



City of Edmonds
ADA Self-Evaluation & Transition Plan for
the Right-of-Way

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Introduction

An ADA Self-Evaluation & Transition Plan is a document that outlines how jurisdictions transition toward compliance with the Americans with Disabilities Act (ADA). This ADA Title II Self-Evaluation & Transition Plan for the Right-of-Way is being prepared to partially fulfill the requirements set forth in Title II of the ADA. The ADA states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. This plan will assist the City of Edmonds to identify policy, program, and physical barriers to accessibility, and to develop barrier removal solutions that will facilitate the opportunity of access to all individuals within the City's public right-of-way. The document is organized as follows:

Chapter 1 – Legal Requirements: The legal requirements of the ADA Title II are summarized for all types of public facilities and programs.

Chapter 2 – Self-Evaluation of Policies, Procedures, and Programs: The findings and recommendations contained in the self-evaluation of policies, procedures, and programs serves as a basis for the implementation of specific improvements for providing access to Public Works programs as required by the ADA.

Chapter 3 – ADA Transition Plan: The transition plan phasing schedule included in this chapter is intended to provide a framework for the continuous improvement of public right-of-way facilities for people with disabilities.

Chapter 4 – ADA Policy and Complaint Procedure: This chapter provides the City's notice under the Americans with Disabilities Act, specifies the ADA grievance procedure and identifies the City's ADA Coordinator.

Chapter 5 – Definitions: Provides a summary of terms used within the ADA and their definitions.

Chapter 6 – Program Accessibility Guidelines, Standards and Resources: Provides a set of resources for the City to utilize in providing programs to the public under Title II of the ADA.

The document has been organized so that the City can easily update the plan to create a comprehensive ADA Self-Evaluation and Transition Plan with information pertaining to all City departments and to include the City's buildings and park facilities.

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1.0 Legal Requirements.

1.1 Legislative Mandate

The American with Disabilities Act (ADA) is a comprehensive civil rights law for persons with disabilities in both employment and the provision of goods and services. The ADA states that its purpose is to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities and to ensure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities.

The development of a Transition Plan is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which requires that all organizations receiving federal funds make their programs available without discrimination toward people with disabilities. The Act, which has become known as the “civil rights act” of persons with disabilities, states that:

No otherwise qualified handicapped individual in the United States shall, solely by reason of handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. (Section 504)

Subsequent to the enactment of the Rehabilitation Act, Congress passed the Americans with Disabilities Act on July 26, 1990. Title II of the ADA covers programs, activities, and services of public entities. The Department of Justice's Title II regulation adopts the general prohibitions of discrimination established under Section 504 and incorporates specific prohibitions of discrimination for the ADA. Specifically, the City may not, either directly or through contractual arrangements, do any of the following¹:

- Deny persons with disabilities the opportunity to participate as members of advisory boards and commissions.
- Deny persons with disabilities the opportunity to participate in services, programs, or activities that are not separate or different from those offered others, even if the City offers permissibly separate or different activities.
- In determining the location of facilities, make selections that have the effect of excluding or discriminating against persons with disabilities.

1.2 Discrimination and Accessibility

This section provides an overview of physical and programmatic accessibility and the basic methods of providing access. There are two kinds of accessibility:

- Program accessibility; and
- Physical accessibility

Absence of discrimination requires that both types of accessibility be provided. Program accessibility includes physical accessibility, but also entails all the policies, practices, and procedures that permit people with disabilities to participate in programs and to access important information. Physical accessibility requires that a facility be barrier-free. Barriers include any obstacles that prevent or restrict

¹ Department of Justice, Title II Regulations Subpart B § 35.130

the entrance to or use of a facility. Program accessibility requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity's programs and services. Program accessibility may be achieved by either structural or non-structural methods. Non-structural methods include acquisition or redesign of equipment, assignment of aides to beneficiaries, and provision of services at alternate sites.

Programs offered by the City to the public must be accessible. Accessibility includes advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication. The City may achieve program accessibility by a number of methods:

- Structural methods such as altering an existing facility;
- Acquisition or redesign of equipment;
- Assignment of aides; and
- Providing services at alternate accessible sites.

It is required that when choosing a method of providing program access, the City will give priority to the one that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In compliance with the requirements of the ADA, the City must provide equality of opportunity.

1.3 Undue Burden

The City is not required to take any action that it can demonstrate would result in a fundamental alteration in the nature of its program or activity, would create a hazardous condition resulting in a direct threat to the participant or others, or would represent an undue financial and administrative burden.

The determination that an undue burden would result must be based on an evaluation of all resources available for use in the City. For example, if a barrier removal action is judged unduly burdensome, the City must consider other options for providing access to the benefits and services of the program or activity by individuals with disabilities.

1.4 Safe Harbor Provisions

The 2010 ADA regulations introduced the concept of “safe harbor”, which allows facilities built prior to March 15, 2012 that comply with the 1991 ADA Standards to remain as-is until the structural feature is altered. For example, the 1991 Standards allowed a 54-inch maximum for a side reach range, and the 2010 Standard lowered the side reach range to 48-inch maximum. Items positioned at the 54-inch height would fall under safe harbor if built before March 15th 2012² until the time of an alteration.

² § 35.150 Existing facilities (b)(2)(i) Safe harbor. Elements that have not been altered in existing facilities on or after March 15, 2012, and that comply with the corresponding technical and scoping specifications for those elements in either the 1991 Standards or in the Uniform Federal Accessibility Standards (UFAS), Appendix A to 41 CFR part 101–19.6 (July 1, 2002 ed.), 49 FR 31528, app. A (Aug. 7, 1984) are not required to be modified in order to comply with the requirements set forth in the 2010 Standards.

This safe harbor is not a blanket exemption for facilities. If a public entity undertakes an alteration to a primary function area, only the required elements of a path of travel to that area that already comply with the 1991 Standards are subject to the safe harbor. If a public entity undertakes an alteration to a primary function area and the required elements of a path of travel to the altered area do not comply with the 1991 Standards, then the public entity must bring those elements into compliance with the 2010 Standards³.

In addition to the exceptions, Title II Regulations specify structural elements not previously included in the 1991 ADA Standards that do not fall under the safe harbor provision:

§ 35.150(b)(2)(ii) The safe harbor provided in § 35.150(b)(2)(i) does not apply to those elements in existing facilities that are subject to supplemental requirements (i.e., elements for which there are neither technical nor scoping specifications in the 1991 Standards). Elements in the 2010 Standards not eligible for the element-by-element safe harbor are identified as follows—

- (A) Residential facilities dwelling units, sections 233 and 809.*
- (B) Amusement rides, sections 234 and 1002; 206.2.9; 216.12.*
- (C) Recreational boating facilities, sections 235 and 1003; 206.2.10.*
- (D) Exercise machines and equipment, sections 236 and 1004; 206.2.13.*
- (E) Fishing piers and platforms, sections 237 and 1005; 206.2.14.*
- (F) Golf facilities, sections 238 and 1006; 206.2.15.*
- (G) Miniature golf facilities, sections 239 and 1007; 206.2.16.*
- (H) Play areas, sections 240 and 1008; 206.2.17.*
- (I) Saunas and steam rooms, sections 241 and 612.*
- (J) Swimming pools, wading pools, and spas, sections 242 and 1009.*
- (K) Shooting facilities with firing positions, sections 243 and 1010.*
- (L) Miscellaneous.*
 - (1) Team or player seating, section 221.2.1.4.*
 - (2) Accessible route to bowling lanes, section. 206.2.11.*
 - (3) Accessible route in court sports facilities, section 206.2.12.*

1.5 Construction Tolerances

The ADA Standards reflect the need for small variations between the standards and the resulting constructed feature. All dimensions are subject to conventional industry tolerances except where the requirement is stated as a range with specific minimum and maximum end points. Application of conventional industry tolerances must be on a case-by-case, project-by-project basis. Predetermined guidelines for construction tolerances could unnecessarily encourage contractors and others to deviate from the access regulations and may wrongfully be viewed by some to have the effect of law.

Conventional building industry tolerances include those for field conditions and those that may be a necessary consequence of a particular manufacturing process. Recognized tolerances are not intended to apply to design work. The barrier data collected in the right-of-way for this Transition Plan do not

³ § 35.151(b)(4)(ii)(C) Path of travel--safe harbor

reflect the application of construction tolerances. The City will evaluate the application of construction tolerances on a case by case basis when alterations or barrier remediation actions are undertaken.

1.6 Maximum Extent Feasible

In an alteration or new construction project, the City must incorporate the ADA Accessibility standards to the maximum extent feasible⁴. As part of the Plan's implementation the City Engineer should document all design exceptions:

When pre-ADA streets or sidewalks are altered, there may be space limitations that restrict how much they can be altered to install accessible curb ramps. In these cases, the curb ramps installed must meet the accessibility requirements of the ADA to the maximum extent feasible. Scoping requirements in the ADA Standards establish limitations for the running slope of the ramp run of curb ramps installed during alterations to pre-ADA streets and walkways⁵.

The Civil Rights Division recognizes that there will be very rare instances when it will be technically infeasible for a curb ramp installed during alterations to pre-ADA roadways and walkways to be constructed in full and strict compliance with the requirements of ADA Standards § 4.1.6(3)(a) and § 4.7 because of physical or site constraints. In such circumstances, state and local governments must install curb ramps that provide accessibility to the maximum extent feasible⁶. Before reaching a conclusion about technical infeasibility, state and local governments need to consider the extent to which physical or site constraints can be addressed by alternative curb ramp designs. The burden of proving technical infeasibility lies with the state or local government that constructed it.

When highways, streets, and roads are built or altered post-ADA, they must have curb ramps at certain locations. Curb ramps must be located wherever there are curbs or other barriers to entry from a pedestrian walkway or sidewalk, including any intersection where it is legal for a pedestrian to cross the street, whether or not there is any designated crosswalk. Curb ramps must also be located wherever there are curbs or other barriers to entry at any designated pedestrian crosswalks that are located mid-block. Likewise, when sidewalks or walkways are built or altered post-ADA, they must include curb ramps or other sloped areas wherever they intersect with highways, streets, or roads and pedestrians may legally cross the vehicular way as well as at public transportation stops.

By contrast, for pre-ADA highways, streets, roads, and sidewalks that have not been altered, state and local governments may choose to construct curb ramps at every point where a pedestrian walkway intersects a curb. However, they are not necessarily required to do so. Under a more flexible standard called "program access," alternative

⁴ Title II Regulations 28 CFR §35.151(b)

⁵ ADA Standards § 4.1.6(3)(a).

⁶ ADA Standards § 4.1.6(1)(j).

routes to buildings may be acceptable where people with disabilities must travel only a marginally longer route than the general public⁷.

1.7 ADA Self-Evaluation and Transition Plan Requirements

The ADA Self-Evaluation and Transition Plan (SETP) is intended to provide a framework for the continuous improvement of the City programs and facilities for people with disabilities. This plan addresses the facilities within the public right-of-way: curb ramps, pedestrian signals, and pedestrian access routes. The SETP is intended to be a living document that is regularly updated as programs and services change, and as barriers are removed, and new facilities come under ownership or control of the City. Programs, activities, and services offered by the City of Edmonds to the public must be accessible for people with and without disabilities. Accessibility applies to all aspects of a programs or services provided by the City, including:

- accessible/adaptive equipment;
- customer service;
- emergency evacuation procedures;
- facilities;
- notice requirements;
- printed information;
- program eligibility and admission;
- public meetings;
- public telephones and communication devices;
- special events on public properties;
- televised and audiovisual public information;
- tours and trips;
- training and staffing;
- transportation services;
- use of consultants for delivering program services; and
- website.

The ADA Self-Evaluation for programmatic access identifies and makes recommendations to correct those policies and practices in the above-mentioned programs and services that are inconsistent with Title II requirements and result in limitations on access for persons with disabilities. As part of the Self-Evaluation⁸, the City:

- Identifies the City's programs, activities, and services;
- Reviews the policies, practices, and procedures that govern the administration of the City's programs, activities, and services;
- Provides opportunity for public comment;
- Makes the report available to the public; and
- Correct any programs, activities, and services that are not consistent with the requirements.

For this planning process, a self-evaluation of policies, programs, and procedures citywide has not been conducted, rather a self-evaluation was completed for the division of the Public Works Department focused on the facilities within the right-of-way and is included in Chapter 2 of this document.

⁷ <https://www.ada.gov/pcatoolkit/chap6toolkit.htm>

⁸ Department of Justice, Title II Regulations Subpart D § 35.105

A Transition Plan is a document that outlines a strategy for the City to progress toward compliance with the Americans with Disabilities Act. The Transition Plan identifies barriers for persons with disabilities and a schedule to remove those barriers over time and must include⁹:

- A list of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- A detailed outline of the methods to be used to remove these barriers and make the facilities accessible;
- A schedule for taking the steps necessary to achieve compliance with the ADA, Title II;
- Provide opportunity for the public to provide comment on the Transition Plan; and
- The name of the individual responsible for the plan's implementation.

This Transition Plan is an assessment of the City's right-of-way facilities to determine if there are barriers to City services, programs, and activities for persons with disabilities. The City has identified which City owned and maintained right-of-way facilities have access barriers for persons with disabilities and has developed a schedule for barrier removal to comply with Title II of the ADA. The Transition Plan for these facilities is described in Chapter 3 and is the result of a detailed evaluation of all City of Edmonds right-of-way facilities.

1.8 Public Involvement

The ADA requires the involvement of the members of the disabilities community in the development and review of the ADA Self-Evaluation and Transition Plan¹⁰. For this planning process the City formed an ADA Stakeholder Advisory Committee that met twice over the course of the plan's development. The first meeting was held on December 16, 2016 where the City presented the work plan, presented criteria for barrier removal priority development, and gathered information on issues experienced within the City's right-of-way. This group met a second time on July 26, 2017 to provide feedback on the Administrative Draft ADA Self-Evaluation & Transition Plan for the Right-of-Way before distribution to the public. The public review draft of the Plan will be made available on the City's website and at highly frequented public facilities, a press release will be issued advertising the public comment period for the Plan. After the public review and comment period this section of the document will be updated and comments will be incorporated into the Plan before the document goes before City Council.

⁹ Department of Justice, Title II Regulations Subpart D § 35.150

¹⁰Department of Justice, Title II Regulations Subpart D § 35.150 (d)(1)

2.0 Self-Evaluation: Policies, Procedures, and Program Accessibility

2.1 Introduction

Programs, activities, and services offered by the City of Edmonds to the public must be accessible for people with and without disabilities. Accessibility applies to all aspects of a program or service, including advertisement, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

This section details the review of current Public Works policies, services, programs, and activities -- as they pertain to the pedestrian access routes within the public right-of-way -- based on City staff responses to the program accessibility questionnaire administered in December 2016 along with a review of the City's policy, program, and program documents. The findings and recommendations contained in this section will serve as a basis for the implementation of specific improvements for providing access to City programs as required by the ADA.

2.2 Programmatic Modifications

The ADA Coordinator, or designee, will follow up with department staff to review the recommendations contained in this section. Where a policy, program, or procedure creates a barrier to accessibility that is unique to the department or a certain program, the ADA Coordinator, or designee, will coordinate with the department head or program manager to address the removal of the barrier in the most reasonable and accommodating manner in accordance with applicable law.

2.3 Self-Evaluation Findings and Recommended Actions

This section is organized into categories based on the requirements of Title II of the ADA.

Accessible/Adaptive Equipment

- Customer Service
- Notice Requirements
- Printed Information
- Televised and Audiovisual Public Information
- Website
- Public Telephones and Communication Devices
- Training and Staffing
- Program Eligibility and Admission
- Public Meetings
- Transportation Services
- Tours and Trips
- Use of Consultants for Delivering Program Services
- Emergency Evacuation Procedures
- Facilities
- Special Events on Public Properties

Actions are listed as required or recommended based on the Americans with Disabilities Act. Some actions are always required, such as not charging a fee for providing accommodation for a disability, while other actions are only required when requested, such as providing alternative formats such as large print agendas. In many cases, the City has many alternatives in selecting methods for providing accessible programs, activities, and services.

Accessibility/Adaptive Equipment

Adaptive aids are devices, controls, appliances, or items that make it possible for persons with disabilities to improve their ability to function independently and participate in programs, services, and

activities offered by the City. For example, a pen, note pad and clip board provided to a person with a hearing or speech impairment to write notes on or accessible electronic equipment such as an accessible computer station are considered adaptive equipment.

Required or Recommended Actions:

1. It is required to provide and maintain in working order accessible equipment for people with disabilities when the public is allowed or required to use equipment such as computers, copy machines, telephones, or other technologies.
2. It is recommended to collaborate with community organizations that serve people with disabilities to develop and maintain a current resource list of assistive technology equipment and sources.
3. It is recommended to establish and maintain a “Resources Toolkit” of adaptive aids and human resources that should be available for use by individuals participating in City programs. Include information about the availability of specific equipment and/or individuals who are available to provide special services (e.g., ASL translation) in public information materials such as brochures and the City’s website.
4. It is recommended to include accessibility as a criterion for purchasing. Whenever possible, evaluate furniture and building material purchases for compatibility with a wide range of disabilities and sensitivities. Select items that are easily adjustable or can be modified to accommodate a variety of physical and ergonomic needs when purchasing items such as furniture, site furnishings, and office systems. Consultation with disability organizations and persons with disabilities will assist in this task.

Customer Service

In-person interaction with the public is one of the primary functions of most City departments.

Required or Recommended Actions:

1. It is required that the City continue the policy of not charging an additional fee to the person requesting accommodation for their disability for program modifications or alternative formats.
2. It is required to continue to make appropriate modifications to regular practices to accommodate the needs of individuals with disabilities when providing customer service.
3. To meet this requirement, it is recommended that the City develop criteria for determining reasonable modifications to provide program accessibility, which may include acquisition or redesign of equipment, assignment of aides to persons with disabilities, and provision of services at alternative accessible sites. An approach should include:
 - Requests for reasonable modification in programs or services should be made to the department responsible for the program or service.
 - The department offering the program or service should meet with the individual with a disability to identify which aspects of the program limit participation and what modifications can be made.
 - The department offering the program or service should consult with the relevant program or service staff to determine the reasonable modification. The department offering the program or service may also consult with the City’s ADA Coordinator or other resources providing services or information regarding persons with disabilities as appropriate.

- The department offering the program or service should document the modification(s) that was offered and the response of the person with the disability to the modification(s) offered. This documentation should be filed with the City ADA Coordinator's office. All accessibility requests should be tracked. The ADA requests should be analyzed periodically to look for global issues that can be addressed and problems that can be solved proactively.
 - If individuals with a disability are not satisfied with the results of this process, they should be directed to the City's ADA Grievance Procedure.
4. It is recommended that the City:
- Assess the composition and needs of the population of people with disabilities, and take the necessary steps to improve communication and outreach to increase the effective participation of community members with disabilities in all City programs and activities.
 - Create partnerships with organizations that provide services to people with disabilities to assist in communicating about accessible City programs. Keep programs up to date through increased community involvement and partnerships with organizations that offer services to persons with disabilities.
 - Publicize efforts to increase participation by persons with disabilities, which might include activities such as distributing program brochures to members of the disability community.

Notice Requirements

Title II regulations require the City to inform the public of the rights and protections provided by the ADA for access to public programs, services, and activities. It is the obligation of the head of the public entity to determine the most effective way of providing notice to the public about their rights and the public entity's responsibilities under the ADA. Publishing and publicizing the ADA notice is not a one-time requirement. State and local governments should provide the information on an ongoing basis, whenever necessary. If you use the radio, newspaper, television, or mailings, re-publish and re-broadcast the notice periodically.¹¹

Required or Recommended Actions:

1. It is required that the City include the following or similar notice regarding the City's commitment to providing accessible services.

Model Notice Provided by the Department of Justice:

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the [name of public entity] will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: [name of public entity] does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the ADA.

Effective Communication: [Name of public entity] will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in [name of public entity's] programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of

¹¹ <https://www.ada.gov/pcatoolkit/chap2toolkit.htm>

making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: [Name of public entity] will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in [name of public entity] offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of [name of public entity], should contact the office of [name and contact information for ADA Coordinator] as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the [name of public entity] to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of [name of public entity] is not accessible to persons with disabilities should be directed to [name and contact information for ADA Coordinator].

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

2. It is required where the City communicates by telephone it can communicate with a person with hearing impairment using a TTY system or equally effective telecommunications systems such as 711 the Telecommunications Relay Service.
3. It is required that the City ensures effective communication and that interested persons can obtain information as to the existence and location of accessible services activities, and facilities. Some ways to ensure this is by including a statement regarding the availability, upon request, of alternative formats and auxiliary aids is included on announcements for City programs, and applications, including:
 - A non-discrimination notice in City hard copy and web publications that provides general information about City services, programs, or activities similar to the following:

The City of Edmonds does not discriminate on the basis of disability in the admissions or access to its programs or activities. An ADA Coordinator has been designated to coordinate compliance with the non-discrimination requirements contained in the Department of Justice regulations implementing Subtitle A of Title II of the Americans with Disabilities Act (42 U.S.C. 12131-12134), which prohibits discrimination on the basis on disability by public agencies.

Bertrand Hauss, ADA Coordinator
121 5th Ave N, Edmonds, WA 98020
425-771-0220 | bertrand.hauss@edmondswa.gov

- The City's text telephone (TTY) number and/or Telecommunications Relay Service information, and the phone number and email address of the person who can provide assistance in meeting special needs; and
 - A notice that requests for alternative formats or auxiliary aids is required with 48-hour notice.
4. It is recommended that the City increase outreach to persons with disabilities and the organizations that serve them. The City should inform the public of the possible modifications that can be provided to make services, programs, and activities accessible.

Printed Information

To meet the ADA's communication standards, City departments must be able to provide information, when requested, in alternative formats such as using easy-to-understand language, Braille, large-print format, audiotape or CD, computer disk, or other formats as requested.

Required or Recommended Actions:

1. It is required that the City provide alternative formats to printed information, when requested (for example, enlarged print format for persons with visual disabilities or in simple language for persons with cognitive disabilities).
2. It is required that the City address all requests for other alternative formats or lengthy documents on an individual basis.
3. It is required that any additional costs for alternative forms of communication are not assigned to the person with a disability requesting the alternative format.
4. It is required to provide programmatic changes (e.g., staff assistance), upon request to assist in filling out forms or when alternative formats are unavailable or infeasible.
5. It is recommended to include the following notice on materials printed by the City that are made available to the public:

This publication can be made available in alternative formats, such as large print, Braille, or electronic format. Requests can be made by calling the ADA Coordinator at (425) 771-0220 (Voice) or by using the 711 Telecommunications Relay Service. Please allow 48 hours for your request to be processed.

6. It is recommended that the City provide instruction to each department on how to produce printed information in alternative formats for persons with various disabilities to ensure that requests are handled in a uniform and consistent manner.
7. It is recommended that when photos are part of a brochure or publication, photos of persons with disabilities are included

Televised and Audiovisual Public Information

Televised and audiovisual information is a means for disseminating public information through presentations produced by City departments. All televised and audiovisual information must be accessible to persons with disabilities. As more and more communication is being done remotely via the rapidly changing internet, it will be increasingly important that all communication tools maintain accessibility as technology changes.

Required or Recommended Actions:

1. It is required that the City provide, when requested, alternatives to audio presentations for City programs and for audiovisual presentations produced by the City (including videos, films, and City Council, and Planning and Transportation Commission meetings) in order to ensure that persons with hearing impairments can benefit from these presentations. Closed captioning is not required.
2. It is recommended that when presenting PowerPoint or other visual presentations that the presenter reads the slides and describes the graphics. This will allow people who are blind or visually impaired to receive the information being presented.
3. It is recommended that when photos are part of an audio-visual presentation, images of persons with disabilities are included.

Website - City and Department Websites

As people turn to the Internet as their primary source of information regarding services, programs, activities, and facilities, the City's website

https://www.edmondswa.gov/government/departments/public_works_and_utilities/transportation_system/ada_transition_plan takes on increased importance as a communications tool.

Providing public access to City publications online is an effective means of reaching persons with disabilities. New accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998 have set forth the technical and functional performance criteria necessary for such technology to be accessible.

Required or Recommended Actions:

1. It is recommended that the City's website is accessible to people with disabilities, including those with visual impairment.
2. It is recommended that the City publish the Policy of Non-Discrimination, including on the Basis of Disability, on the City's website.
3. It is recommended that the City:
 - Increase outreach to persons with disabilities by having the website include more information about the City's commitment to providing accessible services.
 - Continually improve the accessibility of web pages through the use of web accessibility analysis to meet and/or exceed Section 508 of the Rehabilitation Act guidelines for accessibility of electronic information. Acquire the technological resources necessary to create accessible PDF and graphics files as described in ADA standards for electronic and information technology.
 - Assign one department the authority to provide standards and oversight for outside vendors who create pages and for departments who post their own documents. This will support consistent and accessible web pages. Monitor web pages for continued compliance with accessible web page standards.
 - Provide training to City staff members in creating accessible PDF and other electronic files for posting on City or departmental websites.
 - Use services that help web page authors provide an accessible website by identifying and repairing barriers to access for individuals with disabilities.

Public Telephones and Communication Devices

Even with the proliferation of cell phones, text and instant messaging, there is still a requirement for the provision of alternative communication technologies such as teletypewriters (TTY), telecommunication display devices (TDDs), or relay services for conducting communications with the public.

Required or Recommended Actions:

1. It is required that staff members are able to use TTY equipment or other means of communicating over the telephone with a person with a hearing or speech impairment, such as the Telecommunications Relay Service (TRS) – 711, or are able to direct member of the public to knowledgeable staff.
2. It is required that publications that list phone numbers also include information on how people with hearing and/or speech impairment can communicate with departments by phone.
3. It is recommended that City staff become familiar with Video Remote Interpreting Services (VRI) for communicating with people with hearing and/or speech impairment. There are many situations where a live interpreter is required, such as in medical situations, but RVI is a convenient, flexible, lower-cost alternative to live interpreters.

Training and Staffing

As a part of the City's on-going staff development and training, the incorporation of disabilities awareness, standards, and resources is encouraged for all staff interfacing with the public or who maintain the facilities used by the public.

Required or Recommended Actions:

1. It is required that City staff is knowledgeable in providing accessible services, programs and activities for the public and that accessible facilities are maintained in working order
2. It is recommended that the City:
 - Provide all City staff members with on-going awareness and sensitivity training.
 - Provide training to City staff members who have contact with the public about how to provide modifications and use assistive devices to make their programs, activities, and services accessible. Ensure that customer service training includes information about communicating with and providing modifications for persons with a variety of disabilities. Include program-specific adaptations, assistive devices, and modifications in each department's accessibility policy manual.
 - Develop a comprehensive disability access training program. Educate all City staff about their responsibilities under the ADA. The City's ADA Coordinator and department supervisors should be responsible for ensuring that staff members receive training. Reference materials that address special modifications should be included in this training.
 - Develop standard guidelines for training materials. These guidelines should include standard language that appropriately describes the City's policy on inclusion and non-discrimination, and staff members should receive training in using the guidelines effectively.
 - Consider offering training to employees who wish to learn basic American Sign Language (ASL) communication skills for staff who have contact with the public and depending on operational needs. This training should emphasize basic communication skills and should not be viewed as a substitute for utilizing qualified ASL interpreters when requested.

- Train Maintenance Services staff with respect to accessibility compliance and building codes to maintain facilities in an accessible condition.
- Provide City staff members with training in general building evacuation procedures for assisting persons with hearing, speech, visual, mobility, and learning disabilities in an emergency.
- Designate one manager in each department to serve as the department's Disability Access Liaison. The Liaison will be required to complete a training program and attend periodic retraining regarding accessibility issues.

Program Eligibility and Admission

The public must be able to access all programs, services, and activities, regardless of disability.

Admission criteria, ability to complete forms and participation in interviews must be available to all members of the public by providing reasonable accommodations.

Required or Recommended Actions:

1. It is required that individuals with disabilities are not excluded from regular programs or are required to accept special services or benefits.
2. It is required to include individuals with disabilities in regular programs to the maximum extent possible.
3. It is required that the City modify standard policies, practices, or procedures to avoid discrimination unless the modification would fundamentally alter the nature of the program, result in an undue financial or administrative burden, or create a hazardous situation for the participant or others.
4. It is required that when specific policies that would exclude or limit the participation of persons with disabilities are necessary for the safe operation of programs, those requirements are based on real risks, not on speculation, stereotypes, or generalizations.
5. It is recommended that a non-discrimination statement is included on application or registration forms.
6. When interviews are required for program participation, it is required that the meetings are held in an accessible location and that alternative formats or auxiliary aids are provided upon request.

Public Meetings

Public meetings are a regularly occurring activity for public agencies. The main objective of any public meeting is to impart and solicit information on public issues of importance to the local government.

Where these meetings are held are an important consideration in meeting the requirements of the ADA.

Required or Recommended Actions:

1. It is required that public meetings are held in accessible facilities in order to accommodate the participation of people with mobility disabilities. An accessible location includes, but is not limited to, the following: wheelchair accessible path-of-travel to the meeting room, accessible restrooms, accessible parking, an accessible route from transit and parking to the meeting facility, temperature control, signage, and the ability to provide access to fresh air for persons with chemical sensitivities.

2. It is required to provide agendas and other meeting materials in alternative formats, when requested.
3. It is required to provide flexibility in the time limit on speaking for individuals with communication difficulties.
4. It is required to have assistive listening devices available for public meetings.
5. It is recommended to display a notice on meeting agendas indicating the availability of accessibility modifications.
6. It is recommended to prepare a list of accessible meeting spaces to facilitate the scheduling of meetings and/or the relocation of meetings upon request.
7. It is recommended to move disability-related agenda items to the beginning of agendas when possible. Some people with disabilities are unable to stay late at meetings because they use paratransit, or have fixed schedules, and/or need to use personal care attendants.
8. It is recommended for the City to maintain a list of on-call American Sign Language interpreters who may be brought to meetings to assist individuals with hearing impairments.
9. It is recommended to provide instruction to City staff on the types of modification requests that may be made by persons with different types of disabilities including auxiliary aids such as different types of assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies like “real-time captioning.” Provide guidance in the layout of the room, sign-in table and refreshments table, to ensure that these features are accessible.
10. Consider assigning a staff member to be a greeter at public meetings and events. Identify the staff member as a resource for persons who may require assistance.

Transportation Services

Many public agencies provide public transportation services. The public accommodation standards for these services are set forth by the Federal Transit Administration.¹²

Required or Recommended Actions:

1. None. The City does not provide this service.

Tours and Trips

As part of some public agency programs tours and trips are involved that require transportation services, which are subject to ADA Title II Regulations.

Required or Recommended Actions:

1. It is required that the City modifies tours and trips, when requested, to enable people with mobility, visual, speech, hearing and cognitive disabilities to participate. Tour or trip registration materials must enable a person who may need accessibility accommodation to communicate the requested modification. Provide information to participants in advance of a tour or trip regarding the destination, transportation, and other characteristics of the event so that informed requests for accommodations can be made.
2. It is recommended that the City evaluate the destination of the tour or trip and the means of transportation in order to determine its accessibility and any accommodations or modifications

¹² Title 49, Subtitle A, Part 38 - Americans with Disabilities Act Accessibility Specifications for Transportation Vehicles.

that may be required. If a tour route or a portion of a route is not accessible, the City will continue the practice of rerouting the tour or providing alternate accommodation (e.g., photographs, close-captioned videos, etc.) that will allow the tour to be experienced if requested.

Use of Consultants for Delivering Program Services

Many public agencies rely on the use of consultants for the delivery of services. These consultants are considered an extension of the City's services and are required to adhere to the same ADA regulations as the City.

Required or Recommended Actions:

1. It is required that the City ensure consultants are aware of their obligation to make city programs and activities accessible.
2. It is recommended the City monitor programs and activities to ensure continued accessibility.

Emergency Evacuation Procedures

Life and safety protocols and procedures are required to include plans for people with disabilities.

Required or Recommended Actions:

1. It is required that the City develop guidelines and a plan for the evacuation of persons with disabilities in various types of emergency situations. These plans should:
 - Address what to do when an alarm is triggered;
 - Establish meeting places for assistance and evacuation chairs;
 - Provide direction on what to do if assistance is not available; and
 - Establish floor captains.
2. It is required to train City staff regarding emergency evacuation procedures with periodic drills, both announced and unannounced.
3. It is recommended that the City:
 - Review existing procedures dealing with emergencies to ensure that persons with disabilities can be alerted and that they can alert emergency service providers.
 - Work with disability organizations to explore the use of other technologies such as audible exit signs for orientation and direction and vibrating paging systems.
 - Provide training for public safety personnel to enable them to communicate in basic American Sign Language in the event that there is an emergency condition and the area is being evacuated. For example, this training would be provided to police, firefighters, lifeguards, and building inspectors involved in post-disaster emergencies.
 - Take the necessary steps to ensure that emergency teams are aware of persons with disabilities in their communities who may require special assistance in the event of an emergency.
 - Provide American Sign Language interpreters at emergency facilities, on an as-needed basis. To accomplish this, form a pool of interpreters as a resource from which to draw upon (see Section 6).
 - Specific suggestions for evacuation plans and procedures can be found through the US Access Board website at <http://www.ada.gov/emergencyprepguide.htm> and the

Emergency Procedures for Employees with Disabilities in Office Occupancies
document published by FEMA and the US Fire Administration.

Facilities

The identification of structural barriers in buildings, parks and the public rights-of-way are a required element of a ADA Transition Plan.

Required or Recommended Actions:

1. It is recommended that the City provide information about facility accessibility on department publications including the department's website.
2. It is recommended that requests relating to facility access be recorded and monitored. Accessibility requests should be analyzed periodically to look for global issues that can be addressed and problems than can be solved proactively.

Special Events on Public Properties

When a public agency rents its properties to a third party for special events, the responsibility for maintaining an accessible environment is temporarily deferred to the tenant.

Required or Recommended Actions:

1. It is recommended that in situations where private organizations sponsor events in City facilities, the City inform the organizer about applicable ADA requirements.
2. It is recommended that the City provide a checklist and information during the application process to inform organizers of their responsibility for accessibility under the ADA.

2.4 Policy and Program Review

The policy and program review was completed in December of 2016. Each policy and program reviewed is listed in the with recommendations for implementing specific improvements for providing access to City programs within the right-of-way as required by the ADA.

Table 1: Policy and Program Review Recommendations

Policy and Program	Reference	Policy Review/Recommendations
General and Overall	Use of the word "handicap" throughout City policies	<ul style="list-style-type: none">• Use of the word "handicap" is generally to be avoided. Recommend use of disabled or person with a disability.
Board & Commission Appointments	Municipal Code <i>10.30 Disability Board</i>	<ul style="list-style-type: none">• Recommend establishing a Board or Commission for People with Disabilities (current Disability Board appears to be a Disability Insurance Board and not related to accessibility issues).• Include people with disabilities or caregivers of people with disabilities as board/commission members.

Policy and Program	Reference	Policy Review/Recommendations
Comprehensive Transportation Plan	<i>Page 3-66: Non-motorized System - Existing Pedestrian Facilities</i>	<ul style="list-style-type: none"> ADA is referenced here as the standard for sidewalks and curb ramps in the right-of-way. Consider referencing Proposed Right-of-Way Access Guidelines (PROWAG) for technical standards pertaining to sidewalks and curb ramps in the right-of-way.
Comprehensive Transportation Plan	<i>Page 3-74: Curb Ramp Upgrade Program</i>	<ul style="list-style-type: none"> Prioritization of improvements should be in line with the priority levels assigned by the ADA.28 C.F.R. 35.150(d)(2): If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.
Curb Ramp Program	No specific policy in place	<ul style="list-style-type: none"> Continue maintaining citizen request log. Recommend the city create a budget line item for accessibility improvements that would provide a regular funding source for all barrier removal projects, including curb ramps, that arise through citizen request or capital planning.
Disabled Parking	No specific policy in place	<ul style="list-style-type: none"> Formalize practice of installing on-street accessible parking spaces. Refer to PROWAG for recommended frequency and technical standards. Formalize and make publicly available the process for Citizen Requests of on-street accessible parking spaces.
Leaf Removal	Standard Operating Procedures	<ul style="list-style-type: none"> Recommend addressing pedestrian zones of sidewalks, street crossings, or other pedestrian zones. Recommend providing information as part of the program/project/event notification program. Recommend exploring a program encouraging property owners to clear leaves from drains, reducing standing water at curb ramps.

Policy and Program	Reference	Policy Review/Recommendations
Municipal Code	<p><i>5.05.010 Animal Control - Definitions</i></p> <p><i>5.05.050.A Animal Control - Running at Large</i></p> <p><i>5.05.060.A Animal Control - Dogs on Public Grounds</i></p> <p><i>5.05.130 Animal Control - Covered Animal Regulations</i></p>	<ul style="list-style-type: none"> • Recommend adding definition of service animal. (https://www.ada.gov/service_animals_2010.htm) • Recommend amendment to “Covered Animal” definition so as to allow for the use of Miniature Horses when defined as a service animal. • Recommend amendment to “Covered Animal” language to exclude Miniature Horses when defined as a service animal from requirements and limitations imposed on “Covered Animals” • Recommend change of language from “seeing eye dog” to “service animal” • Recommend change of language to allow service animals to be off leash where being on leash would limit or restrict their specifically trained task.
Municipal Code	<p><i>8.36 Motorized Foot Scooters</i></p> <p><i>8.36.10.D. Prohibited Areas</i></p>	<ul style="list-style-type: none"> • Where the Motorized Foot Scooter is being used as an Other Power Driven Mobility Device (OPDMD) by a person with a disability, it is recommended to allow the use of the vehicle where pedestrians are permitted. (https://www.ada.gov/opdmd.htm) • Limits may be placed on authorized areas where the use of an OPDMD might pose a risk to public safety or the environment.
Municipal Code	<i>18.85 Street Trees</i>	<ul style="list-style-type: none"> • It is recommended to add language providing street trees should be maintained with a minimum of 80 inches of clear space above the sidewalk (ADA 307).
Notifications - Event/Program/Project	No specific policy in place	<ul style="list-style-type: none"> • Continue to post notifications to the City website and Facebook page and in the local newspaper. • Recommend formalizing a Notifications Policy to relay messages regarding events, programs, and projects. • Recommend developing a strategy for project/program/event notifications that will inform all planning processes. • Recommend including a strategy that specifically addresses outreach for members of the disability community.

Policy and Program	Reference	Policy Review/Recommendations
Operations for Shell Valley Emergency Access Road	Standard Operating Procedures	<ul style="list-style-type: none"> No comment
Pavement Maintenance Management Program	2012 Draft	<ul style="list-style-type: none"> It is recommended to prioritize maintenance of pavement that is part of pedestrian access routes (crosswalks, intersections). Ensure curb ramps are upgraded and barriers are removed when roadway alterations activities are completed: addition of new layer of asphalt, cape seals, in-place asphalt recycling, microsurfacing and thin-lift overlay, mill and fill/mill and overlay, new construction, open-graded surface course, rehabilitation and reconstruction, and resurfacing of crosswalk.
Pedestrian Sign Policy	Municipal Code <i>18.70 Street Use and Encroachment Permits</i>	<ul style="list-style-type: none"> Continue to require a Street Use Permit for temporary objects in the public right-of-way including sandwich boards and other pedestrian signs. Recommend providing design guidelines for pedestrian signs in the right-of-way on pertinent information sheet.
Sidewalk Program (Minor)	No specific policy in place	<ul style="list-style-type: none"> Recommend the city create a budget line item for accessibility improvements that would provide a regular funding source for all barrier removal projects, including minor sidewalk repairs, that arise through citizen request or capital planning. Recommend maintaining citizen request log.
Snow and Ice Control	Standard Operating Procedures	<ul style="list-style-type: none"> Recommend including sidewalks, street crossings, or other high priority pedestrian zones.
Street Banner Application	2017 Application	<ul style="list-style-type: none"> No comment

Policy and Program	Reference	Policy Review/Recommendations
Street Closures/Work Zones	No specific policy in place	<ul style="list-style-type: none"> • Recommend formalizing a Notifications Policy to relay messages street closures and work zones. • Continue to post notifications on City website and local newspaper. • Recommend including a strategy that specifically addresses outreach for members of the disability community. • Continue to follow MUTCD Traffic Control Standards and refer to PROWAG and WSDOT for recommendations for temporary accessible routes.
Storm Drainage	Standard Operating Procedures	<ul style="list-style-type: none"> • Recommend providing method for citizens to report a problem where drainage or street debris is affecting the usability of pedestrian facilities.
Vegetation Management	Standard Operating Procedures	<ul style="list-style-type: none"> • Complaints are prioritized by the potential for hazards created by the site obstruction. Recommend including obstructions or reductions of pedestrian facilities in the Vegetation Management prioritization for barrier removal so they are maintained in an accessible and usable state for people with disabilities.

2.5 PROW City Standard Details

The City's standard details were reviewed in December of 2016 to ensure compliance with current code. The details were also reviewed with operations and maintenance in mind that could potentially affect long-term accessibility such as pavement strength, thickness, tree roots, potential installation of future improvements and other issues that could cause obstructions such as temporary flooding. Codes consulted during the review include the 2011 Proposed Right-of-Way Accessibility Guidelines and Washington State Amended 2015 International Building Code. The complete standard details review is available under separate cover from the City.

The City acknowledges that the existing Federal and State technical standards for curb ramps may not meet the needs of all users with disabilities. The City will continually work with community stakeholders to identify alternative designs to issues such as counter slope at the base of a curb ramp and textured surfaces along pedestrian access routes.

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3.0 ADA Transition Plan

Title II of the ADA requires that public entities having responsibility for or authority over facilities, streets, roads, sidewalks, and/or other areas meant for public use to develop a Transition Plan to make their facilities meet the standards for Program Accessibility. Program Accessibility means that a program, activity and/or service are accessible when viewed in its entirety. Simply put, a Transition Plan transitions inaccessible facilities into environments that are accessible to and functional for individuals with disabilities. The ADA addresses accessible public rights-of-way where sidewalks are provided by the City of Edmonds. The ADA does not mandate the installation of sidewalks, but does require curb ramps at intersections where existing sidewalks are provided on the roadway.

In 2002, the United States Court of Appeals for the Ninth Circuit, whose jurisdiction includes Washington, held for the first time that sidewalks constitute a service, program or activity of a city, and sidewalks are therefore subject to the ADA's program accessibility regulations¹³. Before the Barden decision, the law was unclear whether municipalities' transition plans should address barrier removal from sidewalks. When originally written, the ADA specifically addressed curb ramps, subsequently the Courts have added sidewalks. This Transition Plan addresses facilities in the public right-of-way and includes curb ramps, pedestrian access routes (sidewalks, crosswalks, railroad crossings, and hazards), and pedestrian activated signals that fall within the City's area of responsibility.

3.1 Facility Evaluation Process

The evaluation of public right-of-way facilities for this planning process includes curb ramps, pedestrian access routes, and pedestrian activated signals throughout the City's public right-of-way¹⁴. Pedestrian access routes include items along the pedestrian path of travel: sidewalks, crosswalks, railroad crossings, and hazards.¹⁵ The facilities were evaluated over a four-month period in early 2017 (January through April) using criteria from the 2010 ADA and the 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way. Due to the volume of facilities in the public right-of-way managed by the City, a GIS based assessment tool was used to allow for a cost effective and efficient assessment of these facilities. See Appendix A: ADA Data Dictionary for information on the specific attributes collected for each right-of-way facility.

3.2 Public Rights-of-Way Prioritization

Prioritization criteria for assigning the barrier removal phasing schedule has been developed. Under Title II Regulation § 35.150(d)(2) the criteria for prioritizing barriers within the public rights-of way are identified.

If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation,

¹³ Barden v. City of Sacramento, 292 F.3d 1073 (9th Cir. 2002)

¹⁴ Accessible on-street parking was addressed as part of the City's 2015 Comprehensive Transportation Plan effort.

¹⁵ Hazards include the following items along the path of travel: overhanging and protruding objects, changes of level, openings that are > ½ inch and/or oriented in the direction of travel, obstacles that narrow the, and driveways with excessive cross slope.

places of public accommodation, and employers, followed by walkways serving other areas.

The City of Edmonds has included the following in the criteria for prioritizing facilities in the public rights-of-way:

- Locations serving government offices and public facilities;
- Locations serving transportation;
- Locations serving commercial districts and employers; and
- Locations serving other areas.

In addition to the required criteria, the City has prioritized the following:

- Locations of citizen complaints; and
- Locations serving medical and health facilities.

3.3 Priorities for Barrier Removal

Tables 2, 3, and 4 on the following pages illustrate the prioritization criteria for curb ramp, pedestrian access route, and pedestrian activated signal barrier removal projects in the City's public right-of-way. Each facility evaluated has been assigned a rank based on its barrier priority and category. The priority assigned is based on the information described in section 3.2 and the barrier category is based on the condition of the facility. The descriptions for each category are provided after each of the tables.

The highest ranked facilities are shaded in purple, medium ranked in gold, and lower ranked in green. The facilities with no assigned rank have no access deficiencies identified and have no assigned color. The columns in the matrix indicate the assigned priority and are in order of importance from left to right, with the left column having the highest importance. The rows indicate the category of condition assigned to each facility during the evaluation process, with the top row having the highest importance.

Table 2: Curb Ramp Priority Matrix for Barrier Removal Projects

Curb Ramps

ADA 35.150(d) Geospatial Proximity Priorities*

Priorities (Category)	Priority Description	A Location of Citizen Complaint / Request (ADA Title II Program Access)	B Location Serving Government Offices & Public Facilities	C Location Serving Medical/Health Facility	D Location Serving Transportation	E Location Serving Commercial Districts, Employers	F Location Serving Other Areas
1	See Category 1 Description	A1 High -----	B1 -----	C1 -----	D1 -----	E1 -----	F1
2	See Category 2 Description	A2	B2	C2	D2	E2	F2
3	See Category 3 Description	A3	B3	C3	D3	E3	F3
4	See Category 4 Description	A4	Medium ----- B4	C4 -----	D4 -----	E4	F4
5	See Category 5 Description	A5	B5	Low ----- C5	D5 -----	E5 -----	F5 -----
6	No deficiencies identified	A6	B6	C6	D6	E6	F6

*The priorities listed under columns B, D, E, and F are specified under Title II 28 CFR Section 35.150 (d)

Curb Ramp Barrier Description

Category 1:

- The curb ramp is built-up in the travel lane.
- The curb ramp is significantly damaged or deteriorated and is unsafe.
- There is a sidewalk with no curb ramp access or there is an obstruction to accessing the curb ramp.

Category 2:

- The curb ramp has no detectable warning.
- The curb ramp has no receiving ramp.
- The curb ramp is not located within marked crossings (when present).
- A 4 by 4-foot clear space at the bottom of the ramp outside of the travel lane is not provided.

Category 3:

- Width of ramp is less than 48 inches.
- Running slope of ramp exceeds 8.33 percent.
- Cross slope of ramp exceeds 2 percent.
- Curb ramp has no top turning space.
- Counter slope of the curb ramp is greater than five percent.
- Surface slopes at grade break are not flush.
- The curb ramp has a lip at the bottom.

Category 4:

- Slope of ramp flared sides (if applicable) exceeds 10 percent.
- Top turning space is less than 4 by 4-feet or the slope exceeds two percent.
- Perpendicular curb ramp with constrained top turning space is less than 4 by 5-feet.
- Parallel curb ramp with constrained top turning space on two or more sides is less than 4 by 5-feet.

Category 5:

- Diagonal curb ramp design without existing physical constraints.
- The detectable warning surface is incorrectly placed.
- The detectable warning surface is the incorrect size.
- The detectable warning surface is not the full width of the ramp.

Category 6:

- No deficiencies identified.
- Curb ramp meets the 1991 ADA standards and was built before March 15, 2012

Table 3: Pedestrian Access Route Priority Matrix for Barrier Removal Projects

Pedestrian Access Routes

ADA 35.150(d) Geospatial Proximity Priorities*							
Priorities (Category)	Priority Description	A Location of Citizen Complaint / Request (ADA Title II Program Access)	B Location Serving Government Offices & Public Facilities	C Location Serving Medical/Health Facility	D Location Serving Transportation	E Location Serving Commercial Districts, Employers	F Location Serving Other Areas
1	See Category 1 Description	High ----- A1	----- B1	----- C1	----- D1	----- E1	----- F1
2	See Category 2 Description	A2	B2	C2	D2	E2	F2
3	See Category 3 Description	A3	B3	C3	D3	E3	F3
4	See Category 4 Description	A4	Medium ----- B4	----- C4	----- D4	E4	F4
5	See Category 5 Description	A5	Low ----- B5	----- C5	----- D5	----- E5	----- F5
6	No deficiencies identified	A6	B6	C6	D6	E6	F6

*The priorities listed under columns B, D, E, and F are specified under Title II 28 CFR Section 35.150 (d)

Table

Pedestrian Access Route Barrier Descriptions

Category 1:

- No detectable warning at railroad crossing.
- The sidewalk width is less than 48 inches, this includes fixed obstacles reducing the width of the pedestrian access route.

Category 2:

- Railroad flangeway gap is greater than 3 inches
- The detectable warnings at the railroad crossing are incorrectly placed.
- Running slope of crosswalk exceeds 5 percent.

Category 3:

- The sidewalk has cross slopes that exceed two percent.
- The crosswalk cross slope exceeds 2 percent.
- The driveway cross slope exceeds 2 percent.

Category 4:

- The sidewalk has overhanging or protruding objects along its route.
- The sidewalk has vertical changes of level that exceed ¼ inch or up to a ½ inch with a bevel.
- The sidewalk has horizontal openings greater than 2 inches wide or opening is parallel to the path of travel.
- The sidewalk surface is not firm and slip resistant or surface condition of the sidewalk is poor (cracking/spalding/heaving/other).

Category 5:

- The sidewalk width is less than 48 inches, due to a movable object reducing the width of the pedestrian access route.
- The pedestrian access route does not have pullouts every 200-feet.

Category 6:

- No deficiencies identified.

Table 4: Pedestrian Activated Signal Priority Matrix for Barrier Removal Projects

Pedestrian Activated Signals

ADA 35.150(d) Geospatial Proximity Priorities*

Priorities (Category)	Priority Description	A Location of Citizen Complaint / Request (ADA Title II Program Access)	B Location Serving Government Offices & Public Facilities	C Location Serving Medical/Health Facility	D Location Serving Transportation	E Location Serving Commercial Districts, Employers	F Location Serving Other Areas
1	Accessible Pedestrian Activated Signal Not Provided	High ----- A1	----- B1	Medium ----- C1	----- D1	Low ----- E1	----- F1
2	See Category 2 Description	A2	B2	C2	D2	E2	F2
3	See Category 3 Description	A3	B3	C3	D3	E3	F3

**The priorities listed under columns B, D, E, and F are specified under Title II 28 CFR Section 35.150 (d)*

Pedestrian Activated Signal Barrier Descriptions

Category 1:

- Accessible pedestrian activated signal is not provided.

Category 2:

- Level clear space at push button not provided.
- Reach to push button from clear space is obstructed.
- Operating force of pushbutton exceeds 5 pounds of force.
- The pushbutton does not have an informational sign or incorrect signage.
- Pushbutton pilot light (if applicable does not activate).
- A locator tone is not provided.
- A tactile arrow is not provided.
- Pushbutton locator tone activates at incorrect time.
- Pushbutton locator tone duration and intensity needs adjustment.

Category 3:

- Pushbutton is located more than 10-feet from curb, shoulder or pavement.
- Pushbutton is farther than 5-feet from the crosswalk line farthest from the intersection (when applicable).
- Pushbutton height is not within 42 and 48 inches above the ground.
- Pushbutton and arrow are not parallel with the direction of travel.
- Distance between 2 pushbuttons on the same corner is less than 10-feet.

3.4 Phasing Schedule

The ADA Title II regulations state that if a transition plan will take more than one year to fully implement, it must contain interim steps to provide program accessibility. This plan proposes a 15-year strategy for removing public right-of-way barriers that limit program accessibility. The City reserves the right to modify barrier removal priorities to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in City programs, and funding opportunities and constraints. The barrier removal strategy for the next 15 years incorporates flexibility in the process and allows the City to respond to new opportunities as they arise.

Curb Ramps

Table 5, Map 1¹⁶, and Map 2 on the following pages summarize the assigned barrier removal ranks for the City's curb ramps.

- Curb ramps meeting Criterion A: Locations of Citizen Complaints and Requests for ADA Title II Program Access will be evaluated and programmed within one year of the complaint.
- Curb ramps ranked high will be addressed within the next one to five years.
- Curb ramps ranked medium will be addressed within the next one to 10 years.
- Curb ramps ranked low will be addressed within the next one to 15-years.
- Curb ramps with no deficiencies will be addressed on an as needed basis.

The current schedule includes the removal of 407 high ranked curb ramps in the next one to five years, 940 medium ranked curb ramps in the next one to 10-years, and low ranked curb ramps in the next one to 15-years. The City intends to remove existing barriers in conjunction with on-going street maintenance and capital improvement projects. It is assumed that as curb ramps are evaluated in greater detail as part of future projects and complaints, a percentage of ramps will fall within the "safe harbor" provisions, as described in Section 1.4. These "safe harbor" ramps will help to reduce the deficient ramp inventory. The City will then revise the curb ramp transition plan schedule for the removal of the remaining barriers, update the curb ramp inventory, and revise the transition plan schedule for the removal of remaining barriers on a regular basis.

¹⁶ All data represented in the document maps are a snapshot in time of facility ADA barrier status. Maps 1 through 6 data collection was completed in April of 2017. Data collection for Map 7 was completed in the summer of 2016.

Table 5: Curb Ramp Transition Plan Phasing Schedule

Priority	Category	Rank	Total Ramps	Percent Total	Schedule
High	1	B1	16	0.8%	1-5 years
High	1	C1	1	0.1%	1-5 years
High	1	D1	68	3.5%	1-5 years
High	2	B2	28	1.4%	1-5 years
High	2	C2	4	0.2%	1-5 years
High	2	D2	67	3.4%	1-5 years
High	3	B3	195	10.0%	1-5 years
High	3	C3	28	1.4%	1-5 years
Subtotal			407	20.9%	
Medium	1	F1	104	5.3%	1-10 years
Medium	2	E2	45	2.3%	1-10 years
Medium	2	F2	45	2.3%	1-10 years
Medium	3	D3	434	22.3%	1-10 years
Medium	3	E3	293	15.0%	1-10 years
Medium	4	B4	6	0.3%	1-10 years
Medium	4	C4	1	0.1%	1-10 years
Medium	4	D4	6	0.3%	1-10 years
Medium	5	B5	6	0.3%	1-10 years
Subtotal			940	48.2%	
Low	3	F3	310	15.9%	1-15 years
Low	4	E4	19	1.0%	1-15 years
Low	4	F4	16	0.8%	1-15 years
Low	5	C5	1	0.1%	1-15 years
Low	5	D5	12	0.6%	1-15 years
Low	5	E5	2	0.1%	1-15 years
Low	5	F5	6	0.3%	1-15 years
Subtotal			366	18.8%	
No Deficiencies	6	B6	7	0.4%	As Needed
No Deficiencies	6	C6	6	0.3%	As Needed
No Deficiencies	6	D6	54	2.8%	As Needed
No Deficiencies	6	E6	32	1.6%	As Needed
No Deficiencies	6	F6	18	0.9%	As Needed
Subtotal			117	6.0%	
Interim Condition*	IC	-	120	6.2%	As Needed
Subtotal			120	6.2%	
Total for All Projects			1,950	100%	

*Interim condition curb ramps are those locations that will need further review due to temporary status or design that is atypical and may not require the construction of a standard curb ramp.

Map 1: Barrier Removal Projects Curb Ramps – High

Please refer to PDF with a file name titled 2017-07-

28_Screenreader_Edmonds_ADA_ROW_Summary_MapAddendum.pdf for Map 1: Barrier Removal Projects Curb Ramps – High.

Map 1 Image Description: This map illustrates the locations of the high priority curb ramp barrier removal projects in Edmond's city limits, assessed in the SETP. Purple dots mark the location of high priority curb ramp barriers that are the responsibility of the City of Edmonds to remove. For context, streets are marked in solid gray lines, water features are filled in solid light blue, and the city limits are marked with a navy blue dashed and dotted line. The north arrow points upwards and the scale is one inch equals a half mile. This map was made by MIG in April of 2017. Refer to Table 5 in the main City Of Edmonds ADA Self-Evaluation & Transition Plan For The Right-Of-Way document for corresponding data.

Map 2: Barrier Removal Projects Curb Ramps – Medium And Low

Please refer to PDF with a file name titled 2017-07-

28_Screenreader_Edmonds_ADA_ROW_Summary_MapAddendum.pdf for Map 2: Curb Ramp – Med & Low.

Map 2 Image Description: This map illustrates the locations of medium and low priority curb ramp barrier removal projects in Edmond's city limits, assessed in the SETP. A series of colored dots mark the location of curb ramp barriers that are the responsibility of the City of Edmonds to remove; ranging from low priority to medium priority and including curb ramps with no deficiencies identified. Medium priority curb ramps are marked with yellow dots, low priority curb ramps are marked with green dots, and curb ramps with no deficiencies are marked with black stars inside circles. For context, streets are marked in solid gray lines, water features are filled in solid light blue, and the city limits are marked with a navy blue dashed and dotted line. The north arrow points upwards and the scale is one inch equals a half mile. This map was made by MIG in April of 2017. Refer to Table 5 in the main City Of Edmonds ADA Self-Evaluation & Transition Plan For The Right-Of-Way document for corresponding data.

Pedestrian Access Routes

Table 6, Table 7, and Maps 3 through 6 on the following pages summarize the assigned barrier removal ranks for the City's pedestrian access routes.

- Pedestrian access routes meeting Criterion A: Locations of Citizen Complaints and Requests for ADA Title II Program Access will be evaluated and programmed within one year of the complaint.
- Pedestrian access routes ranked high will be addressed within the next one to five years.
- Pedestrian access routes ranked medium will be addressed within the next one to 10 years.
- Pedestrian access routes ranked low will be addressed within the next one to 15 years.

Table 6: Pedestrian Access Route Transition Plan Phasing Schedule

Priority	Category	Rank	Total Barriers	Percent Total	Schedule
High	1	B1	125	1.7%	1-5 years
High	1	C1	32	0.4%	1-5 years
High	1	D1	436	5.8%	1-5 years
High	1	E1	141	1.9%	1-5 years
High	1	F1	371	4.9%	1-5 years
High	2	B2	45	0.6%	1-5 years
High	2	C2	2	0.0%	1-5 years
High	2	D2	210	2.8%	1-5 years
High	3	B3	296	3.9%	1-5 years
High	3	C3	70	0.9%	1-5 years
Subtotal			1,728	22.9%	
Medium	2	E2	17	0.2%	1-10 years
Medium	2	F2	61	0.8%	1-10 years
Medium	3	D3	1382	18.3%	1-10 years
Medium	3	E3	430	5.7%	1-10 years
Medium	4	B4	182	2.4%	1-10 years
Medium	4	C4	37	0.5%	1-10 years
Medium	4	D4	691	9.2%	1-10 years
Subtotal			2,800	37.2%	
Low	3	F3	1665	22.1%	1-15 years
Low	4	E4	218	2.9%	1-15 years
Low	4	F4	1056	14.0%	1-15 years
Low	5	B5	4	0.1%	1-15 years
Low	5	C5	1	0.0%	1-15 years
Low	5	D5	15	0.2%	1-15 years
Low	5	E5	5	0.1%	1-15 years
Low	5	F5	41	0.5%	1-15 years
Subtotal			3,005	39.9%	
Total for All Projects			7,533	100%	

The current schedule includes 1,728 high ranked projects, 2,800 medium ranked projects, and 3,005 low ranked projects. The projects are a mix of identified barrier types along the pedestrian access routes. Table 7 summarizes the total number of projects by type of pedestrian access barrier.

Table 7: Pedestrian Access Route Summary by Type of Barrier Project

Barrier Project Type	High	Medium	Low	Total
Sidewalk	545	501	237	1,283
Crosswalk	327	300	87	714
Railroad Crossing	8	0	0	8
Hazard	848	1,999	2,681	5,528
Total	1,728	2,800	3,005	7,533

Map 3: Barrier Removal Projects Pedestrian Access Routes Sidewalks

Please refer to PDF with a file name titled 2017-07-28_Screenreader_Edmonds_ADA_ROW_Summary_MapAddendum.pdf for Map 3: Barrier Removal Projects Pedestrian Access Routes Sidewalk.

Map 3 Image Description: This map illustrates the locations of sidewalk barrier removal projects in Edmonds' city limits, assessed in the SETP. A series of colored lines mark the location of sidewalk barriers that are the responsibility of the City of Edmonds to remove, ranging from low priority to high priority, and including access routes at sidewalks with no deficiencies identified. High priority sidewalk barriers are marked with purple lines, medium priority sidewalk barriers are marked with yellow lines, low priority sidewalk barriers are marked with green lines, and sidewalks with no deficiencies are marked with blue lines. For context, streets are marked in solid gray lines, water features are filled in solid light blue, and the city limits are marked with a navy blue dashed and dotted line. The north arrow points upwards and the scale is one inch equals a half mile. This map was made by MIG in April of 2017. Refer to Tables 6 and 7 in the main City of Edmonds ADA Self-Evaluation & Transition Plan For The Right-Of-Way document for corresponding data.

Map 4: Barrier Removal Projects Pedestrian Access Routes Crosswalks

Please refer to PDF with a file name titled 2017-07-28_Screenreader_Edmonds_ADA_ROW_Summary_MapAddendum.pdf for Map 4: Barrier Removal Projects Pedestrian Access Routes Crosswalks.

Map 4 Image Description: This map illustrates the locations of crosswalk barrier removal projects in Edmond's city limits, assessed in the SETP. A series of colored dots mark the location of crosswalk barriers that are the responsibility of the City of Edmonds to remove, ranging from low priority to high priority. High priority crosswalk barriers are marked with purple dots, medium priority crosswalk barriers are marked with yellow dots, and low priority crosswalk barriers are marked with green dots. For context, streets are marked in solid gray lines, water features are filled in solid light blue, and the city limits are marked with a navy blue dashed and dotted line. The north arrow points upwards and the scale is one inch equals a half mile. This map was made by MIG in April of 2017. Refer to Tables 6 and 7 in the main City of Edmonds ADA Self-Evaluation & Transition Plan For The Right-Of-Way document for corresponding data.

Map 5: Barrier Removal Projects Pedestrian Access Routes Railroads And Hazards - High

Please refer to PDF with a file name titled 2017-07-

28_Screenreader_Edmonds_ADA_ROW_Summary_MapAddendum.pdf for Map 5: Barrier Removal Projects Pedestrian Access Routes Railroads And Hazards - High.

Map 5 Image Description: This map illustrates the locations of high priority barrier removal projects at railroad crossings and pedestrian access route hazards in Edmonds' city limits, assessed in the SETP. Purple dots mark the location of high priority railroad crossing barriers and pedestrian access route hazards that are the responsibility of the City of Edmonds to remove. For context, streets are marked in solid gray lines, water features are filled in solid light blue, and the city limits are marked with a navy blue dashed and dotted line. The north arrow points upwards and the scale is one inch equals a half mile. This map was made by MIG in April of 2017. Refer to Tables 6 and 7 in the main City of Edmonds ADA Self-Evaluation & Transition Plan For The Right-Of-Way document for corresponding data.

Map 6: Barrier Removal Projects Pedestrian Access Routes Hazards Medium And Low

Please refer to PDF with a file name titled 2017-07-

28_Screenreader_Edmonds_ADA_ROW_Summary_MapAddendum.pdf for Map 6: Barrier Removal Projects Pedestrian Access Routes Hazards Medium And Low.

Map 6 Image Description: This map illustrates the locations of the medium and low priority barrier removal projects at pedestrian access route hazards in Edmonds' city limits, assessed in the SETP. A series of colored dots mark the location of pedestrian access route hazards that are the responsibility of the City of Edmonds to remove, ranging from low priority to medium priority. Medium priority pedestrian access route hazards are marked with yellow dots and low priority hazards are marked with green dots. For context, streets are marked in solid gray lines, water features are filled in solid light blue, and the city limits are marked with a navy blue dashed and dotted line. The north arrow points upwards and the scale is one inch equals a half mile. This map was made by MIG in April of 2017. Refer to Tables 6 and 7 in the main City of Edmonds ADA Self-Evaluation & Transition Plan For The Right-Of-Way document for corresponding data.

Pedestrian Activated Signals

Table 8 and Map 7 summarize the assigned barrier removal ranks for the City's pedestrian activated signals.

- Pedestrian activated signals meeting Criterion A: Locations of Citizen Complaints and Requests for ADA Title II Program Access will be evaluated and programmed within one year of the complaint.
- Pedestrian activated signals ranked high will be addressed within the next one to five years.
- Pedestrian activated signals ranked medium will be addressed within the next one to 10-years.
- Pedestrian activated signals ranked low will be addressed within the next one to 15-years.

This preliminary schedule represents a 15-year target for barrier removal. The schedule includes 36 high ranked pedestrian activated signals in the next one to five years, 60 medium ranked in the next one to 10-years, and 54 lower ranked in the next one to 15-years. The City plans to use the following guidelines for removing pedestrian activated signal barriers:

- All new pedestrian activated signals will include an Accessible Pedestrian Signal (APS);
- Projects to add pedestrian activated signals to existing signals will include APS;
- Projects that significantly modify pedestrian activated signals will include APS;
- APS will be scheduled for installation on existing signals when requested by the public; and
- APS will be installed on existing signals on a priority ranking basis per the Transition Plan as funding allows.

Table 8: Pedestrian Activated Signal Transition Plan Schedule

Priority	Category	Priority	Total Signals	Percent Total	Schedule
High Priority	1	B1	22	13.3%	1-5 years
High Priority	2	B2	14	8.4%	1-5 years
Subtotal			36	21.7%	
Medium Priority	1	C1	14	8.4%	1-10 years
Medium Priority	1	D1	38	22.9%	1-10 years
Medium Priority	2	D2	8	4.8%	1-10 years
Subtotal			60	36.1%	
Low Priority	1	E1	32	19.3%	1-15 years
Low Priority	2	E2	14	8.4%	1-15 years
Low Priority	2	F2	8	4.8%	1-15 years
Subtotal			54	32.5%	
No Deficiencies	2	C2	8	4.8%	As Needed
No Deficiencies	2	D2	8	4.8%	As Needed
Subtotal			16	9.6%	
Total for All Projects			166	100%	

Map 7: Barrier Removal Projects Pedestrian Signals

Please refer to PDF with a file name titled 2017-07-28_Screenreader_Edmonds_ADA_ROW_Summary_MapAddendum.pdf for Map 7: Barrier Removal Projects Pedestrian Signals.

Map 7 Image Description: This map illustrates the locations of pedestrian signal barrier removal projects at crosswalks in Edmonds' city limits, assessed in the SETP. A series of colored dots mark the locations of pedestrian signal barriers that are the responsibility of the City of Edmonds to remove, ranging from low priority to high priority, and including pedestrian signals with no deficiencies identified. High priority pedestrian signal barriers are marked with purple dots, medium priority pedestrian signal barriers are marked with yellow dots, low pedestrian signal barriers are marked with green dots, and pedestrian signals with no deficiencies identified are marked with black stars inside circles. For context, streets are marked in solid gray lines, water features are filled in solid light blue, and the city limits are marked with a navy blue dashed and dotted line. The north arrow points upwards and the scale is one inch equals a half mile. This map was made by MIG in the summer of 2016. Refer to Table 8 in the main City of Edmonds ADA Self-Evaluation & Transition Plan For The Right-Of-Way document for corresponding data.

3.5 Roadway Alterations and Maintenance: Triggers for Curb Ramp Barrier Removal

The Department of Justice, in coordination with the U.S. Department of Transportation, specifies that public agencies are required to provide curb ramps or upgrade curb ramps whenever roadways are altered. An alteration is a change that affects or could affect the usability of all or part of a building or facility¹⁷. Alterations of streets, roads, or highways include activities such as reconstruction, rehabilitation, resurfacing, widening, and projects of similar scale and effect¹⁸. Maintenance activities on streets, roads, or highways, such as filling potholes, are not alterations¹⁹. The following list distinguishes between roadway alterations versus maintenance activities.

ALTERATION²⁰

- Addition of new layer of asphalt
- Cape seals
- In-place asphalt recycling
- Microsurfacing and thin-lift overlay
- Mill and fill / mill and overlay
- New construction
- Open-graded surface course
- Rehabilitation and reconstruction
- Resurfacing of a crosswalk

MAINTENANCE

- Chip seals
- Crack filling and sealing
- Diamond grinding
- Dowel bar retrofit
- Fog seals
- Joint crack seals
- Joint Repairs
- Pavement patching
- Painting or striping
- Scrub sealing
- Slurry seals
- Spot high-friction treatments
- Surface sealing

3.6 Strategies for Funding Barrier Removal

Opportunities for funding the removal of access barriers include:

- New construction projects;
- Roadway alteration projects;
- Maintenance and repair projects and programs;
- Dedication of a fund for ADA barrier removal;
- Require private developers to remove access barriers when development affects facilities within the right-of-way; and
- Actively seek out and apply for grant funding specific to removal of access barriers when available.

¹⁷ Title II Regulation § 35.151(b)(1)

¹⁸ 2010 ADA Standards, 106.5

¹⁹ July 8, 2013 Department of Justice/Department of Transportation Joint Technical Assistance
<https://www.ada.gov/doj-fhwa-ta.htm>

²⁰ December 1, 2015 QUESTIONS & ANSWERS Supplement to the 2013 DOJ/DOT Joint Technical Assistance
<https://www.ada.gov/doj-fhwa-ta-supplement-2015.html>

The City currently has in place a pavement management program that schedules out roadway rehabilitation and maintenance. The City plans to review public roadway barriers during the implementation of this Plan, and address those barriers that can be resolved as part of the on-going pavement maintenance and rehabilitation program. As part of the review, the City will revise the Transition Plan schedule for the removal of barriers. The Transition Plan schedule will also be updated as projects for new construction and roadway alterations arise.

Upcoming Barrier Removal Projects

The City currently has four projects funded that will address ADA barriers identified in this plan.

76th Avenue West and 212th

All construction for this project has been identified as high priority barrier removal projects.

- Sidewalk replacement for 250 feet on all approaches. All sidewalks for this project have been identified as high priority

238th Street Southwest from Highway 99 to SR-104

The construction for this project is a mix of high and medium priority barrier removal projects

- New sidewalk on north side of 238th Street Southwest (SR-104 to 84th Avenue West)
- New curb ramps from Hwy. 99 to SR-104

Dayton Street from 3rd Avenue to 9th Street (to be completed in 2019)

The construction for this project is a mix of high and medium priority barrier removal projects

- Driveway reconstruction for stretch between 7th Avenue and 8th Avenue (where existing missing sidewalk link / on south side of street)
- New curb ramps along entire stretch

84th Ave. W Overlay from 220th to 212th (to be completed in 2019)

The construction for this project is a mix of high and medium priority barrier removal projects.

- New curb ramps on east side

Citywide Pedestrian Crossing Improvements (to be completed in 2019)

- SR-104 at 232nd Street Southwest
- SR-524 at 84th Avenue West
- SR-524 at 7th Avenue North or within proximity
- 76th Avenue at 206th Street Southwest
- 229th Place West at 106th Avenue West
- Dayton Street at 2nd Avenue West
- Dayton Street at Commercial Drive
- Walnut Street between 7th Avenue South and 9th Avenue South
- Main Street at Olympic Avenue

4.0 ADA Policy and Complaint Procedure

If a public entity has 50 or more employees, it is required to:

- Designate at least one responsible employee to coordinate Americans with Disabilities Act (ADA) compliance; and
- Develop and publish grievance procedures to provide fair and prompt resolution of complaints under Title II of the ADA at a local level²¹.

The City has a designated ADA Coordinator for coordinating the efforts of the City to comply with Title II and for investigating any complaints that the City has violated Title II of the ADA. The Coordinator also is responsible for coordinating the efforts of the City to comply with all other applicable State and Federal physical and program accessibility requirements.

4.1 Notice Under the Americans with Disabilities Act

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

Employment: The City of Edmonds does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

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

Modifications to Policies and Procedures: The City of Edmonds will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in the City of Edmonds offices, even where pets are generally prohibited.

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

²¹ ADA Best Practices Tool Kit for State and Local Governments, <http://www.ada.gov/pcatoolkit/chap2toolkit.htm>

4.2 City of Edmonds ADA Grievance Procedure under the ADA

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 Edmonds. 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:

Mr. Bertrand Hauss ADA Coordinator / Transportation Engineer, bertrand.hauss@edmondswa.gov

Within 15 calendar days after receipt of the complaint, Mr. Bertrand Hauss or his designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, Mr. Bertrand Hauss 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 Edmonds and offer options for substantive resolution of the complaint.

If the response by Mr. Bertrand Hauss 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 Mayor Earling or his designee.

Within 15 calendar days after receipt of the appeal, Mayor Earling or his designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, Mayor Earling or his 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 Mr. Bertrand Hauss or his designee, appeals to Mayor Earling or his designee, and responses from these two offices will be retained by the City of Edmonds for at least three years.

5.0 Definitions

The following is a summary of many definitions found in the ADA. Please refer to the Americans with Disabilities Act²² for the full text of definitions and explanations²³.

5.1 Auxiliary Aids and Services

The term auxiliary aids and services include:

- Qualified interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments;
- Qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments; and
- Acquisition or modification of equipment or devices; and other similar services and actions.

5.2 Complaint

A complaint is a claimed violation of the ADA.

5.3 Disability

The term disability means, with respect to an individual:

- A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- A record of such impairment; or
- Being regarded as having such impairment.

5.4 Discrimination on the Basis of Disability

Discrimination on the basis of disability means to²⁴:

- Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability;
- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a qualified citizen with a disability to discrimination;
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
- Deny equal benefits because of a disability;
- Fail to make reasonable accommodations to known physical or mental limitations of an otherwise qualified individual unless it can be shown that the accommodation would impose an undue burden on the organization's operations;
- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and

²² ADA.gov United States Department of Justice Civil Rights Division, <http://www.ada.gov/>

²³ Title II Regulations. 28 C.F.R. § 35.104 Definitions.

²⁴ Title II Regulations. 28 C.F.R. § 35.130 General prohibitions against discrimination.

- Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

5.5 Having a Record of Impairment

An individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

5.6 Physical or Mental Impairments

Physical or mental impairments may include, but are not limited to²⁵: vision, speech, and hearing impairments; emotional disturbance and mental illness; seizure disorders; mental retardation; orthopedic and neuromotor disabilities; learning disabilities; diabetes; heart disease; nervous conditions; cancer; asthma; Hepatitis B; HIV infection (HIV condition); and drug addiction if the addict has successfully completed or is participating in a rehabilitation program and no longer uses illegal drugs.

The following conditions are not physical or mental impairments: transvestitism; illegal drug use; homosexuality or bisexuality; compulsive gambling; kleptomania; pyromania; pedophilia; exhibitionism; voyeurism; pregnancy; height; weight; eye color; hair color; left-handedness; poverty; lack of education; a prison record; and poor judgment or quick temper if not symptoms of a mental or physiological disorder.

5.7 Qualified Individual with a Disability

A qualified individual with a disability means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the city.

5.8 Reasonable Program Modifications

If the individual's disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable an individual to perform the essential functions of the program or activity²⁶.

Reasonable program modification is any change in program or activity or in the way things are customarily done that enables an individual with a disability to enjoy equal program opportunities. Accommodation means modifications or adjustments:

- To a registration or application process to enable an individual with a disability to be considered for the program or activity;

²⁵ Title II Regulations. Appendix B 28 C.F.R. Test C—Being regarded as having such an impairment.

²⁶ Title II Regulations. 28 C.F.R. § 35.130 General prohibitions against discrimination. Subpart B—General Requirements

- To the program or activity environment in which the duties of a position are performed so that a person with a disability can perform the essential functions of the program or activity; and
- That enables individuals with disabilities to enjoy equally the benefits of the program or activity as other similarly situated individuals without disabilities enjoy.

Modification includes making existing facilities and equipment used by individuals readily accessible and usable by individuals with disabilities.

Modification applies to:

- All decisions and to the application or registration process;
- All services provided in connection with the program or activity; and
- Known disabilities only.

Modification is not required if:

- It changes the essential nature of a program or activity of the person with a disability;
- It creates a hazardous situation;
- Adjustments or modifications requested are primarily for the personal benefit of the individual with a disability; or
- It poses an undue burden on the city.

5.9 Regarded as Having a Disability

An individual is disabled if she or he is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

5.10 Substantial Limitations on Major Life Activities

Individuals are disabled if they have a physical or mental impairment that (a) renders them unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which they can perform a particular major life activity in comparison to other people.

Major life activities are functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

In determining whether physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and
- The permanent or long-term impact (or expected impact) of or resulting from the impairment.

5.11 Undue Burden

The City of Edmonds shall not provide an accommodation that imposes an undue burden on the operation of the City's business. Undue burden means significant difficulty or expense incurred in the provision of accommodation. Undue burden includes, but is not limited to, financial difficulty. Undue

burden refers to any modification that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature of operation of the business of the city.

Whether a particular accommodation will impose an undue hardship is determined on a case-by-case basis. If a particular modification is determined to cause an undue burden to the City of Edmonds, the city shall attempt to identify another modification that would not pose such a burden. If cost causes an undue burden, the city must consider whether funding for modification is available from an outside source. If no such funding is available, the city must give the person with a disability the opportunity to provide the modification or to pay for that portion of the modification that constitutes an undue burden.

The following factors shall be considered in determining whether a program modification would create an undue burden: the nature and cost of the modification, the financial resources of the city available to make the modification, the impact the expense of the accommodation will have on the affected city operation, and the permanence of the alterations affecting the site.

6.0 Program Accessibility Guidelines, Standards and Resources

6.1 Introduction

To facilitate access to all City programs and departments, the City will maintain the program accessibility guidelines, standards and resources. The information is available to all employees and volunteers. The City will add to these guidelines when necessary to address its needs and include information and technological devices that help staff members and volunteers communicate with individuals with a variety of disabilities. The City will periodically review the components of this section as new technologies are developed, to ensure that the best types of modifications are included.

6.2 Federal Accessibility Standards and Regulations

Below are resources for Federal standards and regulations provided by the U.S. Department of Justice and the U.S. Access Board

U.S. Department of Justice

The U.S. Department of Justice provides many free ADA materials including the Americans with Disability Act (ADA) text. Printed materials may be ordered by calling the ADA Information Line [(800) 514-0301 (Voice) or (800) 514-0383 (TTY)]. Publications are available in standard print as well as large print, audiotape, Braille and computer disk for people with disabilities. Documents, including the following publications, can also be downloaded from the Department of Justice website.

<http://www.ada.gov/>

ADA Regulation for Title II: This publication describes Title II of the Americans with Disabilities Act, Pub. L. 101-336, which prohibits discrimination on the basis of disability by public entities. Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs or activities of all state and local governments. This rule adopts the general prohibitions of discrimination established under section 504, as well as the requirements for making programs accessible to individuals with disabilities and for providing equally effective communications. It also sets forth standards for what constitutes discrimination on the basis of mental or physical disability, provides a definition of disability and of qualified individual with a disability, and establishes a complaint mechanism for resolving allegations of discrimination.

http://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm

Title II Technical Assistance Manual (1993) and Yearly Supplements: The 56-page manual explains in lay terms what state and local governments must do to ensure that their services, programs and activities are provided to the public in a nondiscriminatory manner. Many examples are provided for practical guidance. <http://www.ada.gov/taman2.html>

Accessibility of State and Local Government Websites to People with Disabilities: The 5-page publication provides guidance on making state and local government websites accessible.

<http://www.ada.gov/websites2.htm>

ADA Information for Law Enforcement: This page contains compliance assistance materials to help state and local law enforcement officers understand how to interact with victims, witnesses, suspects and others who have disabilities. <http://www.ada.gov/policeinfo.htm>

Department of Justice/Department of Transportation Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing: Published July 8, 2013 this technical memorandum describes the obligation to provide curb ramps whenever streets, roadways, or highways are altered. <https://www.ada.gov/doj-fhwa-ta.htm>

Glossary of Terms for DOJ/FHWA Joint Technical Assistance on the ADA Title II Requirements to Provide Curb Ramps When Streets Roads or Highways are Altered Through Resurfacing: Published July 8, 2013 this document is a companion to the above listed memorandum. <https://www.ada.gov/doj-fhwa-ta-glossary.pdf>

QUESTIONS & ANSWERS: Supplement to the 2013 DOJ/DOT Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements To Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing: Published December 1, 2015 , this document responds to frequently asked questions that the Federal Highway Administration (FHWA) has received since the technical assistance document was published. <https://www.ada.gov/doj-fhwa-ta-supplement-2015.html>

Title II: U.S. Department of Justice Publications

The Department of Justice has published many technical guidance documents to assist public agencies with understanding their responsibilities under the ADA.

Title II Technical Assistance Manual | Supplement: A 56-page manual that explains in lay terms what state and local governments must do to ensure that their services, programs, and activities are provided to the public in a nondiscriminatory manner. (1993) <http://www.ada.gov/taman2.html>

The ADA and City Governments: Common Problems | PDF: A 9-page document that contains samples of common problems shared by city governments of all sizes, provides examples of common deficiencies and explains how these problems affect persons with disabilities. (2000) <http://www.ada.gov/comprob.htm>

ADA Guide for Small Towns | PDF: A 21-page guide that presents an informal overview of some basic ADA requirements and provides cost-effective tips on how small towns can comply with the ADA. (2000) <http://www.ada.gov/smtown.htm>

Accessibility of State and Local Government Websites to People with Disabilities | PDF: A 5-page publication providing guidance on making state and local government websites accessible. (2003) <http://www.ada.gov/websites2.htm>

ADA Checklist for Polling Places | PDF: A 39-page checklist used as a self-help survey for voting officials to determine whether a polling place has basic accessible features needed by most voters with disabilities. (2004) <http://www.ada.gov/votingchecklist.htm>

An ADA Guide for Local Governments: Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities | PDF: An 11-page illustrated publication that provides guidance on preparing for and carrying out emergency response programs in a manner that results in the services being accessible to people with disabilities. (2006) <http://www.ada.gov/emergencyprep.htm>

Access for 9-1-1 and Telephone Emergency Services | PDF: A 10-page publication explaining the requirements for direct, equal access to 9-1-1 for persons who use teletypewriters (TTYs). (1998)
<http://www.ada.gov/911ta.htm>

Commonly Asked Questions About the ADA and Law Enforcement: A 12-page publication providing information for law enforcement agencies in a simple question and answer format. (2006)
http://www.ada.gov/q&a_law.htm

Communicating with People Who Are Deaf or Hard of Hearing: ADA Guide for Law Enforcement Officers | PDF: An 8-panel pocket guide providing basic information for officers about ADA requirements for communicating effectively with people who are deaf or hard of hearing. (2006)
<http://www.ada.gov/lawencomm.htm>

Model Policy for Law Enforcement on Communicating with People Who Are Deaf or Hard of Hearing | PDF: A 4-page document serving as a model for law enforcement agencies to adopt policies on effective communication with people who are deaf or hard of hearing. Agencies are encouraged to download and adapt the policy to suit their needs. (2006) <http://www.ada.gov/lawenmodpolicy.htm>

Questions and Answers: The ADA and Hiring Police Officers: A 5-page publication providing information on ADA requirements for interviewing and hiring police officers. (1997)
<http://www.ada.gov/copsq7a.htm>

U.S. Access Board Publications

The full texts of federal laws and regulations that provide the guidelines for the design of accessible facilities and programs are available from the U.S. Access Board. Single copies of publications are available free and can be downloaded or ordered by completing a form available on the Access Board's website. In addition to regular print, publications are available in large print, disk, audiocassette and Braille. <http://www.access-board.gov/>

Communications & IT

Access to information and communication technology (ICT) is addressed by Board standards and guidelines issued under Section 508 of the Rehabilitation Act and Section 255 of the Telecommunications Act.

- Section 508 Standards: <http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards>
- Refresh of the Section 508 Standards and the Telecommunications Act Guidelines: <http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh>
- Telecommunications Act Accessibility Guidelines: <http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-telecommunications-act-guidelines>

Buildings & Sites

Standards issued under the Americans with Disabilities Act (ADA) address access to buildings and sites nationwide in new construction and alterations.

- **2010 ADA Standards for Accessible Design:** This document contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the

Americans with Disabilities Act (ADA) of 1990. These scoping and technical requirements are to be applied during the design, construction and alteration of buildings and facilities covered by Titles II and III of the ADA, to the extent required by regulations issued by federal agencies including the Department of Justice and the Department of Transportation. <http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/ada-standards>

Recreation Facilities

Access to recreation facilities, including play areas, swimming pools, sports facilities, fishing piers, boating facilities, golf courses and amusement rides, is addressed in the ADA standards. The ADA standards address outdoor developed areas guidelines which currently are applicable to Federal facilities and cover access to trails, picnic sites, camping sites and beach access routes.

- **Recreation Facilities:** <http://www.access-board.gov/guidelines-and-standards/recreation-facilities/about-recreation-facilities>
- **Outdoor Developed Areas:** <http://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas>

Streets and Sidewalks

New guidelines in development by the Board cover access to public rights-of-way including sidewalks, intersections, street crossings and on-street parking. The Board is also addressing access to shared use paths providing off-road means of transportation and recreation.

- **Public Rights-of-Way:** <http://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way>
- **Shared Use Paths:** <http://www.access-board.gov/guidelines-and-standards/streets-sidewalks/shared-use-paths/about-this-rulemaking>

6.3 State of Washington Accessibility Standards and Regulations

The State of Washington Administrative Code (WAC) Title 51, Chapter 51-50, <http://apps.leg.wa.gov/wac/default.aspx?cite=51-50>, adopts the 2015 International Building Code including Appendix E: Supplementary Accessibility Requirements and ICC/ANSI A117.1-2009 as of the writing of this document. <https://fortress.wa.gov/ga/apps/sbcc/page.aspx?nid=14> and the Revised Code of Washington (RCW) under Title 70: Public Health and Safety, Chapter 70.92 intends to make buildings and facilities accessible to and usable by individuals with disabilities.

Additionally, the Washington Department of Transportation has published an ADA field guide to assist jurisdictions with developing accessible public rights-of-way:

https://wsdot.wa.gov/Publications/Manuals/fulltext/m0000/ADA_Field_Guide.pdf

Because codes and standards are updated every few years, the City should have an ongoing program of regularly reviewing changes and updating policies and procedures related to accessibility to ensure compliance with current code.

6.4 Resources

Other resources for providing accessible programs and facilities

ADA Document Portal: This website provides links to an ADA Collection consisting of more than 7,400 documents on a wide range of topics. The ADA Document Portal is supported by the ten ADA & IT Technical Assistance Centers. <https://adata.org/ada-document-portal>

American Alliance of Museums: Accessible exhibit design publications are available for purchase from AAM's website, including Everyone's Welcome (available in a variety of formats), which addresses museum programs and the ADA, The Accessible Museum, which offers model programs of accessibility for older people and people with disabilities, and What Museum Guides Need to Know to provide access to blind and visually impaired visitors. <http://www.aam-us.org>

Disability.gov: The website is a one-stop interagency portal for information on Federal programs, services and resources for people with disabilities, their families, employers, service providers and other community members. <https://www.disability.gov/>

National Center on Accessibility: The Center is a cooperative project between the National Park Service and Indiana University to provide information and technical assistance, primarily on recreation access. An example of the research activities of the NCA is the National Trails Surface Study. This study is primarily the result of questions that NCA receives from organizations, agencies and individuals who desire to make their trails accessible and are interested in an unobtrusive surface that blends, is friendly to the environment and provides a quality trail experience for people with and without disabilities. NCA also publishes 'What is an Accessible Trail?' which summarizes the Federal guidelines for outdoor developed areas and is available for downloading from its website. The NCA website also has information on campground accessibility, accessible picnic tables, access to beaches and inclusion of people with disabilities in aquatic venues. <http://www.ncaonline.org/>

National Center on Health, Physical Activity and Disability: The Center provides information and resources on physical activity to help people with disabilities find ways to become more active and healthier. The Center also provides information on how to provide access to fitness centers, schools, recreation facilities, camps and health and leisure services. <http://www.nchpad.org/>

Smithsonian Institution: The Accessibility Program has developed the Smithsonian Guidelines for Accessible Exhibition Design (1996), which are available for downloading from their website. Further information is available from the Smithsonian Accessibility Program at the Arts and Industries Building, Room 1239 MRC 426, Washington, D.C. 20560 (202) 786-2942. <http://www.si.edu/accessibility>

Resources for Assistive Technologies (General)

Assistive technology is a device or service that improves the functional capabilities of individuals with disabilities and promotes independence.

- **The National Institute on Disability and Rehabilitation Research:** This agency of the U.S. Department of Education maintains a national web-based service that provides up-to-date links to assistive technologies and disability-related resources. <http://www.abledata.com/>

Alternative Format Communications

Resources to produce standardized publications such as applications and registration forms in Braille, audiotape, large-print text and accessible electronic media will be assembled. Information regarding Braille Services and other accommodations for people with visual disabilities is available by contacting:

- **American Council of the Blind:** ACB is a national organization advocating on behalf of persons who are blind or have low vision. ACB also publishes A Guide to Making Documents Accessible to People Who Are Blind or Visually Impaired, which is available online, in regular print, large print, Braille or on cassette tape. ACB is located at 1155 15th St. NW, Suite 1004, Washington, DC 20005 (800) 424-8666. Email info@acb.org or go to <http://www.acb.org/>
- **National Center on Accessibility:** NCA publishes 'What are Alternative Formats? How Do They Apply to Programs and Services?' which is available for downloading from their website. <http://www.ncaonline.org/>
- **National Center for Accessible Media:** NCAM is a research and development facility dedicated to the issues of media and information technology for people with disabilities in their homes, schools, workplaces and communities. Developers of Web- and CD-ROM-based multimedia need an authoring tool for making their materials accessible to persons with disabilities. NCAM has developed two such tools, version 1.0 and 2.01 of the Media Access Generator (MAGpie), for creating captions and audio descriptions for rich media. MAGpie is available for downloading from NCAM's website. <http://ncam.wgbh.org>
- **American Sign Language Interpreters:** A pool of on-call American Sign Language interpreters should be developed. This list should be routinely updated to ensure their availability. Some programs may need to have a pool of interpreters who are available on a twenty-four-hour basis to handle emergency procedures.

The required qualifications of these interpreters should be established. Many non-certified interpreters provided by local services may have excellent skills and be qualified to handle most circumstances. However, certain circumstances, such as the provision of emergency medical services, may require interpreters who are approved by the courts and can ensure a level of confidentiality. You may want to contact each agency in advance of a need for services to determine their rates so that you are prepared to cover the communication expenses, should the need arise.

You should always request RID certified interpreters <http://rid.org/>. Only in the event that certified interpreters are unavailable should you rely on non-certified interpreters. Individuals who are hard of hearing generally do not use ASL interpreters. Always ask the individual requesting an accommodation what type of accommodation works best for them. Determining what accommodation(s) will be provided is an interactive process. Depending on the situation, accommodating an individual who is hard of hearing may include note writing, use of assistive listening devices and/or provision of Computer Assisted Real-Time (CART) captioning.

Assistive Listening Systems and Devices

Systems and devices to amplify sound for persons with hearing disabilities should be available for public meetings and events. Various technologies exist for these devices. Different types of devices are more suitable for different types of hearing disabilities. Devices should be chosen to accommodate the greatest number of individuals. See the Assistive Listening Systems Technical Bulletins available on the U.S. Access Board's website. <http://www.access-board.gov/>

- **Closed Caption Machine:** To the extent practical, City departments should have access to a device for encoding closed captioning on films and videotapes used for training and other programs.
- **Optical Readers:** Equipment that can translate printed information into an audio format should be available to the City programs.
- **Text Telephone (TTY):** City programs should have access to a text telephone or have access to a telephone transfer service as required by the law and offered by public telephone companies. See the Text Telephones Technical Bulletin available on the U.S. Access Board's website. <http://www.access-board.gov/>
- **TDI:** TDI's (formerly known as Telecommunications for the Deaf, Inc.) mission is to promote equal access in telecommunications and media for people who are deaf, hard of hearing, late deafened or deaf blind. TDI's on-line resources include information about telecommunications access such a TTY, pagers, telephony, VoIP and more. <http://tdiforaccess.org/>
- **Video Relay Services (VRS):** Video Relay Service (VRS) is a form of Telecommunications Relay Service (TRS) that enables persons with hearing disabilities who use American Sign Language to communicate with voice telephone users through video equipment, rather than through typed text. Video equipment links the VRS user with a TRS operator – called a “communications assistant” (CA) – so that the VRS user and the CA can see and communicate with each other in signed conversation. Because the conversation between the VRS user and the CA flows much more quickly than with a text-based TRS call, VRS has become a popular form of TRS. www.fcc.gov/guides/video-relay-services
- **Hands on Video Relay Service:** (877) 467-4877 for English, or (877) 467-4875 for Spanish
- **Sorenson Video Relay:** Using a standard telephone, simply call the toll-free number (866)-327-8877. Have the contact information of the deaf or hard-of-hearing individual (i.e. name, videophone number or IP address) ready. Remain on hold until the call is answered by the next available interpreter.
- **Sprint VRS:** (877)709-5776 or <http://www.sprintrelay.com/>

Enlarging Printed Materials

A copy machine capable of enlarging printed materials should be available for staff.

Guide to Disabilities and Disability Etiquette

A guide to disabilities and disability etiquette should be assembled and distributed to staff and volunteers. The guide will ensure that staff and volunteers are familiar with a variety of types of disabilities and sensitive to the abilities and needs of people with disabilities in order not to offend or demean them. The guide should be periodically updated to ensure that it includes current acceptable language for talking about disabilities.

- **A Guide to Interacting with People who have Disabilities** - Department of Homeland Security. https://www.dhs.gov/sites/default/files/publications/guide-interacting-with-people-who-have-disabilities_09-26-13.pdf
- **Disability Awareness Guide** - Tacoma Area Coalition of Individuals with Disabilities <https://www.co.pierce.wa.us/DocumentCenter/View/6848>
- **Disability Etiquette** - United Spinal Association <https://www.unitedspinal.org/disability-etiquette/#Introduction>

Other Resources and Organizations Serving People with Disabilities

- **The Arc:** The Arc (formerly Association for Retarded Citizens of the United States) is the country's largest voluntary organization committed to the welfare of all children and adults with mental retardation and their families. <http://www.thearc.org>
- **American Association of People with Disabilities:** The American Association of People with Disabilities is the largest nonprofit, nonpartisan, cross-disability organization in the United States. <http://www.aapd.com/>
- **American Foundation for the Blind:** The American Foundation for the Blind (AFB) is committed to improving accessibility in all aspects of life—from cell phones to ATMs, on web sites and in workplaces. Services include assistance in making products and services accessible to people with visual impairments. AFB offers expert consulting services and accessible media production. AFB provides objective product evaluations of adaptive technologies through its assistive technology product database. <http://www.afb.org/>
- **Center on Technology and Disability:** Funded by the U.S. Department of Education's Office of Special Education Programs, the Center on Technology and Disability provides a wide range of resources on assistive technology, from introductory fact sheets and training materials to in-depth discussion of best practices and emerging research. <http://www.ctdinstitute.org/>
- **Disability.gov's online resources for High School:** Guidelines for Accessing Alternative Format, inclusion materials, educational technology, a comprehensive list including college preparatory materials, transition issues for children with special needs and more. <https://www.disability.gov/education>
- **Disability Resources, Inc.:** Disability Resources, Inc. is a national nonprofit organization that provides information about resources for independent living. DRI maintains an on-line directory of assistive technology resources. <http://www.disabilityresources.org/>
- **Institute for Human Centered Design:** The Institute (formerly known as Adaptive Environments) is a non-profit organization committed to advancing the role of design in expanding opportunity and enhancing experience for people of all ages and abilities. The organization provides education and consultation to public and private entities about strategies, precedents and best practices that go beyond legal requirements for human centered design for places, things, communication and policy that integrate solutions with the reality of human diversity. <http://humancentereddesign.org/>
- **National Association of the Deaf:** NAD is a national consumer organization representing people who are deaf and hard of hearing. NAD provides information about standards for American Sign Language Interpreters and the Captioned Media Program on its website. <http://www.nad.org/>

- **National Federation of the Blind:** NFB is a national organization advocating on behalf of persons who are blind or have low vision. NFB provides on-line resources for technology for the blind, including a technology resource list, a computer resource list, screen access technology, sources of large print software for computers and sources of closed circuit TV (CCTV's). <http://www.nfb.org/>
- **National Organization on Disability:** The National Organization on Disability promotes the full and equal participation and contribution of America's 54 million men, women and children with disabilities in all aspects of life. NOD maintains an on-line directory of information and links including transportation-related resources. <http://www.nod.org/>
- **Paralyzed Veterans of America:** PVA is a national advocacy organization representing veterans. PVA's Sports and Recreation Program promotes a range of activities for people with disabilities, with special emphasis on activities that enhance lifetime health and fitness. PVA's website provides information on useful sports publications and a list of contacts. <http://www.pva.org>
- **United Cerebral Palsy Association:** UCP's mission is to advance the independence, productivity and full citizenship of people with cerebral palsy and other disabilities, through a commitment to the principles of independence, inclusion and self-determination. UCP's Sports and Leisure Channel is designed for people with disabilities who are interested in sports and other leisure activities and proposes creative ideas for inclusive community recreation programs, including outdoor adventure activities for people with disabilities. Information about the Sports and Leisure Channel is available on UCP's website. <http://www.ucp.org>
- **United Spinal Association:** United Spinal Association is a membership organization serving individuals with spinal cord injuries or disease. Formerly known as the Eastern Paralyzed Veterans Association, the organization expanded its mission to serve people with spinal cord injuries or disease regardless of their age, gender or veteran status. Information on accessibility training and consulting services and recreational opportunities for people with spinal cord injuries or disease is available on their website. <http://www.unitedspinal.org>
- **World Institute on Disability:** WID is an international public policy center dedicated to carrying out research on disability issues. WID maintains an online information and resource directory on technology, research, universal design and ADA. <http://www.wid.org/resources/>

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