

City of Monroe

//Right-of-Way//Phase 1

//Americans with Disabilities Act Transition Plan

//2021

prepared by

transpogroup 
WHAT TRANSPORTATION CAN BE.



CITY OF MONROE
806 West Main Street
Monroe, WA 98272
360-794-7400
www.monroewa.gov

CITY ADMINISTRATION

Deborah Knight, City Administrator
Brad Feilberg, Public Works Director
Jakeh Roberts, Deputy Public Works Director
Scott Peterson, Deputy City Engineer

CITY COUNCIL MEMBERS

Geoffrey Thomas, Mayor
Kevin Hanford
Patsy Cudaback
Jeff Rasmussen
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Kirk Scarboro

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or by calling toll free, Voice:
360-863-4523(CITY), TTY: 360-893-4626.

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Washington State Relay can be contacted at 711
for assistance in making a request to the City.

PREPARED BY

Transpo Group
12131 113th Ave NE, Ste. 203
Kirkland, WA 98034

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Executive Summary

This Americans with Disabilities Act Self-Evaluation and Transition Plan establishes the City of Monroe’s ongoing commitment to providing equal access for all, including those with disabilities. In developing this plan, the City of Monroe has undertaken a comprehensive evaluation of its public right-of-way facilities and policies to determine what types of access barriers exist for individuals with disabilities.

This plan will be used to help guide future planning and implementation of necessary accessibility improvements.

Both the Self-Evaluation and the Transition Plan are required elements of the federally mandated ADA Title

II, which requires that government agencies provide equal access to programs and services they offer. While the ADA applies to all aspects of government services, this document covers City of Monroe facilities within the public right-of-way. This includes attributes of sidewalks, curb ramps, and pedestrian pushbuttons as these are the facility types inventoried by the City.

While the ADA applies to all aspects of government services, this document covers City of Monroe facilities within the public right-of-way. This includes attributes of sidewalks, curb ramps, and pedestrian pushbuttons as these are the facility types inventoried by the City.

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

The City’s objective is to remove physical barriers associated within the public right-of-way using operation and maintenance, annual street overlay program, and ADA Transition Plan program funding. The City is committed to removing these

barriers and over the next 30 years the City will implement projects to remove barriers identified in this plan. In addition, the City is continually working towards maintaining ADA compliance for all future capital improvement projects, permitted development, and any other right-of-way construction projects.

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Credit: Wikimedia Commons

1 // Introduction

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

1.1 Plan Requirement

Cities and other government agencies are required to have an ADA self-evaluation and transition plan when they grow beyond a threshold of 50 employees. Accessibility requirements extend to all public facilities. The scope of this plan is focused on accessibility within the public right-of-way.

The City completed an inventory of sidewalks, curb ramps, and pushbuttons within the public right-of-way and this plan allows the City to prioritize removal of barriers and update procedures as they relate to the public right-of-way.

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

way, public government buildings, and public parks all fall within the City’s programs.

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

The plan shall, at a minimum:

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

To determine the physical obstacles in a public entity’s facility, the proper standards and guidance must be identified for each feature type.

The 2010 ADA Standards for Accessible Design (ADAS), is the standards document in which all Federal ADA standards are collectively held. The 2010 ADAS and regulations from the 28 CFR Part 35 replaced the 1991 ADA (ADA Accessibility Guidelines (ADAAG)).

The [Revised Draft Guidelines for Accessible Public Right-of-Way](#) was published by the United States Access Board in 2005 to provide guidance on establishing accessible facilities within the right-of-way. The United States Access Board's [Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way](#), or PROWAG, was then published for comment in 2011 as a revised set of guidelines for right-of-way pedestrian facilities. Both the 2005 and 2011 guidelines have not yet been adopted as federal standards. Despite this delay, many public entities currently use the 2005 draft PROWAG as 'best practice' for features within the public right-of-way. This practice has been endorsed by the Federal Highway Administration (FHWA), the US Access Board, and is the standard the Washington Department of Transportation adheres to.

The public right-of-way facilities evaluated under this plan were evaluated against 2011 PROWAG as this is the latest guideline developed by the Access Board.

1.2 Plan Structure

Chapters

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

Chapter 1 – Introduction

Chapter 2 – Self-Evaluation Documents Self-Evaluation methods and findings for policies, practices, design standards, and pedestrian facilities that result in accessibility barriers.

Chapter 3 – Stakeholder Engagement Documents public engagement methods and findings.

Chapter 4 – Pedestrian Barrier Removal Methods and Schedule Provides an overview of existing barrier removal approaches employed by the City, describes barrier removal priorities, and develops a total planning level cost estimate for the removal of existing pedestrian barriers and an accompanying schedule.

Chapter 5 – Recommendations and Next Steps Provides a set of recommendations to inform the implementation of this Transition Plan and ongoing removal of pedestrian barriers.

Several associated appendix items are included to supplement this plan.

Appendices

Appendix A – Existing Data Inventory

Appendix B – Barrier Audit

Appendix C – Stakeholder Engagement

Appendix D – Prioritization Criteria

Appendix E – Accessible Pedestrian Signal (APS) Policy

Appendix F – Maximum Extent Feasible Documentation Template

Appendix G – Planning Cost Estimate Backup

Appendix H – ADA Terminology

Appendix I – Grievance Procedure

Self Evaluation

2 // Self-Evaluation

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

This chapter describes the methods and findings of the Self-Evaluation. Section 2.1 provides an overview of ADA-related City policies. Next, Section 2.2 reviews City practices and design standards. Finally, Section 2.3 summarizes the Self-Evaluation's field data collection methods and findings regarding existing pedestrian facilities, such as sidewalks and curb ramps.

2.1 Policy Review

The City of Monroe primarily addresses pedestrian facilities in their Municipal Code and the Standard Details within the Monroe Design & Construction Standards. There are also policies related to pedestrian facilities in the City Comprehensive Plan (2015).

The policies and standards were reviewed against the Access Board's Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way, PROWAG 2011 and recommendations were provided to fill gaps as they relate to the ADA.

2.1.1 Method

These documents were reviewed for content that relate to existing ADA programs, policies, and practices.

2.1.2 Findings

The City of Monroe develops a Comprehensive Plan in order to complete long range planning for the city. The latest version of this plan was completed for the years 2015-2035. The planning covers topics including land use, transportation, economic development, housing, and capital facilities & utilities.

Goals connected to transportation, specifically pedestrian facilities, within the Comprehensive Plan generally include the following policies:

- Enhance pedestrian connections between key locations.
- Promote features that facilitate safer crossings for pedestrians and bicyclists where need has been identified.
- Improve pedestrian safety.
- Seek investment in streetscape improvements, transportation infrastructure, and public facilities.
- Promote alternative modes of transportation by providing the following: sidewalks, walking and biking paths, interconnected street networks, Improved transit systems.
- Require new development to include site and building features that support alternative

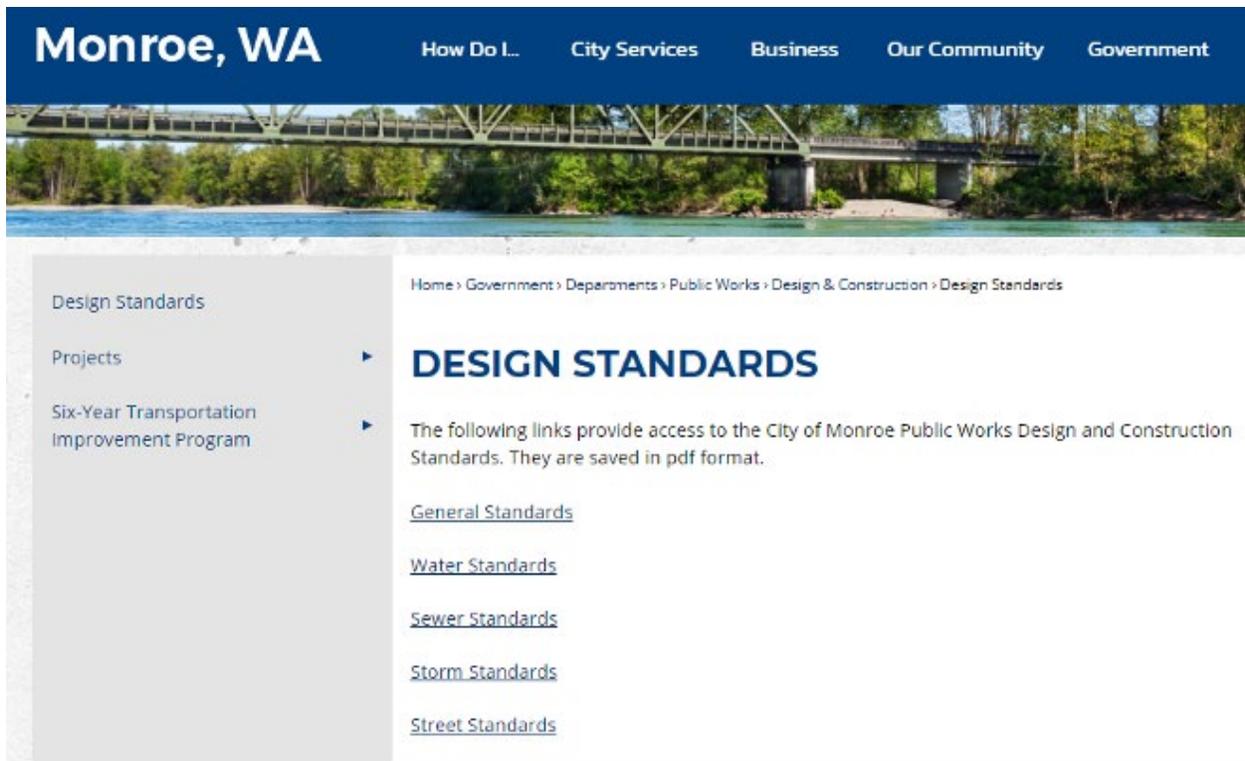


Figure 2-1 City of Monroe Design Standards Web Page

modes of transportation including: walking, bicycle, carpool, and transit.

2.2 Practices and Design Standards

Practices and design standards that meet accessibility standards are essential to ensure that new or upgraded pedestrian facilities are accessible and therefore reduce the number of accessibility barriers throughout the city.

This section summarizes a review of the City of Monroe Design & Construction Standard Details and the Municipal Code to identify any barriers to accessible design. The review was conducted in November 2020. For greater detail on the practices and standards review, see Appendix B for a barrier audit memo.

2.2.1 Method

The Monroe Standard Details and Municipal Code were reviewed for compliance with ADA guidelines found in the 2011 Proposed

Guidelines for Pedestrian Facilities in the Public Right-of Way (PROWAG).

2.2.2 Findings

The City of Monroe maintains design standard details for curb ramps, sidewalks, and driveways. Figure 2-1 shows the web page where the design standards can be accessed.

The City's Municipal Code contains additional guidance on when certain features are required to be constructed within the public right-of-way. In some cases, specific criteria cover the dimensions of pedestrian facilities.

These standards are used for projects within the public right-of-way that range from city funded projects as well as privately designed and constructed projects. The review recommended several changes to the current City standards to achieve ADA compliance and improve clarity, increase consistency across figures, and provide a greater level of detail in the figures. The review of the City standards is grouped into five categories: sidewalks, crosswalks, curb ramps, signals, and other pedestrian areas. The City design standards and municipal



Pushbuttons

Curb Ramps

Sidewalks

Hazards

Figure 2-2 Examples of Inventoried Facilities

code do not address traffic signals, railroad crossings, transit facilities, parking, or work zones. It is recommended for many of these areas to refer to WSDOT design manual to set the standards for these types of facilities.

2.3 Existing Pedestrian Facilities

The Self-Evaluation inventoried barriers to access associated with existing pedestrian facilities, including curb ramps, sidewalks, pedestrian pushbuttons, as required by ADA Title II Part 35, Subpart D – Program Accessibility § 35.150 (d)(3). Each facility and associated barriers were field inventoried and cataloged within the project’s geospatial (GIS) database. Field data was collected from July to October, 2019.

Table 2-1 details the existing pedestrian features within Monroe right-of-way that contain barriers and will require improvements to meet current ADA standards. It is important to note that many of these facilities were constructed before the adoption of current ADA standards, and likely met applicable state and federal standards at the time of construction.

Additionally, it is important to note that ADA regulations require facilities to be made accessible to “the maximum extent feasible,” (MEF) in “circumstances when the unique characteristics of terrain prevent the incorporation of accessibility features” (U.S. Department of Justice, 28 CFR § 35.151 New construction and alterations).

These circumstances are often a result of steep or otherwise constrained locations, which are common to the Monroe road

system. This plan’s Self-Evaluation examined whether facilities were compliant with current ADA design requirements; it did not examine whether non-compliant facilities were built to the maximum extent feasible or practical.

Additional detail regarding the Self-Evaluation’s findings for curb ramps, sidewalks, and pedestrian pushbuttons is provided in the following sections.

2.3.1 Method

A self-evaluation of facilities within the public right-of-way was conducted by StreetScan on behalf of the City and employed a data collection effort that included attributes for sidewalks and curb ramps. These features were collected with the use of StreetScan’s vehicles that are equipped with multi-sensor systems, 3D cameras and optical devices. Some of the attributes for these facilities were autogenerated during the data collection process while other attributes such as sidewalk width had to be manually measured from the 3D data collected. Additional data was collected for pushbuttons by City staff.

The physical inventory of pedestrian facilities, as shown in Figure 2-2, included:

- Approximately 75 miles of sidewalk
- 1,313 curb ramps
- 54 signal pushbuttons
- Over 1,500 vertical discontinuities

Inventory maps of collected pedestrian features can be found in Appendix A.

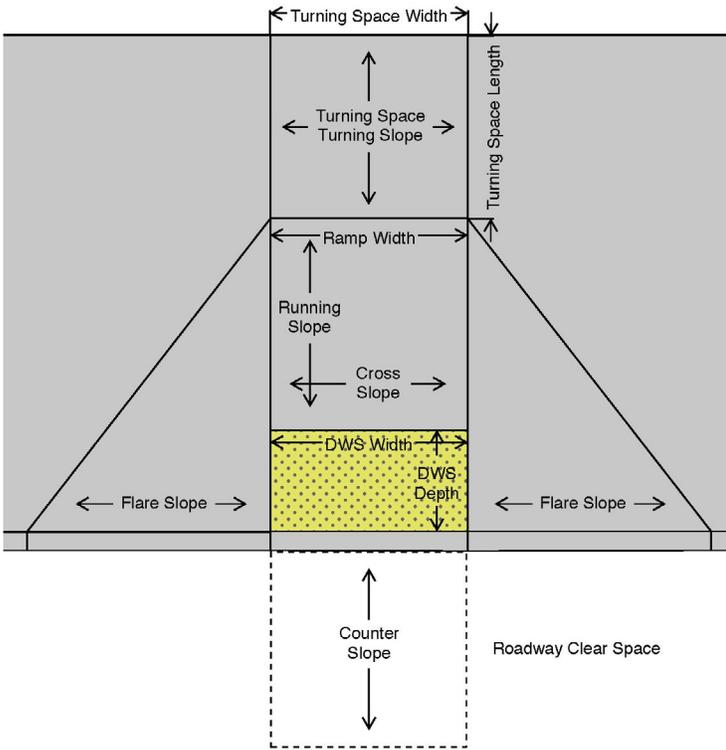


Figure 2-3 Perpendicular Curb Ramp Attributes

Curb Ramps

Field data was collected for existing curb ramps and evaluated for their compliance with ADA standards. Figures 2-3 and 2-4 show the major components of typical perpendicular and parallel curb ramps, respectively, two common types of curb ramps. Less common ramp types, such as ramps that provide a transition from the end of a sidewalk to the road shoulder are also located in the city.

Each curb ramp was reviewed for compliance, then scored based on the degree to which the barrier impeded accessibility. Curb ramps were scored using a scale of 0-30 and categorized as follows:

- 0: Compliant
- 1-29: Minor Non-Compliant
- 30: Significant Non-Compliant

These scores are referred to as the Accessibility Index Score (AIS). Curb ramps that had running slopes that were too steep received a score of 30 and were considered to be significantly non-compliant. Curb ramps that had cross slopes slightly above the compliant threshold received a score of 25 while steeper cross slopes received a 30. Other criteria relating to turning space, flare slopes, detectable warning surfaces (DWS), obstructions, and condition were weighted lower, but could cumulatively reach the threshold for non-compliance.

Scoring and compliance criteria are discussed in more detail in Section 4.2.1 and in Appendix D.

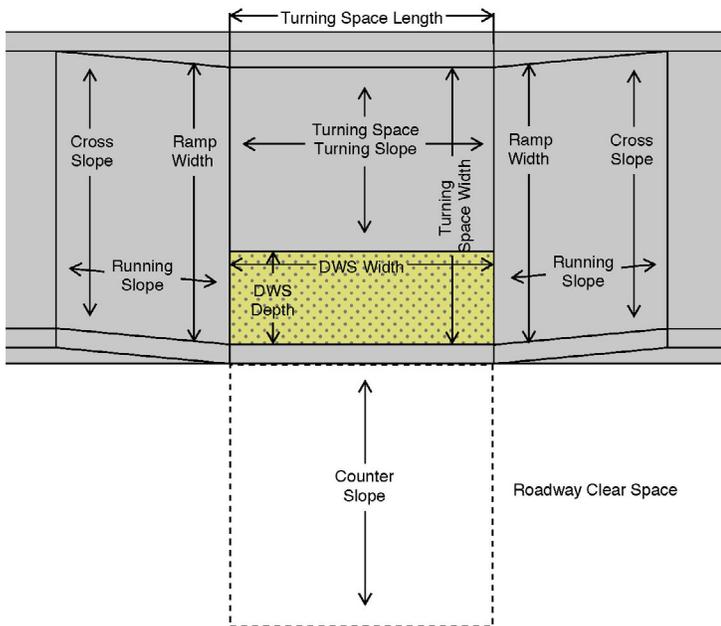


Figure 2-4 Parallel Curb Ramp Attributes

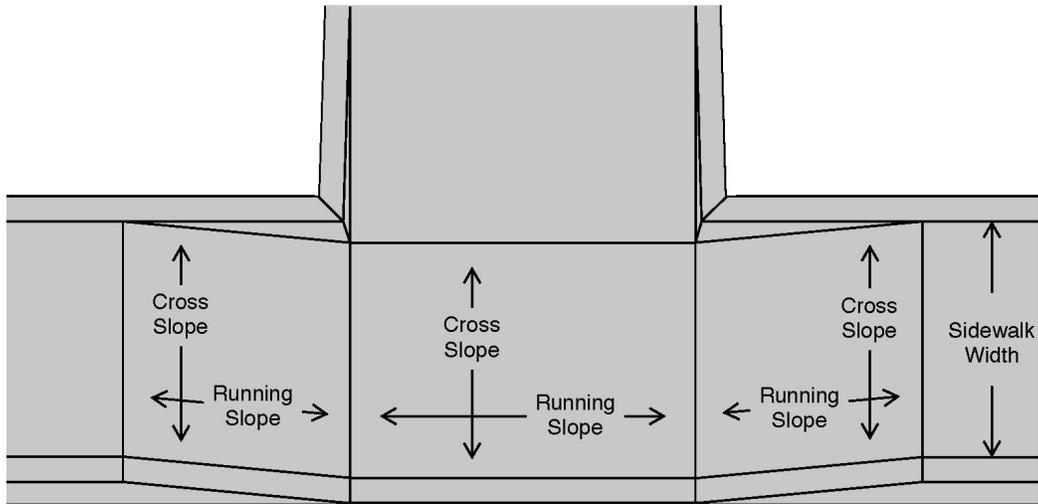


Figure 2-5 Driveway and Sidewalk Attributes

Sidewalks

Field data collection for sidewalks was completed along the entire length of each segment. The average width of each segment was recorded along with the number of vertical discontinuities related to panel uplifts and the surface type. Common attributes for sidewalks and driveways are shown in Figure 2-5.

Each sidewalk was reviewed for compliance, then scored based on the degree to which the barrier impeded accessibility. These barriers include:

- Sidewalk Width, e.g., the sidewalk is too narrow,
- Sidewalk Condition, e.g., amount of cracking.
- Vertical Discontinuities, e.g., sidewalk panel uplifts.

Based on the state of the sidewalk attributes found, a Sidewalk Condition Index (SCI) was assigned. The SCI is a value that Streetscan calculates to define the condition of a sidewalk and is one component that contributes to the larger Accessibility Index Score (AIS) given to each sidewalk segment during Transpo Group's prioritization process.

Sidewalks were scored using a scale of 0-30 and categorized as follows:

- 0: Compliant
- 1-15: Minor Non-Compliant
- 16-30: Significant Non-Compliant

Scoring and compliance criteria are discussed in more detail in Section 4.2.1 and in Appendix D.

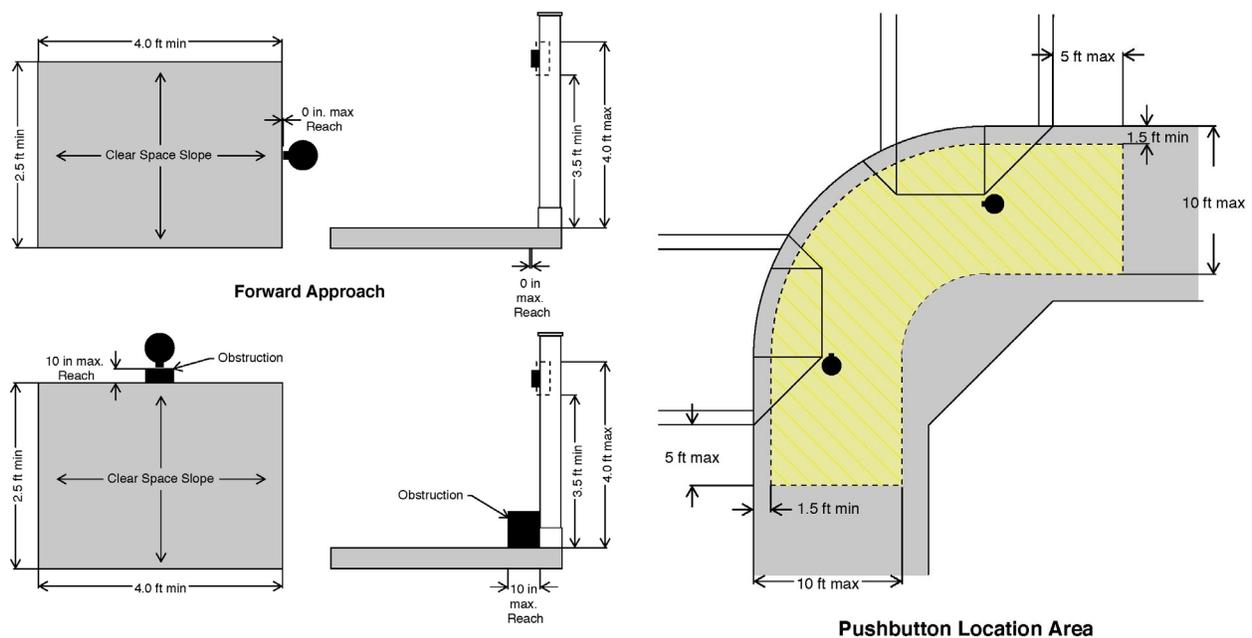


Figure 2-6 APS Pedestrian Pushbutton Location Attributes

Signal Pushbuttons

Accessible pedestrian signals and pushbuttons (APS) provide integrated visual, audible, and vibrotactile information to help pedestrians cross signalized intersections. Some pushbuttons can be programmed to request an extended crossing time or to make the name of the street being crossed audible when pushed for a longer time.

Field data was collected for pedestrian pushbuttons at traffic signals by City staff. Data collectors recorded location and design attributes for each pushbutton. Location attributes included reach distance to the button, availability of a clear and level area at the button, and the location relative to the intersection and corresponding crosswalk (see Figure 2-6). Design attributes included visual and tactile elements,

such as a raised arrow pointing to the crossing. There are additional operational attributes including features that provide audible and vibrational feedback that were not collected. These attributes will need to be reviewed as projects arise near signal pushbuttons.

Each pedestrian pushbutton was reviewed for compliance using eight criteria, then scored based on the degree to which the barrier impeded accessibility.

Pushbutton scores ranged from 0-30 and were categorized as follows:

- 0: Compliant
- 1-15: Minor Non-Compliant
- 16-30: Significant Non-Compliant

Scoring and compliance criteria are discussed in more detail in Section 4.2.1 and in Appendix D.

2.3.2 Findings

Curb Ramps

Approximately 55% of the 1,313 existing curb ramps do not meet ADA standards (see Table 2-1 and Figure 2-7).

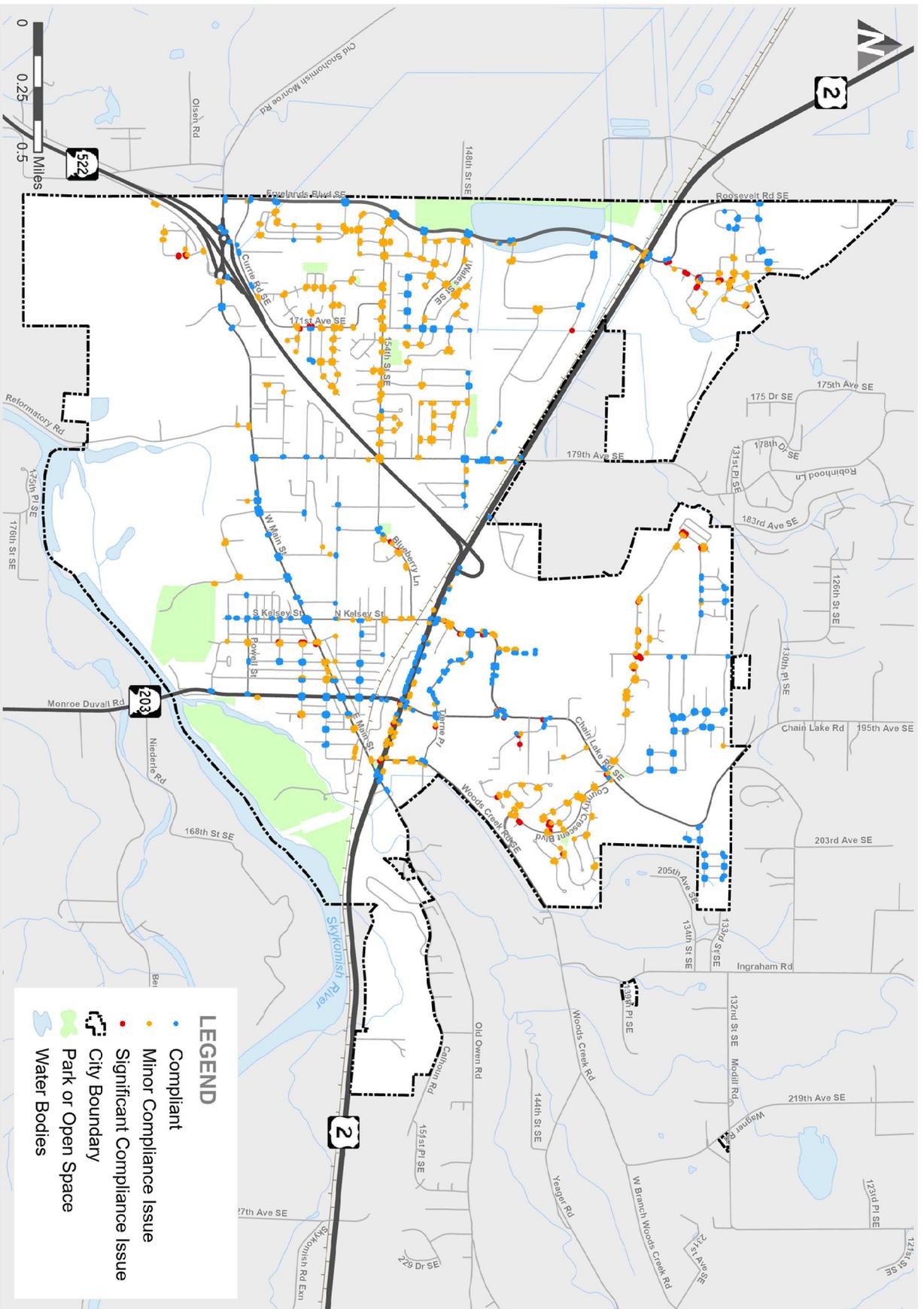
Non-compliant ramps are those that have:

- Non-compliant ramp width, e.g., the ramping area is not present or too narrow.
- Non-compliant running slope, e.g., the ramp running slope is too steep (Figure 2-8). Six curb ramps have running slopes greater than 8.3%.
- Non-compliant cross slope, e.g., the cross slope is too steep (Figure 2-9). 169 curb ramps have cross slopes greater than 2%, 66 of which have cross slopes greater than 3%.
- Several lesser non-compliant features.

Curb ramps are designed and constructed to tie into the existing roadway. As noted previously, steep or otherwise constrained locations may make it infeasible to meet ADA grade standards. When it is not feasible to remove all curb ramp barriers, ramps may be built to the maximum extent feasible (MEF) to satisfy ADA requirements. This planning level Self-Evaluation did not examine whether non-compliant ramps were built to the maximum extent feasible. See Section 5.1 for additional information regarding MEF.

Table 2-1 Existing Curb Ramp Compliance

Curb Ramp Compliance	Ramps	% of Total
Significant Non-Compliant	72	5%
Minor Non-Compliant	653	50%
Compliant	588	45%
Total	1,313	



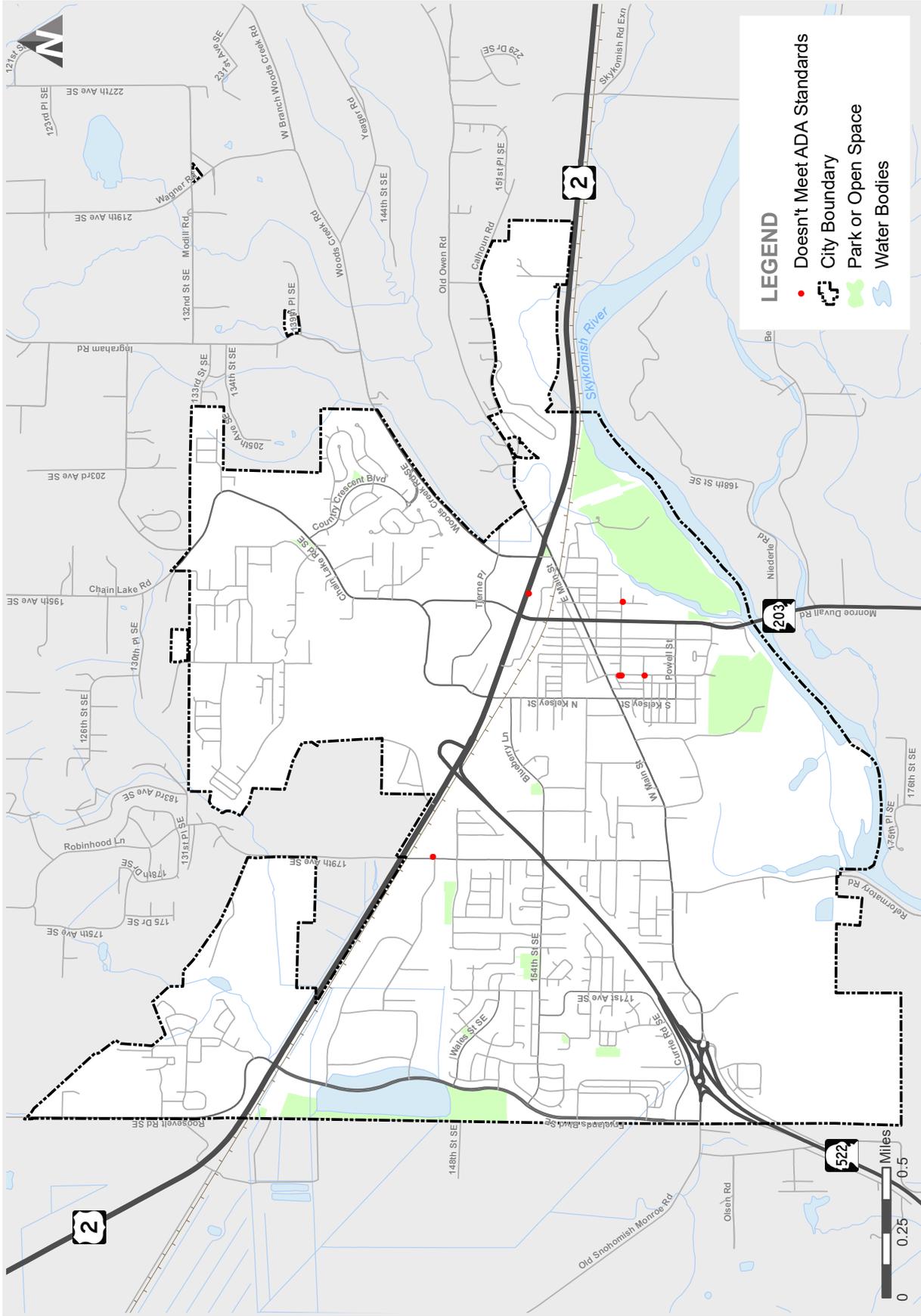
Non-Compliant Curb Ramp

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FIGURE



FIGURE

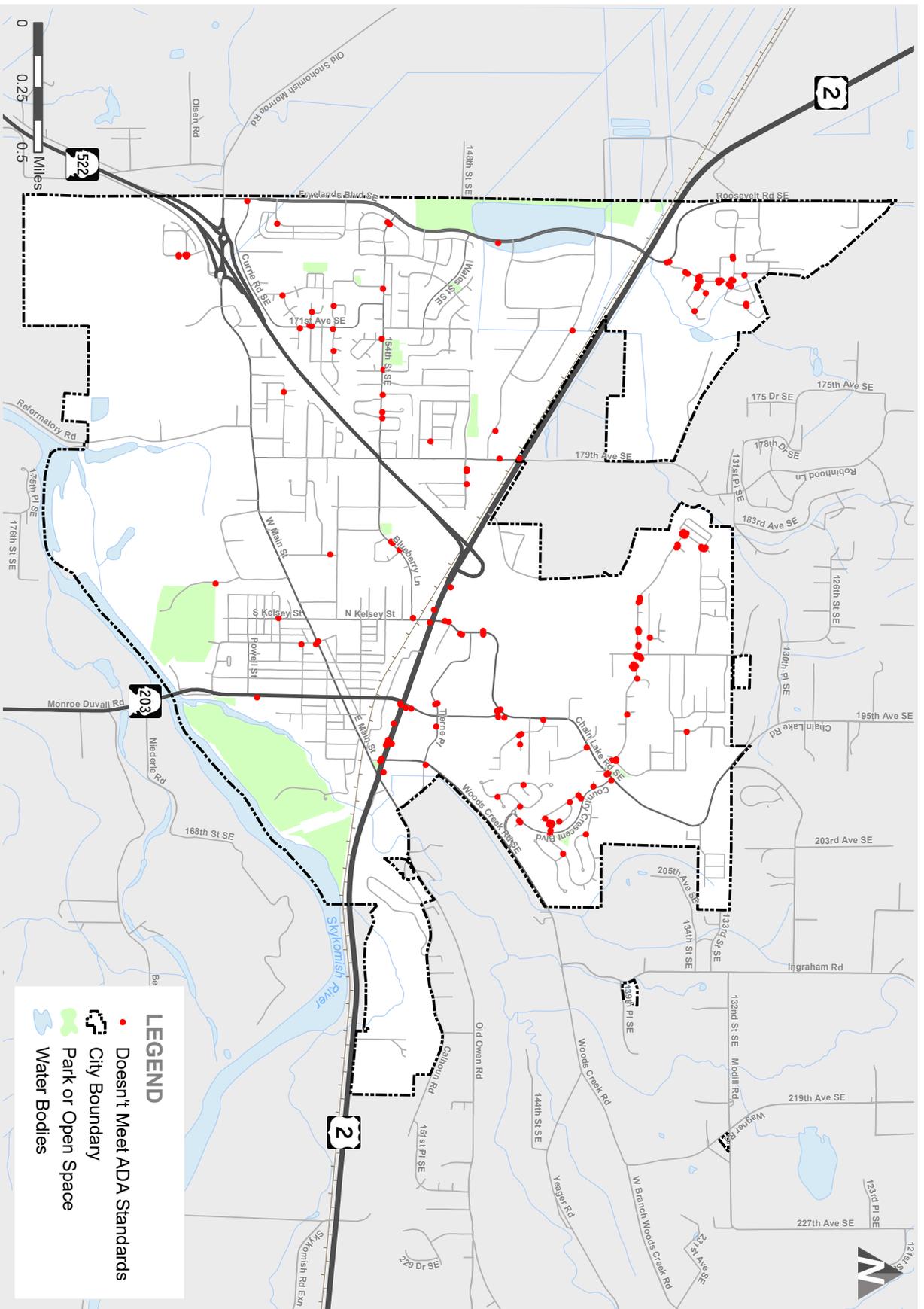
Curb Ramp Running Slope



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Curb Ramp Cross Slope

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FIGURE



Figure 2-10 “H-style” (left) and APS-style pedestrian pushbutton (right)

Sidewalks

Approximately 75 miles of sidewalk were inventoried with approximately 78% not meeting ADA standards (see Table 2-2 and Figure 2-11).

Over 1,100 vertical discontinuities/ uplifts were found. Grinding, patch repair, and full reconstruction are potential solutions for removing the sidewalk barriers depending on the severity of the barrier.

Figure 2-12 shows which sidewalk segments have widths less than 48 inches.

Signal Pushbuttons

Nearly all of the 54 inventoried pedestrian pushbuttons were not fully ADA compliant; only two units met all ADA requirements for measured attributes. Many existing pushbuttons do not meet current standards for location relative to intersection and spacing between buttons.

More than 40% of pedestrian pushbuttons in the city are an older “H-style” design (see Figure 2-10). This style of pushbutton can be upgraded to increase accessibility but must be fully replaced with an accessible pedestrian

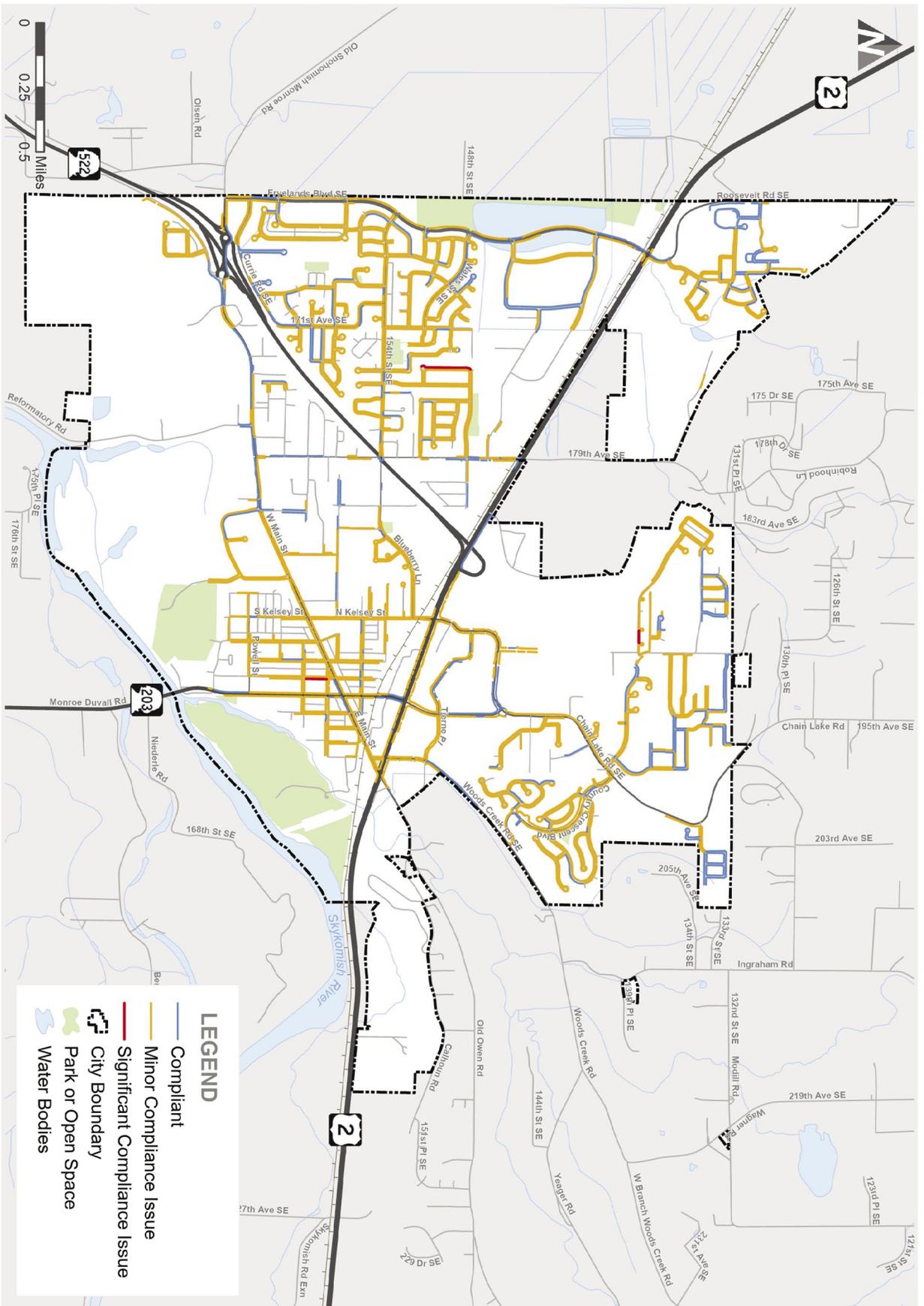
Table 2-2 Sidewalk Compliance

Sidewalk Compliance	Concrete		Asphalt		Total	
	Miles	% of Total	Miles	% of Total	Miles	% of Total
Significant Non-Compliant	0.3	<1%	0	0%	0.3	<1%
Minor Non-Compliant	56.7	78%	1.9	86%	58.6	78%
Compliant	15.7	22%	0.3	14%	16.0	21%
Total	72.7		2.2		74.9	

signal (APS)-style pushbutton to achieve full ADA compliance (see Figure 2-10).

The requirement to use APS-style pushbuttons is relatively new and lack of compliance is typically due to a crossing not being upgraded over time to reflect evolving requirements. Pushbuttons are typically upgraded to APS-style in groups rather than individually. As a result, APS-style additions and upgrades usually occur on an intersection-by-intersection basis.

Figure 2-13 demonstrates the compliance level and locations of these pushbuttons throughout the city.



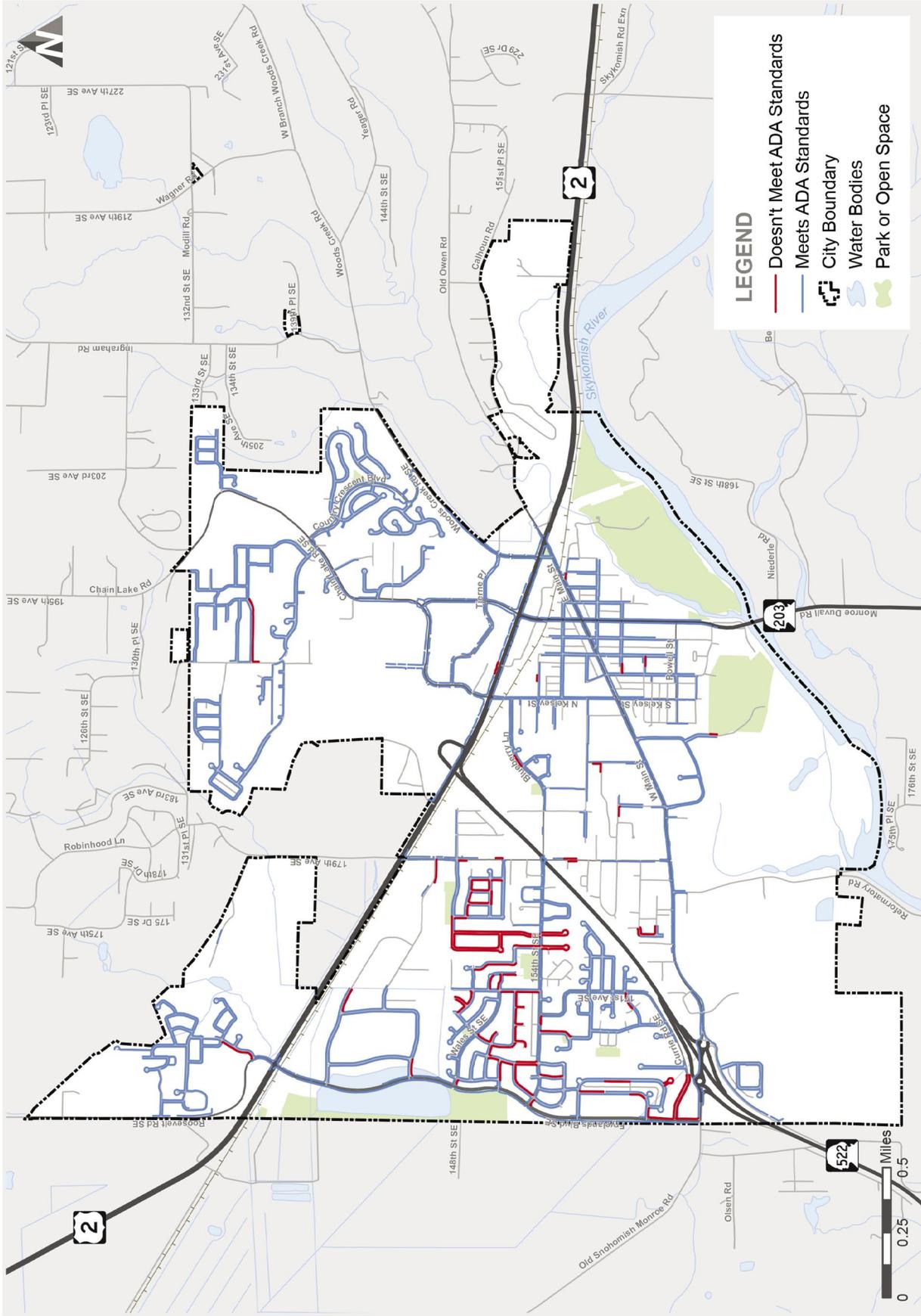
Non-Compliant Sidewalk

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FIGURE

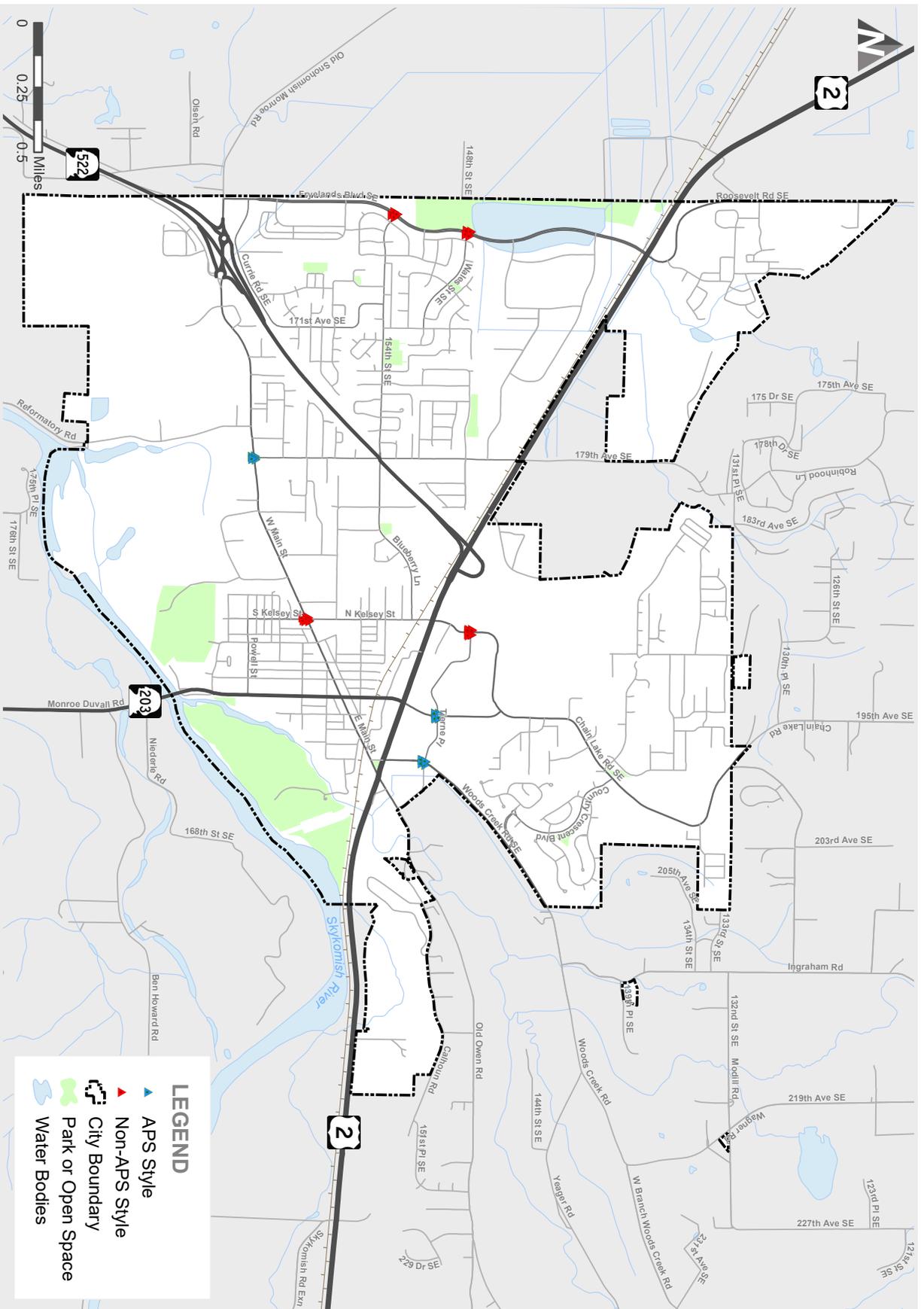


monroe Sidewalk Width
 Monroe ADA Transition Plan

FIGURE
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Signal Push Buttons: APS and Non-APS

Monroe ADA Transition Plan

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FIGURE



3 // Stakeholder Engagement

Public and stakeholder input is an essential element in the transition plan development and self-evaluation processes. ADA implementation regulations require public entities to provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process and development of the transition plan by submitting comments (28 CFR 35.105(b) and 28 CFR 35.150(d)(1)).

There were three primary goals for the public outreach activities prior to adopting the plan:

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

3.1 Engagement Methods

To generate public involvement and capture public feedback on the ADA Transition Plan, the City used three methods: a virtual open

house, engagement survey, and online reporting tool. To solicit participation in the survey, the survey was promoted on the City's website and social media channels. The City of Monroe developed a project website: <https://www.monroewa.gov/947/ADA-Transition-Plan> for easy online access to project information and ways to provide feedback. A full account of the public engagement findings can be found in Appendix C.

3.1.1 Online Open House and Survey

An online open house that dove into the ADA transition plan project, goals and areas of focus of the project, was made available on the City's website. Within the open house an online survey and reporting tool was provided for the public to give feedback on gaps and barriers at specific locations.

The surveyed contained 16 questions focusing on the following areas.

- Whether they have a disability or support someone with one;

- Which type of accessibility barriers they currently experience;
- How they rate the accessibility conditions of existing right-of-way facilities; and,
- What facility types they believe should be prioritized when removing accessibility barriers.

The survey was made available for public participation from June 13, 2020 to August 31, 2020. There were 15 respondents. Of all respondents, 40 percent (six respondents) indicated they have a disability that impacts the way they travel and 27 percent (four respondents) reported supporting someone with a disability. One of these respondents reported that they both have a disability and support someone with a disability.

The survey respondents identified their first and second priorities for improving pedestrian facilities within the city. The weighted rank priorities showed that the following three categories were highest priority:

- Hospitals and Medical Facilities
- Schools and Institutions
- City Parks

During the time frame allotted for the online open house, two locations were identified using the reporting tool.



4// Pedestrian Barrier Removal Methods and Schedule

Chapter 4 provides a summary of barrier removal methods and priorities to guide implementation of this plan. This chapter presents a total planning level cost estimate for the removal of existing pedestrian barriers. Finally, a schedule is presented that outlines the steps necessary to achieve compliance with current ADA standards.

4.1 Barrier Removal Methods

The City currently has a variety of barrier removal methods that are funded from sources that include road maintenance, the annual street overlay program, and an ADA Transition Plan program. Certain programs provide continual means of barrier removal while others vary based on outside influences such as permitted development and grants. The way an existing pedestrian barrier is removed is typically a function of its complexity and cost.

Less complex pedestrian barriers, such as vegetation or movable objects, can be removed through operations and maintenance programs. More complex barriers, such as those associated with ramp or sidewalk design, typically require additional engineering as part of a more costly capital construction project.

The following sections provide additional detail regarding operation and maintenance, annual street overlay program, and ADA Transition Plan program funding.

4.1.1 Capital Projects

The Capital Facilities Plan (CFP) defines projects and identifies funding for different elements of the government including the Transportation Improvement Plan (TIP). Transportation projects range from minor street widening to street extension projects. A variety of short and long-range plans, studies and individual requests help identify projects which are then included and prioritized. The City of Monroe updates its TIP annually, and forecasts projects for a six-year period in the Capital Facilities Plan, also updated annually.

Pedestrian improvements (new or replacement) are often included as a component of these projects. With this transition plan, accessibility barriers are now easier to identify and included within projects listed in the Capital Facilities Plan.

4.1.2 Operations and Maintenance

Operational and maintenance activities typically resolve less costly and less complex barriers to accessibility. A subset of the work completed by the Public Works Operations and Maintenance Division helps to remove ADA related barriers. Though maintenance investments for pedestrian facilities often do not bring sidewalks, ramps, and other pedestrian infrastructure fully up to ADA standards, these investments of staff time and resources typically result in critically important access improvements.

These activities include sidewalk panel grinding, panel replacement, and request-based curb ramp installations and repair. Operations and Maintenance investments are crucial to increasing the longevity of the existing pedestrian network.

4.1.3 Roadway Overlays and ADA Transition Plan Program

The annual street overlay program is used to maintain the current roadway system by providing street overlays, pavement rehabilitation, and curb and sidewalk repair. When a street overlay is being conducted, the curb ramps will be retrofitted to meet current standards if found to be non-compliant. The City has an additional barrier removal funding source through their ADA Transition Plan program. This program supplements efforts for upgrading the City's existing pedestrian infrastructure.

4.1.4 Traffic Signal and Utility Upgrades

The City upgrades existing traffic signals for a variety of reasons, often with the goal of reducing vehicle congestion. When these upgrades occur, the City has the opportunity to ensure that push buttons and pedestrian signals

meet current accessibility standards, including button location and position, non-visual format of indicating "WALK" and "DON'T WALK" guidance using audible tones, and vibro-tactile surfaces.

4.1.5 Permitted Development

With the current funding for accessibility improvements, it will take many years to remove accessibility barriers or provide sidewalk connections between gaps. Redevelopment of properties such as construction of new housing or commercial buildings or major remodels can provide a valuable boost to barrier removal efforts. At times, private development results in street frontage improvements as a function of construction permit requirements. All such improvements are designed and built to meet City and ADA standards. This approach to barrier removal is incremental and depends on the outside influence of developers.

4.2 Barrier Removal Plan and Schedule

The ADA requires agencies to specify a schedule for taking the steps necessary to make existing facilities ADA compliant. This plan section summarizes the three-step process used to develop a barrier removal implementation plan and schedule, consistent with ADA transition plan requirements:

1. Prioritization of pedestrian barriers. Physical barriers identified through the Self-Evaluation were prioritized based on the degree to which they physically impacted accessibility and their proximity to key pedestrian destinations. Community input received through stakeholder engagement informed the prioritization process.
2. Estimation of planning level costs to remove pedestrian barriers. Unit costs were applied to the barrier inventory to generate a total planning level cost estimate to remove Self-Evaluation identified barriers. This planning level cost estimate is the total estimated 'need' for barrier removal.
3. Development of a schedule for barrier removal. An estimate of available financial

resources was generated and compared to the total estimated need to develop a schedule for barrier removal.

4.2.1 Prioritization of Pedestrian Barriers

To inform the City's future project selection and understand the impact of barrier removal programs, a prioritization system was developed and used to score each pedestrian facility. This system was informed by the Self-Evaluation data, the community engagement process, and technical expertise. It reflects both a facility's physical characteristics and its importance to pedestrian travel. Under the prioritization system, each barrier was scored independently on two factors:

- Physical impact to accessibility
- Proximity to key pedestrian destinations, such as transit stops, hospital/medical facilities, and schools.

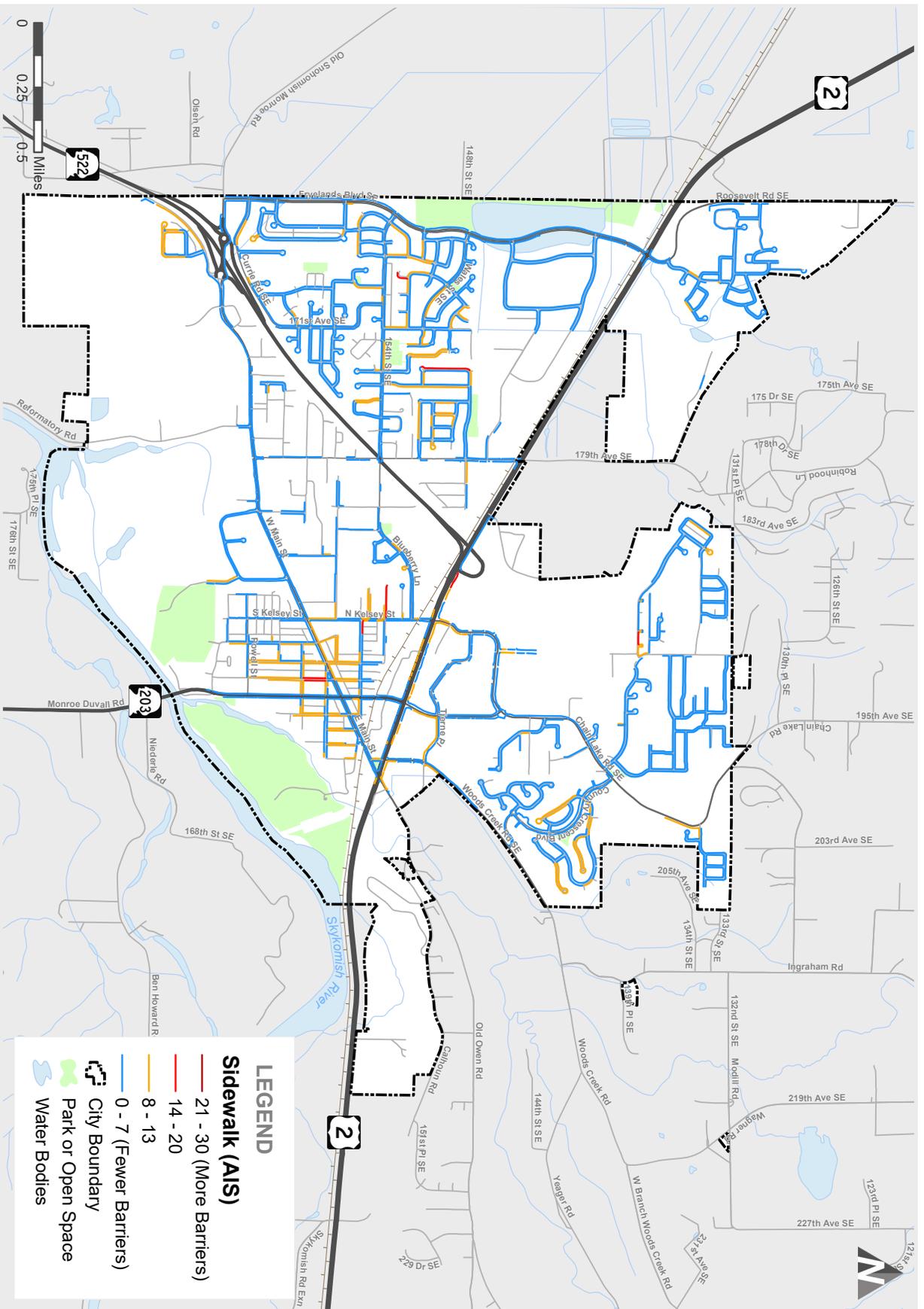
The two resulting scores were added together to incorporate both factors into a single score for prioritization. Based on each facility's score, it was categorized as very high, high,

medium, or low priority for barrier removal. Under this system, facilities that present greater barriers to accessibility and are located near multiple key pedestrian destinations are considered a high priority, while facilities with less significant physical barriers located farther from key pedestrian destinations are considered a low priority. Prioritization scoring factors are described below.

Physical impact to accessibility: Accessibility Index Score (AIS)

The Accessibility Index Score describes the degree to which each facility presents a physical barrier to accessibility. Criteria and weights were developed for sidewalks, curb ramps, and pedestrian pushbuttons. These criteria and weights are shown in Appendix D.

Potential scores for each facility range from 0 (compliant) to 30. Each facility's Accessibility Index Score is the sum of the individual criteria scores. Curb ramps with non-compliant ramp widths, running slopes, or cross-slopes greater than three percent were assigned the highest possible score of 30. Figures 4-1 through 4-3 show the AIS values for features throughout the city.



Accessibility Index Score Composite (Sidewalk)

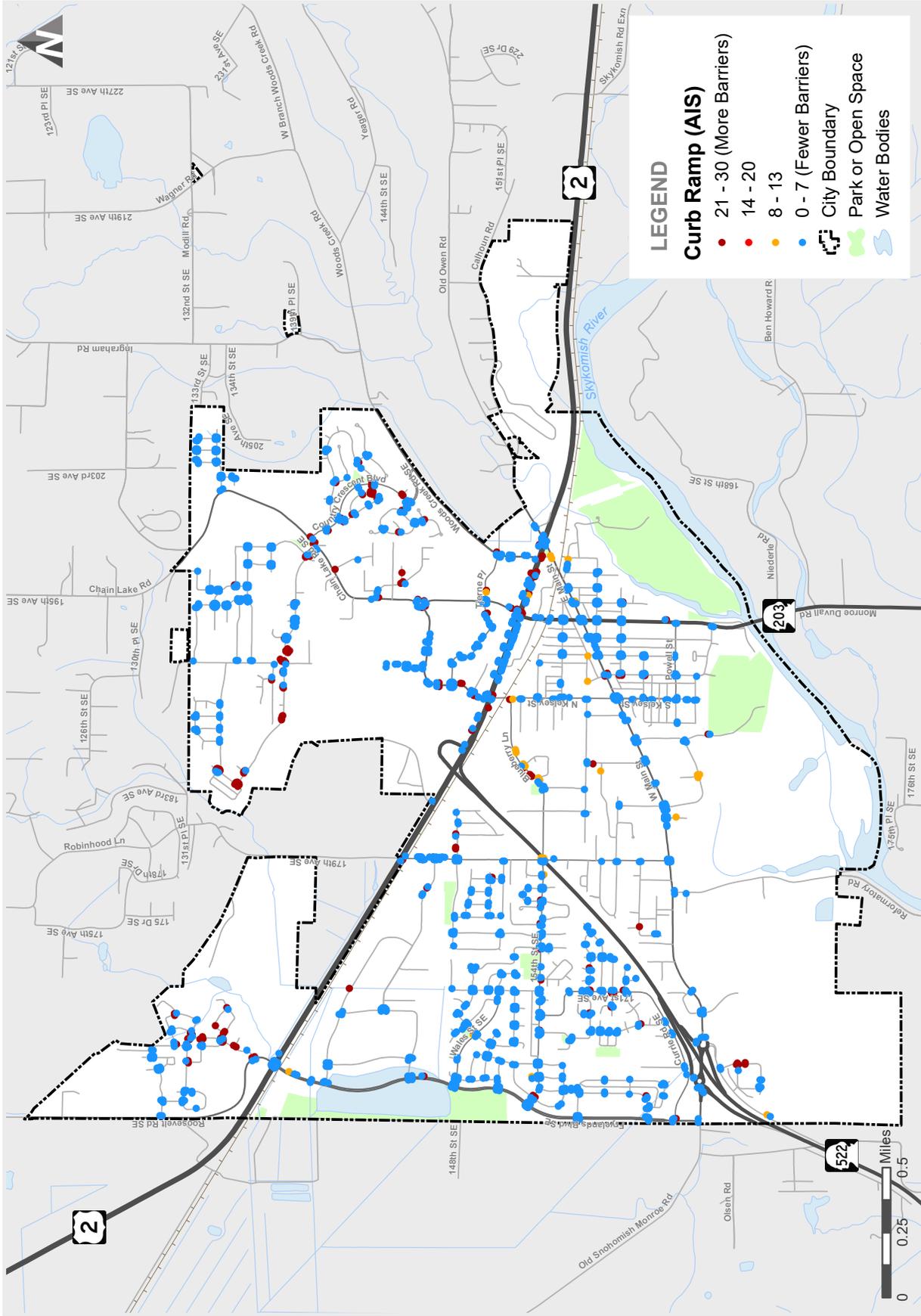
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FIGURE

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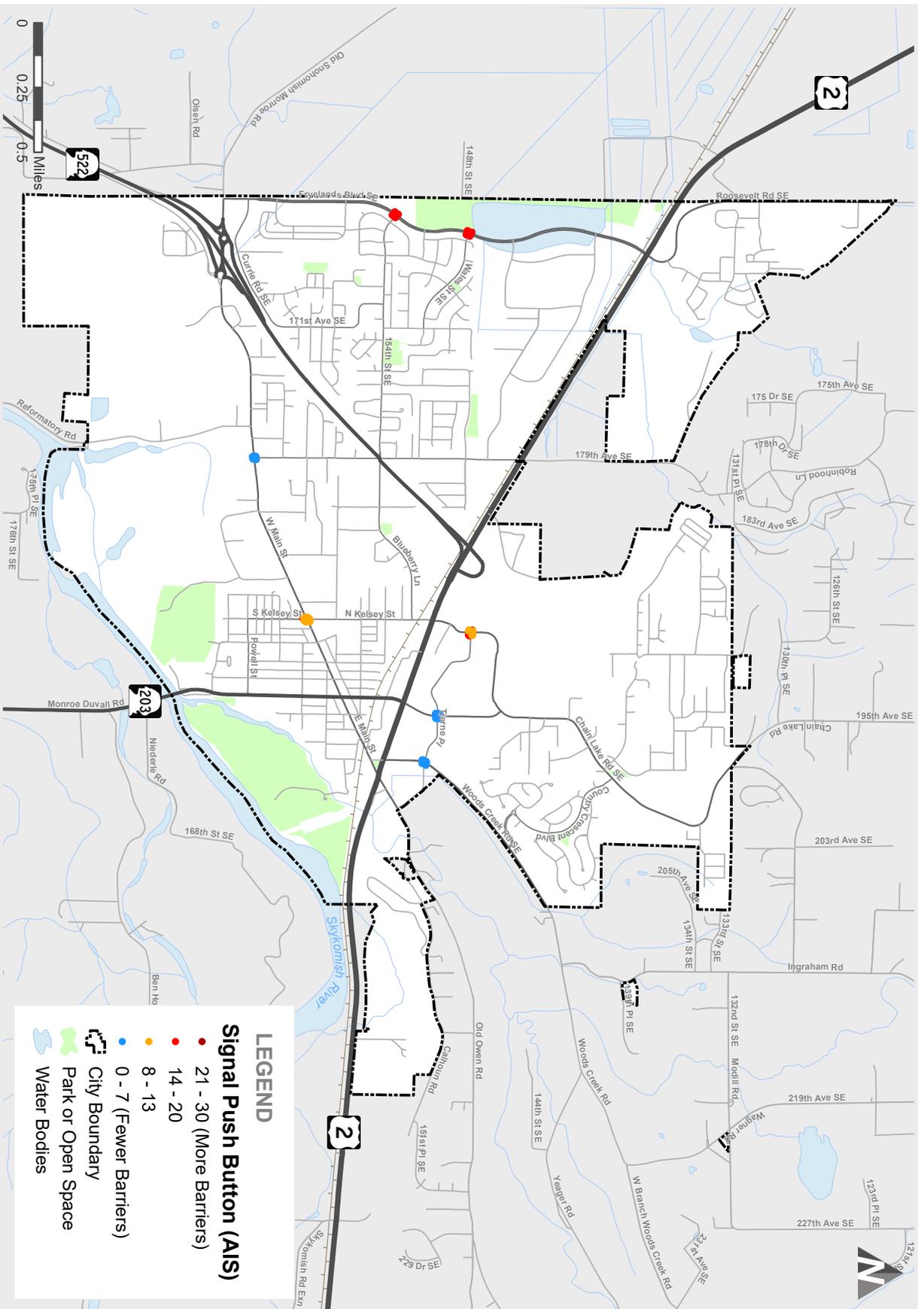


monroe Accessibility Index Score Composite (Curb Ramp)
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FIGURE

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Accessibility Index Score Composite (Signal Push Button)

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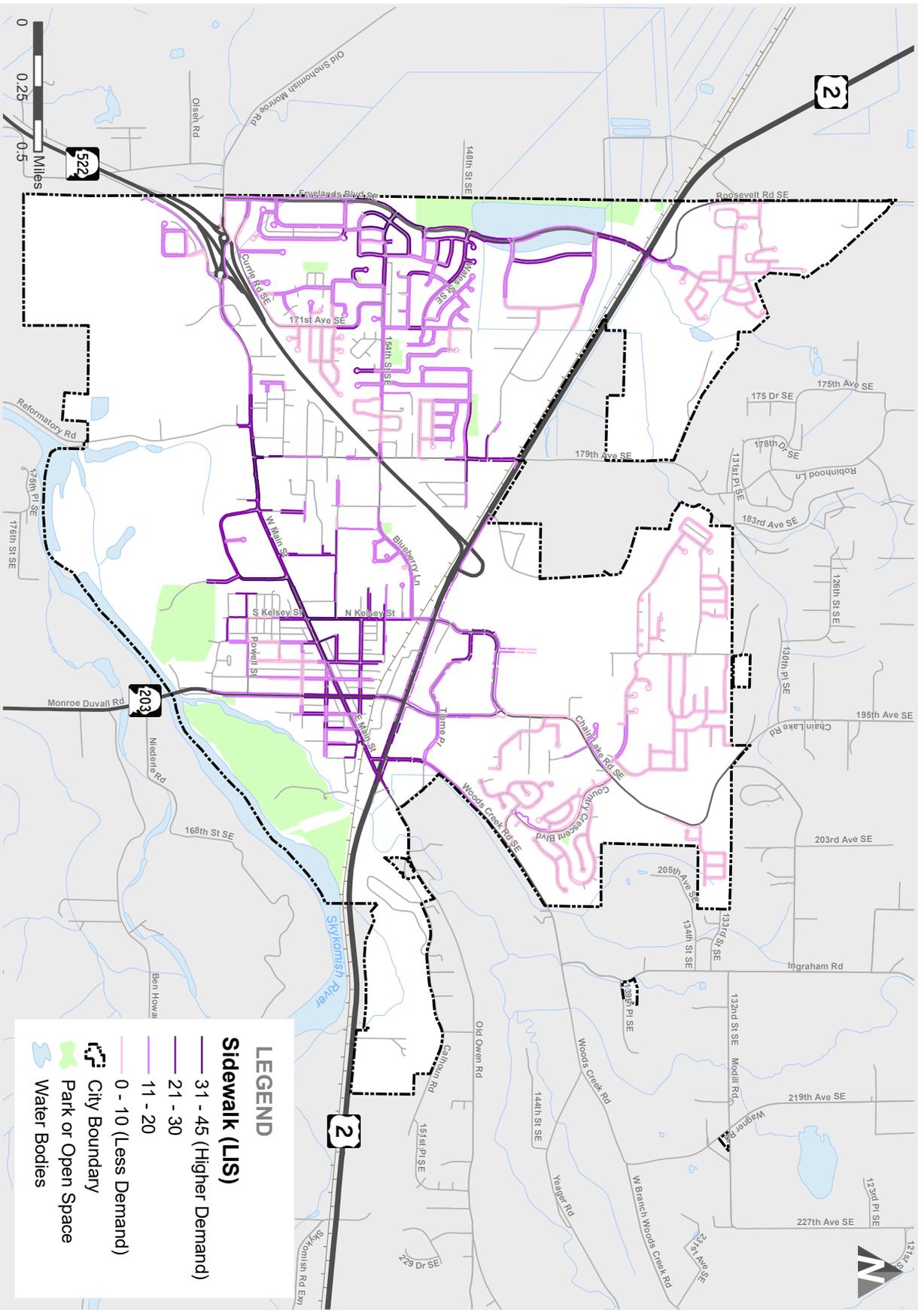
FIGURE

Proximity to key pedestrian destinations: Location Index Score (LIS)

The Location Index Score describes the importance of the pedestrian facility to accessing key pedestrian destinations. Each existing pedestrian facility was scored based on its proximity to schools, parks, transit facilities, signals or roundabouts, public buildings, and downtown or commercial business centers. Facilities near hospitals and medical facilities, schools and institutions, and City parks received a higher score to reflect feedback received through the public engagement survey.

Location Index Scores reflect the number of types of key pedestrian destinations within a defined radius. The full score for each type of destination is assigned if at least one facility of that type is nearby; scores do not increase if a facility is within the radius of multiple destinations of the same type. For example, a facility within one-eighth mile of two parks will receive a score of 5, while a facility within one-eighth mile of a park and a school will receive a score of 10.

Total Location Index Scores ranged from 0 to 45. Location scoring criteria and weights are shown in Appendix D. Figures 4-4 through 4-6 show the LIS values for features throughout the city.



Location Index Score Composite (Sidewalk)

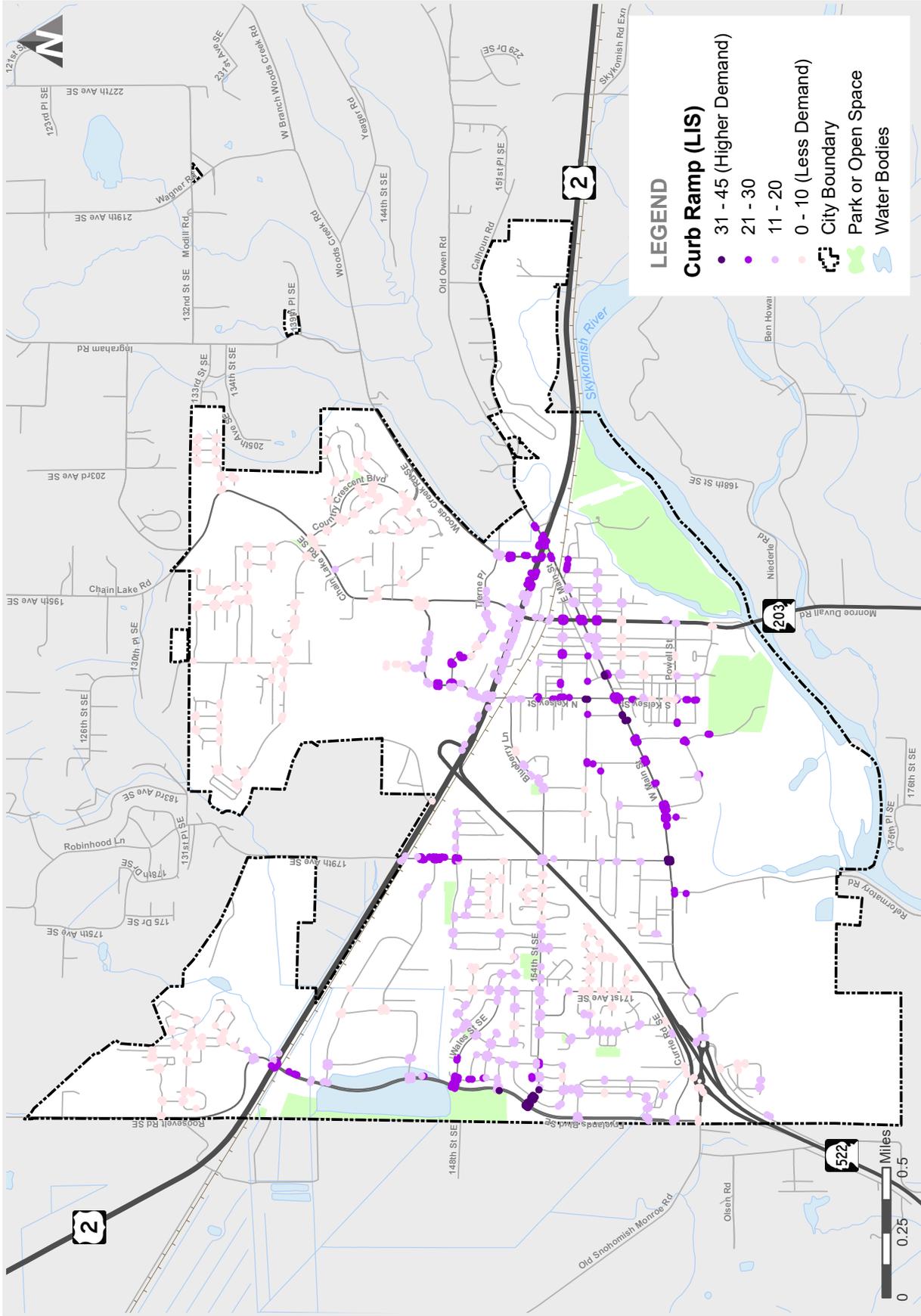
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FIGURE



Location Index Score Composite (Curb Ramp)

Monroe ADA Transition Plan

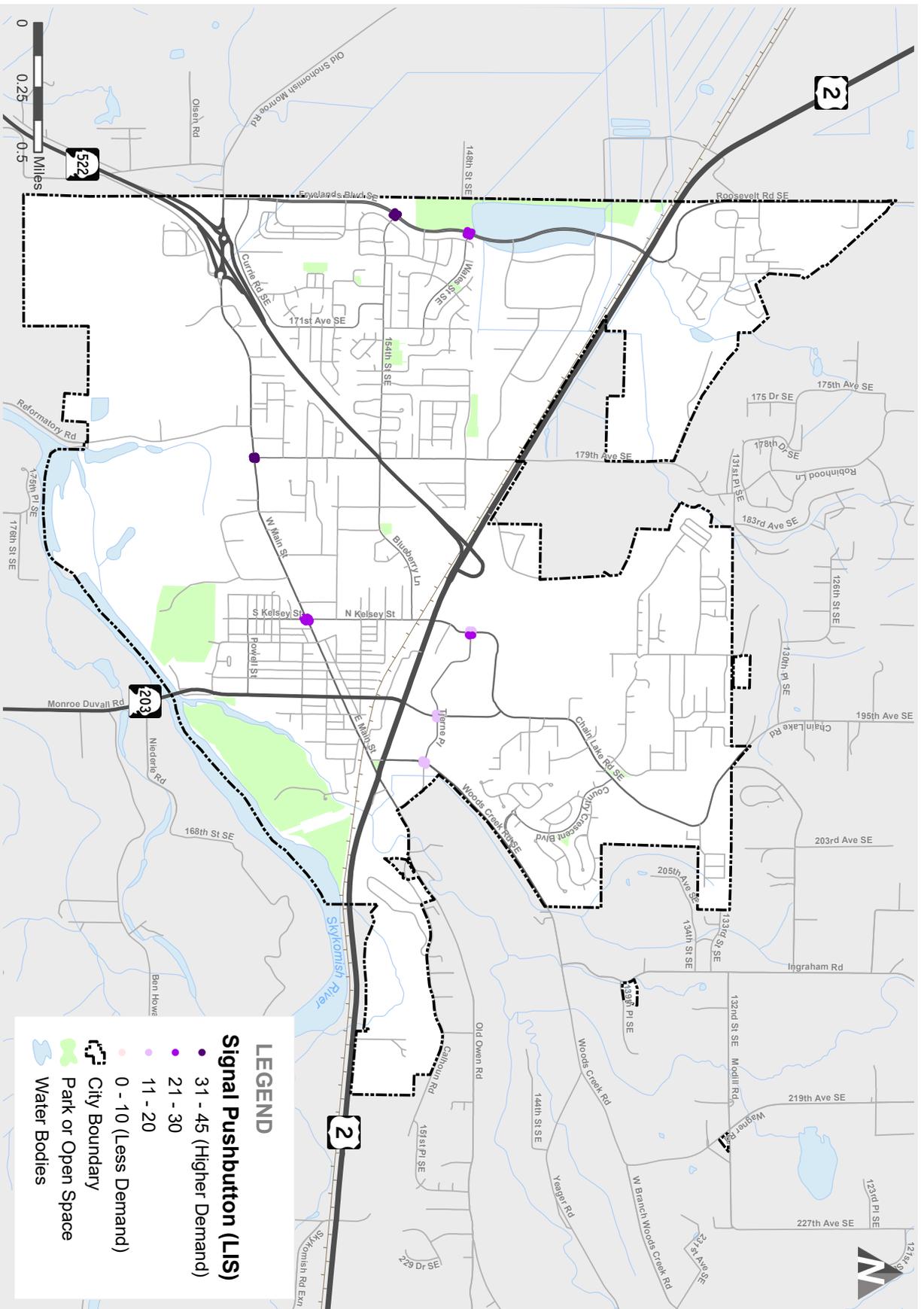
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FIGURE



Location Index Score Composite (Signal Push Button)

Monroe ADA Transition Plan

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FIGURE

Combined Index Score

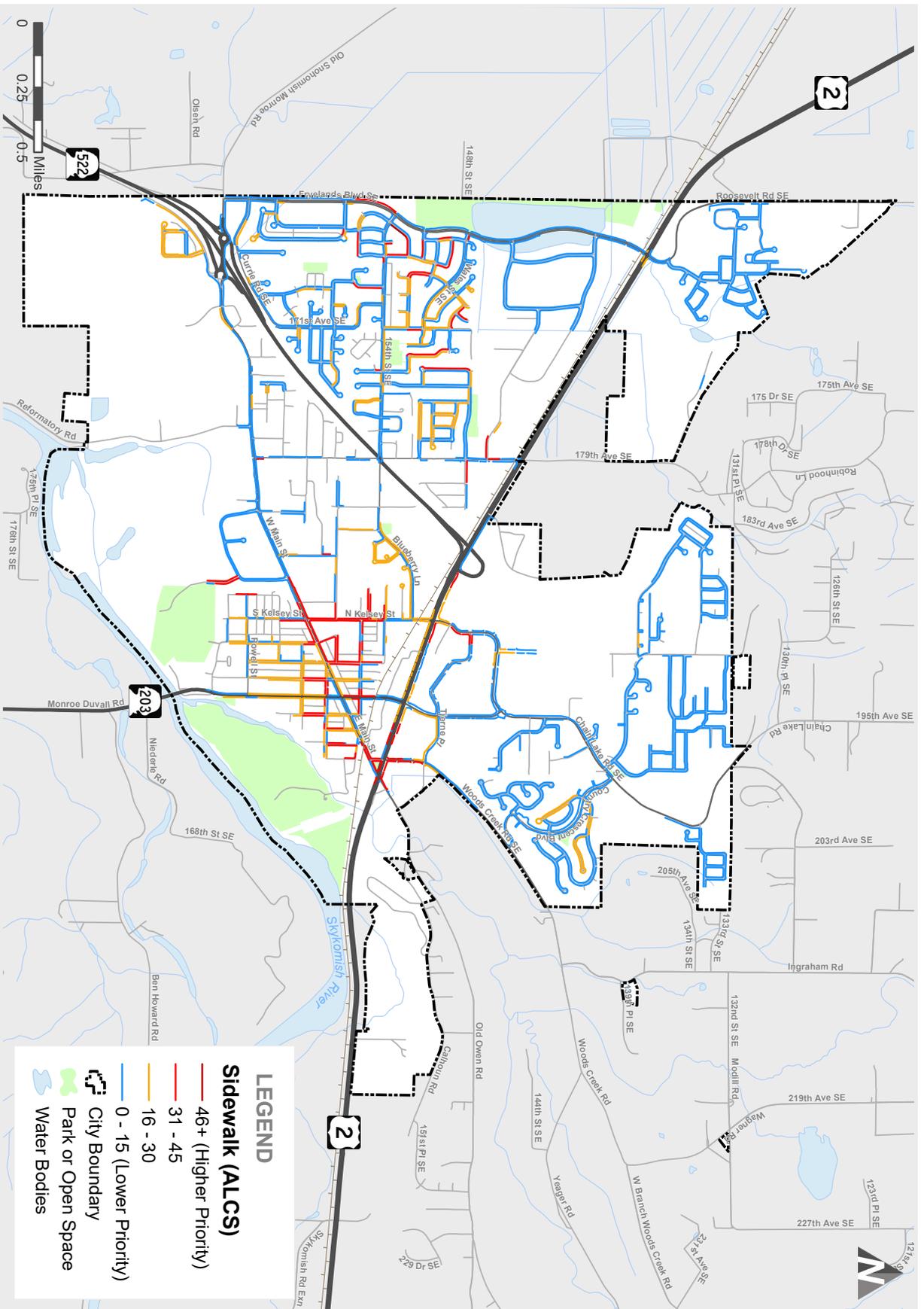
The Combined Index Score sums the Accessibility Index Score and Location Index Score to prioritize facilities with accessibility barriers in areas where pedestrians would be expected.

Scores were grouped into four categories:

- Very High: significant physical barriers in high-demand areas: 46-75 points
- High: 31-45 points
- Medium: 16-30 points
- Low: minor barriers in low-demand areas: 1-15 points

Scores reflect relative priority within each facility type; they do not indicate relative priority between facility types (ex., the importance of addressing a curb ramp barrier versus a sidewalk barrier). Figures 4-7 through 4-9 show the combined index scores for features throughout the city.

Combined index scores provide planning level context to barrier removal and overall accessibility needs within the city. As this Transition Plan is implemented, barrier removal will be guided by multiple factors, including funding availability, location of capital projects that include pedestrian elements, construction efficiency, project-level analysis, etc. Barriers of all priority levels will be removed over time. Figures 4-7 through 4-9 show the combined index scores for features throughout the city.



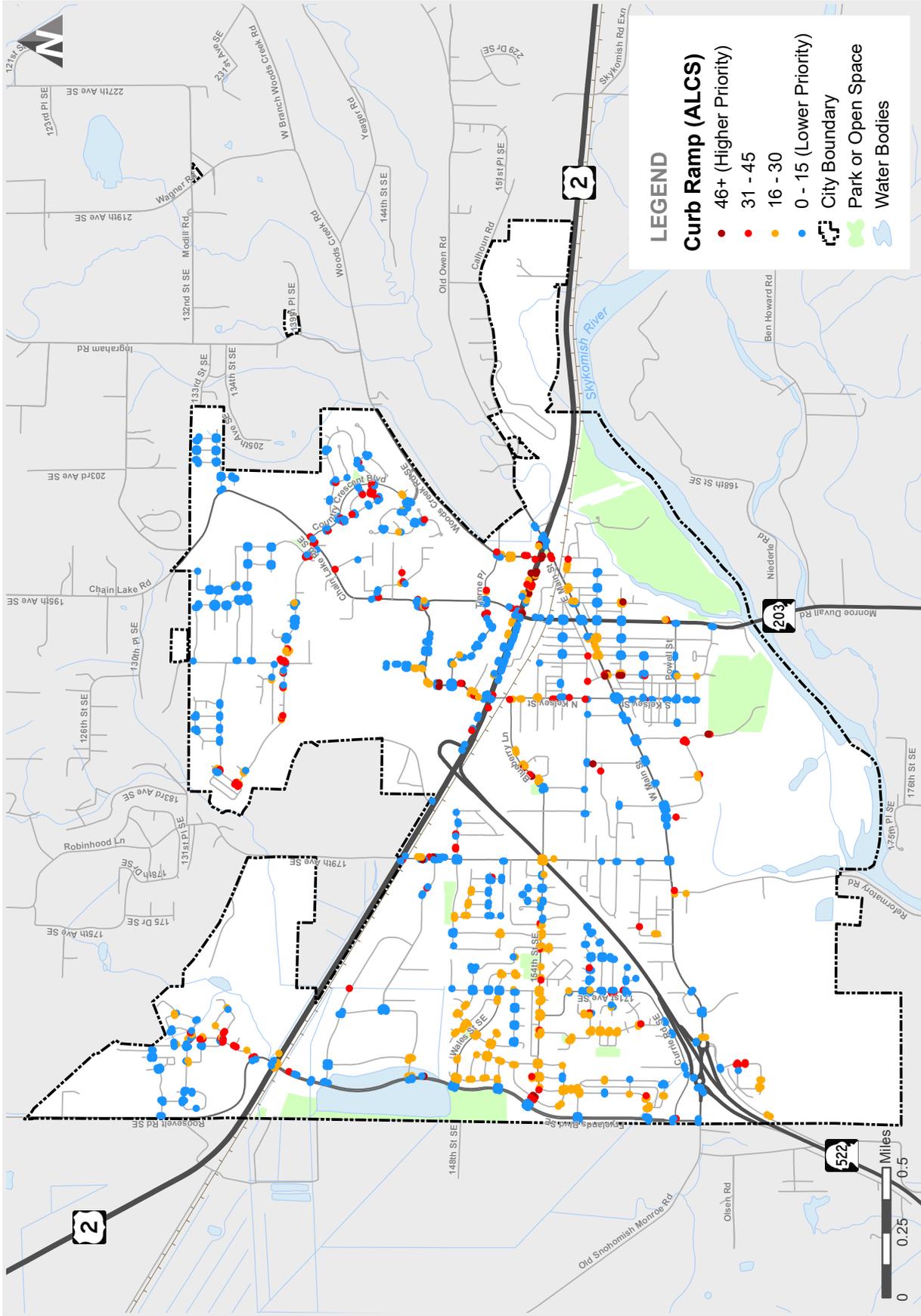
Accessibility (AIS) & Location (LIS) Combined Score (Sidewalk)

Monroe ADA Transition Plan

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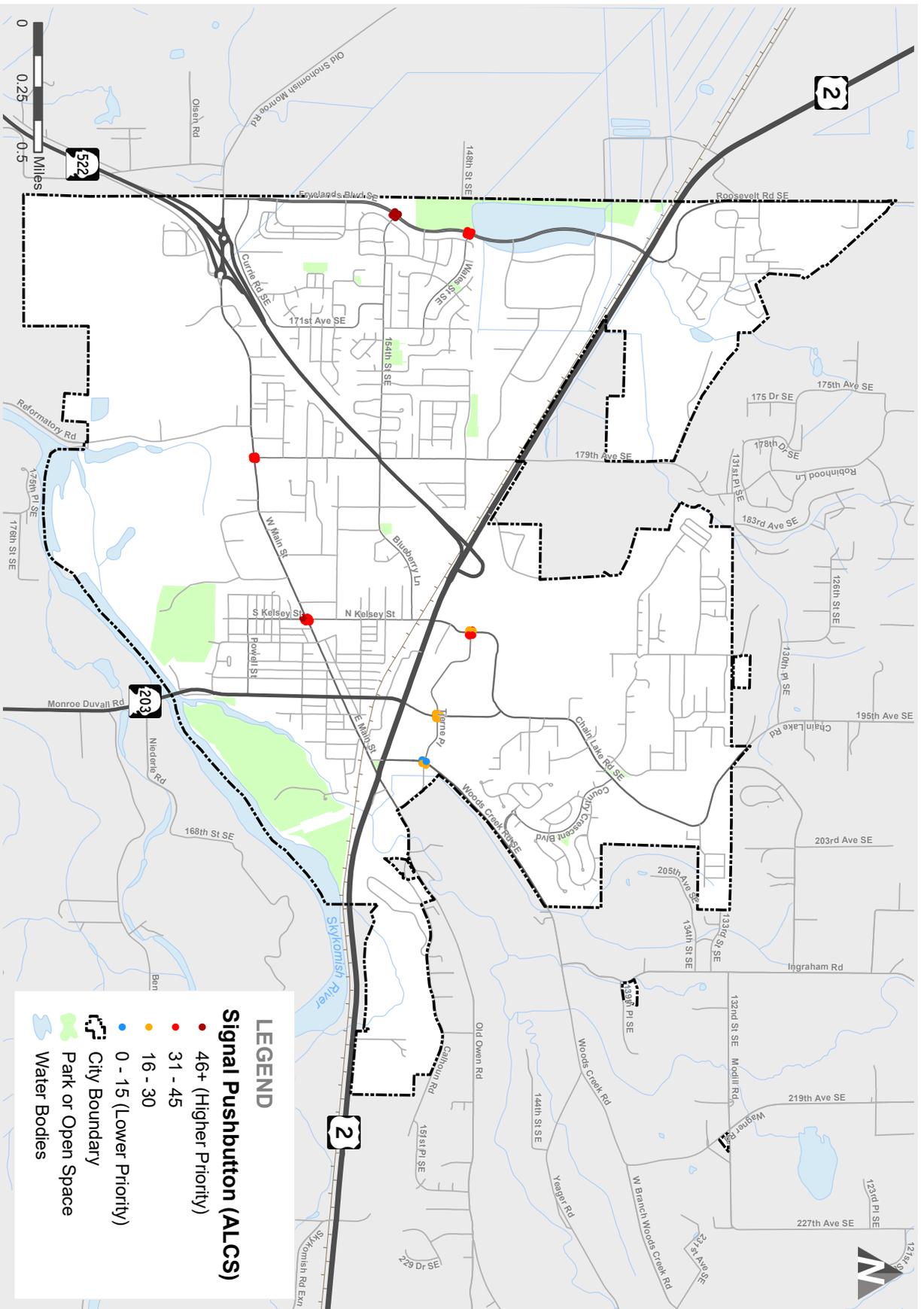
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FIGURE



monroe Accessibility (AIS) & Location (LIS) Combined Score (Curb Ramp) **FIGURE 4-8**
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Accessibility (AIS) & Location (LIS) Combined Score (Signal Pushbutton)

Monroe ADA Transition Plan

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FIGURE 4-9

4.2.2 Planning Level Cost Estimates to Remove Pedestrian Barriers

To meet the ADA transition plan requirement of demonstrating how barriers are to be removed over time, annual available financial resources were estimated and compared to the total estimated barrier removal costs.

Process

Unit costs were developed for the improvements needed to address the pedestrian barriers inventoried through the Self-Evaluation. Unit cost estimates for each barrier type were developed using recent WSDOT and other development construction bid tabulations, input from subject matter experts, and planning level cost assumptions. Unit cost estimates assumed contract-based construction, instead of use of in-house crews.

Unit cost estimates were applied to the inventoried barriers, with adjustments made to account for construction efficiencies and to avoid applying redundant improvements to the same facility. All cost estimates are in 2020 dollars. Cost estimate assumptions are detailed in Appendix G.

Barrier removal construction cost estimates account for contingency, design, right-of-way, mobilization, temporary erosion control, traffic control, and construction management. Sales tax, structural impacts to buildings, permit fees, inflation, and potential changes to accessibility standards are not assumed in the cost estimate.

This planning level cost analysis did not assess whether non-compliant pedestrian facilities had been built to the maximum extent feasible. Therefore, this cost estimate may overstate the amount of feasible improvements.

The total planning-level cost estimate, or total need, to remove all identified pedestrian barriers is approximately \$9,333,000 (in 2020 dollars). Cost estimates by facility and improvement type are shown in Table 4-2. In order to estimate the approximate increase in barrier removal costs due to inflation, it was assumed a third of the barriers would be removed by 2032 and two thirds of barriers would be removed by 2042. To streamline

Table 4-1 Estimated Funding Needed Due to Inflation

Year	% of Remaining Barriers	Funding Needed
2020 Cost Estimate	100%	\$9,333,000
2022	100%	\$9,902,000
2032	66%	\$8,872,000
2042	33%	\$5,962,000

calculations, it was assumed all spending for each third of barrier removal would occur in the first year of the ten-year interval. Table 4-1 shows the estimated funding needed at each ten-year interval using an inflation rate of 3%.

4.2.3 Barrier Removal Funding

A requirement of this plan is to forecast available funding that may be used to support plan implementation. This plan assumes total annual funding for barrier removal of \$340,000 per year for pedestrian barrier removal. A breakdown of the annual budget resources anticipated to be available to support pedestrian barrier removal implementation follows.

- Annual Road Maintenance Program, \$200,000
- ADA Transition Plan Program, \$140,000

To determine these annual estimates, historical data for each program was reviewed over the past three years to identify how much funding was related to ADA barrier removal for existing facilities. See Section 4.1 for details on these programs. These improvements may address low, medium, high, and very high priority barriers based on the location of a proposed larger project or maintenance program.

4.2.4 Schedule

Based upon the Self-Evaluation, planning-level cost estimates, identified barrier removal methods, and projected budgetary resources that may be available, a barrier removal budget and schedule was developed. Due to the large investment needed to remove accessibility barriers, it is important

Table 4-2 Planning Level Cost Estimate

Ada Deficiency	Improvement Types	Quantity	Unit Cost	Total Cost
Sidewalks				
Non-compliant sidewalk	Reconstruct, grind, or patch sidewalk.			\$2,884,000
				<i>Subtotal</i> \$2,884,000
Curb Ramps				
Non-compliant curb ramp	Remove and reconstruct existing curb ramp.	210 EA	\$7,000	\$1,470,000
Curb ramp without detectable warning surface (DWS) or poor condition DWS	Install/replace detectable warning surface (DWS)	515 EA	\$500	\$258,000
				<i>Subtotal</i> \$1,728,000
Pushbuttons				
Non-APS pushbutton and pushbutton is located incorrectly.	Install new APS pushbutton and new pole.	32 EA	\$5,900	\$189,000
APS pushbutton that has non-compliant dimensions and/or programming and located incorrectly.	Reprogram pushbutton, reorient pushbutton, and/or install tactile arrow and install new pole and relocate pushbutton.	6 EA	\$3,700	\$23,000
APS pushbutton located incorrectly.	Install new pole and relocate pushbutton.	10 EA	\$3,500	\$35,000
APS pushbutton that has non-compliant dimensions and/or programming	Reprogram pushbutton, reorient pushbutton, and/or install tactile arrow.	4 EA	\$200	\$1,000
				<i>Subtotal</i> \$248,000
				Total \$4,860,000
Contingency @ 20%				\$972,000
Design @ 12%				\$584,000
Mobilization @ 8%				\$389,000
TESC + Traffic Control @ 12%				\$584,000
Construction Management @ 20%				\$972,000
Right-of-Way Acquisition @ 20%				\$972,000
TOTAL 2020 DOLLARS				\$9,333,000

to identify the highest priority barriers and focus resources to remove them first.

An analysis of the barrier prioritization was completed to determine how many barriers found during the self-evaluation process are classified as 'very high' and 'high', 'medium', and 'low' priority as defined in Section 4.1. Highest priority level represents a significant barrier to accessibility in areas with higher pedestrian demand. Lower priority levels represent lesser barriers to accessibility in areas with lower pedestrian demand. Although

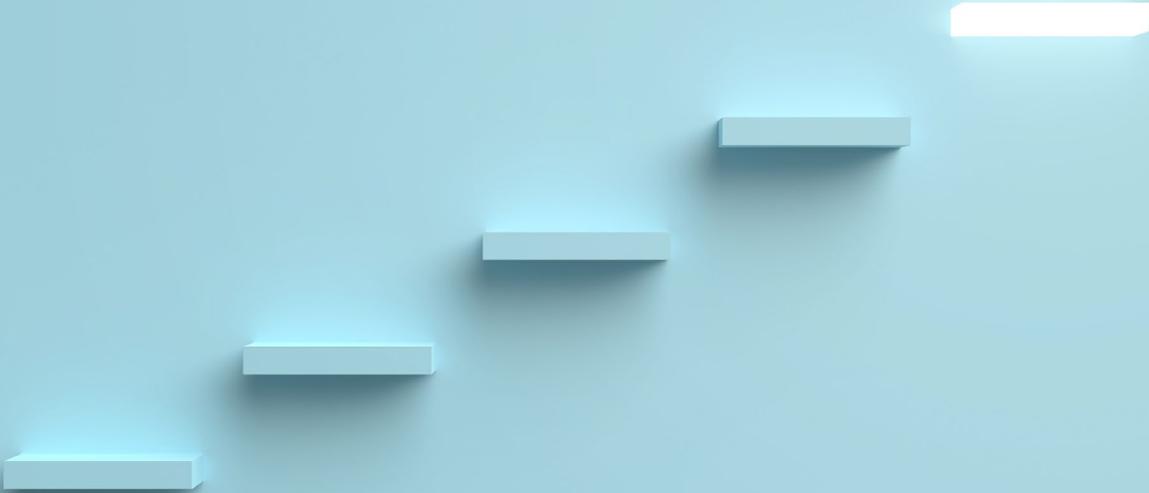
some facilities will receive low ratings, all barriers associated with them will still need to be removed and be determined to have been built to the maximum extent feasible.

A 30-year plan was developed to target removal of all barriers. The City should aim to remove the highest priority barriers first as target-able funding becomes available. This will support the goal of providing better access to the most needed programs in the shortest time frame possible.

The City should create a two to five-year barrier removal plan with a list of projects to remove specific barriers. This program should focus on the highest priority barriers as funding allows. The purpose of the repeated program is to make progress in barrier removal but also to provide a way to reassess the 30-year plan and measure incremental progress. In order to inform the two-to-five-year program, a scoping effort should occur that includes site visits for areas identified as a high priority to determine the severity of the barrier and to brainstorm possible solutions to fix the issue. When selecting projects, site conditions and improvement feasibility should be taken into account. Areas with multiple barriers within close proximity can be grouped together to achieve cost savings. As areas are identified, additional data collection should be completed in the vicinity of the proposed project and added into the facility's GIS database. The additional information will be able to provide the remaining attributes necessary to determine if a facility fully meets PROWAG requirements.

Following completion of each two to five-year plan implementation cycle, lessons learned regarding costs, methods, schedule, and outcomes shall be evaluated to inform the next two-to-five-year cycle of pedestrian barrier removal investments. If progress is slower than anticipated, additional funding may be required. If progress is faster than anticipated, a shorter timeline may be achievable. Several factors may contribute to differences between the estimated transition schedule and the actual rate and cost of implementation. Some of these factors include actual funding acquired, individual project cost, site specific design savings, additional deterioration of pedestrian facilities, and unanticipated capital projects. In addition, it may be determined that some barriers identified through this transition plan are on facilities that have been built to the maximum extent feasible as discussed in Section 5.1. Each project to remove barriers should be evaluated to determine if improvements to the facility are feasible in the engineering design phase.

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5 // Recommendations and Next Steps

This chapter provides a set of recommendations intended to inform the implementation of this Transition Plan and ongoing removal of pedestrian barriers. Recommendations are not presented in priority order and represent near-term and longer-term Transition Plan implementation work plan tasks.

5.1 Recommended Actions

Recommendation 1:

Update City design standards to match ADA Standards

Status: Underway

A detailed audit of City design standards using Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way 2011 (PROWAG) was conducted to inform Chapter 2. This audit, which is included in Appendix B and recommends specific changes and additions to the City's standard plans and municipal code. Recommendations were identified for updating existing sidewalk, curb ramp, and pushbutton standards and filling in ADA guidelines for areas not covered in the City's standards and code. The City should update these documents to meet PROWAG standards.

Recommendation 2:

Identify an official responsible for Transition Plan implementation within the Public Works Department

Status: Complete

Ben Warthan has been identified as the as the City's "ADA Coordinator." This role is one of the four major federal requirements for every ADA transition plan. The ADA Coordinator is responsible for facilitating transition planning such as responding to grievance requests. In addition to Ben Warthan, the Public Works director has been identified as the person responsible for implementing this plan. They will help maintain a consistent approach to barrier removal and achieving ADA standards across capital, maintenance, and operational activities.

ADA Coordinator:
Ben Warthan

806 W Main St
Monroe, WA 98272

360-863-4523(CITY)
TTY: 360-893-4626

bwarthan@monroewa.gov

Person Responsible for Plan Implementation:

Brad Feilberg, Public Works Director
bfeilberg@monroewa.gov

Recommendation 3:

Adopt a Citywide Accessible Pedestrian Signal (APS) policy

Status: Pending

Accessible Pedestrian Signal (APS) policies serve as a means for cities to be consistent with ADA requirements at traffic signals. The APS policy covers when installation of APS devices that “communicate information about pedestrian timing in nonvisual formats such as audible tones, verbal messages, and/or vibrating surfaces” (MUTCD, 2009) is required. The recommended APS policy is included in Appendix E.

Recommendation 4:

Educate City staff, consultants, and contractors on ADA standards

Status: On-going

Transition plans are often a learning experience for City staff, consultants, and contractors alike since they change existing practices and expectations. The City should use updates to the City’s design standards as an opportunity to teach and learn about accessibility and the barriers that those with limited mobility or sight experience when traveling in the City’s public right-of-way. Education can take many forms from review of updated design standards with key individuals such as field inspectors and contractors, development and review of City specific design standards or checklists with City engineers, or training from groups that serve those with disabilities.

Recommendation 5:

Develop a standard grievance process for barriers to accessibility

Status: Underway

Public entities subject to Title II of the ADA are required to adopt and publish a grievance procedure as part of their transition plan. A grievance process allows community members to formally report denial of access to a City facility, program, or activity on the basis of disability.

Currently, the City has a two-step process. First a community member can ask for an accommodation through a public access request. Available on the City website, is a form to fill out and return to the human resources director to ask for an accommodation. The form has spaces to provide contact information and describe the program, service, or activity that the applicant cannot access to their disability. The second step, a Grievance, is used to report denial of access to a City facility, activity, or program. A request for accommodation should be required prior to submitting a grievance. The request for accommodation and grievance form can be found in Appendix I.

The following adjustments are recommended to the City’s accommodation request and grievance process:

- Ensure a request for accommodation and grievance can be completed in-person, by telephone, by mail, or via e-mail and documented by the City of Monroe. Information on how to file this should be easily accessible.
- Ensure access requests are also provided to the ADA coordinator in addition to the human resources director.
- A standard number of days should be established by the City to respond to a request for accommodation and grievance.
- A clear process for appeal of a Grievance decision should be communicated if a denial is issued.
- Make the service request/grievance process easily navigable from the main website.

- Revise the City's website to define the service request/grievance process more clearly as a two-step process and provide clearer directions on how to follow these steps.
- Ensure that the City's website and pdf forms are accessible using common screen readers and provide alternative ways of filing this form. This could include providing a fillable web form and/or contact information to submit a service request or grievance verbally as alternatives to the existing pdf form.
- Add a self-evaluation process in the request for service stage that includes additional data collection in the area of the complaint. Use this additional data collection to supplement the existing inventory database and to better inform the response to the service request.
- Connect the reporting tool used in the public engagement effort for this plan to the request for accommodation web page.

Recommendation 6:

Develop a consistent and centralized Maximum Extent Feasible documentation database

Status: Pending

The ADA dictates that alterations that could affect the usability of a facility must be made in an accessible manner to the maximum extent feasible (MEF). ADA Standards for Accessible Design (2010) dictates that:

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

The City should document newly constructed or altered facilities that have been built to the maximum extent feasible rather than full ADA standards using standard template. An example template is included in Appendix F. Each project is to be evaluated to determine if improvements to the facility are feasible in the engineering design phase.

The reason for any variation from accessibility standards when it is infeasible to fully remove any barriers should be documented. To help organize MEF documentation, a central location for all MEF documentation can be established and geocoded to the facility location and ensure consistency of data for facilities designed and constructed by others. Consolidation of past MEF records into this data is also recommended.

Recommendation 7:

Develop performance measures and processes to track removal of barriers

Status: Pending

The primary purpose of an ADA transition plan is to develop a plan for removal of accessibility barriers. To show progress towards this requirement, the City should develop a process of tracking barrier removal on a year-by-year basis. It is recommended that the City actively update the GIS ADA self-evaluation database developed for this plan, tracking how and when ADA barriers are removed. This data can be used to provide two-to-five-year updates on progress and demonstrate to the public as well as federal regulators that the City is making progress to meet Title II requirements. These updates should coincide with the two-to-five-year planning efforts completed to outline future barrier removal efforts.

Recommendation 8:

Continue data collection for pedestrian features in the public right-of-way

Status: Pending

The City should continue their data collection efforts to complete their database of pedestrian facilities in the public right-of-way. Attributes that are part of the PROWAG standards but not included in the first round of collection should be added to the GIS database as well as new types of facilities not inventoried like street parking, crosswalks, and bus stops. As construction projects within the City enter into the as-built phase, pedestrian facility data should be collected and entered into the GIS Database to enhance the barrier removal tracking process.

Recommendation 9:

Review policies relating to accessibility through construction zones and update or clarify as needed

Status: Pending

Work zones must provide the same level of accessibility as permanent pedestrian facilities covered by ADA requirements. Pedestrian accessibility must be maintained in areas of street construction and maintenance.

The City should review its standards and policies to ensure that temporary, alternative walking routes are available within designated construction zones.



