



# MARYSVILLE

## WASHINGTON

### ADA Self-Evaluation and Transition Plan for Public-Right-of-Way and Programs

December 2020

Prepared by



***Transportation Solutions***

INNOVATIVE | PRACTICAL | EQUITABLE

16932 Woodinville-Redmond Road NE, Suite A206  
Woodinville, WA 98072  
425-883-4134

**The Americans with Disabilities Act Notice:**

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

**Alternative Formats:**

Materials can be requested in alternative formats by contacting the City's ADA/504 Coordinator:

**Name/Title:** Teri Lester, Human Resources Manager

**Phone:** (360) 363-8084

**Federal Information Relay Service/TTY/Voice:** 7-1-1 or 1-800-877-8339

**Email Address:** [tlester@marysvillewa.gov](mailto:tlester@marysvillewa.gov)

**Mailing Address:** 1015 State Avenue, Marysville, WA 98270

**City Website Links:**

<https://www.marysvillewa.gov/724/ADA-Accommodation>

<https://www.marysvillewa.gov/accessibility>

**Questions about this report:**

If you have questions about the content of this report, please contact:

**Name/Title:** Jeff Laycock, City Engineer

**Phone:** (360) 363-8100

**Federal Information Relay Service/TTY/Voice:** 7-1-1 or 1-800-877-8339

**Email Address:** [jlaycock@marysvillewa.gov](mailto:jlaycock@marysvillewa.gov)

**Mailing Address:** 80 Columbia Ave., Marysville, WA 98270

**City Website link:** <https://www.marysvillewa.gov/1032/ADA-Plan>

### **Acknowledgements**

The City of Marysville wishes to thank the organizations and individuals who contributed to this project. This was truly a collaborative venture that could not have happened without the input, creativity, and participation of many people. Thank you all.

#### **City of Marysville Mayor and City Council**

John Nehring, Mayor

Kamille Norton, Council President

Mark James, Council Member

Stephen Muller, Council Member

Tom King, Council Member

Kelly Richards, Council Member

Michael Stevens, Council Member

Jeffrey Vaughn, Council Member

#### **City of Marysville Project Team**

Jeff Laycock, City Engineer

Teri Lester, Human Resources Manager and ADA/504 Coordinator

Connie Mennie, Communications Administrator

#### **Consultant Team**

##### **Transportation Solutions, Inc.**

Victor Salemann, Principal

Kirk Harris, Project Manager

Jennifer Salemann, Planner

## Table of Contents

A. Introduction and Legal Requirements .....	9
1. Legal Precedent.....	9
1.1 Section 504 of the Rehabilitation Act .....	9
1.2 American with Disabilities Act .....	9
2. Scope of ADA Transition Plan.....	10
2.1 Federal ADA Transition Plan Requirements.....	10
2.2 WSDOT Local Agency Guidelines .....	10
2.3 Scope of 2020 Marysville ADA Self-Evaluation and Transition Plan .....	10
3. Organization of Document.....	11
B. ADA Accessibility Assurance .....	12
C. ADA/504 Coordinator and Official Responsible to Implement Plan.....	13
D. Grievance/Complaint Procedure .....	14
1. Implemented Changes .....	14
2. Updated Grievance/Complaint Procedure .....	14
E. Notice of ADA Provisions .....	15
F. Self-Evaluation.....	16
1. Public Right of Way Self-Evaluation .....	17
1.1 Curb Ramps .....	17
1.2 Sidewalks.....	19
1.3 Driveway Interface With Sidewalks .....	20
1.4 Accessible Pedestrian Signals (APS) .....	21
1.5 Accessible Parking.....	22
1.6 Recommendations .....	26
2. Programs, Services, and Activities Self-Evaluation .....	27
2.1 Programmatic Self-Evaluation Scope .....	27
2.2 City Questionnaire Findings .....	28
2.3 Marysville Municipal Code and Engineering Design & Development Standards .....	31
2.4 Recommendations .....	32
G. Public Outreach .....	35
1. Public Outreach Strategy .....	35
1.1 Project Webpage Content.....	35

- 1.2 Online Surveys..... 35
- 1.3 Public Workshop ..... 35
- 2. Public Outreach Findings ..... 36
  - 2.1 Public Workshop Findings..... 36
  - 2.2 Map-Enabled Survey123 for ArcGIS Survey Results ..... 39
  - 2.3 Survey Monkey Survey Results ..... 40
  - 2.4 Other Online Feedback ..... 40
  - 2.5 November 2020 Public Comments on Draft ADA Transition Plan ..... 40
- 3. Recommendations ..... 41
- H. ADA Transition Plan ..... 42
  - 1. Generic Prioritization ..... 42
    - 1.1 Higher Priority ..... 42
    - 1.2 Lower Priority..... 42
  - 2. Public Right of Way ADA Transition Plan ..... 43
    - 2.1 Public Right of Way Barrier Prioritization ..... 43
    - 2.2 Public Right of Way Barrier Removal Cost Estimates ..... 51
    - 2.3 Public Right of Way Barrier Removal Financial Plan ..... 54
    - 2.4 Public Right of Way Barrier Removal Implementation Schedule ..... 55
  - 3. Programs, Services, and Activities ADA Transition Plan ..... 56
    - 3.1 Programmatic Barrier Prioritization..... 56
    - 3.2 Programmatic Barrier Removal Cost Estimates ..... 57
    - 3.3 Programmatic Barrier Removal Financial Plan..... 57
    - 3.4 Programmatic Barrier Removal Implementation Schedule ..... 59
- I. Accessible Pedestrian Signal (APS) Policy ..... 60
- J. Barrier Removal Monitoring and Scheduled Plan Updates ..... 62
  - 1. Annual Report of Barriers Removed ..... 62
  - 2. Five-Year ADA Transition Plan Update Schedule ..... 62
  - 3. Future Self-Evaluation and Transition Plan Actions Needed ..... 62
- K. Accessibility Guidelines, Standards, and Resources ..... 63
  - 1. General Resources ..... 63
  - 2. Barrier-Specific Resources ..... 63

## List of Figures

Figure 1. Marysville Curb Ramp Inventory Pie Chart (%).....	17
Figure 2. Marysville Curb Ramp Inventory (2019) .....	18
Figure 3. City-Provided Missing Sidewalk Network Map .....	19
Figure 4. IMS 2020 Assets Missing Sidewalk Network Map .....	19
Figure 5. Example of Direct or Mini-Shoulder to Driveway Interface (4528 84 <sup>th</sup> St NE).....	20
Figure 6. Example of Driveway to Sidewalk Interface in Older Neighborhoods (6412 65 <sup>th</sup> Dr NE) .....	20
Figure 7. Marysville City Block Perimeters with Marked On-Street Parking .....	25
Figure 8. PROW Barrier Groups - Lakewood/Smokey Point/Shoultes and Marshall/Kellogg Marsh .....	37
Figure 9. PROW Barrier Groups - Pinewood/Downtown.....	38
Figure 10. Online Survey Map Results Snapshot .....	39
Figure 11. Curb Ramp Barriers by Inventory Type - North Marysville.....	45
Figure 12. Curb Ramp Barriers by Inventory Type - Central Marysville.....	46
Figure 13. Curb Ramp Barriers by Inventory Type - South Marysville.....	47
Figure 14. Curb Ramp Barriers by Priority Rank Score - North Marysville.....	48
Figure 15. Curb Ramp Barriers by Priority Rank Score - Central Marysville .....	49
Figure 16. Curb Ramp Barriers by Priority Rank Score - South Marysville.....	50
Figure 17. WSDOT LAG Chapter 29 ADA Title II Checklist.....	64

## List of Tables

Table 1. Summary of Ramp Inventory by Type, Number, and Percentage .....	17
Table 2. Accessible Pedestrian Signal (APS) Inventory Status .....	21
Table 3. 2010 ADA Standards Table 208.2 Parking Spaces .....	23
Table 4. U.S. Access Board Table R214 On-Street Parking Spaces.....	23
Table 5. Lakewood/Smokey Point/Shoultes Neighborhoods .....	36
Table 6. Pinewood/Downtown Neighborhood.....	36
Table 7. Survey123 for ArcGIS Public Comment Barriers .....	40
Table 8. Survey Monkey Public Comment Barriers.....	40
Table 9. Curb Ramp Barriers by Group .....	44
Table 10. Priority Rank Score Index .....	44
Table 11. Individual Curb Ramp Barrier Cost Estimate .....	51
Table 12. ADA Curb Ramp Barrier Removal Cost Estimate Summary .....	51
Table 13. Accessible Pedestrian Signal (APS) Barrier Removal Cost Estimate Summary.....	52
Table 14. Accessible Parking Stall Barrier Removal Cost Estimate Summary.....	53
Table 15. Public Right of Way Barrier Removal Cost Estimate Summary .....	53
Table 16. 2021-2026 TIP Funding Summary .....	54
Table 17. Public Right of Way Barrier Removal Implementation Schedule.....	55
Table 18. Programmatic Barrier Removal Cost Estimate Summary .....	58
Table 19. Programmatic Barrier Removal Implementation Schedule .....	59

## List of Appendixes

**APPENDIX A** - Updated Grievance/Complaint Procedure and Forms

**APPENDIX B** - IMS Data Attributes and Curb Ramp Inventory

**APPENDIX C** - Accessible Pedestrian Signal Inventory

**APPENDIX D** - Programmatic Assessment Questionnaire

**APPENDIX E** - Marysville Municipal Code Accessibility Language References

**APPENDIX F** - Programmatic Compliance Checklist

**APPENDIX G** - Public Outreach

**APPENDIX H** - GIS Curb Ramp Model and Prioritization

**APPENDIX I** - Detailed Curb Ramp Inventory and Priority Rank Score Maps

## A. Introduction and Legal Requirements

The City of Marysville is committed to removing barriers to accessibility in its services, programs, and activities. To achieve this end, the City has completed an *Americans with Disabilities Act* (ADA) Self-Evaluation and Transition Plan.

This introduction summarizes the legal precedent for and the required components of an ADA Self-Evaluation and Transition Plan. It also provides an overview of the scope and organization of the City of Marysville's ADA Self-Evaluation and Transition Plan with respect to these requirements.

### 1. Legal Precedent

The following federal laws and local Washington State guidelines informed the content and scope of this ADA Self-Evaluation and Transition Plan. See also Washington State Department of Transportation (WSDOT) Local Agency Guidelines (LAG) manual Chapter 29 (June 2020).

#### 1.1 Section 504 of the Rehabilitation Act

Section 504 of the Rehabilitation Act of 1973 states that no person with a disability shall be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity that receives Federal funding. This includes both transportation and non-transportation funding.

Section 504 extends to the entire operations of a recipient or subrecipient, regardless of the specific funding source of a particular operation. Section 504 Regulations (49 CFR Part 27.5) define a recipient as any public entity that receives Federal financial assistance from the USDOT or its operating administrations either directly or through another recipient. An example of a recipient is WSDOT. An example of a subrecipient is a local agency receiving USDOT funds through WSDOT, for projects/programs/activities administered by the local agency.

#### 1.2 American with Disabilities Act

The *Americans with Disabilities Act* (ADA) of 1990 is a civil rights statute that prohibits discrimination against people who have disabilities. There are five separate Titles, or sections, of the Act that cover different aspects of potential discrimination. These include: Title I – Employment, Title II – Public Services and Transportation, Title III – Public Accommodations, Title IV – Telecommunications, and Title V – Miscellaneous. Title II of the Act specifically addresses the subject of making public services and public transportation accessible to those with disabilities. Designing and constructing facilities for public use that are not accessible by people with disabilities constitutes discrimination.

The ADA is mirrored after Section 504 but extends the reach of Federal accessibility laws to include those agencies that are not recipients or subrecipients of Federal funding. Title II (28 CFR Part 35) of the ADA specifically pertains to state and local governments.

The ADA applies to all facilities, including both facilities built before and after 1990. State and local government and public entities or agencies are required to perform self-evaluations of their current facilities, relative to the accessibility requirements of the current ADA accessibility standards. The requirements of the ADA apply to all public entities or agencies, no matter the size. The ADA transition plan formal procedures as outlined in 28 C.F.R. section 35.150 only govern those public entities with more than 50 employees.

## 2. Scope of ADA Transition Plan

### 2.1 Federal ADA Transition Plan Requirements

Under Title II of the ADA, Section 28 CFR Part 35.150 (d) - Transition Plan outlines the requirements of an ADA Transition Plan.

(1) In the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop, within six months of January 26, 1992, a transition plan setting forth the steps necessary to complete such changes. A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan shall be made available for public inspection.

(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.

(3) The plan shall, at a minimum—

(i) Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;

(ii) Describe in detail the methods that will be used to make the facilities accessible;

(iii) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and

(iv) Indicate the official responsible for implementation of the plan.

(4) If a public entity has already complied with the transition plan requirement of a Federal agency regulation implementing section 504 of the Rehabilitation Act of 1973, then the requirements of this paragraph (d) shall apply only to those policies and practices that were not included in the previous transition plan.

### 2.2 WSDOT Local Agency Guidelines

The WSDOT Local Agency Guidelines (LAG) Chapter 29 includes additional items per Section 504 that calls on agencies to:

- Designate an ADA/504 Coordinator
- Adopt and publish Complaint/Grievance Procedure
- Adopt an Accessible Pedestrian System (APS) Policy

### 2.3 Scope of 2020 Marysville ADA Self-Evaluation and Transition Plan

This ADA Transition Plan includes documentation of the self-evaluation, public outreach efforts, barrier removal schedule, and barrier removal financing plan for the City of Marysville's 1) public right of way

and 2) programs, services, and activities. The City intends to evaluate accessibility barriers for parks, trails, and city facilities within the next six-year period.

### 3. Organization of Document

The NCHRP No. 20-7 (232) ADA Transition Plans: *A Guide to Best Practices* (May 2009) demonstrates how the federal ADA Transition Plan requirements give agencies flexibility on how to format their Transition Plans. The City of Marysville's ADA Transition Plan is organized to align with the WSDOT LAG Chapter 29 ADA Title II Checklist items:

- ADA Accessibility Assurance
- ADA/504 Coordinator
- Grievance/Complaint Procedure
- Notice of ADA Provisions
- Self-Evaluation
- Public Outreach
- ADA Transition Plan
- Accessible Pedestrian Signal Policy
- Barrier Removal Monitoring and Scheduled Plan Updates
- Accessibility Guidelines, Standards, and Resources
- Appendixes

## B. ADA Accessibility Assurance

In accordance with Section 28 CFR Part 35.150 (a) of Title II of the ADA, the City of Marysville will endeavor to operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. This paragraph does not—

- (1) Necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities;
- (2) Require a public entity to take any action that would threaten or destroy the historic significance of an historic property; or
- (3) Require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens. In those circumstances where personnel of the public entity believe that the proposed action would fundamentally alter the service, program, or activity or would result in undue financial and administrative burdens, a public entity has the burden of proving that compliance with §35.150(a) of this part would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the head of a public entity or his or her designee after considering all resources available for use in the funding and operation of the service, program, or activity, and must be accompanied by a written statement of the reasons for reaching that conclusion. If an action would result in such an alteration or such burdens, a public entity shall take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity.

In accordance with Section 28 CFR Part 35.150 (b) of Title II of the ADA, the City of Marysville shall make alterations to existing buildings to meet the accessibility requirements of Part 35.151 and, in choosing among available methods for meeting the requirements of this section, give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

In accordance with Section 28 CFR Part 35.150 (c) of Title II of the ADA, where structural changes in facilities are undertaken to comply with the obligations established under this section, the City of Marysville shall make such changes as expeditiously as possible. The City is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section.

In accordance with Section 28 CFR Part 35.150 (d) of Title II of the ADA, where the City of Marysville has responsibility or authority over streets, roads, or walkways, its ADA 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.

### C. ADA/504 Coordinator and Official Responsible to Implement Plan

The City of Marysville has designated at least one employee as the City's ADA/504 Coordinator and made the name and contact information available internally and externally via the City's website. The ADA/504 Coordinator is also the official responsible to implement the ADA Transition Plan. Contact information for the City's current ADA/504 Coordinator is provided below:

**Name:** Teri Lester

**Title(s):** ADA/504 Coordinator, Human Resources Manager

**Mailing Address:** 1015 State Ave. Marysville, WA 98270

**Phone:** 360-363-8000

**TTY:** 1-800-877-8339

**Email:** [tlester@marysvillewa.gov](mailto:tlester@marysvillewa.gov)

**Website:** <https://www.marysvillewa.gov/724/ADA-Accommodation>

The ADA/504 Coordinator is responsible to:

- Coordinate efforts of the City of Marysville to comply with ADA Title II/Section 504 regulations.
- Investigate any complaints that the City of Marysville has violated Title II in accordance with the City's Grievance Procedure.
- Keep a record of and record responses to submitted grievances/complaints and appeals in accordance with the City's Grievance/Complaint Procedure (retain records for three years).
- Coordinate responses to requests for accommodation and/or materials in alternative formats (responses may be provided from within the Human Resources or via other City departments).
- Provide training resources and/or guidance to staff on ADA compliance.
- Implement the scheduled recommendations of the ADA Transition Plan.
- Implement regular updates to the ADA Transition Plan.
- Coordinate annual barrier removal tracking activities to be completed by appropriate City department staff.
- Administer the city's compliance with federal, state and local laws regarding the Americans with Disabilities Act.
- Formulate and recommend revisions to the city's personnel policies and procedures to comply with federal, state and local laws.
- Interpret policies, laws and regulations for managers and supervisors.
- Recommend corrective action to ensure compliance.
- Prepare for and serve as management representative for grievances.
- Recommend and implement training and education.
- Oversee, participate in, and provide staff support.

## D. Grievance/Complaint Procedure

The City updated its Grievance/Complaint procedure per the text recommended in Chapter 2 of the ADA Best Practices Tool Kit for State and Local Governments provided by the U.S. Department of Justice Civil Rights Division.

### 1. Implemented Changes

The City implemented the following recommended changes to the procedure and forms:

#### *ADA Grievance Procedure*

- Updated responsible employee contact information including physical address, phone number, and email address.
- Added the Washington Relay TTY numbers (711 or 1-800-833-6384) for ease of access.
- Provided procedural instructions on how to file a complaint.
- Provided procedural instructions on how to appeal a decision.

#### *Forms*

- Created new Grievance Form and removed reference to Request for Accommodation.
- Created Appeal Form.

### 2. Updated Grievance/Complaint Procedure

The City of Marysville's updated Grievance Procedure is available via the City's website at:

<https://www.marysvillewa.gov/724/ADA-Accommodation>

See also **Appendix A**.

## E. Notice of ADA Provisions

The City of Marysville refers to its Notice of ADA Provisions as the Notice Under the Americans with Disabilities Act. The text is taken from Chapter 2 of the ADA Best Practices Tool Kit for State and Local Governments provided by the U.S. Department of Justice Civil Rights Division.

The Notice is reproduced below and posted publicly on the City's website at:

<https://www.marysvillewa.gov/724/ADA-Accommodation>.

### **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 Marysville will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

**Employment:** The City of Marysville 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 Marysville 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 Marysville 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 Marysville 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 City of Marysville 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 the City of Marysville, should contact the office of Teri Lester, Human Resources Manager, at (360) 363-8084 or [tlester@marysvillewa.gov](mailto:tlester@marysvillewa.gov), as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the City of Marysville 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 the City of Marysville is not accessible to persons with disabilities should be directed to Teri Lester, Human Resources Manager, at (360) 363-8084 or [tlester@marysvillewa.gov](mailto:tlester@marysvillewa.gov).

The City of Marysville 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.

## F. Self-Evaluation

The scope of this ADA Self-Evaluation included City of Marysville public right of way facilities and City services, programs and activities.

Assessed **Public Right of Way** facilities included:

- Curb Ramps
- Sidewalks (existing and non-existing sidewalk locations)
- Driveway Interface with Sidewalks (Google® imagery field samples)
- Accessible Pedestrian Signals and Pushbuttons (APS)
- Accessible Parking (Google® imagery survey of on-street accessible parking)

Assessed **Programs, Services and Activities** included:

- Existing City ADA-related policy and procedure documents
- Internal Citywide Department Assessment Questionnaire covering staff knowledge of and compliance with accessibility policies and procedures including:
  - ADA/504 Coordinator
  - Public Notice Under the ADA
  - Grievance Procedure
  - Effective Communication
  - Website Accessibility
  - Emergency Communication Services
  - Employment Procedures
  - Public Right of Way (Accessible Pedestrian Signal “APS” Policy)
- Review of Marysville Municipal Code and its Engineering Design & Development Standards

### 1. Public Right of Way Self-Evaluation

The inventory efforts of this ADA Transition Plan focus on ADA compliance of curb ramps, accessible pedestrian signals, and on-street accessible parking. The inventory efforts for sidewalks and driveway interface with sidewalks provides some detail on possible ADA barriers and are not intended to be detailed ADA compliance inventories. This section describes the inventory field data collected by Infrastructure Management Systems (IMS) as well as data provided by the City.

#### 1.1 Curb Ramps

The self-assessment identified 4,120 total ramp locations - this total includes locations where no ramps were present but deemed required. The self-assessment classified existing and/or missing ramps into six (6) different types based on the following data components:

- Ramp Facility or Detectable Warnings: Truncated Domes, Textured, No Facility, Other
- Back Curb: Yes or No
- Landing: Yes or No
- Ramp Slopes: Slight, Moderate or Severe

Of the 4,120 total inventory, 3,630 locations have **Non-Compliant** ramps or are **Missing** ramps. Although ramps labeled as **Non-Compliant (Old Standard)** are functional in most cases, they are technically non-compliant to the existing 2010 ADA Standard. For summary statistics, see **Table 1** and **Figures 1 and 2** below. For curb ramp asset attribute data, a detailed map and inventory spreadsheet, see **Appendix B**.

**Table 1. Summary of Ramp Inventory by Type, Number, and Percentage**

IMS Ramp Type	Transportation Solutions (TS) Ramp Type	Number (#) of Ramps by TS Type	Percentage (%) of Inventory
Ramp_Required	Missing	1029	25%
Type_1	Compliant "Current Standard"	490	12%
Type_2	Non-Compliant "Old Standard"	1908	46%
Type_3	Non-Compliant	693	17%
Type_4			
OTHER			
<b>TOTAL</b>		<b>4120</b>	<b>100%</b>

**Figure 1. Marysville Curb Ramp Inventory Pie Chart (%)**

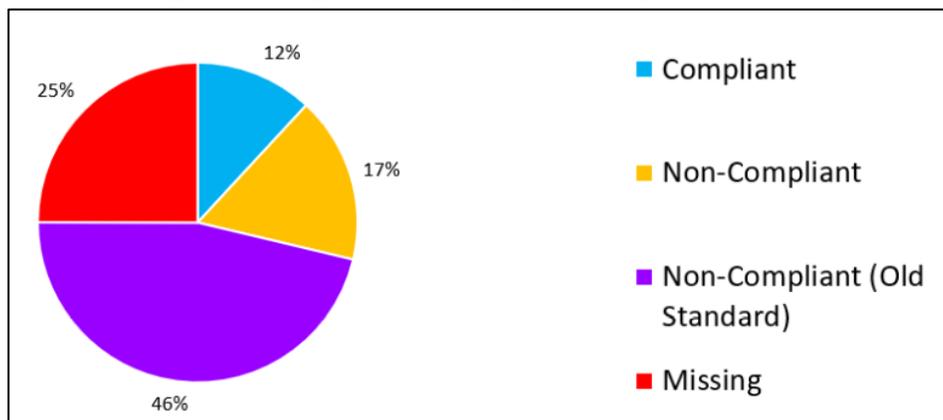
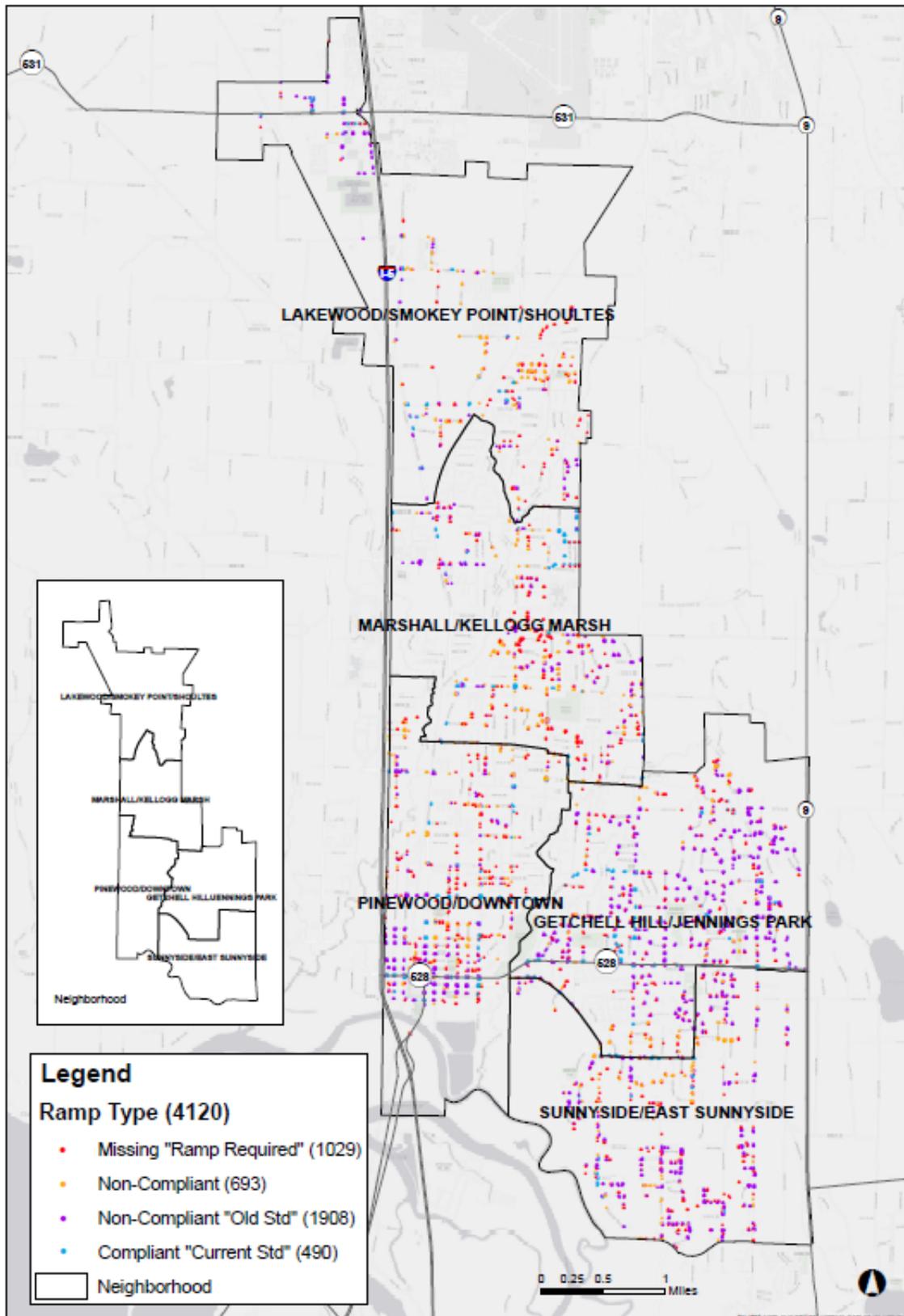


Figure 2. Marysville Curb Ramp Inventory (2019)



## 1.2 Sidewalks

### *City-Provided Data*

The City shared its sidewalk GIS data with project team staff in February 2019. This data included 55.9 miles (295,166 ft) of missing sidewalk. This is not a detailed inventory of ADA compliance of sidewalk facilities. The Marysville Comprehensive Plan prioritizes providing sidewalks on most collectors and arterials higher than providing them on residential streets. See **Figure 3** below.

**Figure 3. City-Provided Missing Sidewalk Network Map**



### *IMS 2020 Assets Inventory Data*

IMS prepared their sidewalk GIS layer in January 2020, which was provided to the City in March 2020. Of the 388.3 total miles (2,050,019 ft) of sidewalk inventory, approx. 166.8 miles (880,916 ft) or 43% of the total inventory was categorized as not having sidewalks. The IMS sidewalk layer inventory identifies missing sidewalk segments on all roadway types including residential, local, collector and arterial streets. See **Figure 4** below. This is not a detailed inventory of ADA compliance of sidewalk facilities. Field studies are recommended to identify ADA compliant and non-compliant sidewalk features as part of any Plan update. This inventory includes select attribute data helpful for identifying areas of potential non-compliance, including: sidewalk type, condition, material, width, position, location, obstructions, and length. For a detailed description of the sidewalk data attributes collected, see **Appendix B**. Note: Absence of sidewalks is not in and of itself a barrier to accessibility. However, transportation safety (for both motorized and non-motorized users) is a concerning matter for roadways without dedicated pedestrian facilities and/or narrow or absent shoulders. In addition, the City documents trip hazards along existing sidewalks that are reported by the public and identified during maintenance work.

**Figure 4. IMS 2020 Assets Missing Sidewalk Network Map**



### 1.3 Driveway Interface With Sidewalks

Spot checks were conducted using Google maps to assess the interface between driveways and sidewalks. This is not a detailed inventory of ADA compliance. Field studies are recommended to identify ADA compliant and non-compliant driveway interface with sidewalk features as part of any Plan update. Many streets in the Marysville roadway network do not have sidewalks. Many roads have one or no shoulder, and often driveways intersect with the roadway directly or with a 1-2 foot wide, but relatively narrow, mini-shoulder. Many driveways are gravel or have gravel between the paved shoulder and the paved driveway (see **Figure 5**). Where sidewalks are present in older neighborhoods and on older City arterials, the cross slopes may not be compliant with current 2010 ADA Standards (see **Figure 6**). These interfaces appear functional although they may have been built to the 1991 ADA Standards or are technically deficient. Otherwise, newer, or reconstructed arterial roadways appear to have functional, flatter cross slopes connecting sidewalks to driveways that appear compliant to current 2010 Standards or meet the Safe Harbor provision for facilities built to previous standards.

**Figure 5. Example of Direct or Mini-Shoulder to Driveway Interface (4528 84<sup>th</sup> St NE)**



**Figure 6. Example of Driveway to Sidewalk Interface in Older Neighborhoods (6412 65<sup>th</sup> Dr NE)**



1.4 Accessible Pedestrian Signals (APS)

The City provided the project team with a spreadsheet inventory of 45 traffic signal locations. The column “Fully ADA Pushbuttons” includes inventory data related to the pushbuttons only, not the APS signal system as a whole. Note: This inventory does not include evaluation of signal phase timing. The City keeps a record of the signal phase timing for all active signalized pedestrian crossings. Pedestrian crossing times account for the distance of the pedestrian pushbutton to the curb/cross walk entrance as well as the crosswalk distance. Additionally, at locations such as elementary schools with short duration heavy pedestrian movements, crossing times when warranted have been increased by time of day plans.

Per City engineering staff, the definition of “Fully ADA Pushbuttons” refers to the time of evaluation when some considered the audible PPBs (Pedestrian Pushbuttons) without vibrotactile arrow to be ADA-compliant. “Fully ADA Pushbuttons” refers to the pushbuttons only and means that a model with all ADA features is present (audible, vibrotactile arrow, locator tone, etc.). These locations may not fully meet current 2010 ADA Standards in regard to location of the pushbutton in reference to the curb ramp or separation from other pushbuttons. Many locations will need a traffic signal ADA inspection as part of future inventory inspections. In 2017, City staff performed ADA inspections at four (4) signalized intersections:

- 47<sup>th</sup> Ave NE and 4<sup>th</sup> St
- State Ave and 4<sup>th</sup> St
- 47<sup>th</sup> Ave NE and 3<sup>rd</sup> St
- Cedar Ave And 4<sup>th</sup> St

For a summary of the signal inventory, see **Table 2**. To review the traffic signal inventory spreadsheet data and 2017 ADA inspections, see **Appendix C**.

**Table 2. Accessible Pedestrian Signal (APS) Inventory Status**

“Fully ADA Pushbutton” Column Category	Category Definition	APS Compliance Status (2010 ADA Standards)	# of Signals	% of Signals
Project Name (2020)	Where a project w/ year is listed, the signal ADA components including pushbuttons, ped heads, ramps etc. will be upgraded to fully meet ADA Guidelines or reasons as to why some components of ADA cannot be met will be documented.	Fully Compliant to Maximum Extent Feasible	7	16%
X	PPB model is fully ADA; rest of signal may or may not meet all other ADA Guidelines	Partially Compliant	13	29%
X (not 10’ separated)	PPB model is fully ADA; however buttons do not meet 10’ separation required for ADA	Partially Compliant	2	4%
Blank		Non-Compliant	23	51%
<b>Total</b>			<b>45</b>	<b>100%</b>

## 1.5 Accessible Parking

### *Pavement Marking*

The IMS field data included a GIS layer of locations marked with the international wheelchair accessible symbol painted on the pavement. The inventory included four (4) accessible parking stalls in the City's public right of way:

- Two (2) angled parking stalls on the north side of 10<sup>th</sup> St just west of 47<sup>th</sup> Ave NE/Liberty St
- One (1) angled parking stall on the south side of 3<sup>rd</sup> St just east of State Ave (in front of Hilton Pharmacy & Gifts)
- One (1) parallel parking stall on a residential street at 5407 79<sup>th</sup> Ave NE where there were no other marked stalls

The self-assessment efforts included the use of Google® maps to identify the following additional marked stalls:

- One (1) accessible stall on the north side of 3<sup>rd</sup> St just east of State Ave
- One (1) parallel accessible parking stall on a residential street at 1908 8<sup>th</sup> Street (east of Union Ave) where there are no other marked stalls

Also of note, no accessible parking stalls were observed in the on-street parking surrounding Comeford Park adjacent to the Ken Baxter Community Center.

### *Accessible Parking Requirements*

The City is responsible to provide accessible parking in the public right of way. The 2010 ADA Accessibility Standards include a "safe harbor" for features that already comply with 1991 Standards but may not meet the new 2010 Standards. Any alterations made after March 15, 2012, must comply with the 2010 Standards, to the maximum extent feasible. For more information, see the National ADA Network's [2017 Fact Sheet on Accessible Parking](#). Note: Accessible parking at building facilities is not within the scope of this ADA Transition Plan.

The 2010 ADA Standards for parking spaces include the following:

**208 Parking Spaces. 208.1 General.** Where parking spaces are provided, parking spaces shall be provided in accordance with 208. **EXCEPTION:** Parking spaces used exclusively for buses, trucks, other delivery vehicles, or vehicular impound shall not be required to comply with 208 provided that lots accessed by the public are provided with a passenger loading zone complying with 503.

**208.2 Minimum Number.** Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2 and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

**Advisory 208.2 Minimum Number.** The term "parking facility" is used in Section 208.2 instead of the term "parking lot" so that it is clear that both parking lots and parking structures are required to comply with this section. The number of parking spaces required to be accessible is to be calculated separately for each parking facility; the required number is not to be based on the total number of parking spaces provided in all of the parking facilities provided on the site.

The 2010 ADA Standards **Table 208.2 Parking Spaces** requires the following number of parking spaces per parking facility:

**Table 3. 2010 ADA Standards Table 208.2 Parking Spaces**

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000

*On-Street Accessible Parking PROWAG Guidelines (Best Practices)*

The U.S. Access Board recommends agencies follow the best practices identified in the 2011 PROWAG (Public Right of Way Accessibility Guidelines). The PROWAG is not currently enforceable. The [U.S. Access Board R214 On-Street Parking Spaces](#) states that where on-street parking is provided on the block perimeter and the parking is marked or metered, accessible parking spaces complying with R309 shall be provided in accordance with Table R214 (see **Table 4** below):

**Table 4. U.S. Access Board Table R214 On-Street Parking Spaces**

Total Number of Marked or Metered Parking Spaces on the Block Perimeter	Minimum Required Number of Accessible Parking spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 and over	4% of total

Based on **Table 4** above, each block perimeter with at least one on-street marked or metered parking stall requires at least one accessible parking stall.

To estimate the number of missing accessible parking stalls, the project team utilized GIS analysis tools to estimate the number of City block perimeters with at least one marked on-street parking stall based on the “Striping” GIS layer in the IMS field data. In **Figure 7** below, the “Striping” feature is represented by the teal markings and identifies locations in the City’s road network painted with white solid single lines. Next, a “block perimeter” polygon was created adjacent to on-street striped parking stall locations. The GIS analysis yielded forty-four (44) City blocks with one or more marked on-street parking stalls (see light purple, numbered polygons in **Figure 7**).

Note: The GIS block perimeters shown in **Figure 7** are rough sketches only and do not represent precise alignment with City public right of way boundaries. They are, however, sufficiently accurate to show where on-street marked parking stalls are located within the City block grid.

Three (3) of the accessible parking stalls identified in the City’s inventory were located on separate block perimeters with marked or metered parking stalls. Therefore, it is estimated that roughly forty-one (41) block perimeters with on-street marked or metered parking stalls lack ADA accessible parking stalls and are therefore not ADA compliant.



## 1.6 Recommendations

The following actions are recommended with respect to the barrier types inventoried:

### *Curb Ramps*

- Coordinate curb ramp upgrades with City Capital Facility Program (CFP) projects.
- Prioritize removal of curb ramp barriers at Missing and Non-Compliant locations higher than functional Non-Complaint “Old Standard” locations in the barrier removal schedule.
- Consider the role of public feedback to identify high priority curb ramp barriers.

### *Sidewalks*

- Continue expanding the City’s sidewalk network in accordance with planned City CFP projects.
- Consider the role of public feedback to identify high priority sidewalk barriers.
- Consider conducting a sidewalk ADA compliance field inventory at a future update to the ADA Transition Plan. Information gathered as part of the inventory may be used to develop a prioritized schedule and financial plan to remove identified barriers.

### *Driveway Interface With Sidewalks*

- Continue upgrading sidewalk/driveway interfaces in accordance with planned City CFP projects.
- Consider the role of public feedback to identify high priority driveway-to-sidewalk barriers.
- Consider conducting a driveway/sidewalk interface ADA compliance field inventory at a future update to the ADA Transition Plan. Information gathered as part of the inventory may be used to develop a prioritized schedule and financial plan to remove identified barriers.

### *Accessible Pedestrian Signals (APS) and Pushbuttons*

- Consider adding a “Fully APS System” column to the **SignalInventory.xls** to acknowledge signal systems that are fully ADA complaint across all system features.
- Consider developing a capital improvement program to prioritize and upgrade all remaining signals to incorporate fully ADA compliant equipment and features, all in accordance with the City’s Accessible Pedestrian Signal (APS) policy. See **Section I Accessible Pedestrian Signal (APS and Pushbutton Policy)** below.
- Consider following the MUTCD guidance for signal phase timing at intersections.
- Consider the role of public feedback to identify high priority locations for APS.

### *Accessible Parking*

- At a future update to the ADA Transition Plan, evaluate accessible parking at City building facilities as part of ADA building evaluations.
- At a future update to the ADA Transition Plan, conduct an inventory of City on-street marked or metered parking stalls per block perimeter and identify those stalls that are ADA accessible. To achieve this, City GIS staff could:
  - Create a polygon feature class for on-street marked or metered parking stalls based on the IMS-provided STRIPING-White Solid Single Line GIS feature class.
  - Update the MARKINGS - Accessible Parking Symbol node feature class.
- Determine the number of deficient accessible parking stalls per block perimeter—including van-accessible parking spaces--based on the [U.S. Access Board R214 On-Street Parking Spaces](#) requirements. Per Safe Harbor, any alterations made after March 15, 2020, should comply with the 2010 Standards, to the maximum extent feasible.
- Develop a schedule to add the necessary accessible stalls to the City’s on street parking inventory.

- Consider the role of public feedback to identify high priority accessible parking needs.

#### *Recognition of Compliance Activities To Date*

The City of Marysville has taken the following steps to increase ADA compliance:

- Inventoried the City's curb ramp features for ADA compliance
- Inventoried the City's sidewalk network for existent and non-existent features and potential ADA barriers
- Field sampled the City's driveway interface with sidewalks network for potential ADA barriers
- Inventoried the City's accessible pedestrian signal/pushbutton features for ADA compliance;
- Inventoried the City's accessible parking inventory for potential ADA barriers based on 2011 PROWAG best practices guidelines
- Upgraded seven (7) traffic signals to include APS features to the maximum extent feasible as part of 2020 projects;
- Constructed ADA-compliant replacement ramps as a part of other City projects and overlays; and
- Required new and redevelopment projects to construct ADA-compliant ramps.

## 2. Programs, Services, and Activities Self-Evaluation

This section reviews the City's efforts to self-evaluate the policies and procedures of the City's programs, services and activities.

### 2.1 Programmatic Self-Evaluation Scope

#### *Existing Policy Documents Audit – May/June 2019*

In May/June 2019, an audit of the City's website found the following existing policies and/or procedures related to accessibility:

- Public Notice Under the ADA
- ADA Request for Accommodation Form (online and pdf download options)
- ADA Grievance Procedure and Form (online and pdf download options)

#### *Programmatic Assessment Questionnaire – April 2020*

Due to the wide variety of disabilities the ADA requires public agencies to accommodate, a Self-Assessment Questionnaire was completed by fifteen (15) department representatives and it included seventy-nine (79) questions that asked for "Yes," "No," or "Not Sure" responses and also allowed space for providing optional comments. This method provided a measure of area-specific compliance knowledge/activities. The Assessment Questionnaire was not intended to reveal violations of ADA policy in a punitive sense; rather, it was done to provide an understanding of existing conditions in the City.

Departments chosen to participate in the Assessment Questionnaire were selected by the project team as they represent the departments that most directly interface with the general public. These included:

- |                         |                       |                   |
|-------------------------|-----------------------|-------------------|
| • City Clerk            | • Engineering         | • Legal           |
| • Code Enforcement      | • Executive           | • Municipal Court |
| • Community Development | • Finance             | • Parks           |
| • Community Information | • Human Resources     | • Police          |
| • Emergency Management  | • Information Systems | • Public Works    |

See **Appendix D** for individual and collated questionnaire response documentation.

## 2.2 City Questionnaire Findings

### *Public Notice of ADA Provisions*

The City's Public Notice of ADA Provisions was found to be compliant with the requirements of the ADA. The document must be accessible in alternative formats (which can be requested). See **Section E Notice of ADA Provisions** above.

### *Request for Accommodation*

The City's Request for Accommodation has outdated contact person information. Otherwise, it was found to be compliant with the requirements of the ADA.

### *ADA Grievance Procedure and Form*

The City's ADA Grievance Procedure and Form has outdated contact person information. Otherwise, it was found to be compliant with the requirements of the ADA. See **Section D Complaint/Grievance Procedure** above.

### *Programmatic Assessment Questionnaire*

The Assessment Questionnaire responses revealed varying levels of ADA-compliance requirement awareness and ADA-compliant activities across the departments surveyed. The following section summarizes the Assessment Questionnaire findings according to the administrative requirements for a compliant ADA Transition Plan provided in WSDOT's Local Agency Guidelines (Chapter 29, Appendix 29.11), Section 28 CFR Part 35 of the ADA, and other ADA resources including the national ADA Network's ADA Title II Tutorial. Findings encompass the below areas:

- ADA Coordinator
- Public Notice under the ADA
- Grievance Procedure
- Effective Communication
- Website Accessibility
- Emergency Communication Services
- Employment Procedures
- Public Right of Way

Overall, most City staff have some knowledge regarding their obligations under the ADA at a macro level. Some departments are more knowledgeable or active than others regarding how to fulfill these obligations through specific policies and procedures.

### *ADA Coordinator/ Public Notice Under the ADA/Grievance Procedure*

Roughly half of the respondents know where to find the ADA/504 Coordinator contact information as it is posted in their building or available online. With respect to carrying out the responsibilities of this role, the ADA Coordinator identified that she directs public requests and complaints to appropriate personnel.

Two-thirds of respondents know where to find the Public Notice Under the ADA while one-third know how to make the Public Notice accessible in alternative formats.

Familiarity with the City's Grievance Policy and Procedure and where to find it is low. However, half of respondents said their agency keeps a record of filed grievances and responses.

## *Effective Communication*

### Provision of Auxiliary Aids

Most staff are aware that they are obligated to provide auxiliary aids to provide effective communication for persons with disabilities and that people with disabilities may not be charged a fee to cover the cost to provide those auxiliary aids.

The Communication Services and the Municipal Court know how to provide the greatest variety of auxiliary aids for persons who are deaf or hard of hearing. Roughly a third of departments know how to provide qualified sign language interpreters or use a TTY (Text Telephone) or TDD (Telecommunication Device).

The City Clerk's Office and Information Services offices are most familiar with auxiliary aids for people with vision disabilities. A third of departments know how to provide documents in large print. A handful can provide information in audio recording or screen-reader friendly accessible electronic formats.

Five departments were not sure or did not know how to provide any specific aids. Three departments did not provide answers for this section: Emergency Risk Management, Executive and Parks, Culture, and Recreation.

### Service Animals

Two thirds of departments are aware that public officials may ask two questions related to a service animal: A) If the animal is required because of a disability; and B) What work or task the animal has been trained to perform.

### Television Programs/Videos

Responses were a mix of "yes," "no," and "not sure" regarding provision of captioning or audio description formats for publicly produced television programs or videos.

### Telephone Communications

Two departments (Municipal Court and Parks, Culture, and Recreation) provide text telephone (TTY) or 711 Telecommunications Relay Services (TRS) upon request. Two departments (City Clerk and Parks, Culture and Recreation) provide TTY and TRS information on the City's hard copy and website publications wherever the City's telephone number is publicized. Four departments instruct public employees to accept and handle relayed calls.

### Sign Language Interpreters and Readers

Less than a third of departments have arrangements with a vendor to provide interpreting services. Two thirds of departments are aware that it is inappropriate to ask a family member or friend of a person who is deaf to serve as a sign language interpreters. Roughly half of departments know that a sign language interpreter or reader must be qualified to communicate effectively, accurately, and impartially (but is not required to have certification).

### Primary Consideration

Most departments are unsure if they give primary consideration to the preferred type of auxiliary aid requested by the person with a disability. However, half of departments are aware of situations when granting a request for primary consideration (preferred auxiliary aid type) is not required: A) The public entity can demonstrate that another equally effective means of communication is available; B) Use of the means chosen would result in a fundamental alteration in the service/program/activity; C) the means chosen would result in an undue financial and administrative burden.

### Policies and Procedures

Responses were mixed regarding whether departments publish the effective communication policy (Notice Under the ADA) on the agency's website in an accessible format so people with disabilities know about any reasonable advance notice requirements adopted by the agency.

Parks, Culture, and Recreation has department policies and procedures in place to respond to requests from the public for documents in accessible formats. Four departments have policies/procedures in place to respond to public request for sign language interpreters (given reasonable advance notice, at no charge, and/or written statement of reasons for denying an interpreter after considering all resources available). Three departments have policies/procedures to respond to public requests for note-takers, computer-assisted real-time transcription services and other aids/services.

Most departments have not had a situation where they have been unable to provide access to a request for an alternative format (the Municipal Court did have a situation). Three departments reported that employees within their department who interact with the public have been trained on the correct procedures to follow when a person requests an interpreter or other auxiliary aid/service.

### *Website Accessibility*

#### Policies and Procedures

Most respondents were not sure whether their agency had a written website accessibility policy and five respondents knew where to find the Website Accessibility Policy online. There is a mixed response regarding whether procedures have been developed to ensure that content is not added to the website until it has been made accessible, including whether text-based versions of pdf documents are posted. Most respondents are able to locate information for reporting website accessibility problems and requesting accessible services and information. Most departments reported no or not sure for having procedures in place to assure quick response to such website accessibility requests, or for having a specific written plan with timeframe to make all existing web content accessible.

Note: The City's [Website Accessibility](#) webpage directs users to contact individual departments for accessibility inquiries. However, it is not clear whether website accessibility is managed internally by individual departments or if a single department provides oversight/direction for ensuring website accessibility. The webpage has been designed according to [Section 508](#) and [2.0A and AA](#) website accessibility standards. According to the latter (also referred to as [Web Content Accessibility Guidelines](#) or WCAG) WCAG 2.0 was published on 11 December 2008. WCAG 2.1 was published on 5 June 2018. WCAG 2.0 and WCAG 2.1 are both existing standards and WCAG 2.1 does not deprecate or supersede WCAG 2.0.

### New Website Pages

Although many respondents provided “not sure” answers to this section, Information Systems and Community Information affirmed that new links and images have alternative descriptive text. Over a third of respondents reported “no” as to whether in-house and contractor staff have received appropriate training on website accessibility policies and procedures.

### *Emergency Communication Services*

For most questions related to this topic, respondents answered “not sure.” Many of the questions relate to ensuring capability to accept and conduct TTY calls, TTY equipment maintenance, and back up procedures in the case of equipment malfunction. While some City departments provide more emergency services than others, the responses reveal a knowledge gap regarding the TTY communication format.

### *Employment Procedures*

The majority of respondents reported that they ensure employees with decision making responsibilities are aware of and comply with ADA nondiscrimination requirements. One third of departments have a roster of employees with decision making responsibility for the employment process.

Most respondents are aware that application forms may not ask questions regarding the presence of a disability, that interviews are to be conducted in accessible locations, and that confidential disability-related materials must be kept in secure separate files. Many have been trained on what questions may be asked in the pre-employment process.

However, three departments confirmed that employment advertisements/announcements are made accessible in alternative formats and via TTY phone number. Most department are not sure how to identify and hire a qualified sign language interpreter if requested by an applicant.

### *Public Right of Way*

Four departments are aware of the requirement for an Accessible Pedestrian Signal (APS) Policy while most other departments are not sure.

## 2.3 Marysville Municipal Code and Engineering Design & Development Standards

A review of the City’s code and standards demonstrates the City does reference appropriate ADA standards as described below.

### *International Building Code*

It should be noted that while the 2010 ADA Standards for Accessible Design are currently the federal ADA standards, many states turn to other building codes when it comes to accessibility. For example, in Region 10, Washington, Idaho, and Alaska all use the International Building Code (IBC), while Oregon uses the Oregon Structural Specialty Code (based on the IBC but Oregon-specific). All of these states also use the ANSI A117.1 . When an entity, architect, or contract is building or modifying a building or feature, they first look at the code that the state uses, and if that feature is missing from the code or provides less accessibility than the ADA Standards, the Standards should be used for the specific feature. For more information, visit <http://nwadacenter.org/toolkit/ada-standards-and-international-building-code>.

### *Marysville Municipal Code on Code Standards*

The Marysville Municipal Code (MMC) Chapter 16.04.010 includes adoption by reference, exclusions, and exemptions regarding code standards:

*(1) Certain documents, copies of which are on file in the office of the building official of the city of Marysville, being marked and designated as the “International Building Code” and the “International Residential Code,” and the “International Building Code Standards,” 2009 Edition, published by the International Code Council, except for the provisions in subsections (3), (4) and (5) of this section, are adopted as the building code of the city of Marysville for regulating the erection, construction, enlargement, alteration, repair, moving, removal, conversion, demolition, occupancy, equipment, use, height, area and maintenance of buildings or structures in the city of Marysville, providing for the issuance of permits and the collection of fees therefor, and providing for penalties for the violation thereof. Each and all of the regulations, provisions, penalties, conditions, and terms of said code are incorporated and made a part of this chapter as if fully set forth in this chapter.*

*(2) IBC and IRC Sections 101.1 Title. These regulations shall be known as the building code of the city of Marysville, Washington, hereinafter referred to as “this code.”*

MMC Chapter 22C requires compliance with the International Code Council, and requires that development and redevelopment projects must meet the Americans with Disabilities Act (ADA). General site, accessible routes and building elements shall comply with ICC/ANSI A117.1-2003 or current edition.

### *Engineering Design and Development Standards on Curb Ramps*

Chapter 3 of the City’s Engineering Design and Development Standards (September 1999, revised January 2017) Section 3-516:

*On all streets with vertical, ramped sections to facilitate passage of handicapped persons shall be constructed through curb and sidewalk at street intersections and other crosswalk locations. See Standard Plan 3-516-001. Where a ramp is constructed on one side of the street, a ramp shall also be provided on the opposite side of the street. Curb ramps shall be positioned so that a ramp opening is situated within the marked crosswalk or crossing area if unmarked. Curb ramps shall meet all ADA standards including maximum grade and cross-slope requirements. Curb ramps shall be designed and constructed in accordance with the latest WSDOT standard plans. Dual ramp layouts are preferred unless technically infeasible.*

### *Other References to Accessibility in Marysville Municipal Code*

The City’s municipal code ([MMC](#)) was reviewed for accessibility language references. The search results are grouped by the search terms used including: “ADA,” “Disabilities,” “Disabled,” and “Accessible.” See **Appendix E**.

## 2.4 Recommendations

The recommendations provided below correlate to the eight ADA Compliance checklist items included in the Title II/Section 504/WSDOT LAG Chapter 29/Appendix 29.11 guidelines (See **Section K Accessibility Guidelines, Standards, and Resources**). Recommendations are provided in two groups based upon the amount of time required to satisfy the check list items:

- **Short Term Items** involve macro-level administrative requirements that are applicable in a uniform manner to all departments and can be accomplished within one year of the date of publication for this ADA Transition Plan.
- **Long Term Items** may require department-specific modifications to fit the services, programs, and activities provided by each department to be accomplished in two or more years.

#### *Short Term Items*

It is recommended the City prioritize the following items as they are “easily achievable” and comprise four out of the eight Title II/Section 504/WSDOT LAG Chapter 29 checklist requirements. It is recommended the City:

##### ADA/504 Coordinator:

- Work with all departments to make them aware of the name, contact information, and responsibilities of the designated ADA/504 Coordinator and ensure that staff know where the aforementioned information is publicly and internally published (such as on the City’s website).
- Provide the ADA/504 Coordinator with adequate training to carry out the responsibilities of the role including monitoring the implementation of the ADA Transition Plan to effectively coordinate with individual departments.
- See **Section C ADA/504 Coordinator** above.

##### Grievance/Complaint Procedure

- Update the contact information for the ADA Coordinator.
- Work with all departments to make them aware of the City’s updated ADA Grievance/Complaint Procedure, how to access it, and how to provide it in alternative formats.
- Train department staff on the specific purpose of this ADA Grievance/Complaint Procedure as opposed to the separate Request for Accommodation.
- See **Section D Grievance/Complaint Procedure** and **Appendix A**.

##### Public Notice of ADA Provisions

- Update the contact information for the ADA Coordinator.
- Work with all departments to make them aware of the Public Notice Under the ADA, how to access it, where to publicly post it, and how to provide it in alternative formats.
- Train department staff on the significance of the Public Notice Under the ADA as a policy and procedure reference document.
- See **Section E Notice of ADA Provision**.

##### Accessible Pedestrian Signal (APS) Policy

- Adopt an Accessible Pedestrian Signal (APS) Policy.
- Post the adopted APS Policy to the City website, and notify City staff of its existence and location.
- See **Section I Accessible Pedestrian Signal (APS) Policy**.

### *Long Term Items*

It is recommended the City address the following items within two or more years to satisfy the remaining four out of eight Title II/Section 504/WSDOT LAG Chapter 29 checklist requirements. Other recommendations are also included below. It is recommended the City:

#### Programs Services and Activities

- Prioritize production of policies and procedures and training of staff for the **Short-Term** Items.
- Use the Programmatic Compliance Checklist provided in **Appendix F** (a modified version of the Internal City Department Self-Assessment Questionnaire) to monitor progress towards compliance for existing and future City staff.

#### Self-Evaluation (1)

- It is acknowledged that the Programmatic Assessment efforts described above satisfy **in part** one of the Title II/Section 504/WSDOT LAG Chapter 29 checklist requirements. (This requirement encompasses physical barrier assessment completed in **Section F Self-Evaluation** for the public right of way as well as other City facilities including parks and buildings that is recommended to occur within six years of publication of this ADA Transition Plan).

#### Self-Evaluation (2)

- Maintain the completed self-evaluation and attached appendixes for this ADA Transition Plan on file and make it available on the City's website for public inspection for at least three years following its publication.

#### Municipal Code, Standards, and Accessibility During Construction/Maintenance Projects

- Considering having the City's legal team review the Marysville Municipal Code (MMC) to change references to "disabled persons" to "persons with disabilities" in line with ADA language etiquette best practices (see Module 7.3 "Use Person-First Language" of [ADA Title II Tutorial](#)).
- Consider including direct reference to 2011 PROWAG requirements.

## G. Public Outreach

### 1. Public Outreach Strategy

The project team conducted a public outreach strategy on both digital and in-person platforms. The project team sought input from the Mayor's ADA Advisory Committee regarding the proposed project website, online survey, and public workshop content at an internal City meeting on January 15<sup>th</sup>, 2020. With the Committee's approval, the project team worked with the City's Communications Administrator to launch the project website and respective map-enabled and screen-reader friendly surveys on January 29<sup>th</sup>, 2020.

The City advertised the project website, surveys, and public workshop on various media platforms including:

- City news release on February 12<sup>th</sup>
- The Marysville Globe "Briefly" announcement on February 14<sup>th</sup>
- Facebook posts on February 20<sup>th</sup>, February 29<sup>th</sup>, and March 3<sup>d</sup>
- HeraldNet article on March 9<sup>th</sup>
- NextDoor platform on March 7<sup>th</sup>

#### 1.1 Project Webpage Content

Content for the project webpage content included a project description, schedule, links to online surveys (one map-enabled version and one screen-reader friendly version), public workshop meeting information, City staff contacts, a documents section for uploading the draft version for public comment and final version, and a recent/annual accomplishments section for further tracking of ADA Transition Plan implementation progress. For the project webpage content, see **Appendix G** or <https://www.marysvillewa.gov/1032/ADA-Plan>.

#### 1.2 Online Surveys

The map-enabled **Survey123 for ArcGIS** survey was administered by project staff from January 21<sup>st</sup> to March 22<sup>nd</sup>, 2020. City staff administered the screen-reader friendly **Survey Monkey** survey for the same period. The original March 8<sup>th</sup> deadline was extended to March 22<sup>nd</sup> to encourage additional community feedback. For survey content, see **Appendix G**.

#### 1.3 Public Workshop

The City hosted a Public Workshop on Wednesday, March 4<sup>th</sup>, 2020, from 6-7:30pm at the Marysville Public Library located at 6120 Grove St, Marysville, WA, 98270. Other than meeting facilitators, two members of the public attended the meeting. One participant is currently a member of the Mayor's ADA Advisory Committee. The other participant, a person who uses a wheel chair, shared valuable feedback for half a dozen locations throughout Marysville where he experiences physical access barriers including: railroad crossings, lack of sidewalks on his route to Columbia College, bus stops at distant locations from desired services, and lack of lighting at crossings. The 24"x36" map displays prepared for the workshop are included in **Appendix G**.

## 2. Public Outreach Findings

### 2.1 Public Workshop Findings

The following **Tables 5 to 7** and map **Figures 8 to 10** below display the public-right-of-way barrier locations identified by the public workshop participants. The barrier locations are organized by group numbers identified in the tables that correspond to the map call outs. For more detailed maps, see **Appendix G**.

**Table 5. Lakewood/Smokey Point/Shoultles Neighborhoods**

Group #		Barrier Locations
<b>Figure 8</b>		
<b>Group 1</b>	<ul style="list-style-type: none"> <li>136<sup>th</sup> St NE from 45<sup>th</sup> Ave NE to Shoultles Elementary School: no sidewalk on northern side from just west of railroad spur line over tracks to just west of 51<sup>st</sup> Ave NE</li> <li>136<sup>th</sup> Ave railroad spur line crossing - no paved shoulder therefore wheelchair user must cross in roadway</li> </ul>	
<b>Group 2</b>	<ul style="list-style-type: none"> <li>Lack of lighting/LED ground lights at crossing of 51<sup>st</sup> Ave NE at 139<sup>th</sup> ST and bus stop (crossing has flashers for vehicles, but not for crosswalk users)</li> <li>Non-compliant curb ramps from 51<sup>st</sup> Ave NE heading west onto 139<sup>th</sup> St NE</li> </ul>	
<b>Group 3</b>	<ul style="list-style-type: none"> <li>Lack of Sidewalks on 51<sup>st</sup> Ave NE</li> </ul>	
<b>Group 4</b>	<ul style="list-style-type: none"> <li>Railroad crossing at 116<sup>th</sup> St and State Ave: lack of advance warning truncated domes</li> </ul>	
<b>Group 5</b>	<ul style="list-style-type: none"> <li>Bus stop at State Ave and 113<sup>th</sup> St NE: no crosswalk markings; why is this stop located this far away from State Ave/116<sup>th</sup> St intersection and adjacent shopping centers/services?</li> </ul>	

**Table 6. Pinewood/Downtown Neighborhood**

Group #		Barrier Locations
<b>Figure 9</b>		
<b>Group 8</b>	<ul style="list-style-type: none"> <li>Group Vicinity of Pinewood Elementary School: square created by 88<sup>th</sup> St NE, 55<sup>th</sup> Ave, and 84<sup>th</sup> St NE: missing sidewalks</li> <li>Curve from 55<sup>th</sup> Ave NE heading south onto 84<sup>th</sup> St NE heading west: blind corner/poor sight distance and roadway markings feel unsafe</li> </ul>	
<b>Group 9</b>	<ul style="list-style-type: none"> <li>72<sup>nd</sup> St NE and State Ave: sections of uneven sidewalk</li> </ul>	
<b>Group 10</b>	<ul style="list-style-type: none"> <li>Lack of Sidewalks on 51<sup>st</sup> Ave NE</li> </ul>	
<b>Group 11</b>	<ul style="list-style-type: none"> <li>7<sup>th</sup> St and State Ave: angle where curb cut slope meets road slope creates hazard</li> </ul>	
<b>Not mapped</b>		
<b>General</b>	<ul style="list-style-type: none"> <li>Lack of sidewalks</li> <li>Bus stops without sidewalks create steep ingress/egress for mobility devices accessing buses</li> <li>Railroad crossings: lack of advance warning truncated domes or lack of paved shoulder/sidewalk</li> </ul>	

Figure 8. PROW Barrier Groups - Lakewood/Smokey Point/Shoultes and Marshall/Kellogg Marsh

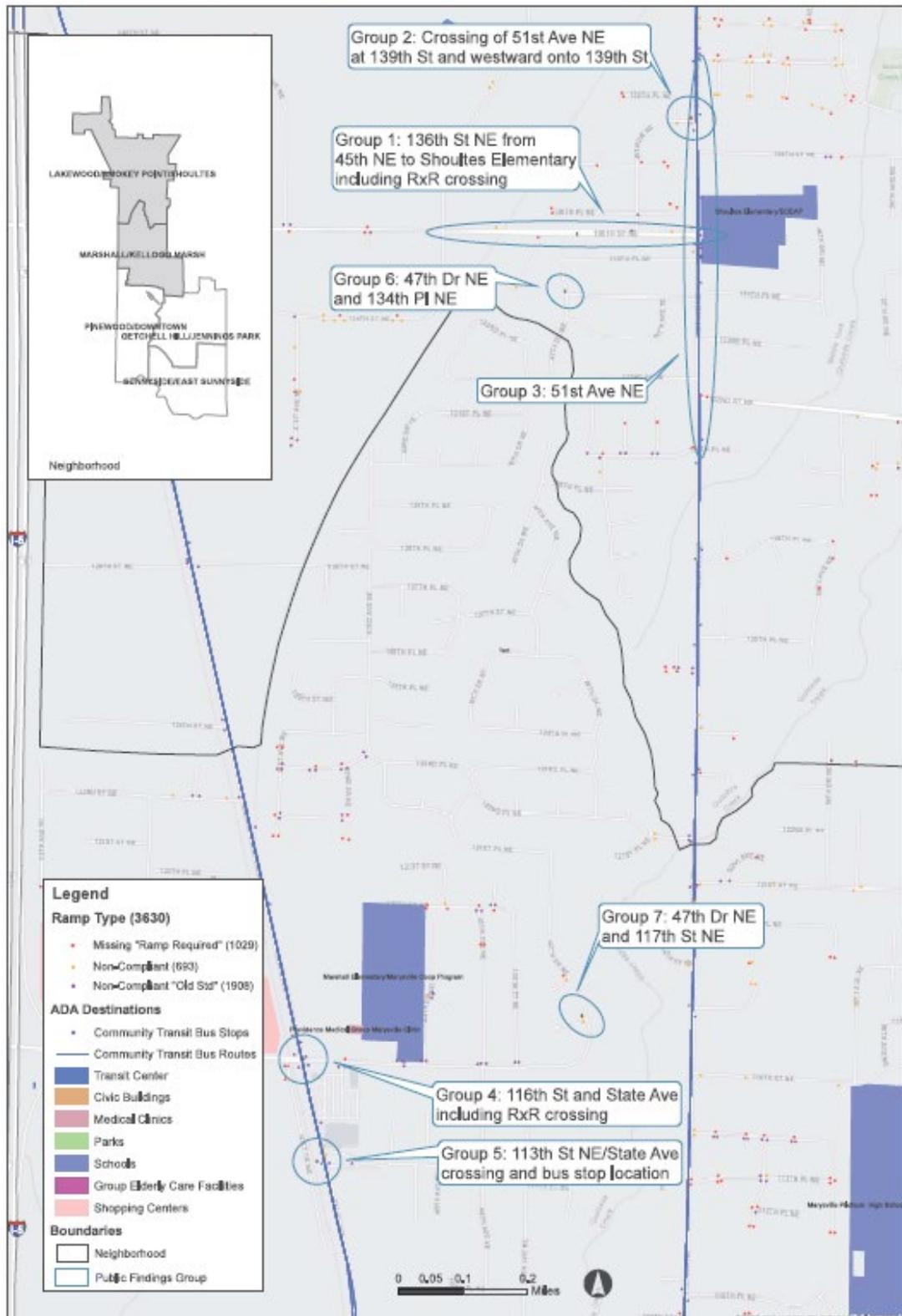
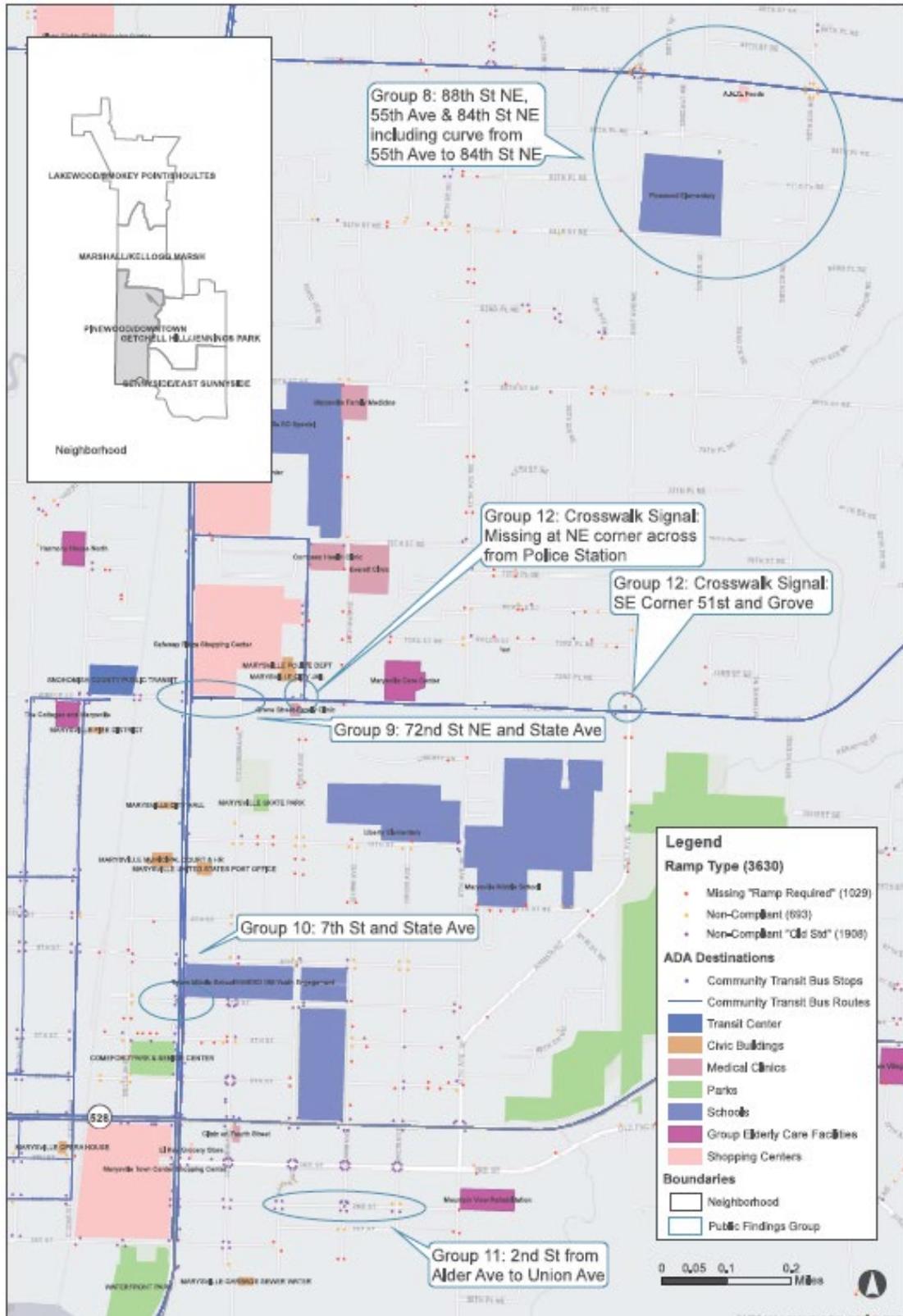


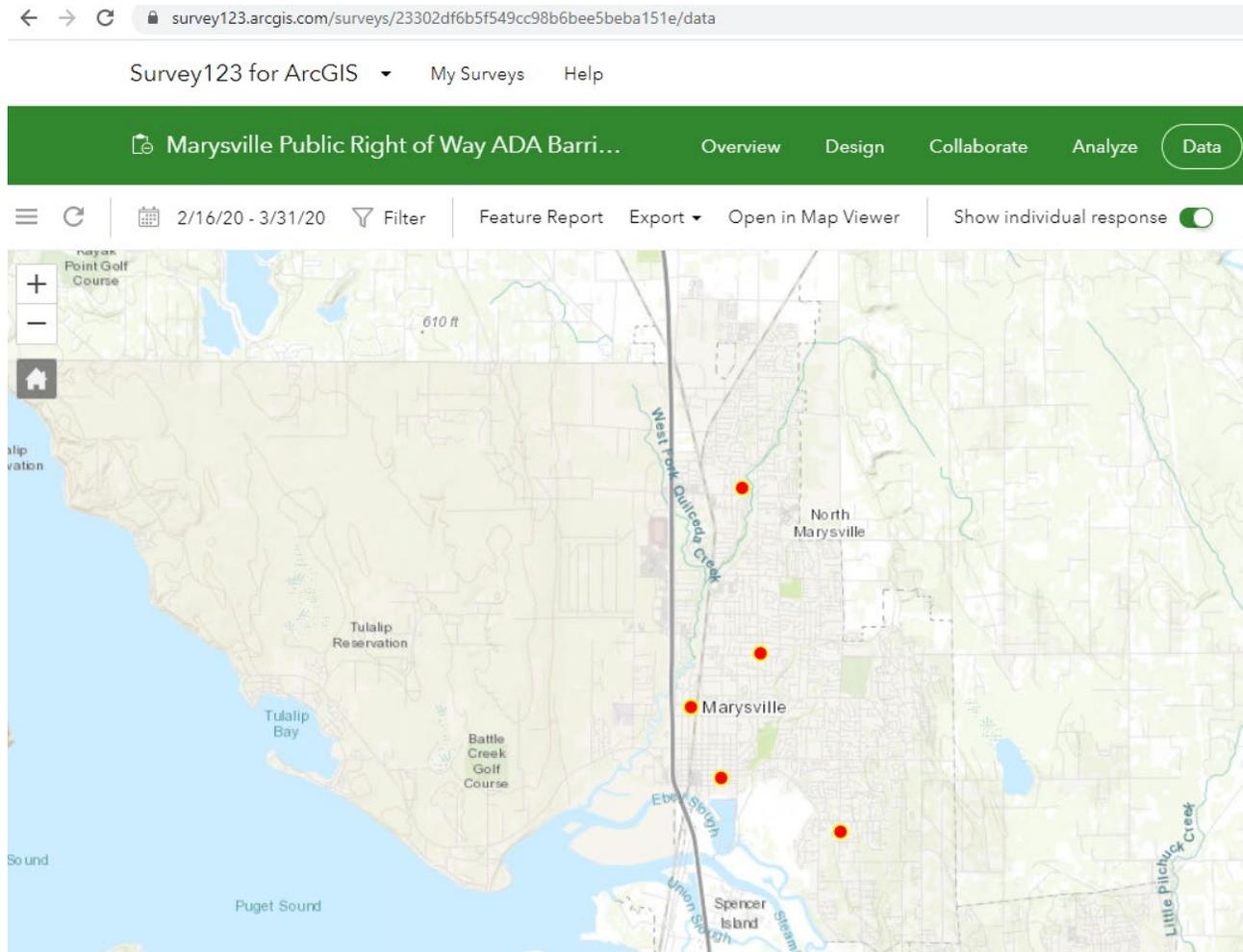
Figure 9. PROW Barrier Groups - Pinewood/Downtown



### 2.2 Map-Enabled Survey123 for ArcGIS Survey Results

For the online survey responses, the red dots in **Figure 10** were assigned a group number in **Table 7**. These grouped locations are also included in map **Figures 8 and 9** above. Complete raw survey data is provided in **Appendix G**.

**Figure 10. Online Survey Map Results Snapshot**



**Table 7. Survey123 for ArcGIS Public Comment Barriers**

GROUP #		BARRIER LOCATIONS
<b>Figure 8 above</b>		
<b>Group 1</b>	<ul style="list-style-type: none"> <li>47<sup>th</sup> Dr NE and 136<sup>th</sup> St NE (This is also near railway crossing with no sidewalk on 136<sup>th</sup>).</li> </ul>	
<b>Group 6</b>	<ul style="list-style-type: none"> <li>Missing sidewalk in neighborhood in vicinity of 47<sup>th</sup> Dr NE and 134<sup>th</sup> PI NE</li> </ul>	
<b>Group 7</b>	<ul style="list-style-type: none"> <li>High curb at crosswalk at 117<sup>th</sup> St NE near 47<sup>th</sup> Dr NE</li> </ul>	
<b>Figure 9 above</b>		
<b>Group 8</b>	<ul style="list-style-type: none"> <li>Missing sidewalks on 84<sup>th</sup> Street, 55<sup>th</sup> Avenue and 88<sup>th</sup> Street (3 people identified these locations in the vicinity of Pinewood Elementary School)</li> </ul>	
<b>Group 11</b>	<ul style="list-style-type: none"> <li>Lack of crosswalks on all of 2<sup>nd</sup> at new roundabouts</li> </ul>	
<b>Not Mapped</b>		
<b>General</b>	<ul style="list-style-type: none"> <li>Bus stops along State (west side) do not have curb cuts</li> <li>Poles in the middle of gates meant to keep bikes out also keep wheelchairs out</li> <li>Desire for overall improvement of City sidewalk maintenance including increase in sidewalk and light pedestrian crossings</li> </ul>	

2.3 Survey Monkey Survey Results

One person reported the following ADA barriers via the alternative format online survey. See **Table 8** below. The Group 12 barriers are identified in map **Figure 9** above. Complete raw survey data is provided in **Appendix G**.

**Table 8. Survey Monkey Public Comment Barriers**

GROUP #		BARRIER LOCATIONS
<b>Figure 9 above</b>		
<b>Group 12</b>	<ul style="list-style-type: none"> <li>Crosswalks signals that are not in working order in [inclement] weather:</li> <li>SE corner 51<sup>st</sup>/Grove-next to Dr. Gold’s office</li> <li>Missing one at NE corner across from the police station</li> </ul>	
<b>Not Mapped</b>		
<b>General</b>	<ul style="list-style-type: none"> <li>Sidewalks with recently installed on[e]-sided yellow grading leaving side streets with level access to the sidewalks</li> <li>Uneven sidewalks throughout the entire town are a tripping hazard for all citizens not just the physically disabled or seniors</li> </ul>	

2.4 Other Online Feedback

One person posted a request on the City’s Facebook page for all crosswalks in Marysville to have pedestrian signal walk lights and sound alerts. The person expressed concerns about safety for crossing based on motorized signal alerts (green lights) and crossing at night. Complete raw survey data is provided in **Appendix G**.

2.5 November 2020 Public Comments on Draft ADA Transition Plan

One person provided comments on the Draft Plan during the two-week public comment period held November 10-24, 2020. The comment is included in **Appendix G**.

### 3. Recommendations

Members of the public with disabilities, their service providers, loved ones, and advocates are an invaluable resource for identification of accessibility barriers. Addressing public feedback is therefore a critical component of the ADA Transition Plan process. It is recommended the City:

- Consider prioritizing the barriers identified by the public for removal to the maximum extent feasible in the short-term (1 to 6 years) following publication of this ADA Transition Plan.
- Consider using this project webpage platform for communicating progress towards implementation of the ADA Transition Plan via annual report updates.
- Consider using the map-enabled survey123arcgis.com and/or Survey Monkey tools for future public engagement efforts related to continued public-right-of-way barrier identification and prioritization.

## H. ADA Transition Plan

This section covers the prioritization method, cost estimates, barrier removal schedule and funding strategies for removing accessibility barriers in the City of Marysville's:

- Public right-of-way
- Programs, services and activities

Due to the unique nature of each barrier type, both generic and barrier-specific prioritization criteria were applied to prioritizing barriers. Generic priorities are described here. Barrier-specific priorities are covered in **Section 3.1 Public Right of Way** and **Section 4.1 Programmatic** prioritization sections below.

Barrier removal schedules are based on an estimated number of years required to remove identified barriers. Funding strategies are based on levels of annual funding in dollars.

### 1. Generic Prioritization

The City acknowledges that prioritization criteria will differ depending on the nature of an accessibility barrier. It is recommended all City departments apply this generic schema as the guiding prioritization policy for all barrier types:

#### 1.1 Higher Priority

- Barriers to accessibility identified in filed grievances/complaints.\*
- Barriers to accessibility identified through public engagement efforts.
- Barriers to accessibility correlated to planned capital improvement projects, department maintenance projects, and policies and procedures.
- Barriers serving State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

#### 1.2 Lower Priority

- Barriers for services not frequently used by the public.
- Barriers to accessibility in public right of way facilities slated for demolition or pending renovation.
- Barriers to accessibility where alternative locations or formats make programs, services, or activities accessible (i.e. situations wherein accommodations can be made to provide alternative equal access).

\*It is assumed that filed grievances/complaints about barriers to accessibility be considered high priority for a response and resolution in accordance with the City's adopted ADA Grievance Policy and Procedure and any other established relevant policies.

The project team acknowledges the participation and cooperation of City staff to develop the above prioritization criteria. The criteria are guided by the overarching principle that barriers identified and/or experienced by people within the ADA community are of higher priority for removal than other barriers. Public outreach efforts are therefore a critical component of the prioritization process. The criteria also take into consideration concurrent City projects/planning efforts to maximize the efficiency of accessibility barrier removal.

## 2. Public Right of Way ADA Transition Plan

This section covers the barrier-specific prioritization, removal schedule, removal cost estimates and financial plan for accessibility barriers in the City of Marysville's public right of way.

### 2.1 Public Right of Way Barrier Prioritization

#### *Review of Capital Facilities Plan/Transportation Improvement Program*

Capital Facility Plan documents as well GIS data available related to future planned project locations was reviewed. The City's 2020-2025 Transportation Improvement Program (TIP) was available in GIS, spreadsheet, and document format. The City uses the TIP for both short 6-year (funded) and long-range (unfunded) transportation projects.

Other GIS files related to water, sewer, and storm water planning were provided and represented inventory and system completion data. For purposes of barrier prioritization, the City decided not to include water/sewer/storm projects because there is not a significant practicality/cost benefit to combining ramps with utility projects. In addition, City staff believe the budget would be better spent on other locations (utility projects are not always in the same location as high usage/priority pedestrian facilities).

**Note:** It is recommended the City revisit the feasibility of geo-coding the other capital facility project types (water, sewer, and storm water) in future updates of the ADA Transition Plan to efficiently pair ADA curb ramp upgrades with planned improvement projects wherever possible.

#### *Curb Ramp Barriers*

The City established the following two-pronged policy for addressing curb ramp barriers:

- Curb Ramp Barriers within 50 feet of 2020-2025 identified Transportation Improvement Program (TIP) projects will be removed as part of the TIP project
  - Exceptions: Crack filling and sealing, surface sealing, chip seals, slurry seals, fog seals, scrub sealing, joint crack seals, joint repairs, dowel bar retrofit, spot high-friction treatments, diamond grinding, and pavement patching will not trigger curb ramp barrier removal as they are considered maintenance under the ADA.
- Curb Ramp Barriers beyond 50 feet of TIP projects as defined above will be prioritized by a combination of a priority rank score (see below) and public feedback.

Further City discussion and public engagement feedback of curb ramp barriers identified additional priorities.

- Curb ramp barriers near transit facilities (centers, routes, and stops) will be prioritized twice as heavily.
- Missing and Non-Compliant ramp barriers will be prioritized higher than functional Non-Compliant (Old Standard) in the ADA Transition Plan barrier removal schedule.

See **Table 9** below.

**Table 9. Curb Ramp Barriers by Group**

Group	Curb Ramp Barrier Type		Priority Level	# of Curb Ramp Barriers	% of Curb Ramp Barriers
A	Within 50ft of TIP Project (TIP)		-	345	10%
B	Beyond 50ft of TIP Project (Non-TIP)		-	3,285	90%
	B1	Missing/Non-Compliant	Higher	1580	43%
	B2	Non-Compliant (Old Standard)	Lower	1705	47%
Total				3,630	100%

*Curb Ramp Barrier Prioritization GIS Model*

A GIS map was created of destinations likely accessed by members of the ADA community within City limits. The destinations align with federal guidelines in Section 2.1 and include:

- Civic Buildings
- Transit Centers
- Transit Stops
- Transit Routes
- Medical Clinics
- Parks
- Schools
- Group/Elderly Homes
- Shopping Centers

Each curb ramp barrier received a priority rank score based upon the following parameters:

- 1) How close a curb ramp barrier is to an individual destination (0.1 to 0.5 miles)
- 2) How many destinations a curb ramp barrier is close to (1 to 9).

Curb ramp barriers closest to the most destinations scored higher than curb ramp barriers that were farther away from fewer destinations. For instance, a curb ramp barrier within 0.1 miles of all nine destination types scored 18,000 while a curb ramp within 0.5 miles of one destination received a score of 1. Curb ramps beyond 0.5 miles of any destination scored zero. See **Table 10** and **Figures 11-16** below. For model documentation and prioritized curb ramp list, see **Appendix H**. For 24"x36" detailed maps of **Figures 11-16**, see **Appendix I**.

**Table 10. Priority Rank Score Index**

Priority Rank Score Index					
# of Destinations in Distance Buffer	Distance Buffer (in miles) from Destination				
	0.1	0.2	0.3	0.4	0.5
9	18000	6000	2000	500	100
8	16000	5000	1750	400	75
7	14000	4000	1500	300	50
6	12000	3000	1250	200	25
5	10000	1900	1000	100	5
4	8000	1800	750	80	4
3	6000	1700	500	70	6
2	4000	1600	250	60	2
1	2000	1500	100	50	1

Figure 11. Curb Ramp Barriers by Inventory Type - North Marysville

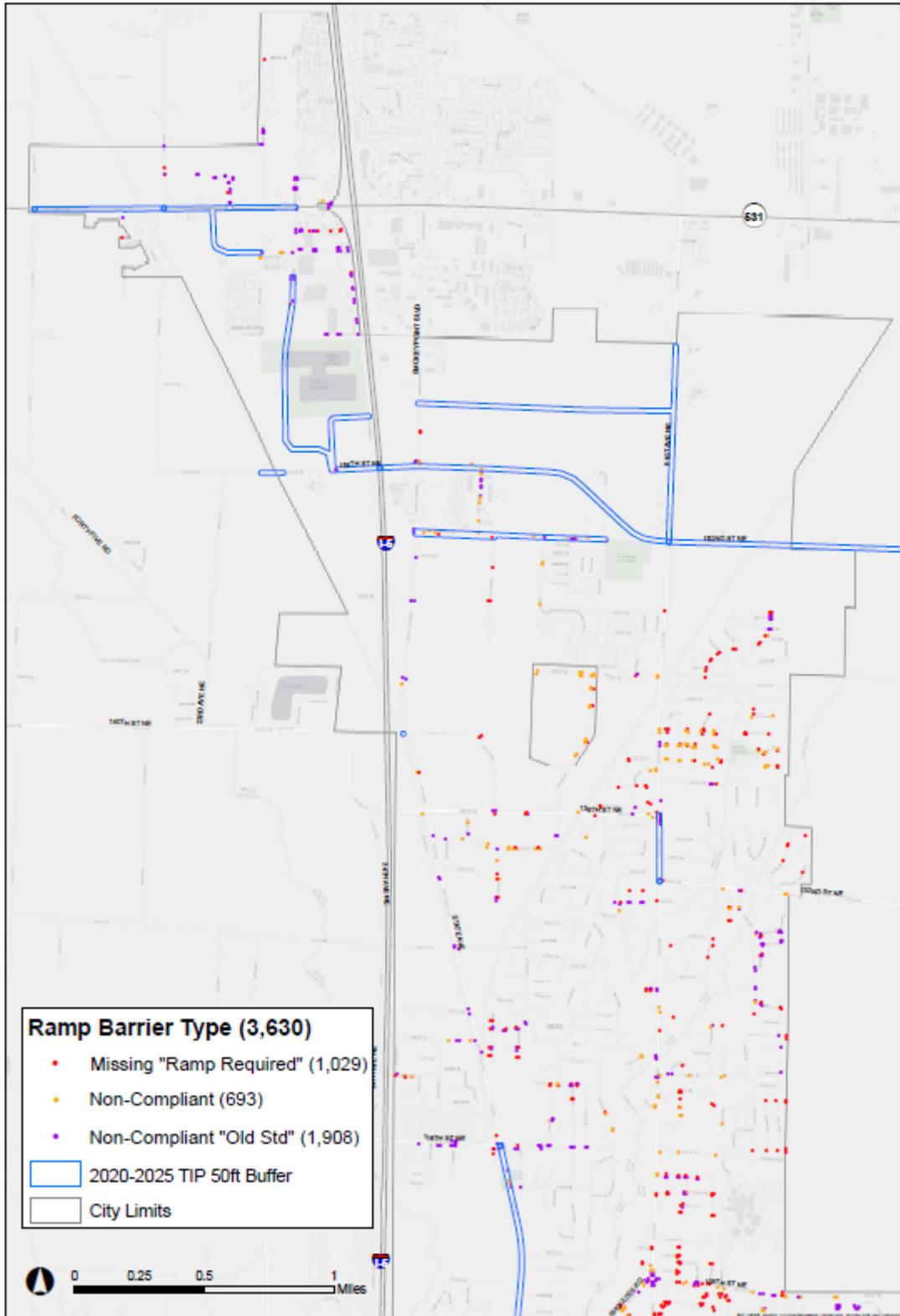


Figure 12. Curb Ramp Barriers by Inventory Type - Central Marysville

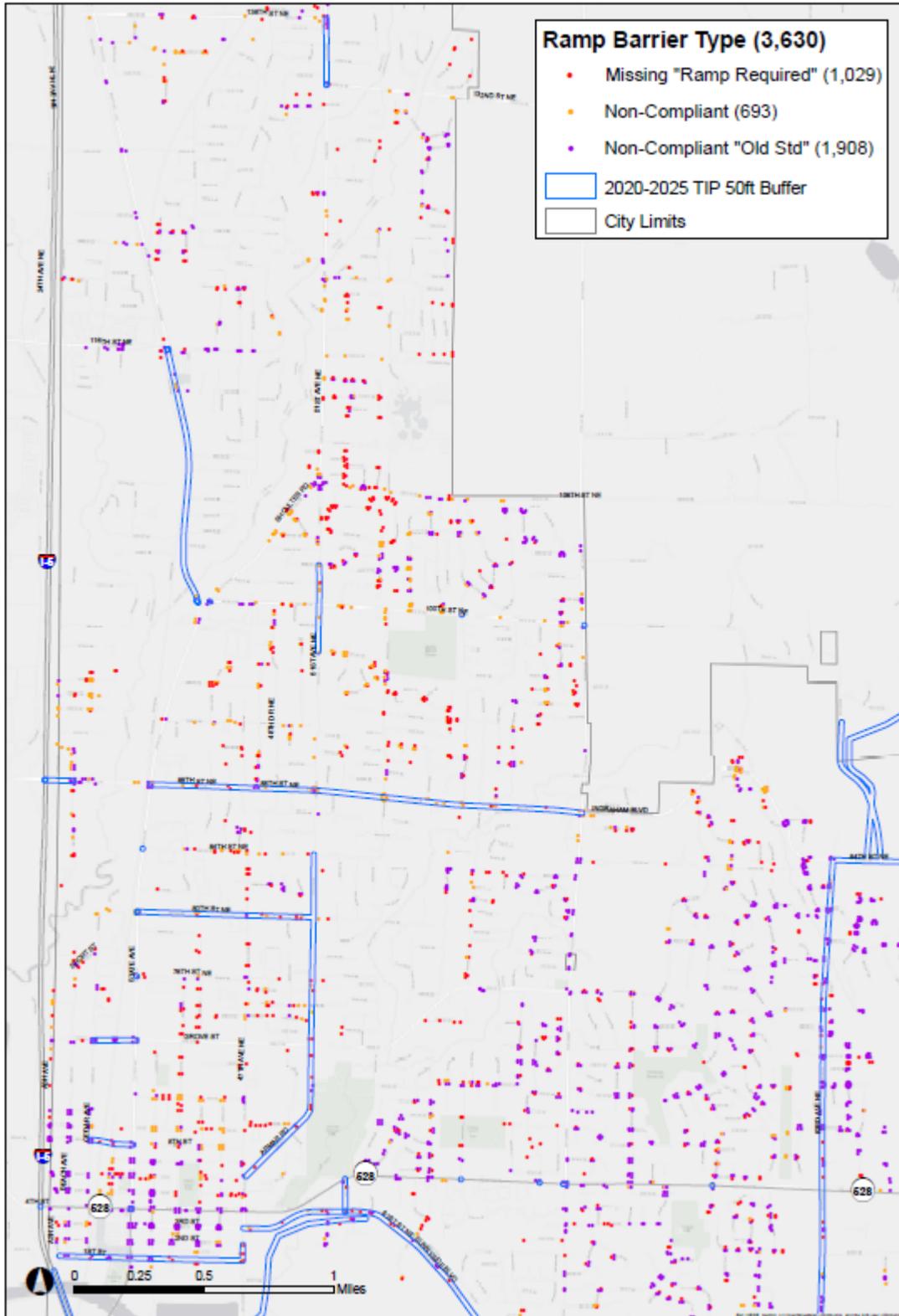


Figure 13. Curb Ramp Barriers by Inventory Type - South Marysville

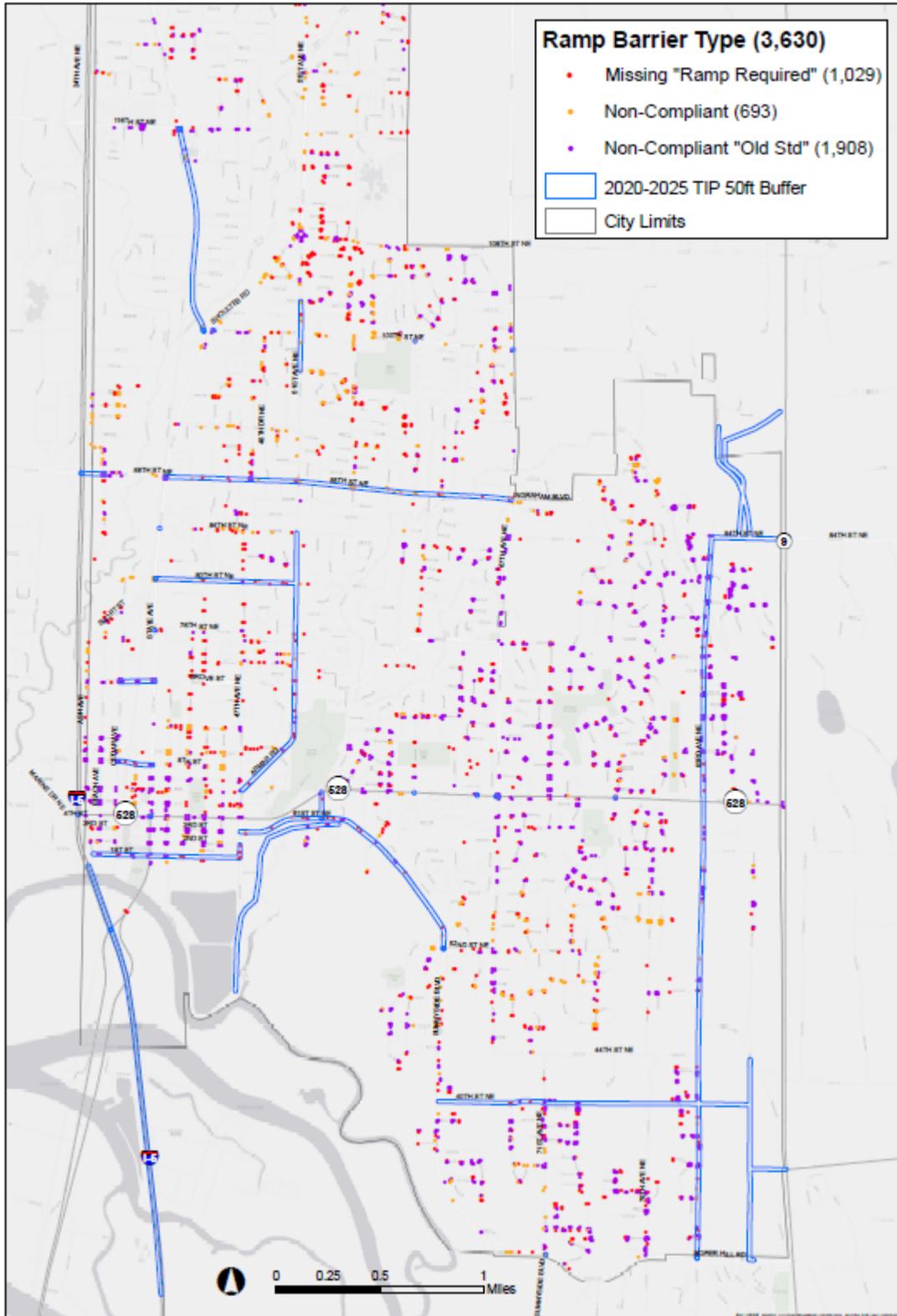


Figure 14. Curb Ramp Barriers by Priority Rank Score - North Marysville

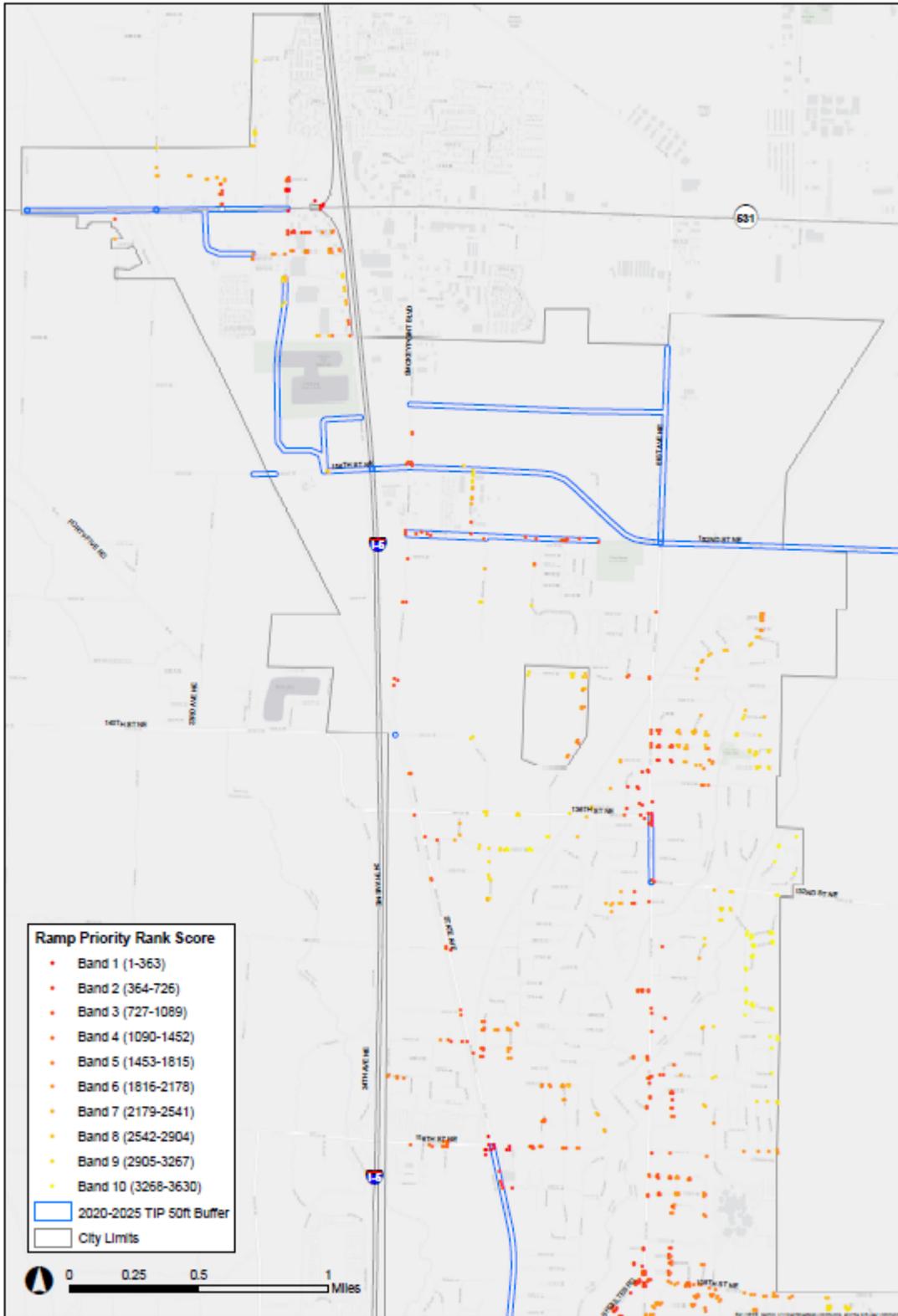


Figure 15. Curb Ramp Barriers by Priority Rank Score - Central Marysville

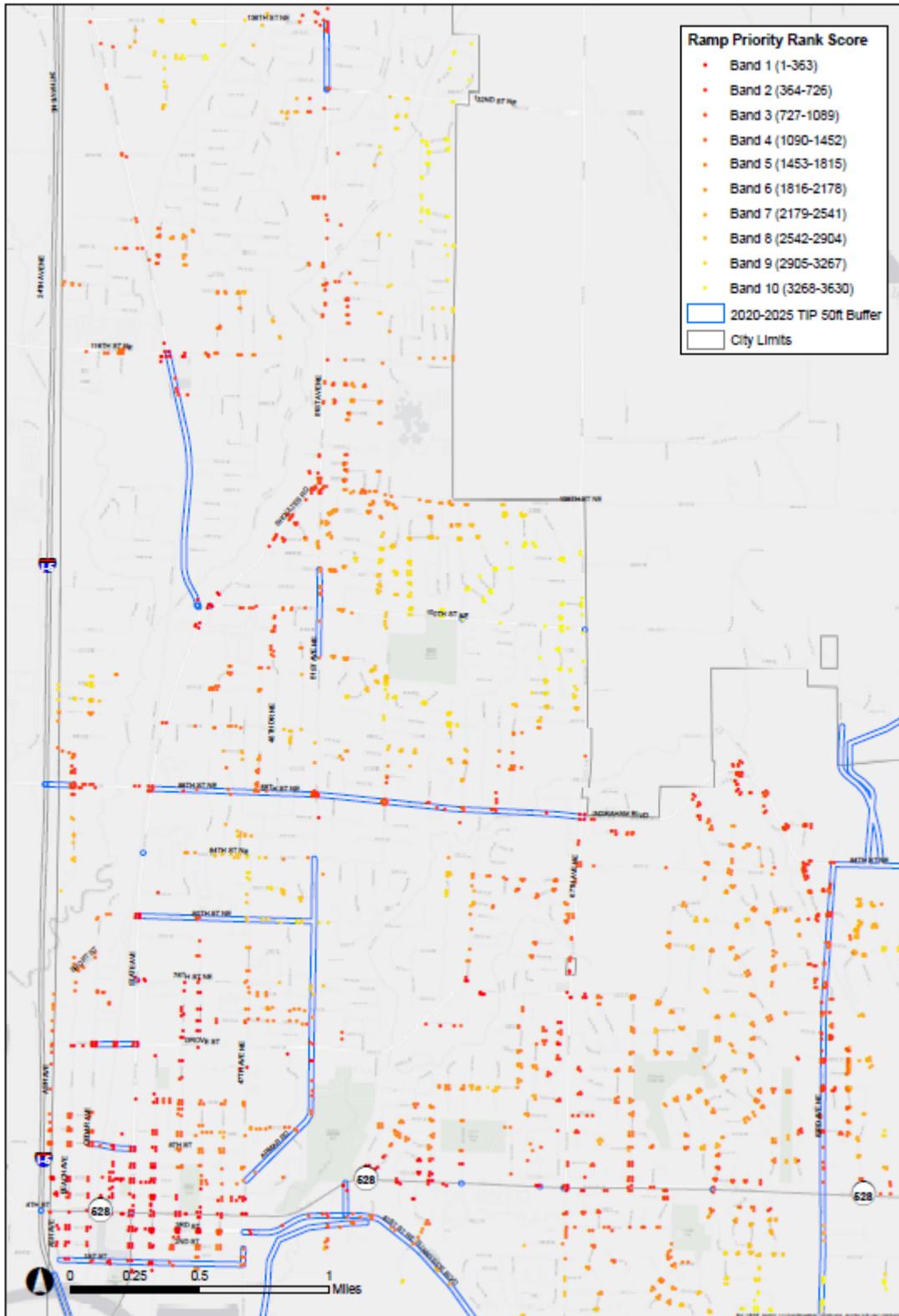
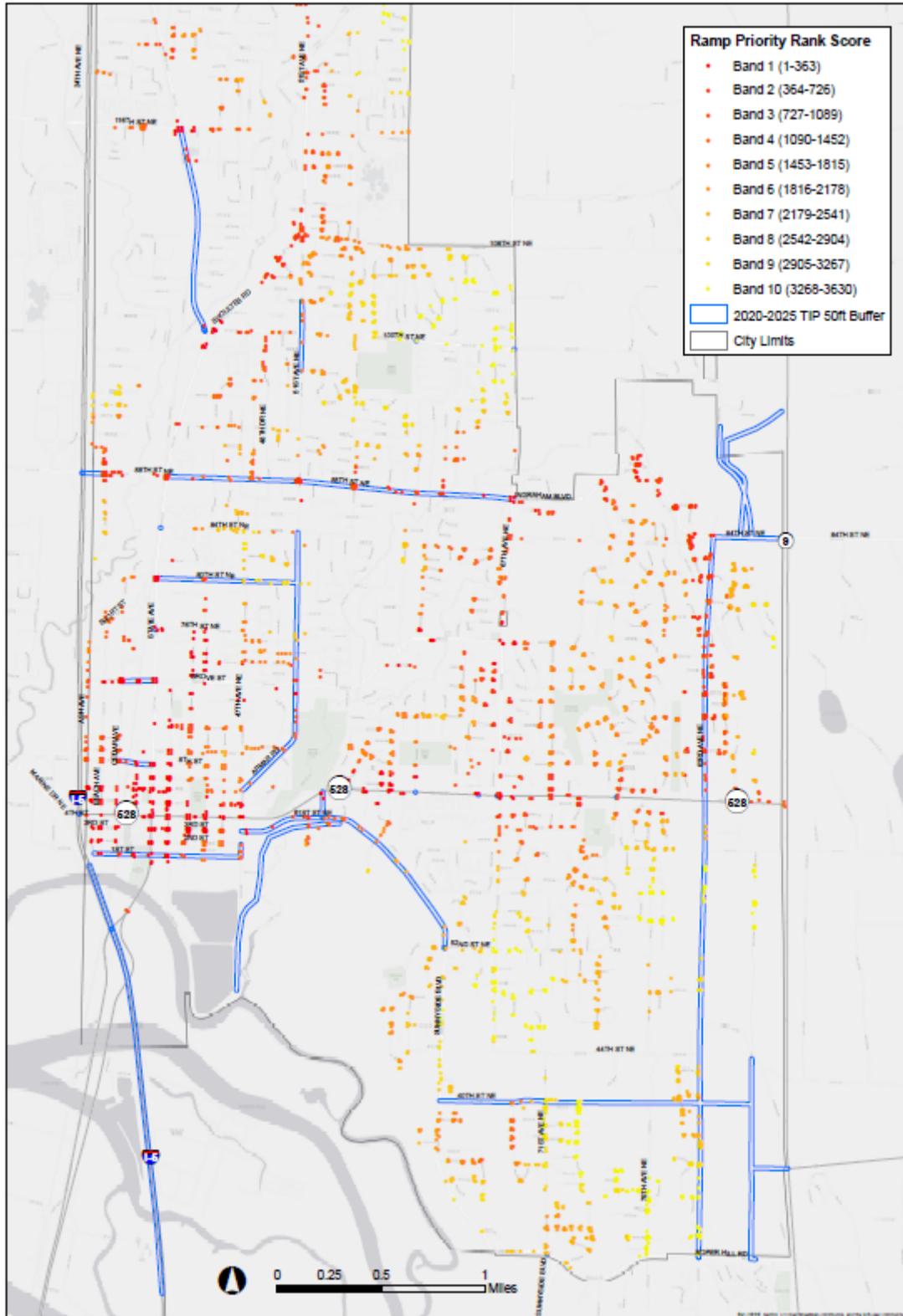


Figure 16. Curb Ramp Barriers by Priority Rank Score - South Marysville



*Sidewalk Barriers*

Prioritization of sidewalk barriers is driven by planned CFP projects and feedback from public engagement efforts.

*Driveway Interface with Sidewalk Barriers*

Prioritization of sidewalk/driveway interface barriers is driven by planned CFP projects and feedback from public engagement efforts.

*Accessible Pedestrian Signal (APS) Barriers*

Prioritization of pedestrian crossing (Accessible Pedestrian Signal “APS”) barriers will be driven by the City’s Accessible Pedestrian Signal Policy. See **Section I Accessible Pedestrian Signal (APS) Policy** below.

*Accessible Parking Barriers*

Prioritization of accessible parking barriers is driven by planned CFP projects and feedback from public engagement efforts.

2.2 Public Right of Way Barrier Removal Cost Estimates

*Curb Ramps*

Curb ramp barrier removal costs vary due to differences in curb type and sidewalk/intersection interface. For cost estimating purposes, a median cost estimate of \$15,000 is recommended, with a plus or minus 15% cost estimate range of \$12,500 to \$17,500 per curb ramp. See **Table 11** below.

**Table 11. Individual Curb Ramp Barrier Cost Estimate**

<b>Task</b>	<b>Cost</b>
Survey/Map	\$1,500
Design	\$1,700
CM	\$1,200
Construction	\$8,600
Contingency	\$2,000
<b>Median Cost per Curb Ramp</b>	<b>\$15,000</b>
<i>Low (85%)</i>	<i>\$12,500</i>
<i>High (115%)</i>	<i>\$17,500</i>

At an average price of \$15,000 per ramp, the total ADA curb ramp program cost estimate is \$54,450,000 to replace all 3,630 curb ramp barriers. See **Table 12** below.

**Table 12. ADA Curb Ramp Barrier Removal Cost Estimate Summary**

<b>Curb Ramp Barrier Type</b>	<b>Count</b>	<b>Cost (\$2020)</b>
Group A - Curb Ramp Barriers within 50 feet of TIP/CFP Projects	345	\$5,175,000
Group B1 - Missing/Non-Compliant Curb Ramps	1,580	\$23,700,000
Group B2 - Old Standard/Functional Curb Ramps	1,705	\$25,575,000
<b>Total Curb Ramp Barrier Removal Cost Estimate</b>	<b>3,630</b>	<b>\$54,450,000</b>

*Sidewalks*

Cost estimates for sidewalk barriers are unavailable until an ADA inventory evaluation is complete.

*Sidewalks - Illumination*

While not identified in typical ADA Transition Plan development as a barrier, public feedback identified various locations where lack of sidewalk illumination presented mobility barriers. The City should consider the public feedback received when planning sidewalk illumination. It is estimated to cost \$60/LF to construct a City-owned and maintained illumination system. Adding a new luminaire onto Snohomish Public Utility District (PUD) owned utility poles to improve lighting is expected to be more cost effective if applicable based upon site conditions. Costs for improvements to the illumination have not been included within this plan.

Note regarding sidewalk vegetation maintenance and snow removal: According to MMC Chapter 12.12, it is the responsibility of abutting property owners to maintain the sidewalk. Per MMC 12.12.020, the public works department or designee shall notify the owner of the property to clean, repair, or renew the sidewalk.

*Driveway Interface with Sidewalks*

The total estimated cost for removing driveway/sidewalk interface barriers is unknown until an ADA inventory is conducted. It is recommended the City conduct the GIS inventory inhouse.

*Accessible Pedestrian Signals (APS)*

It is estimated to cost \$35,000 per traffic signal to install full APS ADA-compliant features at an intersection. To upgrade to fully accessible pushbuttons only, it is estimated to cost \$10,000 per intersection. Of the total 45 traffic signals in the City of Marysville, seven (7) are undergoing APS upgrades to the maximum extent feasible in 2020. Of the remaining 38, fifteen (15) are partially compliant. As a place holder, the total cost estimate for removing APS ADA barriers is \$1,150,000. See **Table 13**.

**Table 13. Accessible Pedestrian Signal (APS) Barrier Removal Cost Estimate Summary**

<b>“Fully ADA Pushbutton” Column Category</b>	<b>Category Definition</b>	<b>APS System Compliance Status</b>	<b># of Signals</b>	<b>Estimated Cost Per Signal (\$2020)</b>	<b>Estimated Cost (\$2020)</b>
Project Name (2020)	Where a project w/ year is listed, the signal ADA components including pushbuttons, ped heads, ramps etc. will be upgraded to fully meet ADA Guidelines or reasons as to why some components of ADA cannot be met will be documented.	Fully Compliant to Maximum Extent Feasible	7	\$0 (already budgeted)	\$0 (already budgeted)
X	PPB model is fully ADA; rest of signal may or may not meet all other ADA Guidelines	Partially Compliant	13	\$25,000	\$325,000

“Fully ADA Pushbutton” Column Category	Category Definition	APS System Compliance Status	# of Signals	Estimated Cost Per Signal (\$2020)	Estimated Cost (\$2020)
X (not 10’ separated)	PPB model is fully ADA; however buttons do not meet 10’ separation required for ADA	Partially Compliant	2	\$20,000	\$40,000
Blank		Non-Compliant	23	\$50,000	\$1,150,000
<b>Total APS Barrier Removal Cost Estimate</b>					<b>\$1,515,000</b>

*Accessible Parking*

The total estimated cost for removing Accessible Parking barriers at City building facilities is unknown until a detailed inventory is conducted. The estimated cost of inventorying on-street parking stalls and assessing compliance with U.S. Access Board Accessible Parking PROWAG best practices guidelines is conservatively set at \$25,000. Based on the three (3) existing accessible parking stalls located on separate block perimeters with marked parking stalls, and the US Access Board recommendation for at least one accessible parking stall per block perimeter with marked/metered stalls, a placeholder estimate of forty (41) accessible stalls at \$10,000/stall is provided. See **Table 14** below.

**Table 14. Accessible Parking Stall Barrier Removal Cost Estimate Summary**

Accessible Parking Barrier Type	Unit Price	Count	Estimated Cost (\$2020)
Detailed Barrier Inventory	\$25,000	1	\$25,000
Accessible Parking Stall	\$10,000	Approx. 41	\$410,000
<b>Total Accessible Parking Barrier Removal Cost Estimate</b>			<b>\$435,000</b>

For a summary of identified public right of way barrier removal cost estimates, see **Table 15**.

**Table 15. Public Right of Way Barrier Removal Cost Estimate Summary**

Public Right of Way Barrier Type	Unit Price	# of Units	Total Barrier Removal Cost Estimate
Curb Ramps	\$15,000/ramp	3,630	\$54,450,000
Accessible Pedestrian Signals	\$10,000-\$35,000/signal	38	\$1,515,000
Accessible Parking (includes \$25,000 inventory)	\$10,000/stall	Approx. 41	\$435,000
<b>Total Public Right of Way Barrier Removal Cost Estimate</b>			<b>\$56,400,000</b>

2.3 Public Right of Way Barrier Removal Financial Plan

The unpredictable impact of COVID-19 on future revenue sources may impact the City’s ability to meet planning goals. The City will reassess through its semi-annual budget process.

*Curb Ramps*

Pavement Preservation Program

The City plans to address twenty (20) ramps that are not ADA-compliant per year on average as part of its pavement preservation program. To address 20 ramps annually, the median cost estimate is \$300,000 per year totaling \$900,000 over three years. Actual annual ramp upgrades will be specific to the number of ramps that are adjacent to proposed pavement preservation locations. The City’s Transportation Benefit District funds the Pavement Preservation Program and is set to expire in 2023. The City will ask voters to approve another 10-year Transportation Benefit District in 2023.

2021-2026 Transportation Improvement Program

The City also intends to replace ramps that are not ADA-compliant as part of TIP projects with secured funding. For a breakdown of City project funding sources for the 2021-2026 TIP for ADA relevant projects, see **Table 16** below. (Funding sources for projects on state-maintained roadways such as interchanges with I-5 and roadway widening associated with HOV projects are not included).

**Table 16. 2021-2026 TIP Funding Summary**

<b>2021-2026 TIP Funding Sources for Local Roads</b>	<b>Percentage</b>
Local Agency Roads - Secured Funds	20%
Developer - Unsecured Funds	30%
Remainder - Unsecured Funds (includes Pavement Preservation Program)	50%
<b>Total</b>	<b>100%</b>

Approximately 20% of TIP projects have secured funding. If curb ramp barrier removal represents the same ratio between the value of funded and value of unfunded TIP projects, it is anticipated that 69 out of 345 curb ramp barriers within fifty feet of TIP projects (approximately 20%) can be addressed by local agency government funded 2021-2026 TIP projects. Another 104 (approximately 30%) could be addressed by developer funds, should development occur. The remaining 172 (approximately 50%) could be addressed if these unsecured funding projects receive funding. The implementation schedule in Table 16 below includes only the estimated portion of ramps to be addressed by projects with secured funds.

Public Grievance/Request Contingency Reserve

Furthermore, the City will maintain a Public Grievance/Request contingency reserve through its streets repair and maintenance budget for public right of way barriers that may be utilized to remove curb ramp barriers. It is recommended the City dedicate a standalone budget line item for this contingency reserve.

Upon completion of curb ramp upgrades associated with the pavement preservation program and funded TIP projects, the City may utilize the priority rank index score and public outreach feedback provided in this ADA Transition Plan to schedule removal of the remaining curb ramp barriers at a future update of this plan.

*Accessible Parking*

The City intends to address accessible parking barriers as part of its Public Grievance/Request reserve. Accessible parking barriers may be addressed through planned maintenance projects that can utilize funds from existing streets maintenance budget.

*Sidewalks*

The City intends to address sidewalk barriers as part of its Public Grievance/Request reserve. Sidewalk barriers may be addressed through planned maintenance projects that can utilize funds from streets existing maintenance budget.

*Driveway Interface with Sidewalks*

The City intends to address driveway interface with sidewalk barriers as part of its Public Grievance/Request reserve. Driveway/sidewalk barriers may be addressed through planned maintenance projects that can utilize funds from existing streets maintenance budget.

*Accessible Pedestrian Signals (APS)*

The City intends to address accessible pedestrian signal barriers as part of its Public Grievance/Request reserve per the Accessible Pedestrian Signal (APS) Policy (see **Section I**). APS barriers may be addressed through planned maintenance projects that can utilize funds from existing streets maintenance budget.

2.4 Public Right of Way Barrier Removal Implementation Schedule

**Table 17** shows the public right of way barrier removal implementation schedule by planned time periods. This implementation schedule reflects the extensive, long-range program for public right of way ADA barrier removal and will be updated with subsequent ADA Transition Plan revisions. Barrier removal implementation may occur at a faster rate due to ADA upgrades accomplished through the City’s TIP/CFP projects and/or through increased funding from City budget or other sources.

**Table 17. Public Right of Way Barrier Removal Implementation Schedule**

Year Range	Curb Ramps (ea.)	Anticipated Program Funding	Notes
2021-2023	60	\$900,000	Pavement Preservation Program
2021-2026	69*	\$1,035,000	Other TIP projects - secured funds
2021-2022	TBD**	Unknown	Public Grievance/Requests (Utilize existing streets maintenance budget for any public right of way barrier type)
2023-2024	TBD**	\$80,000	Public Grievance/Requests Contingency Reserve (\$40,000 annually from streets maintenance budget for any public right of way barrier type)
2027+	TBD	TBD	Remaining PROW barriers

\*Estimate: subject to change pending TIP project actually executed.

\*\*TBD in this table is for “To Be Determined.”

### 3. Programs, Services, and Activities ADA Transition Plan

This section covers the barrier-specific prioritization, removal schedule, removal cost estimates and financial plan for accessibility barriers in the City of Marysville's programs, services, and activities.

#### 3.1 Programmatic Barrier Prioritization

The project team based the programmatic barrier prioritization into two tiers: **Short Term** (Higher Priority) and **Long-Term** (Lower Priority) Items. The project team also acknowledges that feedback regarding City programs, services, or activities gathered during the public engagement process be considered as higher priority.

##### *Short Term Items*

The scope of this ADA Transition Plan covers the **Short-Term Items** as they are required elements of a compliant ADA Transition Plan and satisfy four of eight (4 of 8) Title II/Section 504/WSDOT LAG Chapter 29 checklist requirements. As such, they are deliverables of this Final ADA Transition Plan and provide citywide policies and procedures applicable to all departments to streamline compliance activities. The **Programmatic Compliance Checklist** (see **Appendix F**) is a tool to confirm agency-wide awareness and implementation of these items:

- ADA/504 Coordinator
- Public Notice under the ADA
- Grievance Procedure
- Public Right of Way (Accessible Pedestrian System [APS] Policy)

##### *Long Term Items*

The project team acknowledges that removing accessibility barriers identified under **Long Term Items** may require individualized approaches dependent upon department roles and responsibilities. It is recommended that each City department use the provided **Programmatic Compliance Checklist** to monitor their progress towards compliance in the following areas:

- Effective Communication
- Website Accessibility
- Emergency Services
- Employment Procedures

The **Programmatic Compliance Checklist** is a condensed version of the **Programmatic Questionnaire** converted into a checklist that the whole agency or individual departments can use. For example, some checklist items are a matter of educational awareness that could be addressed in a dedicated quarterly or annual staff ADA training meeting administered by the ADA Coordinator for all departments. Another example would be the department responsible for web accessibility could establish policies/procedures and then inform/train other departments in cooperation with the ADA Coordinator.

##### *Other Recommendations*

The ADA Coordinator would benefit from taking the [ADA Title II Tutorial](#) provided by the ADA Access Board to assist departments in filling the knowledge gaps and accessing resources. It may also be the ADA Coordinator's role to work with departments that already have knowledge to share with other departments.

### 3.2 Programmatic Barrier Removal Cost Estimates

Cost estimates are based on labor hour estimates to inform and/or train staff. Cost estimates are for labor hours only and do not include any necessary capital expenditures. **Table 16** below outlines the barrier removal cost estimates for the Short Term (1 year) and Long Term (2 or more years).

The **Short Term** programmatic barriers can be removed through informing staff of existing resources at little to no cost beyond labor hours. For example, email memos from the ADA/504 Coordinator explaining their role, responsibilities, and contact information, Grievance Procedure, and APS Policy could bring current staff up-to-date. Other recommended memo topics include resources for provision of auxiliary aids, alternative formats, interpreter/reader/service animal accommodations, and TTY/TRS/711 and emergency evacuation procedures. The Fire and Legal departments, as they currently use TTY and TRS/711, could be resources for training other public-facing department staff on these communication devices. Establishing website content submission guidelines and updating the City's municipal code and design standards would also be important short term items.

The **Long Term** programmatic barriers may require individual departments to spend labor hours on developing resources and then notifying/training other departments on how to comply. For instance, making documents web accessible may ultimately fall under the purview of Communications Services, but this department can inform other departments regarding how to submit ADA-friendly content for publication and posting.

Training resources include the ADA National Network's [ADA Title II Tutorial](#) recommended for the ADA/504 Coordinator and the Northwest ADA Center's [Respectful Interactions Disability Language and Etiquette](#) tutorial (\$30/person) that could be integrated into current and new employee training.

### 3.3 Programmatic Barrier Removal Financial Plan

The City intends to address the Short Term barrier items listed in **Table 18** with an estimated \$4,000 in labor hours. Thereafter, the City intends to dedicate \$4,000 per year to address remaining Long Term barrier items.

**Table 18. Programmatic Barrier Removal Cost Estimate Summary**

Programmatic Barrier Type	Barrier Removal Cost (Labor hours)	Barrier Removal Cost (2020 at \$50/hr)
<b>SHORT TERM ITEMS (1 year)</b>		
ADA/504 Coordinator Role/Responsibilities Memo	2	\$100
Complaint/Grievance Procedure Memo	2.5	\$125
Public Notice of ADA Provision Memo	1	\$50
Accessible Pedestrian System (APS) Policy Memo	2.5	\$125
Resources for Providing Auxiliary Aids, Alternative Formats, and Interpreter/Reader/Service Animal Accommodation Memo	5	\$250
ADA Title II Tutorial (Free) for ADA Coordinator	5	\$250
ADA-Etiquette Tutorial for Department-Heads (Labor Hours)	20	\$1,000
ADA-Etiquette Course Fee (\$30/person; discounts available for groups of 10 or more)	N/A	\$300
Emergency Services Memo - Train public-facing staff on TTY/TRS/711 phone and evacuation procedures and establish maintenance/back-up equipment strategy	10	\$500
Website Accessibility - Establish city-wide content submission guidelines to ensure accessibility of all new website content	6	\$300
Update Code, Design Standards, and Procedures to Ensure Accessible Routes during Construction/Maintenance Projects	20	\$1,000
<b>Sub-Total</b>		<b>\$4,000</b>
<b>LONG TERM ITEMS (2 or more years)</b>		
Website Accessibility - Ensure all website content is accessible by updating or removing non-accessible content (includes closed-captioning for video/film)	200	\$10,000
Establish checklist for print media to include TTY and TRS/711 numbers wherever agency phone number is provided and name and address of person to send requests for alternative accessible formats	20	\$1,000
Audit Employment Procedures regarding the rights of persons with disabilities.	20	\$1,000
Establish policies and procedures for ensuring tours, transportation, and use of contracted services and purchasing are ADA-compliant.	20	\$1,000
Develop ADA Training Materials for new staff to cover areas in 2019 ADA City Staff Programmatic Assessment Survey	100	\$5,000
<b>Sub-Total</b>	<b>360</b>	<b>\$18,000</b>
<b>Contingency</b>	<b>40</b>	<b>\$2,000</b>
<b>TOTAL</b>	<b>474</b>	<b>\$24,000</b>

3.4 Programmatic Barrier Removal Implementation Schedule

**Table 19** shows the programmatic barrier removal implementation by planned time frame period. This implementation schedule reflects the extensive, long-range program for programmatic ADA barrier removal and will updated with subsequent ADA Transition Plan revisions. Barrier removal implementation may occur at a faster rate due to increased funding from City budget or other sources.

**Table 19. Programmatic Barrier Removal Implementation Schedule**

Year Range	Programmatic Barrier Type	Anticipated Program Funding
2021-2022	Short Term Items	\$4,000
2023+	Long Term Items	\$20,000

## I. Accessible Pedestrian Signal (APS) Policy

The below policy was developed with input from the City's Public Works department staff as part of this ADA Transition Plan process. It is recommended that the City post this policy on its Public Works website and inform employees who interact with the public of its presence and content.

### **Intent:**

It is the City's intention to be consistent with the most current version of the WSDOT Local Agency Guideline Chapter 29.4<sup>1</sup> and Public Right of Way Access Guidelines (PROWAG 2011)<sup>2</sup> in the provision and location of accessible pedestrian signals and pushbuttons. Further guidance is available in 28 CFR Part 36 and MUTCD section 4E.

### **Purpose:**

The purpose of this policy is to establish a reasonable and consistent policy for installing APS to ensure that access for persons with disabilities is provided.

### **Scope:**

- 1. Requests from the Public** - Requests for APS signals at existing signalized locations from the public will be responded to in a timely manner and considered in light of ADA Transition Plan project planning efforts:
  - A. If the request is for an APS signal at a location where no pedestrian signal exists, the City will go through a process, to include an engineering study as determined by the City, to determine how, if, and/or when it can add the requested ADA facility to the City's ADA Transition Plan, Capital Facilities Plan and budget.
  - B. If the request is for an APS upgrade to an existing pedestrian signal, the City will prioritize the timing of APS facility installation to be consistent with the City's forth-coming ADA Transition Plan, Capital Facilities Plan and budget.

---

<sup>1</sup>See WSDOT Local Agency Guidelines M36-63.37 CHAPTER 29 - Section 504 and the Americans with Disabilities Act. Pages 29-4 to 29-6. <https://www.wsdot.wa.gov/Publications/Manuals/M36-63.htm>

<sup>2</sup>See also United States Access Board. *Proposed Rights of Way Guidelines (2011): Chapter R2: Scoping Requirements*. <https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/proposed-rights-of-way-guidelines/chapter-r2-scoping-requirements>.

**2. Provision for APS Facilities<sup>3</sup>** - The following list identifies various project activity types and indicates whether the City is or is not required to provide APS facilities concurrent with the project.

**A. New Construction** – All projects for new construction that provide pedestrian facilities, as follows:

- Installation of a new traffic signal with pedestrian crossing. YES
- Installation of a new signalized pedestrian crossing. YES
- Installation of a new RRFB, or similar, at pedestrian crossing. YES

**B. Alteration** – Alterations are a change to a facility in the public right of way that could affect the structure, grade, function, and use of the roadway or could affect access, circulation, or use by persons with disabilities, as follows:

- When the signal controller **AND** software are systematically replaced not in kind as part of a planned project (i.e. change to different vendor/software). YES
- When the signal head is replaced/added **AND** changes the functionality/phasing of the pedestrian signal phasing. YES
- Relocation of an existing pedestrian pushbutton on same signal pole. NO
- Relocation of an existing pedestrian pushbutton onto different signal pole. YES

**C. Maintenance** – Maintenance activities include actions that are intended to preserve the existing system, reduce/minimize future deterioration, and maintain the functional condition of the roadway.

- Signal and pedestrian equipment replaced due to damage/emergencies. NO
- Activities including but not limited to: signal timing adjustments or coordination changes, vehicular detection installation and repairs, installation and repair of CCTV or other cameras, vehicular signal head replacement and repairs, and repair of pedestrian detection. NO

---

<sup>3</sup> Definitions for “new construction,” “alteration,” and “maintenance” taken from Isler, Frederick D. *Clarification of FHWA’s Oversight Role in Accessibility*. 9-12-06. Accessed December 26, 2019. 8B-FHWA-Memos-106osw4.pdf. Pages 3-4. See also National Academies of Science, Engineering, and Medicine, 2011. *NHRCP Accessible Pedestrian Signals: A Guide to Best Practices (Workshop Edition 2010)*. Washington, DC: The National Academies Press. Pages 82-85. <https://doi.org/10.17226/22902>. Accessed December 26, 2019.

## J. Barrier Removal Monitoring and Scheduled Plan Updates

The City of Marysville intends the ADA Transition Plan to be a living document able to respond to the ever changing needs of the community.

### 1. Annual Report of Barriers Removed

To ensure implementation of this ADA Transition Plan, the City will incorporate an annual process to track and report ADA barrier removal across its public right of way facilities and its programs, services, and activities. As stated in Section C, the ADA/Section 504 Coordinator is the official responsible to implement the ADA Transition Plan including coordination of annual barrier removal tracking activities to be completed by appropriate City department staff.

### 2. Five-Year ADA Transition Plan Update Schedule

The plan is intended to be reviewed/updated at five year intervals. As the plan is updated, an updated barrier removal schedule will be identified. With each plan update, an official public comment period will be established to continue public outreach and involvement.

The inventories will be re-analyzed at each five year plan update to determine patterns of need as it relates to the complete facility inventory and prioritization scores.

### 3. Future Self-Evaluation and Transition Plan Actions Needed

The City intends to evaluate accessibility barriers for parks, trails, and city building facilities (including accessible parking at those facilities) within the next six-year period.

## K. Accessibility Guidelines, Standards, and Resources

This ADA Transition Plan is based on the most recent federal and state ADA regulations, standards, and guidelines. The resources are divided into general and barrier specific groups with links to websites. The WSDOT LAG Chapter 29 Checklist is provided below in **Figure 17**.

### 1. General Resources

Federal ADA Regulations: [ADA Title II Regulations \(28 CFR Part 35\)](#)

U.S. Access Board Standards: [Access Board DOJ ADA Accessibility Standards \(2010\)](#)

U.S. Department of Justice Guidelines: [U.S. DOJ ADA Best Practices Tool Kit for State and Local Governments](#)

WSDOT Local Agency Guidelines: [Local Agency Guidelines: Chapter 29 Section 504 of the Americans with Disabilities Act](#)

### 2. Barrier-Specific Resources

Public Right of Way:

- [ADA Title II Technical Assistance Manual](#)
- [U.S. DOJ ADA Best Practices Tool Kit for State and Local Governments](#)

Services, Programs and Activities:

- [National ADA Network Title II Tutorial](#)
- [U.S. DOJ ADA Best Practices Tool Kit for State and Local Governments](#)

Figure 17. WSDOT LAG Chapter 29 ADA Title II Checklist

**Appendix 29.11 ADA Title II and Section 504 Regulatory References**

ADA Title II and Rehabilitation Act Section 504 Regulatory References	Requirements for agencies with less than 50 employees	Requirements for agencies with 50 or more employees
Programs, Services, and Activities: Ensure that programs, services, and activities are accessible to persons with disabilities. (28 CFR Part 35.150(a) and (c))	✓	✓
ADA/504 Coordinator: Designate at least one responsible employee (ADA/504 Coordinator) and make the name and contact information available internally and externally. (28 CFR Part 35.107(a) and 49 CFR Part 27.13(a))	✓	✓
Complaint/Grievance Procedures: Adopt and publish complaint/grievance procedures. (28 CFR Part 35.107(b) and 49 CFR Part 27.13(b))	✓	✓
Notice of ADA Provisions: Provide a public notice of how the agency will address ADA accessibility in its employment, communications, policies, and resolution of complaints. (28 CFR 35.106)	✓	✓
Self-evaluation <sup>2</sup> : Evaluate all services, policies, and practices for barriers that restrict / limit persons with disabilities from access to services, programs, and activities. (28 CFR Part 35.105(a) and 49 CFR Part 27.11(c)(2)(i) and (v))	✓	✓
Self-evaluation <sup>2</sup> : Maintain the completed self-evaluation on file and make it available for public inspection for at least three years following its completion. (28 CFR Part 35.105(c) and 49 CFR Part 27.11(c)(3)(ii):	✓	✓
Transition Plan <sup>2</sup> /Program Access Plan: Develop a transition plan or program access plan that outlines the structural modifications that must be made to those services, programs, and activities that are not accessible. (28 CFR Part 35.150(d) and 49 CFR Part 27.11(c)(2)(ii))	✓ program access plan	✓ transition plan (post it on the agency's website)
Accessible Pedestrian Signal and Pushbutton (APS) Policy <sup>2</sup> : Develop a "reasonable and consistent" policy for installing accessible pedestrian signals and pushbuttons when a transition plan has not yet been completed. (28 CFR Part 35.130 and 35.160a(1) and 49 CFR Part 27.7(c))	✓	✓

**Notes:**

<sup>1</sup>Employees include paid permanent, temporary, and contract employees regardless of whether the employees are full or part time.

<sup>2</sup>Complete self-evaluations, and develop transition plans, program access plan and APS policies by engaging persons with disabilities and/or their advocates (28 CFR Parts 35.105 and 35.150 and 49 CFR Part 27.11(c)(2)).