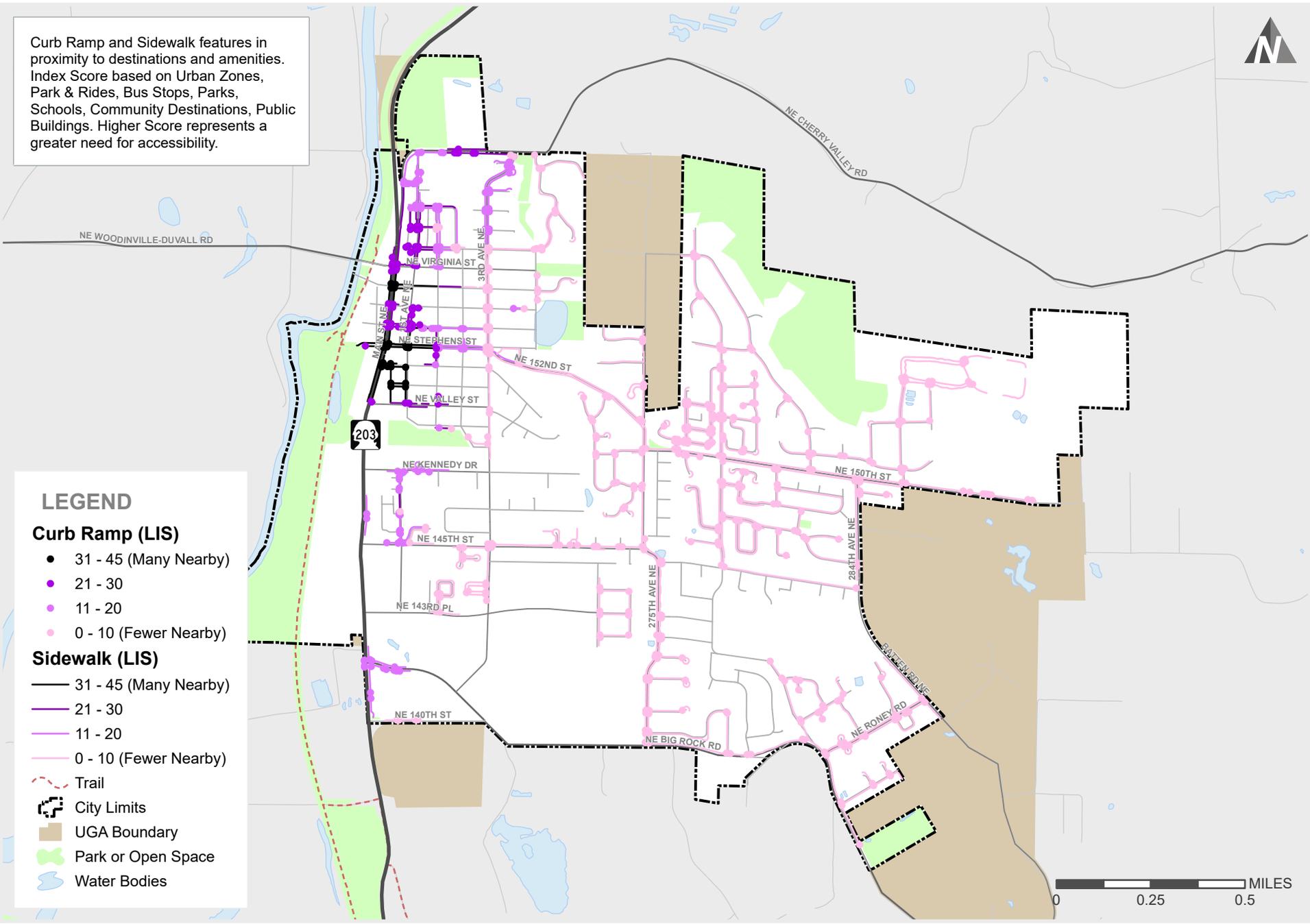
Table 5-2 Location Index Score Value

LOCATION CRITERIA	RATING CRITERIA	POSSIBLE SCORE
Schools		
Proximity to Schools	Within 1/8-mile radius of school	5
Walk-To-School Route	Within safe routes to school zone	5
Parks		
	Within 1/8-mile radius of park	5
Transit		
Park & Ride	Within 1/8-mile of park & ride	5
Transit Bus Stops	Within 1/8-mile of transit stop	5
Traffic Signal/Roundabout		
	Within 1/8-mile of signal or roundabout	5
Public Buildings		
	Within 1/8-mile of location	5
Downtown / Urban / Commercial Business Centers		
	Within 1/4-mile radius of Downtown, Urban and Commercial Business Center Zoning	5
Community Defined Destinations		
	Within 1/8-mile of location	5
TOTAL LOCATION INDEX SCORE (LIS)		45

Figures 5-3 through 5-6 show results of the LSI. The darker locations indicate areas with a higher concentration of pedestrian

destinations while the lighter areas represent areas with a lower concentration of these destinations.

Curb Ramp and Sidewalk features in proximity to destinations and amenities. Index Score based on Urban Zones, Park & Rides, Bus Stops, Parks, Schools, Community Destinations, Public Buildings. Higher Score represents a greater need for accessibility.



LEGEND

Curb Ramp (LIS)

- 31 - 45 (Many Nearby)
- 21 - 30
- 11 - 20
- 0 - 10 (Fewer Nearby)

Sidewalk (LIS)

- 31 - 45 (Many Nearby)
- 21 - 30
- 11 - 20
- 0 - 10 (Fewer Nearby)

- - - Trail
- ⬜ City Limits
- UGA Boundary
- Park or Open Space
- Water Bodies



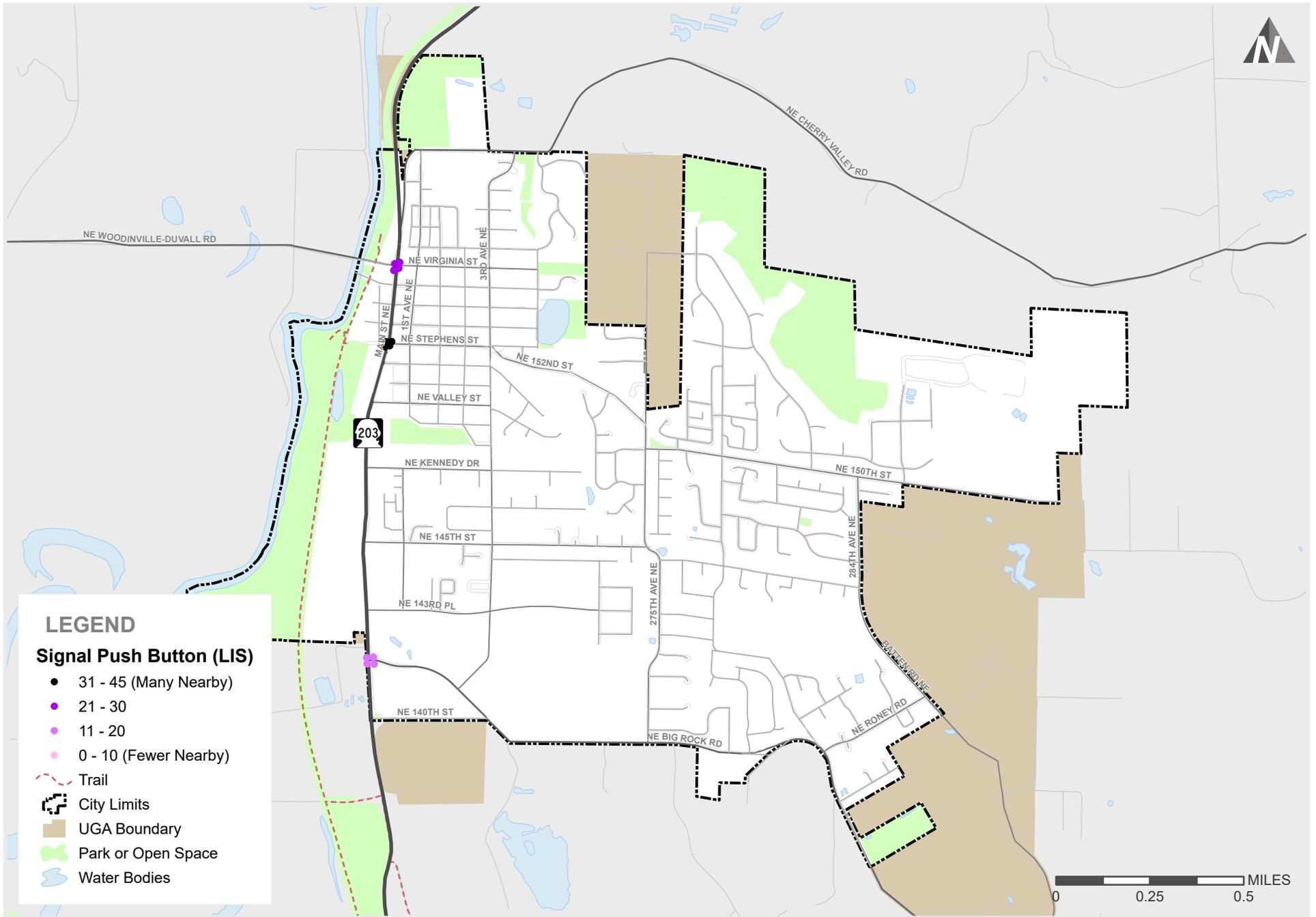
Location Index Score Composite (Curb Ramp - Sidewalk)

City of Duvall ADA Transition Plan

FIGURE



5-3



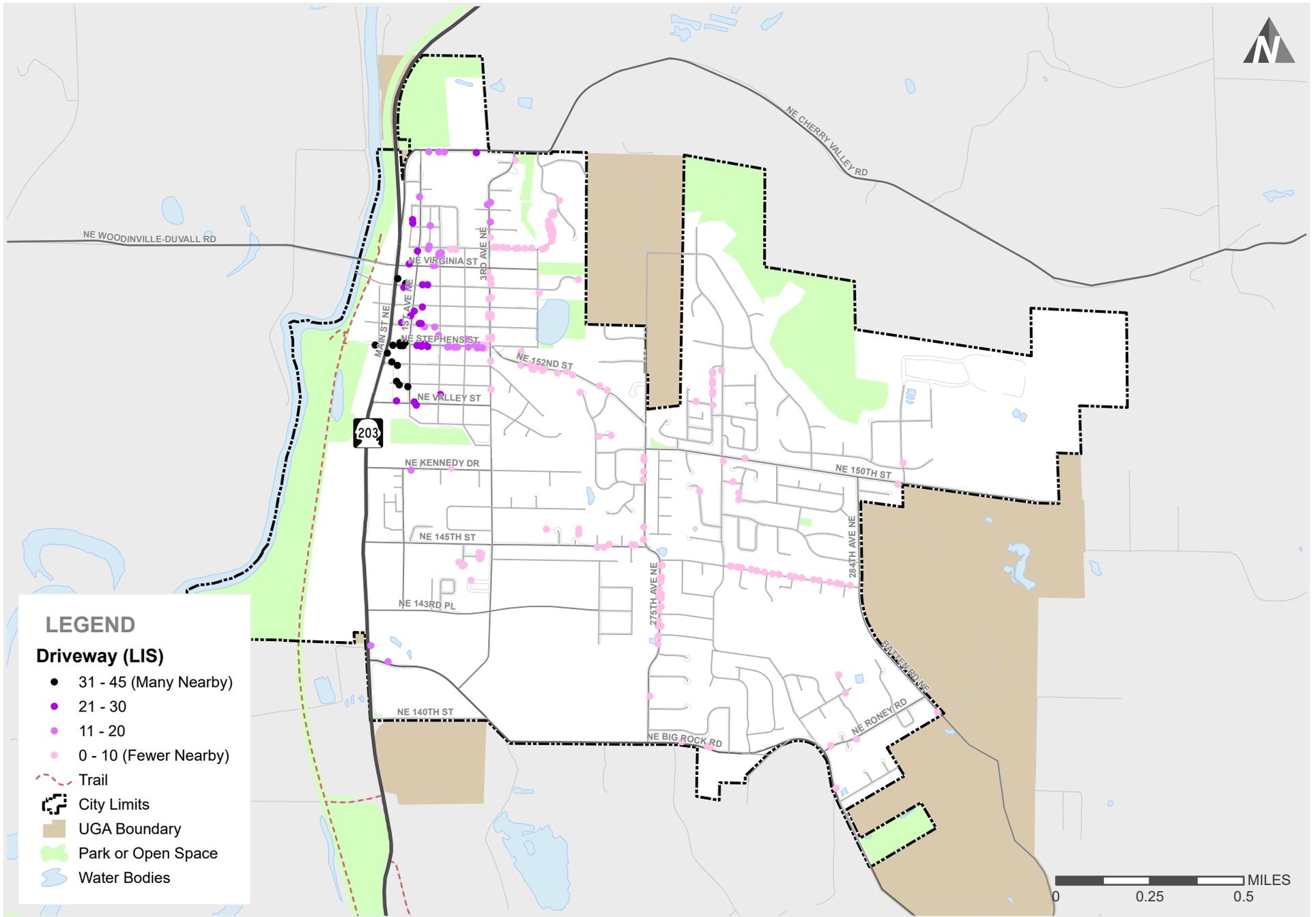
Location Index Score Composite (Signal Push Button)

City of Duvall ADA Transition Plan

FIGURE

transpogroup

5-4



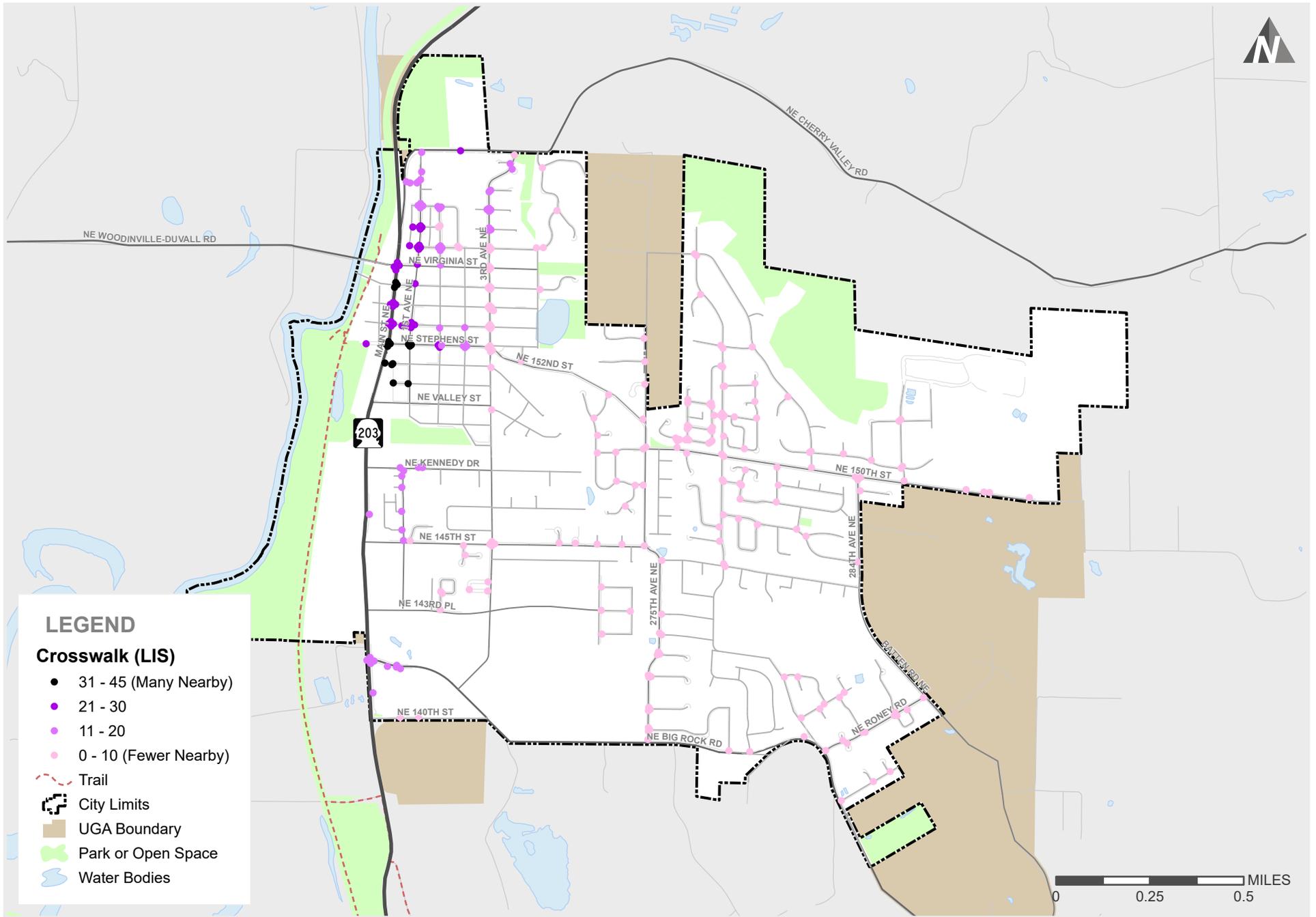
Location Index Score Composite (Non-Compliant Driveway)

City of Duvall ADA Transition Plan

FIGURE



5-5



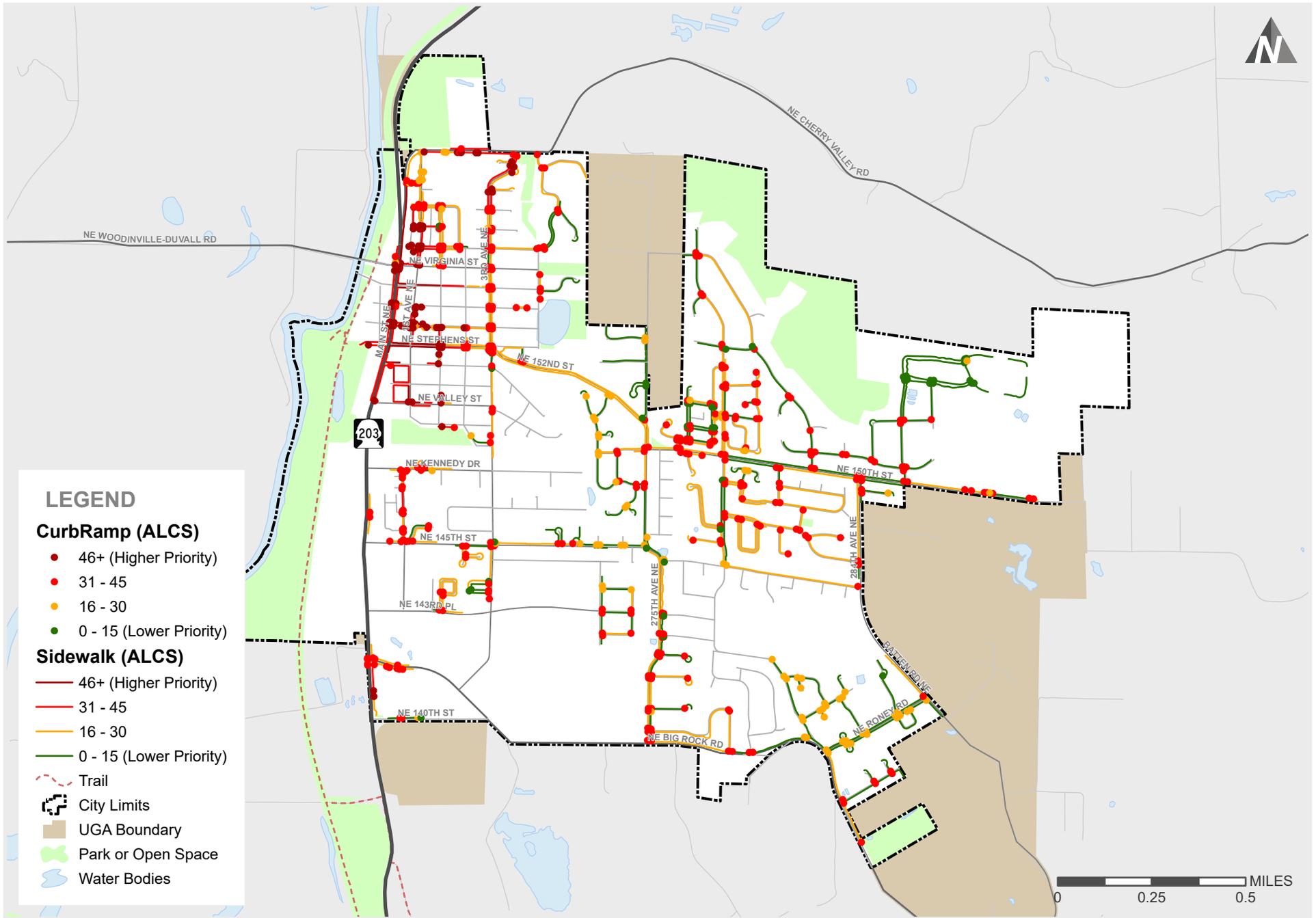
5.2.3 Barrier Removal Priorities

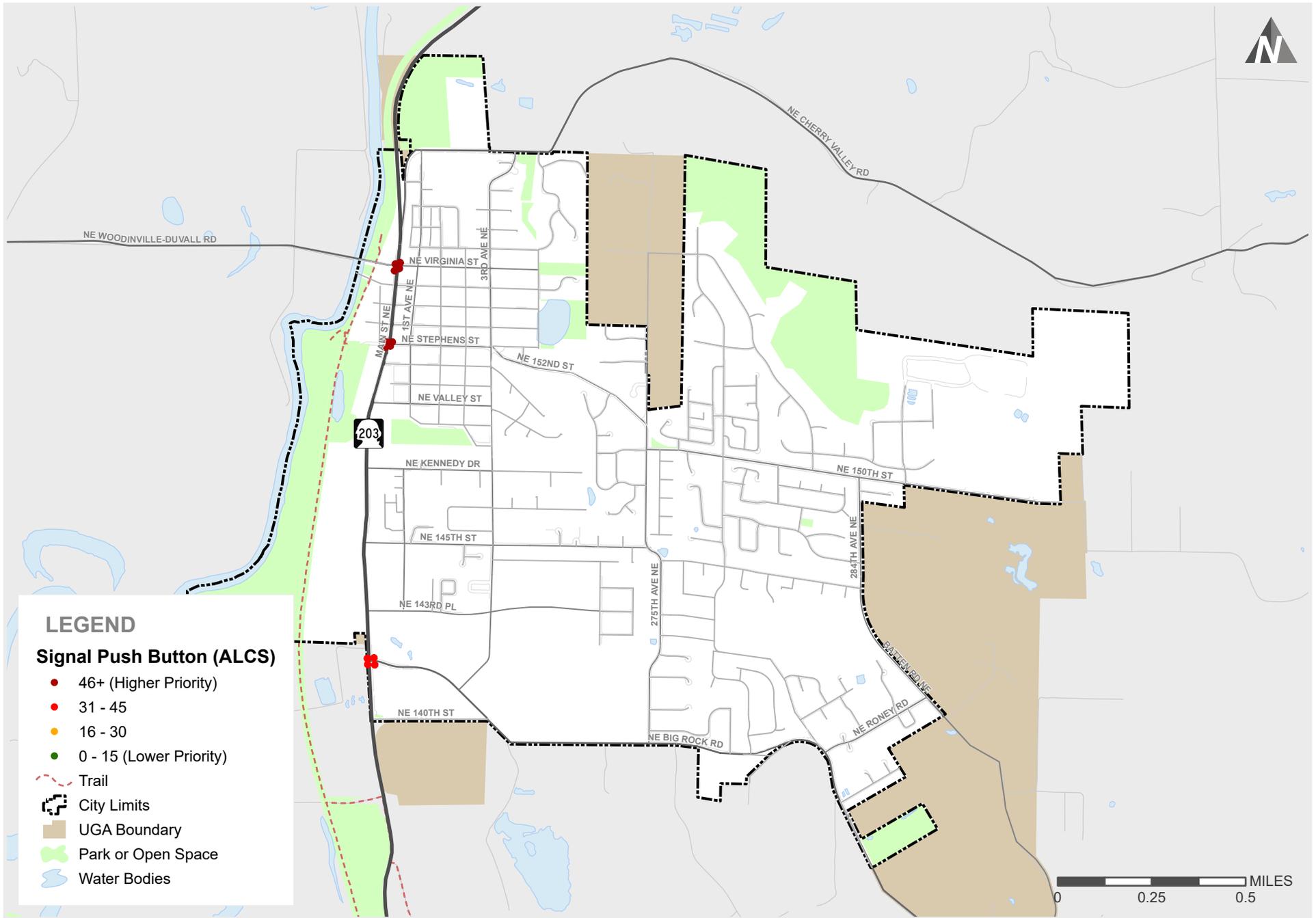
A Composite Index Score (CIS) was developed by combining the AIS and the LIS together. Together, these measures prioritize where pedestrian facilities present a barrier and where pedestrians would be expected. These scores are relative, comparing one facility to the other.

Facilities with the highest score should be addressed first (46+ points) because they represent facilities that present a clear physical barrier and are in high-demand areas. Facilities with lower scores should be

address last (0 to 15 points), because these have minor barriers, and are in locations where pedestrian demand would be expected to be lower. The ranges for medium and high priority were defined based on review of the identified barriers and assessment of the relative barrier they present. It should be noted that while some barriers have a lower priority, they still should be removed.

Figures 5-7 through 5-8 show the combined scores.





5.3 Transition Plan Cost and Schedule

A key requirement of an ADA Transition Plan is development of a schedule which shows how long it will take the City to remove accessibility barriers. Understanding the financial resources needed to address accessibility barriers is essential for developing such a schedule.

5.3.1 Process

Unit costs were developed to address ADA barriers described in Chapter 2. These unit costs were developed using recent bid tabulations and assuming a typical cost of replacement for each ADA barrier.

A final cost estimate was determined using information from the data inventory and calculated using 2018 construction costs. The cost estimates are meant to assist in determining a schedule for completion of the barrier removal process and as a tool to help the City plan funding for full removal of barriers over a number of years.

5.3.1.1 Cost Estimate Assumptions

Planning level cost estimates were determined using data gathered during the inventory process and unit costs were developed from the City and WSDOT. Sidewalk and curb ramp ADA deficiencies were totaled using their respective unit –

linear feet for sidewalks, and number of facilities for curb ramps.

To avoid overestimation of non-compliant facilities assumptions were made when necessary to address the reasonableness of the unit cost and the quantities for each item. These assumptions are detailed in Appendix C. Other factors such as contingency, design, mobilization and traffic control were added to the cost subtotal. Right-of-way costs were not captured in this cost estimation process.

It is also important to note that the physical possibility of removal for each ADA barrier was not considered in developing the planning level cost estimate. It is likely that a significant portion of the ADA barriers cannot be fully removed, but only improved to the maximum extent feasible due to existing roadway grades, geometry and other physical factors.

5.3.1.2 Planning Level Cost Estimate

The planning level cost estimate to remove all identified barriers with the City is \$8,857,000 (2018 dollars) including construction, design, mobilization, and other construction related contingencies. Table 5-3 shows a summary of each activity associated with barrier removal and its associated cost. Non-compliant sidewalks represent the largest overall cost, followed by non-compliant curb ramps.

Table 5-3 – Planning Level Cost Estimate

ADA DEFICIENCY	IMPROVEMENT TYPES	TOTAL QUANTITY	TOTAL PRICE
Sidewalks			
Non-Compliant Sidewalk	Reconstruct existing sidewalk	107,740 LF	\$3,986,400
Non-Compliant Driveway	New driveway with sidewalk	223	\$267,600
Subtotal			\$4,254,000
Maintenance/Miscellaneous			
Non-Compliant Vertical Discontinuity	Sidewalk grinding (10 LF of sidewalk)	251	\$62,800
Non-Compliant Horizontal Discontinuity	Sidewalk crack sealing/grouting	90	\$22,500
Fixed Obstacles	Relocation of obstacles including utility pole, mailbox, tree trunk, etc.	47	\$141,000
Moveable Obstacles	Relocation of obstacles including tree/bush (prunable), message boards, parked cars, etc.	59	\$11,800
Protruding Obstacles	Relocation of obstacles including of bush/tree, signs, awnings etc.	502	\$251,000
Subtotal			\$490,000
Curb Ramps			
Curb Ramps without Truncated Domes (DWS), Non-Compliant DWS Placement, Non-Compliant DWS Depth, or Non-Compliant DWS Width	Curb ramp improvement (install/replace detectable warning surface)	8	\$3,200
Crossings Missing Receiving Curb Ramps and Locations with Asphalt Ramps	New curb ramp	70	\$175,000
Substandard Ramp Landings	Curb ramp improvement (upgrade/install top landing)	14	\$2,800
Major Non-Compliant Ramp	Curb ramp improvement (reconstruct existing ramp)	470	\$1,250,200
Subtotal			\$1,432,000
Push Buttons			
Locations without APS push buttons	Upgrade existing traffic signal to APS	3	\$60,000
Subtotal			\$60,000
Total			\$6,236,000
Contingency @ 10%			\$624,000
Design @ 12%			\$749,000
Mobilization @ 8%			\$499,000
TESC + Traffic Control @ 12%			\$749,000
TOTAL 2018 DOLLARS			\$8,857,000

As described in Section 4.1, the City has a variety of funding programs that contribute to ADA barrier removal. This includes Capital Projects, Sidewalk Improvement Program, and the Safe Routes to School

Program. ADA barriers that have the potential to be included in these projects, were categorized and subtracted from the total cost estimate as shown in Table 5-4 below.

Table 5-4 –CIP and Safe Routes to School Funding Allocation

ADA DEFICIENCY	ALL IMPROVEMENTS	WITHIN VICINITY OF TRANSPORTATION IMPROVEMENT PROJECTS	ELIGIBLE FOR SAFE ROUTE TO SCHOOL PROJECTS	REMAINING COST
Sidewalks	\$6,041,000	\$446,000	\$2,447,000	\$3,148,000
Maintenance/ Miscellaneous	\$696,000	-	\$184,000	\$512,000
Curb Ramps	\$2,034,000	\$216,000	\$608,000	\$1,210,000
Locations without APS push buttons	\$86,000	\$29,000	-	\$57,000
Total (including Contingency, Design, Mobilization, TESC and Traffic Control)	\$8,857,000	\$691,000	\$3,239,000	\$4,927,000

Costs associated with the barriers that could potentially be removed with planned Transportation Improvement Projects (2018-2023) are shown by ADA Deficiency along with how much funding would be needed for the remaining barriers to be removed. These values are shown in Table 5-5. These costs include items such as contingency, design, and mobilization.

Table 5-5 –Funding allocations for development

	ADA DEFICIENCY	COST
Total in TIP (Stand-alone projects)	Sidewalks	\$446,000
	Maintenance / Miscellaneous	
	Curb Ramps	\$216,000
	Locations w/o APS Push Buttons	\$29,000
Total in ADA Program (TIP #O-3)	Sidewalks	\$5,595,000
	Maintenance / Miscellaneous	\$696,000
	Curb Ramps	\$1,818,000
	Locations w/o APS Push Buttons	\$57,000

5.3.2 Schedule

Based upon the self-assessment, planning-level cost estimates, and prioritization, a schedule for barrier removal was developed. Table 5-5 below summarizes the schedule in terms of priority level of improvements. With funding of \$450,000 per year from sources such as the ADA improvements

program, Capital Improvement Programs, private development and other right-of-way construction, the City’s objective is to address all known deficiencies within 20 years. This schedule can be accelerated as the City budget evolves or other funding sources can be leveraged to remove barriers faster (Table 5-6).

Table 5-6 ADA Barrier Removal Duration by Priority Level

	BARRIER PRIORITY			
	Lower	Medium	High	Very High
Cost Estimate	\$3,150,000	\$3,375,000	\$1,800,000	\$675,000
Annual Investment	\$450,000	\$450,000	\$450,000	\$450,000
Transition Duration (individual/cumulative)	7 years/ 20 years	7.5 years/ 13 years	4 years/ 5.5 years	1.5 years/ 1.5 years

6 Current Practices

This chapter documents key pieces of information which are critical for ongoing Plan implementation. This information is likely to change over the lifetime of the Plan such as the official responsible for Plan oversight or progress report on barrier removal. This section is meant to act as a “living document” which should be updated to represent current practices or information.

This section is updated as of: November 2017

6.1 Official Responsible

- Official Responsible – Boyd Benson, Director of Public Works
- Mailing Address – PO BOX 1300, Duvall, WA 98019
- Phone Number – (425) 788-3434
- Email -

6.2 Current Grievance Process

- See Appendix E

6.3 Maximum Extent Feasible Database and Process

- See Appendix D

6.4 APS Policy

- See Appendix F

6.5 Accessibility of ADA Transition Plan Information

To be finalized upon adoption of the plan.

6.6 Barrier Removal Performance Monitoring

The plan is currently less than a year old so it represents the most recent available data.

7 References

7.1 Transition Plan 2017

ADA Title II

Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way 2011

City of Duvall, 2016, Complete Streets Policy, Adopted September 20, 2016 ordinance 1200.

Public Works Development and Design Standards (PWDDS, City of Duvall, 2013),

Transportation Element (2017),

and in the City of Duvall Municipal Code (DMC).

Puget Sound Regional Council (PSRC) Transportation 2040 (PSRC, 2010)

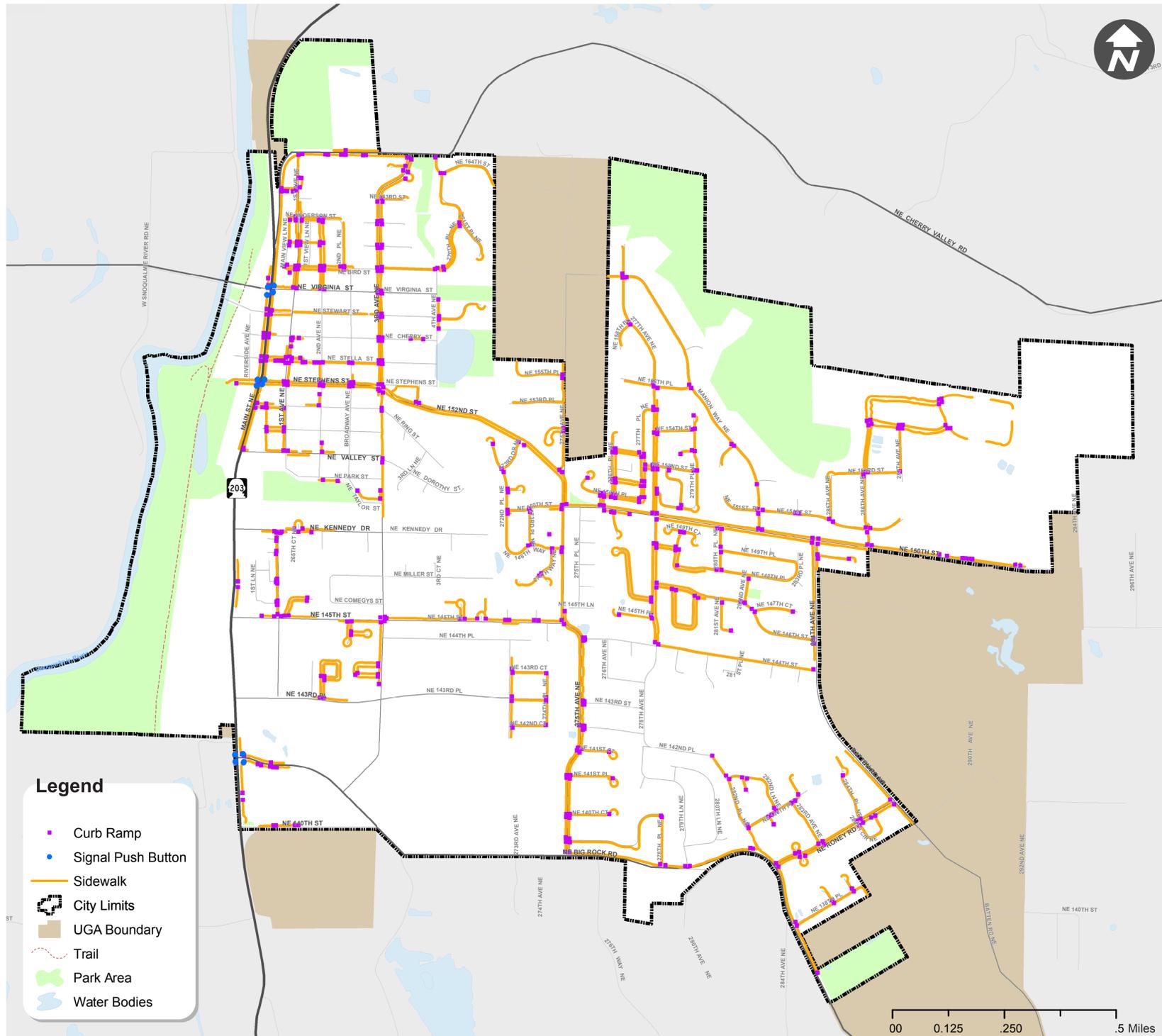
and Countywide Planning Policies (King County, 2012) were reviewed.

ADA guidelines found in Public Rights-of-Way Accessibility Guidelines (US Access Board, 2011),

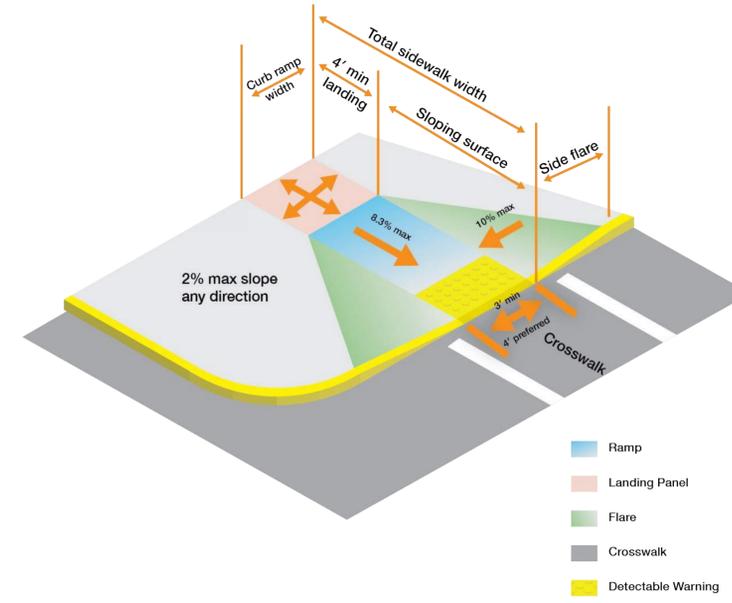
WSDOT Design Manual (WSDOT, 2013), and

WSDOT Field Guide for Accessible Public Right-of-Way (WSDOT, 2012).

Appendix A – Open House Materials



ADA Inventory Data Collection



ADA Curb Ramp Requirements



Pedestrian Push Buttons

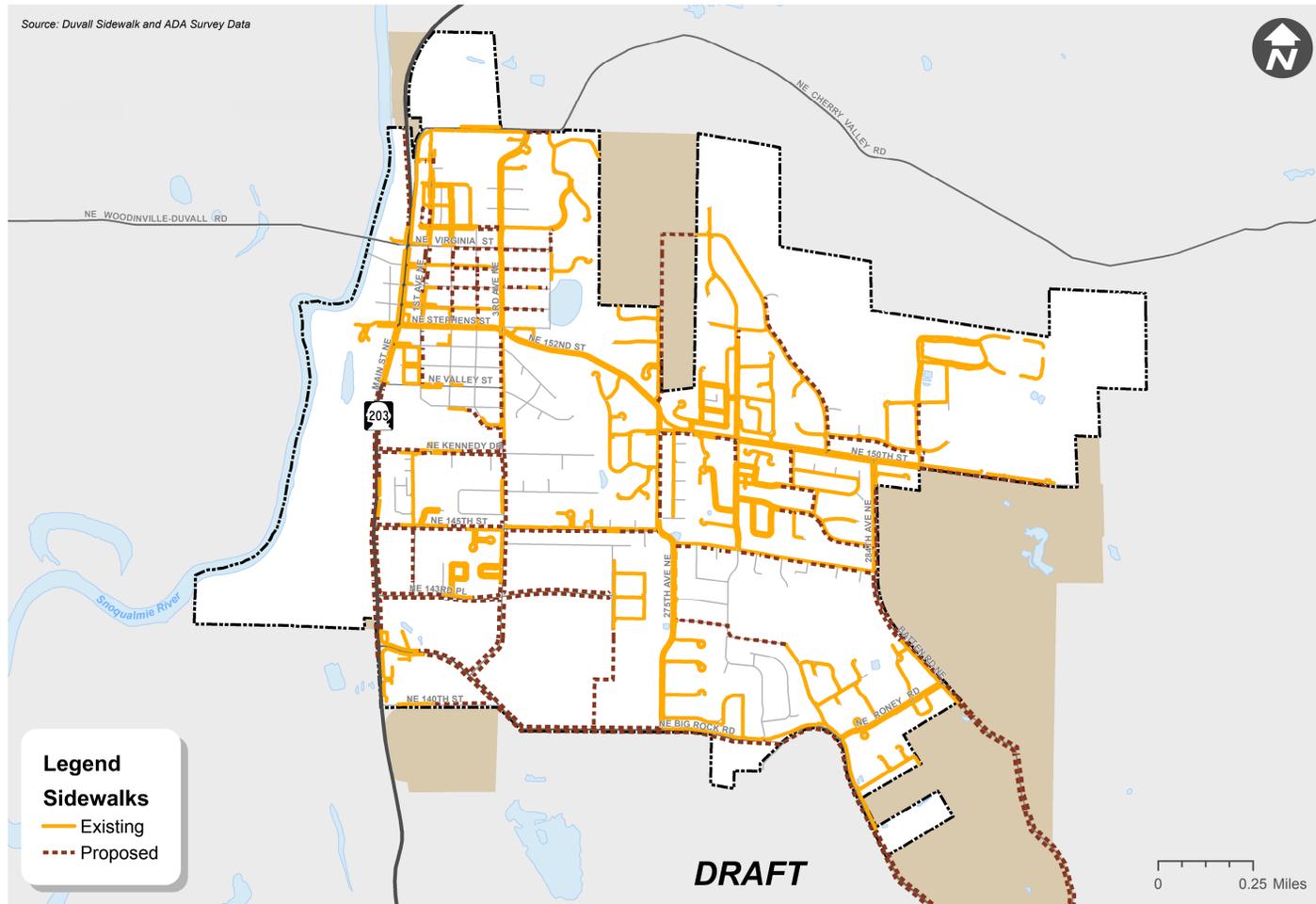


Well-Designed Curb Ramp



Absence of Curb Ramp

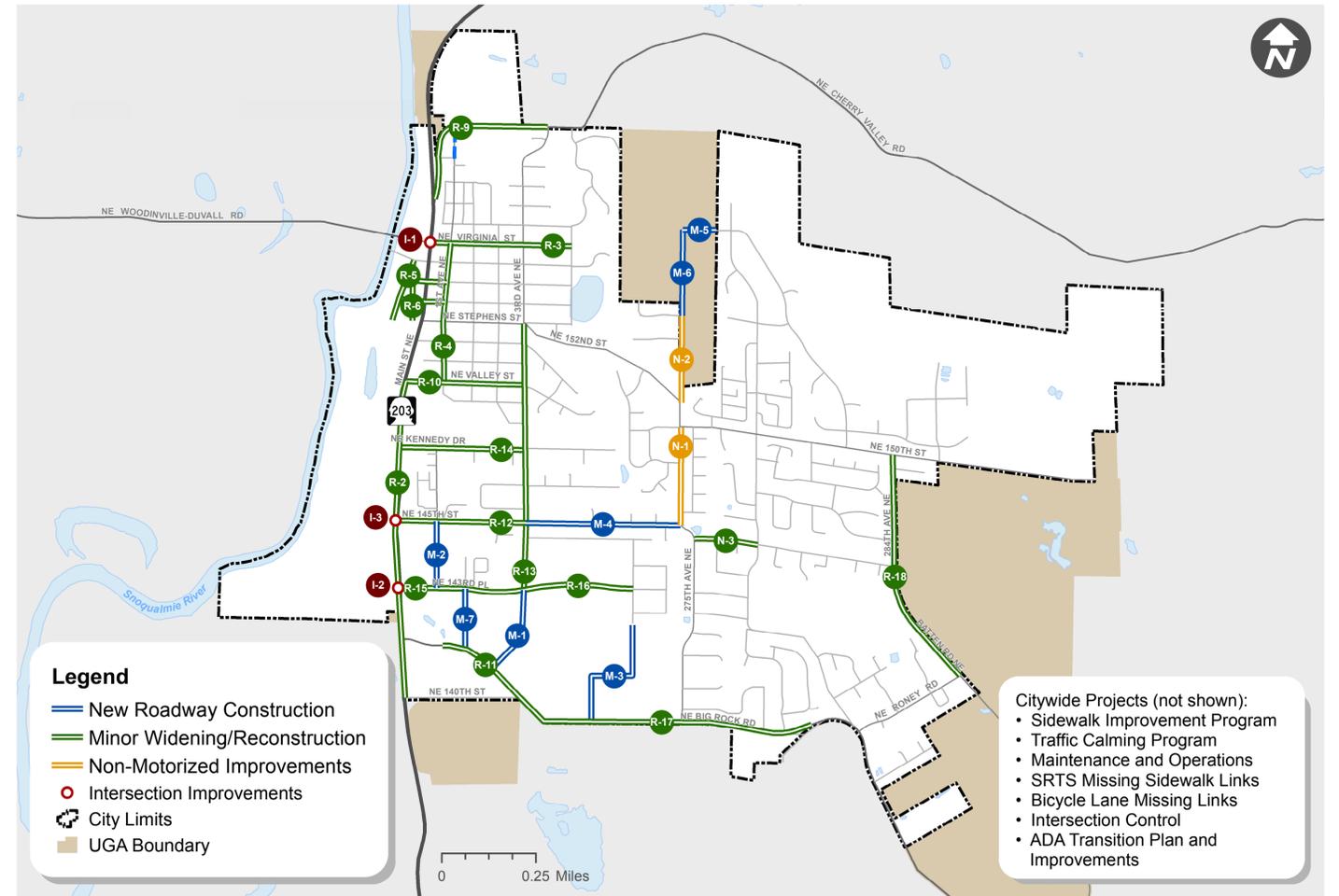
Curb Ramps & Signal Push-Buttons



Pedestrian Facility Network
City of Duvall Transportation Plan

M:\16\16110.00 - Duvall 2016 Transportation Element Update\GIS\Maps\MXD\Fig 3-4 Pedestrian Facility Network.mxd

FIGURE 3-4



Long Range (2015-2035) Transportation Improvement Projects
City of Duvall Transportation Plan

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FIGURE 5-1

Appendix B - Barrier Audit

TECHNICAL MEMORANDUM

Date: September 12, 2018 **TG:** 16388.00

To: Boyd Benson, City of Duvall

From: Ryan Peterson, PE, PTOE, Transpo Group

cc:

Subject: Barrier Removal (Task 4) Audit Findings and Recommendations –
City of Duvall ADA Transition Plan

The City of Duvall maintains approved design standards for pedestrian facilities. These design standards are used for City funded projects as well as privately designed and constructed projects within public right-of-way. This memorandum describes design guidelines that meet the requirements of the Americans with Disabilities Act (ADA), common accessibility design issues, and references to specific design guidelines. The audit of the City's street design standards summarized herein included Development Design Standards (City of Duvall, January 2013).

Design Guidelines

There are several key design measurements that ADA design guidelines address. These measures are used because they are important to the accessibility and safety of the facility. When pedestrian facility designs cannot be constructed to full design requirements, they should be built to conform to the maximum extent feasible. When this arises, the City should identify the location this occurs, provide justification, and document for future reference. The phrase 'to the maximum extent feasible' is defined in the U.S. Department of Justice title III regulation at 28 CFR 36.402 Alterations as applying when:

"...the nature of an existing facility makes it virtually impossible to comply fully with applicable accessibility standards through a planned alteration. In these circumstances, the alteration shall provide the maximum physical accessibility feasible. Any altered features of the facility that can be made accessible shall be made accessible. If providing accessibility in conformance with this section to individuals with certain disabilities (e.g., those who use wheelchairs) would not be feasible, the facility shall be made accessible to persons with other types of disabilities (e.g., those who use crutches, those who have impaired vision or hearing, or those who have other impairments)."

Several guidelines and references are available to assist the City of Duvall in adhering to accessible design standards based on the needs for various projects. There are many opportunities to improve pedestrian conditions by identifying areas of need and establishing the appropriate accessibility design requirements.

Public Rights-of-Way Accessibility Guidelines (July 2011)

The United States Access Board is the rule making body that guides ADA compliance across the US. Since the late 2000's the US Access Board has been in the process of updating its *Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way*. This guidance, with the most current version as of July 26, 2011, is the definitive resource on accessible design of pedestrian facilities in the public right of way.

This guide focuses on accessibility of sidewalks, curb ramps and in the soon to be released versions address shared-use trails. The guideline covers legislative background, administration requirement, and design requirements. The US Access Board PROWAG should be used to confirm that City design standards conform to ADA design requirements.

WSDOT Design Manual (July 2016)

This manual includes pedestrian facility guidelines under Chapter 1510 that follow the guidance in PROWAG. The design manual is intended to guide practitioners implementing construction projects to the best practices and statewide standards for design. *WSDOT Standard Plans: Section F* accompanies the design manual and includes the details of many pedestrian facilities including sidewalks, curb ramps, crossings, pushbuttons, and other facilities.

WSDOT Field Guide for Accessible Public Right of Way (2012)

To ensure that pedestrian facilities are built in compliance with PROWAG standards WSDOT has also developed a *Field Guide for Accessible Public Right of Way 2012 Edition*. This guide provides a detailed checklist to assist field inspectors. This checklist helps to clarify requirements from the City Engineer all the way down to construction field crews, reducing confusion and possibly costly mistakes.

Design Requirements

Recommended actions are included where necessary to meet national and state ADA design guidelines.

Sidewalks

Sidewalks are generally defined as the portion of the pedestrian system from the edge of the roadway (back of curb) to the edge of right-of-way, generally along the sides of streets, between street corners.

Design Element	Requirement	Review / Recommendations
Sidewalk Width	Minimum clear width is 4 feet excluding the curb; however, on pedestrian routes less than 5 feet wide, passing space of 5 feet by 5 feet is required every 200 feet (PROWAG R302.3 and R302.4, WSDOT Design Manual 1510.07(1)(a)).	Typical sidewalk width is 5 feet wide (City of Duvall, 3-03-005B).
Sidewalk Grade	The grade of pedestrian access routes shall be 5 percent maximum. In cases where sidewalk is located along roadway with a higher grade, the sidewalk grade shall not exceed general grade of adjacent roadway (PROWAG, R302.5).	Include 5 percent maximum running grade on sidewalks.
Cross Slope	The cross slope of pedestrian access routes shall be 2 percent maximum (PROWAG, R302.6).	2 percent maximum slope in sidewalks connecting to ramps (3-04-002, 3-04-003, 3-04-004). Include cross slope of 2 percent maximum for sidewalks on sidewalk detail.



Crosswalks

Crosswalks are part of the pedestrian access routes at intersections, midblock crossings, and pedestrian refuge islands. These are important connections across streets to enable pedestrians to travel from one side to the other.

Design Element	Requirement	Review / Recommendations
Crosswalk Width	Marked crosswalks may range from 6 to 10 feet depending on the application, but wider crosswalks are typically preferred.	The length of crosswalks shall be 10 feet (City of Duvall, 3-04.05).

Curb Ramps

Curb ramps are the immediate junctions between the sidewalk and street crosswalk. Perpendicular and diagonal curb ramps have a running slope that cuts through the curb at right angles, while parallel curb ramps have a running slope that is in-line with the sidewalks. Combination ramps include elements of both parallel and perpendicular curb ramps.

Design Element	Requirement	Review / Recommendations
Ramp Width	Ramps shall be 4 feet wide unless fixed obstacles constrain the turning surface on more than 2 sides, in which case 5 feet are required parallel to the direction of pedestrian travel on the ramp (PROWAG R304.1).	Perpendicular ramps are required to be 4 feet wide with a minimum landing width of 4 feet. (3-04-002) Parallel ramps are required to be 5 feet wide. (3-04-003).
Grade and Length	Curb ramp slopes shall not exceed 8.3 percent; however, a design slope of 7.5 percent to allow for construction tolerances is recommended by WSDOT. Where the slope of the street right of way does not allow for a maximum slope of 8.3 percent, the ramp shall not extend past 15 feet (PROWAG R304.2.2).	Curb ramps shall have a maximum grade of 1H:12V. Provide recommendation of a grade of 1H:13.33V or flatter to allow for construction tolerances for curb ramps in addition to maximum grade.
Cross Slope	Curb ramp, blended transition, and turning space shall have a 2 percent maximum cross slope (PROWAG R304.5.3).	Maximum cross slope in landing is 2 percent (3-04-002, 3-04-003, 3-04-004). Include maximum cross slope of 2 percent in ramps.
Flared Sides	Where a pedestrian circulation path crosses the curb ramp, flared sides shall be sloped 10 percent maximum, measured parallel to curb line (PROWAG R304.2.3).	Ensure slopes of flared sides have a maximum slope of 10 percent.
Direction	The running slope of a perpendicular curb ramp shall intersect the curb at a right angle (PROWAG 304.2.2).	Direction of curb ramps shall be square to curb & roadway (3-04-002, 3-04-004).
Counter Slope	The counter slope of the gutter or street at the foot of curb ramps shall not exceed 5 percent (PROWAG R304.5.4).	Show maximum counter slope of gutter or street at base of curb ramp and within crosswalk as 5 percent.
Grade Break	Grade breaks at the top and bottom of curb ramps shall always be perpendicular to the direction of travel (PROWAG R304.5.2).	Ensure grade brakes at top and bottom of ramp are perpendicular to the running slope.

Top Landing and Turning Surface	The top landings should extend at least 4 feet beyond the top of the curb ramp for maneuverability. Where turning space is abutted by a fixed object at the back of sidewalk a turning space of 4 feet by 5 feet shall be provided with the 5 feet parallel of the direction of ramp travel (PROWAG R304.2.1).	Minimum landing of 4 feet (3-04-002). Ensure minimum landing width is 5 feet when there is an abutting object at back of sidewalk.
Clear Space	Beyond the bottom grade break a clear space of a minimum of 4 feet by 4 feet within the crosswalk and outside the parallel vehicle travel lane is required (PROWAG R304.5.5).	A minimum of 4 feet by 4 feet area should be provided that is clear of obstacles adjacent to bottom grade break of ramp and clear area is within crosswalk (marked or unmarked).
Detectable Warning Surfaces	Truncated domes shall extend the full width of the ramp and extend a minimum of 2 feet in the direction of the ramp travel (PROWAG R305.1.4). Surface shall contrast adjacent gutter, street, or highway (PROWAG R305.1.3). The truncated domes shall have a base diameter of 0.9 in minimum and 1.4 in maximum, a top diameter of 50 percent of the base diameter minimum and 65 percent of the base diameter maximum, and a height of 0.2 in (PROWAG R305.1.1). The truncated domes shall have a center-to-center spacing of 1.6 in minimum and 2.4 in maximum, and a base-to-base spacing of 0.65 in minimum, measured between the most adjacent domes (PROWAG R305.1.2).	Detectable warning devices are needed for full width of ramp and to be 2 feet in direction of ramp (3-04-002, 3-04-003, 3-04-004, 3-04-005). Size and spacing of truncated domes should meet minimums and maximums (as described).

Signals

Signals are important connections in the pedestrian network that provide crossings at intersections for all roadway users. Where pedestrian signals are provided at pedestrian street crossings, they shall include accessible pedestrian signals and pedestrian pushbuttons complying with sections 4E.08 through 4E.13 of the MUTCD (PROWAG R209.1). The City's street design standards currently require following WSDOT Specifications

Design Element	Requirement	Review / Recommendations
Audible tone or message; Push Button Vibration	An accessible pedestrian signal and pedestrian pushbutton is an integrated device that communicates information about the WALK and DON'T WALK intervals at signalized intersections in non-visual formats (i.e., audible tones and vibrotactile surfaces) to pedestrians who are blind or have low vision (PROWAG R209).	Follow WSDOT Specs. Ensure WSDOT design manual is also followed when designing accessible pedestrian signals and pushbuttons.
Pedestrian Crossing Times	All pedestrian signal phase timing shall comply with section 4E.06 of the MUTCD (incorporated by reference, see R104.2 and shall be based on a pedestrian clearance time that is calculated using a pedestrian walking speed of 1.1 m/s (3.5 ft/s) or less (PROWAG R306.2).	Follow WSDOT Specs. Ensure MUTCD is also followed for pedestrian crossing timing.

Other Pedestrian Areas

Other pedestrian areas include transit stops and work zones. Transit provides a critical lifeline of access and independence for those with limited mobility or vision. Transit stops have additional width requirements for boarding and alighting passengers, and work zones should provide the same level of accessibility as permanent pedestrian facilities.

Design Element	Requirement	Review / Recommendations
Transit Stops	Boarding and alighting areas shall meet other accessibility and local transit guidelines. Maneuvering space 8 feet from curb face and 5 feet parallel to curb faces shall be provided for boarding and alighting. Stop height and vehicle floor height shall be coordinated to reduce slope while boarding to less than 2 percent.	Sidewalks must be 8 to 12 feet wide in landing areas accessing transit services (3-3.02). Ensure landing areas accessing transit services are 5 feet long parallel to curb and have a maximum cross slope of 2 percent.
Work Zones	Pedestrian accessibility needs to be maintained in areas of street construction and maintenance. Work zones shall meet same requirements as the permanent facilities covered in the PROWAG.	Ensure WSDOT design manual is followed in work zones.
Driveway Crossings	Sidewalk or ramp cross slope has a 2 percent maximum (WSDOT Design Manual 1510.08(2)).	Cross slope on sidewalks and ramps within driveways shall be 2 percent (3-03-004A, 3-03-004B, 3-03-005A, 3-03-005). Show cross slope of 2 percent as a maximum.
Step Risers and Treads	Risers shall be 4 inch high minimum and 7 inch high maximum. Treads shall be 11 in deep minimum (PROWAG R408.2).	Risers shall have a height of 5 inches minimum and 7.5 inches maximum. Treads shall be 11 inches minimum and 12 inches maximum deep. (3-05-008). Ensure maximum riser height shall be 7 inches.
Handrail Extension on Stairways	At the top of a stair flight, handrails shall extend horizontally above the landing for 1 foot minimum beginning directly above the first riser nosing (PROWAG R409.10.2). At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance at least equal to one tread depth beyond the last riser nosing (PROWAG R409.10.3).	1 foot 6 inches of handrail extension required at top and bottom of the stairway.

How will pedestrian barriers get removed?

The process to update design standards to comply with ADA requirements needs to include conversations and education with local contractors and design firms to increase awareness of changes to the design standards. The City should also pursue programs and funding sources that expedite the process of removing pedestrian barriers. Addressing pedestrian sidewalk improvements within the City requires a system of prioritization based on available funding and community need. The current prioritization process for identifying the removal of barriers as well as opportunities to improve the prioritization process are described in the following section that will be explored further in the implementation schedule.

Programs and Funding Sources

Project considerations are intended to help guide the decision of which projects to address first. The current considerations include:

- Eliminating Missing Links
- Proximity to Major Destinations
- Matches Available Funding
- Potential for Public/Private Partnerships
- Most Dangerous Accident Locations
- Recommend from Public Input
- Street Improvements that are Planned or Anticipated for Improvement
- Cost Effective
- Near Highest Population Densities
- Designed to Attract New Users
- Areas Most Likely to Develop

As noted above, connectivity, community desire, safety, and funding sources are essential factors to determining the priority of a project. The current information gathering process - for which the data is used to make priority determinations – is identified in the above considerations. This information addressing locations where the highest number of users will benefit, gathering information via public input, and addressing any potential funding sources for the barrier removal.

Examples from other cities

Other cities have different program prioritization selection processes and funding sources based on different factors such as geography, resident demographics, and business stakeholders. A review of other cities was completed to identify how other jurisdictions address the barrier removal process and to identify potential new concepts that would benefit the City of Duvall.

Prioritizing pedestrian barrier removal is addressed by other cities in the country. A typical process for the removal of barriers includes addressing sites during resurfacing projects, when new development is being constructed, in response to hazards, and when addressing requests and/or complaints.

The City of Eugene, Oregon has developed a prioritization process that influences the barrier removal schedule. The prioritization reflects the adjacent land uses that generate higher levels of pedestrian trips and demand on the pedestrian network. The three-tier priority strategy includes:

- Priority 1 – Address State/Local Government and Public Use Facilities
- Priority 2 – Places of Public Accommodation and Employment
- Priority 3 – Other considerations (service requests, connectivity, funding requirements)

San Francisco addresses locations with poor scores or no curb ramps at all first. Once those locations have been satisfied, the city addresses locations that are the subject of Public Requests or complaints. Project ramp installations priorities are ranked via a matrix.

Financial constraints are a consideration when addressing the prioritization and timing of barrier removal. Current funding sources used by the City are identified in the *Transportation Plan*. These sources included private, public, federal, state, and local. Examples of private funding sources include financing from commercial developers or private stakeholders; public sources include City budgetary items such as the Street Maintenance and Operations Program; Sidewalk Improvement Program, Safe Routes to School Program, a dedicated ADA Improvement Program, and grant sources. Federal funding is generally distributed to local agencies via state or regionally competitive grant programs. State sources are generally grant based and including through programs such as Safe Routes to School, Pedestrian and Bicycle grants, etc.

Appendix C - Cost Estimating Backup

Engineer's Opinion of Probable Cost
 PROJECT NAME: Duvall ADA Transition Plan
 JOB NUMBER: 16388.00
 PREPARED BY: MRW
 CHECKED BY: CAC

NOTE: This cost estimate is planning level in nature. It should be considered preliminary and for planning purposes only. It specifically excludes right-of-way acquisition and all associated costs. Potential items such as retaining walls, earthwork, etc., are assumed to be included in the planning level estimate contingency unless otherwise indicated. When features require multiple improvements, the cost of the smaller component is included in the larger task. (i.e. detectable warning surface is included with curb ramp reconstruction.

Citywide ADA Improvement Cost

Item No.	ADA Deficiency	Improvement Type	Quantity	Unit	Unit Price	Total Price	
Sidewalk Improvements							
1	Non-compliant sidewalk	Reconstruct existing sidewalk	107,740	LF	\$37	\$3,986,400	
2	Non-compliant driveway	New driveway with sidewalk	223	EA	\$1,200	\$267,600	
					Subtotal	\$ 4,254,000	
Maintenance/Miscellaneous							
3	Non-compliant vertical discontinuity	Sidewalk grinding (10 LF of sidewalk)	251	EA	\$250	\$62,800	
4	Non-compliant horizontal discontinuity	Sidewalk crack sealing/grouting	90	EA	\$250	\$22,500	
5	Fixed Obstacles	Relocation of obstacles including utility pole, mailbox, tree trunk, etc.	47	EA	\$3,000	\$141,000	
6	Moveable Obstacles	Relocation of obstacles including tree/bush (prunable), message boards, parked cars, etc.	59	EA	\$200	\$11,800	
7	Protruding Obstacles	Relocation of obstacles including of bush/tree, signs, awnings etc.	502	EA	\$500	\$251,000	
					Subtotal	\$ 490,000	
Curb Ramp Improvements							
8	Curb ramps without truncated domes (DWS), non-compliant DWS placement, non-compliant DWS depth, or non-compliant DWS Width	Curb ramp improvement (install/replace detectable warning surface)	8	EA	\$400	\$3,200	
9	Crossings missing receiving curb ramps and locations with asphalt ramps	New curb ramp	70	EA	\$2,500	\$175,000	
10	Substandard ramp landings	Curb ramp improvement (upgrade/install top landing)	14	EA	\$200	\$2,800	
11	Major non-compliant ramp	Curb ramp improvement (reconstruct existing ramp)	470	EA	\$2,660	\$1,250,200	
					Subtotal	\$ 1,432,000	
Push Button Improvements							
12	Locations without APS push buttons	Upgrade existing traffic signal to APS	3	EA	\$20,000	\$60,000	
					Subtotal	\$ 60,000	
					Grand total	\$ 6,236,000	
					Contingency @ 10%	\$ 624,000	
					Design @ 12%	\$ 749,000	
					Mobilization @ 8%	\$ 499,000	
					TESC + Traffic Control @ 12%	\$ 749,000	
Total						2018 Dollars	\$ 8,857,000

Annual Investments \$ 450,000
 Transition Years 20



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Cost by Priority

ADA Deficiency	Priority (Quantity)				Cost				Total
	Low (0-15, Sidewalk) (0-10, Driveway)	Medium (16-30, Sidewalk) (11-20, Driveway)	High (31-45, Sidewalk) (21-30, Driveway)	Very High (46+, Sidewalk) (31-40, Driveway)	Low (0-15, Sidewalk) (0-10, Driveway)	Medium (16-30, Sidewalk) (11-20, Driveway)	High (31-45, Sidewalk) (21-30, Driveway)	Very High (46+, Sidewalk) (31-40, Driveway)	
Non-compliant sidewalk	42,440	54,900	7,150	3,260	\$1,570,300	\$2,031,300	\$264,600	\$120,700	\$3,986,900
Non-compliant driveway	151	33	25	14	\$181,200	\$39,600	\$30,000	\$16,800	\$267,600
Subtotal					\$ 1,751,500	\$ 2,070,900	\$ 294,600	\$ 138,000	\$ 4,255,000

ADA Deficiency	Priority (Quantity)				Cost				Total
	Low (0-10)	Medium (11-20)	High (21-30)	Very High (31-40)	Low (0-10)	Medium (11-20)	High (21-30)	Very High (31-40)	
Non-compliant vertical discontinuity	189	26	28	8	\$47,300	\$6,500	\$7,000	\$2,000	\$62,800
Non-compliant horizontal discontinuity	60	17	9	4	\$15,000	\$4,300	\$2,300	\$1,000	\$22,600
Fixed Obstacles	17	11	8	11	\$51,000	\$33,000	\$24,000	\$33,000	\$141,000
Moveable Obstacles	44	8	6	1	\$8,800	\$1,600	\$1,200	\$200	\$11,800
Protruding Obstacles	386	64	32	20	\$193,000	\$32,000	\$16,000	\$10,000	\$251,000
Subtotal					\$ 315,100	\$ 77,400	\$ 50,500	\$ 46,200	\$ 489,200

ADA Deficiency	Priority (Quantity)				Cost				Total
	Low (0-15)	Medium (16-30)	High (31-45)	Very High (46+)	Low (0-15)	Medium (16-30)	High (31-45)	Very High (46+)	
Curb ramps without truncated domes (DWS), non-compliant DWS placement, non-compliant DWS depth, or non-compliant DWS Width	4	3	1	0	\$1,600	\$1,200	\$400	\$0	\$3,200
Crossings missing receiving curb ramps and locations with asphalt ramps	1	15	42	12	\$2,500	\$37,500	\$105,000	\$30,000	\$175,000
Substandard ramp landings	7	5	2	0	\$1,400	\$1,000	\$400	\$0	\$2,800
Major non-compliant ramp	16	71	298	85	\$42,560	\$188,860	\$792,680	\$226,100	\$1,250,200
Subtotal					\$ 48,100	\$ 228,600	\$ 898,500	\$ 256,100	\$ 1,432,000

ADA Deficiency	Priority (Quantity)				Cost				Total
	Low (0-15)	Medium (16-30)	High (31-45)	Very High (46+)	Low (0-15)	Medium (16-30)	High (31-45)	Very High (46+)	
Locations without APS push buttons	0	0	1	2	\$0	\$0	\$20,000	\$40,000	\$60,000
Subtotal					\$ -	\$ -	\$ 20,000	\$ 40,000	\$ 60,000

	Low (0-15)	Medium (16-3)	High (31-45)	Very High (45+)	Total
Grand total	\$ 2,114,700	\$ 2,376,900	\$ 1,263,600	\$ 480,300	\$ 6,236,200
Contingency @ 10%	\$ 212,000	\$ 238,000	\$ 127,000	\$ 49,000	\$ 624,000
Design @ 12%	\$ 254,000	\$ 286,000	\$ 152,000	\$ 58,000	\$ 749,000
Mobilization @ 8%	\$ 170,000	\$ 191,000	\$ 102,000	\$ 39,000	\$ 499,000
TESC + Traffic Control @ 12%	\$ 254,000	\$ 286,000	\$ 152,000	\$ 58,000	\$ 749,000
2018 Dollars	\$ 3,004,700	\$ 3,377,900	\$ 1,796,600	\$ 684,300	\$ 8,857,200
Annual Investment	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000	\$ 450,000
Transition Years	6.7	7.5	4.0	1.5	19.7

Appendix D – Design Audit

MEF Template

Project Description

Highway Parameters

- Design Matrix:
- Highway Classification:
- Design Class:
- Design Speed/Posted Speed:
- Design Year ADT:
- Truck Percentage:
- Access Control:

Existing Pedestrian Facilities – general description (for new construction projects include a summary of the project pedestrian study)

Pedestrian Design Standards – cover the following subjects

- Discuss the criteria that apply to the pedestrian elements on the project that will be built to the Maximum Extent Feasible
- Include reference(s) to the appropriate DM section(s) [including revision date]

Alternative(s) analysis - needed for new construction projects only

Proposal – cover the following subjects

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

Justification

- Discussion of what constraints/challenges there are to meet full design level
- See worksheet

Additional Benefits – new construction projects

Attachments

MEF Template – Alteration Project Example

Project Description

This Alteration project will mill & fill SR “A” (from edge line to edge line) with 0.15’ HMA (Class 1/2" PG 64-22) from MP 4.03 to 4.45 and from MP 4.71 to 6.89. This project will overlay the roadway (from edge of pavement to edge of pavement) with 0.20’ HMA (Class 1/2" PG 64-22) from MP 4.45 to 4.71. There is no proposed paving on the County Roads.

Highway Parameters

- Design Matrix: 5-1 (HMA/PCCP)
- Highway Classification: Non-NHS, U-1, Urban Principal Arterial.
- Funding Program: P1 – Paving
- Posted/Design Speed: Mainline - 55/60 mph
- Average Daily Traffic: 25,000 (per Project Definition)
- Truck %: 9% (per Traffic Operations)
- Access Management Classification: Currently classified as Managed Access Class 3. On Master Plan for Modified Limited Access

Existing Pedestrian Facilities

There are five curb ramps and eight sidewalk ramps (from sidewalk to shoulder) located along SR “A” within the paving limits of this project. All five curb ramps and seven of the eight sidewalk ramps do not meet current ADA standards. One sidewalk ramp is located north of the “X” Street intersection (east side – E1, meets guidelines) at the north end of the sidewalk.

There are curb ramps and sidewalk ramps located at the four corners of the “Y” Avenue signalized intersection. Pedestrians can cross this intersection via six curb ramps and four marked crosswalks.

There are curb ramps and sidewalk ramps located at the southwest and northwest corners of the “Z” Way signalized tee intersection. Pedestrians can cross this intersection via three curb ramps and two marked crosswalks. There is one unmarked crossing on SR “A” located at the north side of this intersection. The unmarked crossing meets ADA standards, but the curb ramp located at the west side of the unmarked crossing does not meet ADA standards. This curb ramp is for the marked crosswalk on “Z” Way, is outside of our paving limits, and will not be addressed.

Pedestrian Design Standards

Curb Ramps – Landing, DM Section 1510.09(2)(d), July 2011

The running and cross slopes of a curb ramp landing shall be 2% maximum.

This also implies that the gutter slope adjacent to a curb ramp landing shall be 2% maximum.

Proposal

Curb Ramps and Ramps (from sidewalk to shoulder)

North of the “X” Street intersection (west side - W4)

This sidewalk ramp will be upgraded to meet WSDOT standards.

“Y” Avenue Intersection

Three of the four proposed curb ramps and all four proposed sidewalk ramps at the “Y” Avenue intersection meet current WSDOT standards. Proposed curb ramp "Y" Avenue SW2, located at the southwest corner, is designed to the maximum extent feasible.

Proposed curb ramp "Y" Avenue SW2 will maintain its current landing location to accommodate two crosswalks. All curb ramp elements will meet current WSDOT standards, except for the proposed gutter slope (4.4%) and landing cross slope (5.0%). These two elements will maintain the existing gutter slope >2%.

“Z” Way Intersection

The two proposed sidewalk ramps at the “Z” Way intersection meet current WSDOT standards. Proposed curb ramp “Z” Way SW2, located at the southwest corner, is designed to the maximum extent feasible.

Proposed curb ramp “Z” Way SW2 will maintain its current landing location to minimize the gutter slope and landing cross slope. All curb ramp elements will meet current WSDOT standards, except for the proposed gutter slope (7.4%) and landing cross slope (7.9%). These two elements will maintain the existing gutter slope >2%.

Justification

To construct the curb ramps to be 100% compliant would require re-profiling the existing roadway. This type of major reconstruction is not feasible in this type of Alteration project.

To construct the curb ramps while maintaining the existing profile of the roadway would require rebuilding the roadway adjacent to the proposed curb ramps. The rebuilt roadway would not eliminate the transition from the 2% cross slope of the curb ramps as it matches into the steeper cross slopes of the existing crosswalks but would simply move the transition further into the active traveled roadway. The result would be a grade change transition within the driving lane that would be undesirable.

Attachments

Vicinity Map

Spreadsheet

Curb Ramp Geometrics

Plan Sheets

Appendix E - Grievance Process

City of Duvall, Washington

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 the City of Duvall. The City's Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. 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.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

City of Duvall Public Works Director, **Boyd Benson**
ADA Coordinator
PO Box 1300, Duvall, WA 98019

Within 15 calendar days after receipt of the complaint, Public Works Director or his designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, Public Works Director or his 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 the City of Duvall and offer options for substantive resolution of the complaint.

If the response by Public Works Director or his designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the City Manager or his/her designee.

Within 15 calendar days after receipt of the appeal, the City Manager or his/her designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the City Manager or his/her designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by Public Works Director or his designee, appeals to the City Manager or his/her designee, and responses from these two offices will be retained by the City of Duvall for at least three years.

Appendix F - APS Policy

City of Duvall Policy for Installation of Accessible Pedestrian Signals and Pushbuttons

Intent:

It is the City's intention to be consistent with the most current version of the Public Right of Way Access Guidelines (PROWAG) in the provision of and location of accessible pedestrian signals and pushbuttons¹ (APS) at traffic signals. Further guidance is available in 28 CFR Part 26 and MUTCD section 4E.09.

Purpose:

The purpose of this policy is to establish a reasonable and consistent policy for installing APS.

Scope²:

1. *Requests*: Requests for APS signals from the public will be responded in a timely manner³ and the consideration for installation will be done in accordance with applicable sections of the ADA.
2. *New construction*: New construction of traffic signal projects requires installation of APS and associated accessible features when pedestrian signals are installed.
3. *Curb ramp replacement at traffic signals*: Altering or replacing curb ramps does not require installation of APS unless the curb ramp cannot be altered or replaced without the alteration, installation or replacement of any pole to which a pedestrian push button is attached. Then, installation of APS on poles in accessible locations is required (see 5. below).
4. *Minor work and routine maintenance at traffic signals*: Projects, including but not limited to: emergency repairs⁴, signal timing adjustments (including signal phasing or coordination changes), vehicular detection installation and repairs, installation and repair of CCTV or other cameras, vehicular signal head upgrades and repairs, and repair of pedestrian detection do not require installation of APS and associated accessible features.

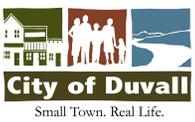
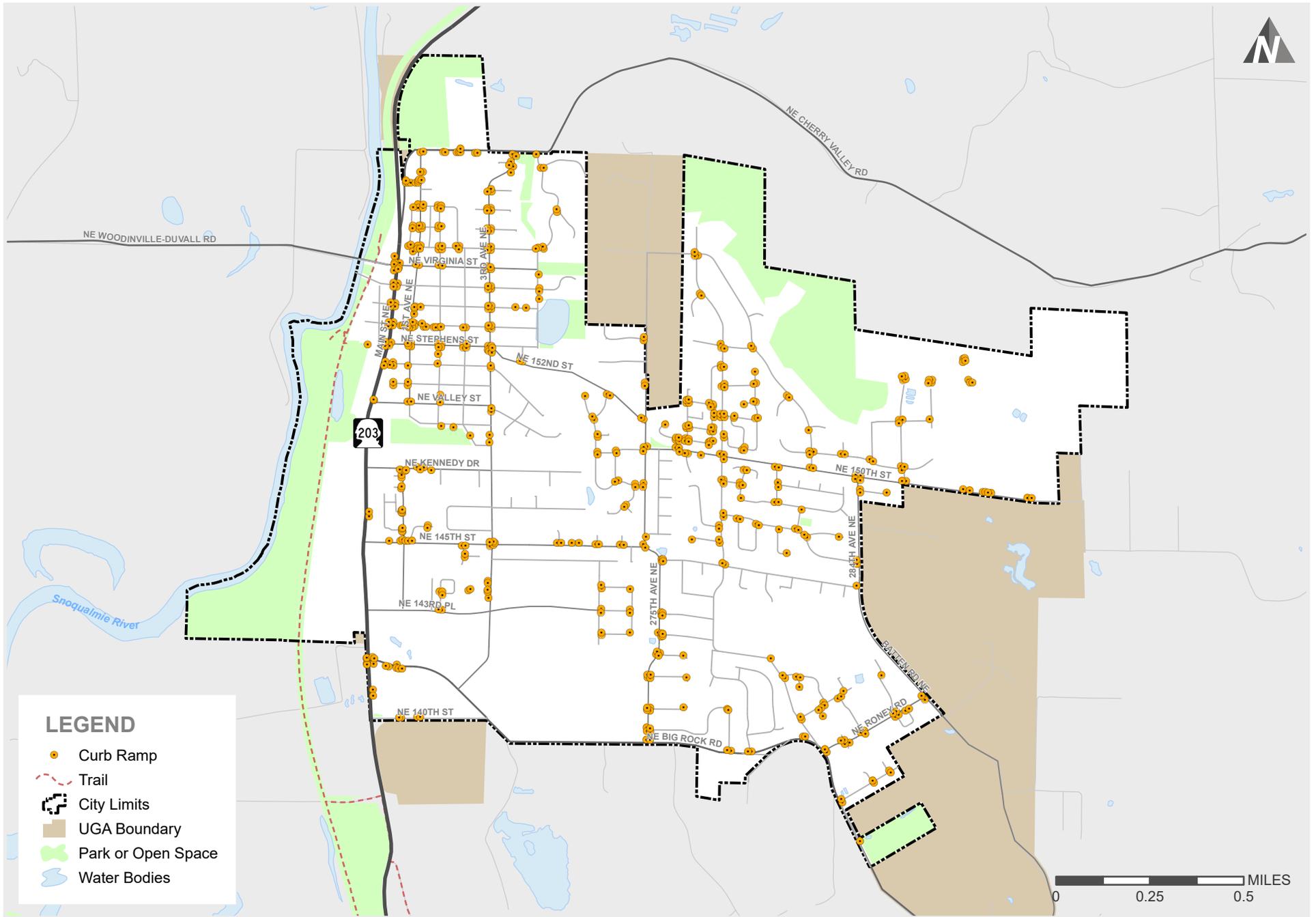
Signal controller software upgrades and repairs and/or cabinet upgrades and repairs that do not alter the operation or display of pedestrian signals do not require installation of APS and associated accessible features.

5. *Other traffic signal projects*: For traffic signal improvement projects that are not new construction, minor work and routine maintenance or curb ramp replacement projects:
 - a. Where the project scope, includes the alteration, installation or replacement of any pole to which a pedestrian push button is attached, installation of APS on poles in accessible locations is required. Relocation of poles may be required to achieve accessibility. Construction or alteration of curb ramps is not required.
 - b. Where the project scope, does not include the alteration, installation or replacement of any pole to which a pedestrian push button is attached, installation of APS at existing push button locations is required. Relocation of poles, construction or alteration of curb ramps, etc. is not required.
 - c. Signal controller software upgrades and repairs and/or cabinet upgrades and repairs that alter the operation or display of pedestrian signals require installation

of APS at existing push button locations. Relocation of poles, construction or alteration of curb ramps, etc. is not required.

- d. Adding or revising pedestrian signal heads or pedestrian detectors require installation of APS at existing push button locations. Relocation of poles, construction or alteration of curb ramps, etc. is not required.
- e. In addition to the areas above, APS will be install through fulfillment of the city's obligations to complete its ADA Transition Plan.

Appendix G – Data Collection Inventory



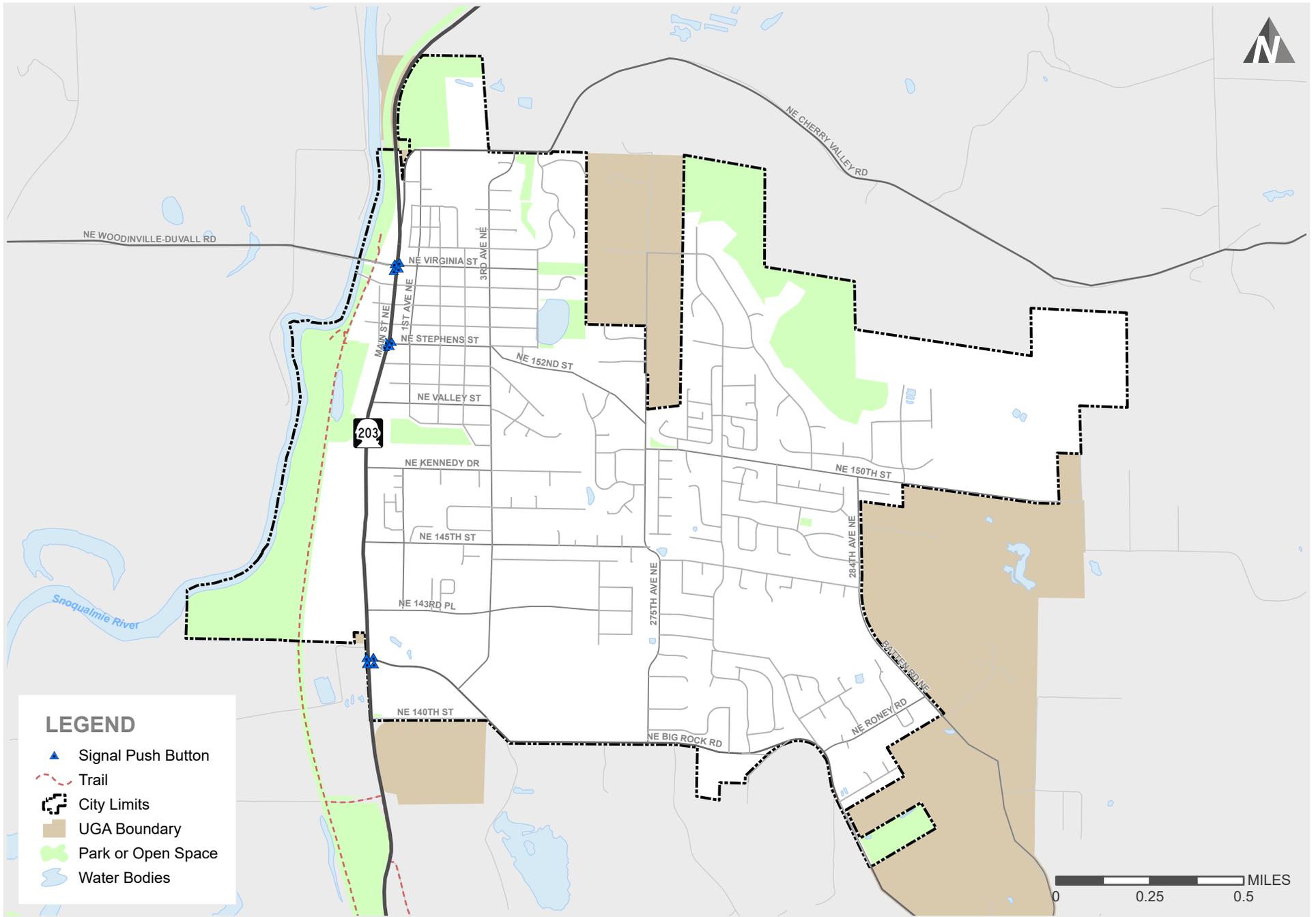
Data Collection Inventory (Curb Ramps)

City of Duvall ADA Transition Plan

FIGURE

I-1





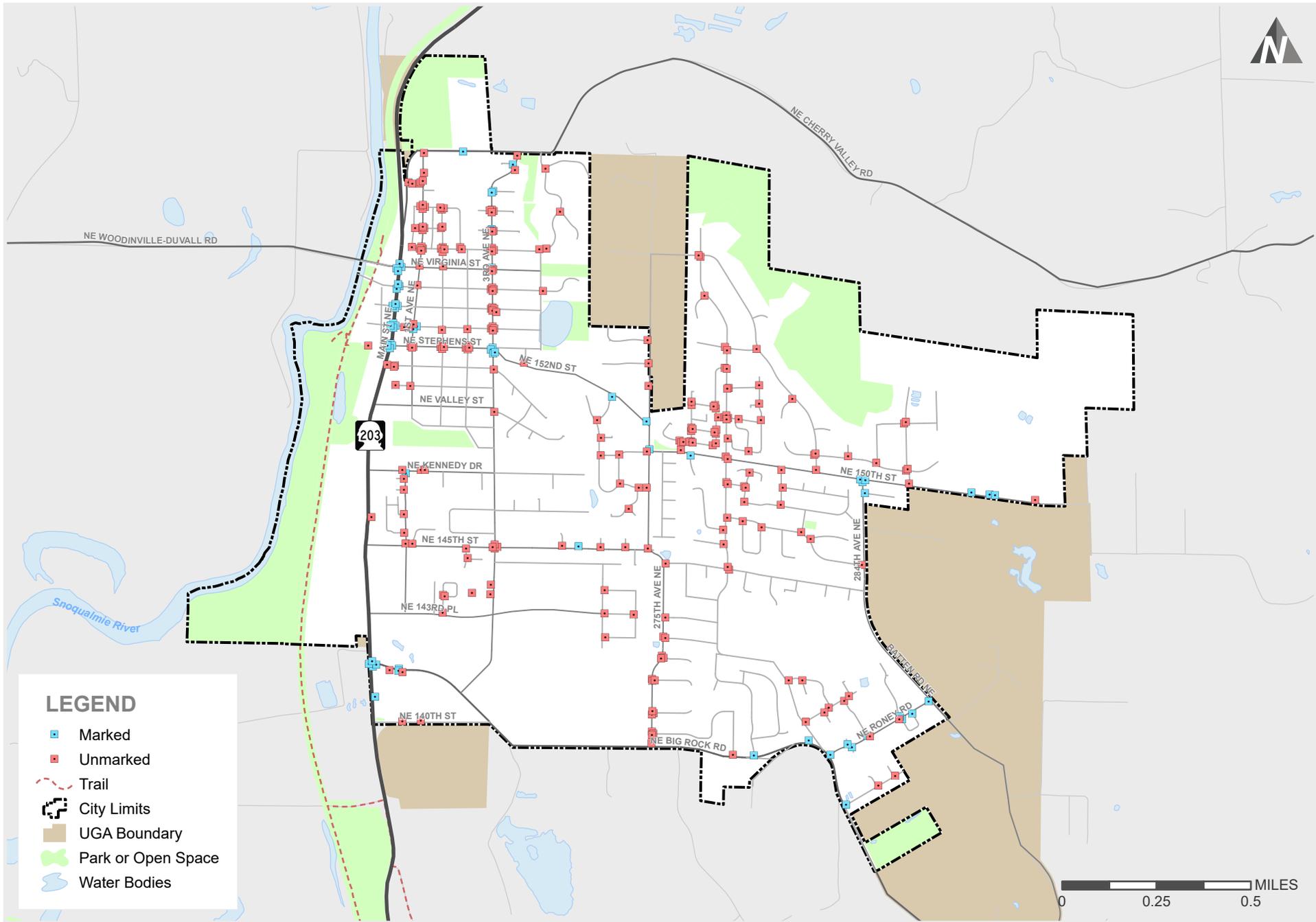
Data Collection Inventory (Signal Push Buttons)

City of Duvall ADA Transition Plan

FIGURE

I-3





Data Collection Inventory (Crosswalks)

City of Duvall ADA Transition Plan

FIGURE

I-4



