

## ADA POLICY IMPLEMENTATION:

The following documents are available for review by the public:

[Camas ADA Self Evaluation Report](#)

[Camas ADA Transition Plan DRAFT](#)

Comments for inclusion in our draft review should be submitted to the City of Camas no later than September 30, 2016.

Comments should be addressed to:

City of Camas Engineering Department  
ADA Transition Plan Comments  
616 NE 4<sup>th</sup> Ave  
Camas, WA 98607

or you can reach us by email at:

[engineering@cityofcamas.us](mailto:engineering@cityofcamas.us)

or you may call us at:

(360) 817-1563 (Dial "1" for Public Works Administration)

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[CITY CONTACT INFORMATION – ADA ISSUES WITHIN THE CITY RIGHT-OF-WAY](#)

## CITY CONTACT INFORMATION – ADA ISSUES WITHIN THE CITY RIGHT-OF-WAY and POLICY COMMENTS

In accordance with the requirements of the Americans with Disabilities Act of 1990 (“ADA”) the City of Camas Public Works Department is committed to meeting all requirements of the ADA in the public right-of-way. Specifically we are committed to providing the City of Camas with ADA compliant infrastructure and addressing citizen concerns about areas of need.

IF YOU HAVE AN ADA RELATED CONCERN SPECIFIC TO PUBLIC ACCESS IN THE RIGHT-OF-WAY:

Call Public Works Administration at:

(360) 817-1563

(Push “1” for Public Works Administration)

Persons who are deaf or hard of hearing may make a request for alternative formats through the Washington Relay Service at 7-1-1.

Interpretation / Translation services are available upon request.

You should receive a response the same day during normal business hours, but typically no longer than three business days.

ADA related concerns are taken very seriously. If it is an issue of correcting a hazardous situation, the City will typically respond within 24 hours.

IF YOU HAVE AN ADA GRIEVANCE RELATED TO THE RIGHT-OF-WAY THAT HAS NOT BEEN SATISFACTORILY ADDRESSED ABOVE THEN CONTACT:

James Carothers, PE, Engineering Department Manager

City of Camas  
616 NE 4<sup>th</sup> Ave  
Camas, WA 98607

Phone: (360) 817-1561

FAX: (360) 834-1535

[jcarothers@cityofcamas.us](mailto:jcarothers@cityofcamas.us)

## DOCUMENT RETENTION POLICY:

Service request and complaint files will be retained for three years from the date of request.



## SELF EVALUATION REPORT FOR THE PUBLIC RIGHT OF WAY

May 7, 2015



Prepared for:  
**The City of Camas Public Works Department**

Prepared by:  
**HDJ Design Group PLLC**  
in conjunction with:  
**Urbane Streets**



## **Mission Statement**

*The City of Camas commits to preserving its heritage, sustaining and enhancing a high quality of life for all its citizens, and developing the community to meet the challenges of the future. We take pride in preserving a healthful environment while promoting economic growth. We encourage citizens to participate in government and community, assisting the City in its efforts to provide quality services consistent with their desires and needs.*

## **Americans with Disabilities Act & Title VI information**

**Americans with Disabilities Act (ADA) Information:** Materials can be provided in alternative formats by contacting Jim Carothers, pending ADA Facilitator/Point of Contact Person for the Public Right of Way at 360-817-1561 x4230 (voice) or [jcarothers@cityofcamas.us](mailto:jcarothers@cityofcamas.us) (email). Persons who are deaf or hard of hearing may make a request for alternative formats through the Washington Relay Service at 7-1-1.

**Title VI Notice to Public:** It is the City of Camas' policy to assure that no person shall, on the grounds of race, color, national origin or sex, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, be denied the benefits of, or be otherwise discriminated against under any of its federally funded programs and activities. Any person who believes his/her Title VI protection has been violated may file a complaint with the Title VI Coordinator. For Title VI complaint forms and advice, please contact the City's Administrative Services Director who is the Title VI Coordinator at 360-817-7013 (voice).



## **Acknowledgements**

### **The City of Camas City Council**

Scott Higgins, Mayor  
Greg Anderson  
Bonnie Carter  
Don Chaney  
Tim Hazen  
Steve Hogan  
Melissa Smith  
Shannon Turk

### **The City of Camas**

Pete Capell  
James Carothers  
Wes Heigh  
Jeff Englund  
Jim Hodges  
Ronda Syverson

### **ADA Community Advisory Committee for the Public Right of Way**

Tom Anderson  
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## Overview

The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 requires cities with more than fifty employees to prepare a Self-evaluation and ADA Transition Plan. The Self-evaluation activity is intended as an inventory of existing conditions of the physical conditions, as well as policies and procedures. The ADA Transition Plan is intended to build on the ADA Self-evaluation Report and provide a formal assessment as to how to eliminate barriers to the disabled.

The City of Camas has an existing ADA Transition Plan for its public buildings, hiring practices, and meeting procedures. The current effort is intended to address the built environment in the public right of way. The ADA and Section 504 emphasize that cities engage members of the disabled community in preparing their Self-evaluation Report and ADA Transition Plan.

The goal of this process is to complete a high quality ADA Transition Plan covering the near term for the City of Camas that reflects public input, especially from members of the disabled community.

## Public Right of Way Facilities Self-evaluation Report

The Americans with Disabilities Act requires public participation in the preparation of the Self-Evaluation Report. This self-evaluation report focuses on the public right of way with a primary emphasis on public streets. The City of Camas has invited community members to participate in a community advisory committee. Staff and their representatives prepared “findings” for the committee to consider that will be used to prepare the ADA Transition Plan, which will be a living document that will establish a list of high priority projects for approximately the next ten years.

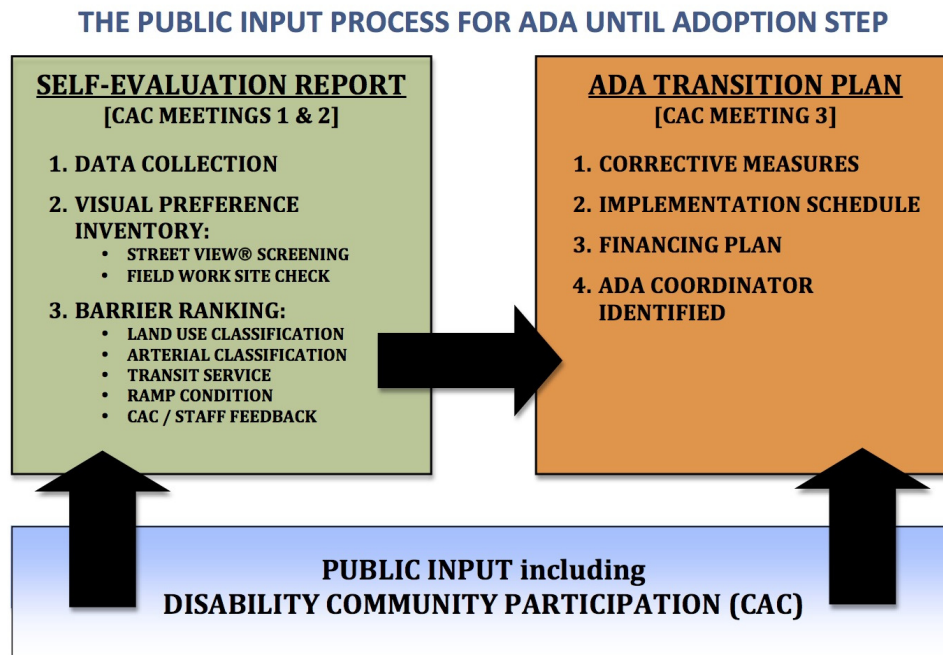
The Sidewalk Self-Evaluation Report and ADA Transition Plan will go before City Council for final approval.

### Self-evaluation Report for the Public Right of Way

The Self-evaluation Report should produce the minimum:

- A list of interested persons consulted;
- A description of the policy areas and procedures examined and any problems identified;
- A description of any modification made;
- A citizen comment / grievance procedure related to sidewalk accessibility; and
- A designated individual to oversee the ADA Transition Plan.

Figure 1: Flowchart of the public process



*Urbane Streets 2014*

### The ADA Transition Plan for the Public Right of Way

The Self-evaluation Report is then used to prepare an ADA Transition Plan that will be used to develop a schedule for correcting barriers to the disabled community.

## City of Camas Public Right of Way Policy and Practices Review

### Summary

The Department of Justice provides a Title II Checklist for local governments to use to evaluate their compliance under the Americans with Disabilities Act. See Appendix A for the Title II checklist. The findings from this process were then used to develop the recommendations for changes in policies and practices. These were prepared to assure the City of Camas is in overall compliance with Title II of the ADA and in doing so meeting the needs of the community. A full listing of each finding with its corresponding recommendation(s) can be found in Appendix B.

The City of Camas' Transportation policies and procedures were reviewed with respect to compliance with Title II requirements and to verify if such are creating barriers denying access to transportation facilities in the public right of way.

This included review of:

- The Transportation component of the City's Comprehensive Plan;
- City of Camas Municipal Code, Title 12.04 020: Streets and Sidewalks;
- City of Camas Standard Plans and Street Standards; and
- Clark County Bicycle and Pedestrian Master Plan (2010).

## Findings

The recently updated City of Camas Design Standard Manual (October 2014) details included are in compliance with current ADA standards.

There are additional design issues and decisions that can be addressed, such as retrofitting urban streets often requires maneuvering around utility poles, adding ramps when sidewalk gaps are located midblock, and other obstructions, as well as complications not covered in the Camas Design Standards Manual. Many self-evaluations find that these physical gaps often occur at the edge of new developments or during half street improvements when one side of the road is compliant but not the other. This can be accomplished by supplementing the current street details with the current standards, such as the WSDOT Design Manual or the WSDOT Field Guide for Accessible Public Right of Way, 2012 Edition. Citizen committees will find the latter document is more user friendly.



**Figure 2: Examples of accessibility barriers in a developing pedestrian network**

## Recommendation 1:

Modify the Camas Design Standard Manual to include reference to the WSDOT Field Guide for Accessible Public Right of Way, 2012 Edition.

## Findings

The City of Camas Design Standard Manual does not provide staff specific direction about what alterations to an existing roadway facility triggers the need to upgrade a facility to meet ADA standards related to providing curb ramps at pedestrian crossings.

### **Recommendation 2:**

Modify the Design Standard Manual to include specific policies and procedures to assure that altered pedestrian crossings are upgraded to full ADA standards.

### **Findings**

In projects where this is necessary, take special care during the construction inspection to verify the ramp dimensions meet the design. Through the design, construction, and inspection process the resulting curb ramps are sometimes found out of full compliance in the final inspection. In some projects with federal funding, agencies have been made to replace newly constructed curb ramps that are out of compliance.

### **Recommendation 3:**

Modify the City's Design Standard Manual to warn against designing to the maximum or minimum dimensions allowed.

### **Findings**

It is important to note that the US Department of Justice does not consider cost as a valid consideration, but the federal accessibility standards only require compliance within the scope of the project.

If the original scope of work only included replacing the ramps, then reconstructing the whole intersection to meet grades is an example of major scope of work change that can be used to rationalize not needing to complete all ADA standards for a single intersection.

### **Recommendation 4:**

Modify the City's Design Standard Manual to include documentation of criteria that prevent specific locations from meeting full ADA compliance, such as right of way purchase or utility relocation, when these are not required elsewhere in the project.

### **Findings**

With alteration, ADA upgrades are required at traffic signals to meet the 2009 edition of the Manual on Uniform Traffic Control Devices (MUTCD) standards for accessible pedestrian signals (APS). Most traffic signals in Camas do not meet APS standards at this time.

### **Recommendation 5:**

Upgrade traffic signals at high priority locations that do not meet current reach standards for either height or distance. As traffic signals are modified, they all should be upgraded to current APS standards.



**Figure 3: Examples of pedestrian push buttons, inaccessible versus accessible**

### Findings

Washington State Law requires upgrade of sidewalk ramps across the street but only requires one (1) additional receiving ramp.

### Recommendation 6:

Modify the City's Design Standard Manual to include documentation that requires a matching sidewalk ramp at the other end of a crosswalk, if the sidewalk and curb exist, so as to comply with RCW 35.68.075(3).

### Findings

The provision of accessibility for persons with disabilities through construction work zones and severe weather is an important issue as our communities become more accessible on a day-to-day basis. This has become an emerging topic of awareness for staff at local governments, as citizen expectations concerning mobility grow. All agencies are required to maintain accessibility that includes pedestrian facilities impacted by overgrown vegetation, snow/ice, severe heaving/cracking of surfaces, construction work zones, and so on, as called for in Chapter 29.3 of the WSDOT LAG Manual. For example, when streets are de-iced/ plowed of snow or swept, Camas should consider also performing the same maintenance tasks on the adjoining sidewalks and curb ramps, especially along transit routes and stops. The same evolution of access is currently occurring within construction work zones by providing temporary ADA ramps or trench crossings; and pathway fencing is now more common, where once projects only used caution tape and did not include ADA ramps with a protected detour route.

### Recommendation 7:

Modify the City's maintenance procedures to assure the transit routes are barrier free due to damage to walkways, snow events on snow routes, and, update pedestrian detour plans in construction zones to maintain access to the disabled.





**Figure 4: Examples of work zone accessibility, inaccessible versus accessible**

### Findings

“Reasonable” access can be provided by many sub-standard curb ramps. ADA upgrades to existing sidewalks and curb ramps are expensive and funding is limited. In Clark County, Community Development Block Grant (CDBG) funds are programmatically restricted to the construction of new ramps and do not cover the upgrade of existing sub-standard ramps. The inspection of ramps throughout Camas and other small communities throughout Washington State finds a high percentage of ramps within the public right of way out of full compliance with the ADA.

While reasonable access can be provided by sub-standard curb ramps, direction is still needed by staff, as to which sub-standard curb ramps are a priority and should be replaced. To do this, a ranking of replacement ramps is recommended to make best use of scarce resources.

The following criteria were prepared to assist in the inventory and prioritizing locations for replacement of substandard ramps. For projects that “alter” existing pedestrian crossings with substandard curb ramps, particularly at an important destination, any facility defect may require replacement or upgrade.

### Recommendation 8:

To assist in the inventory process, the following criteria are recommended to rank ramps for replacement:

#### High need for replacement:

- Lack of level landing;
- Obstructions or damaged sidewalks;
- Steep grade on ramp throat or ramp wings; or
- A half of an inch or more lip at the curb gutter.

The above deficiencies in curb ramps create a barrier to mobility.



### **Medium need for replacement:**

- Level landing near ramp;
- No obstructions or tripping hazards; and
- Less than one quarter of an inch lip at curb gutter.

These are the borderline sidewalk ramps that may be a barrier to accessibility. In some cases they may be upgraded with minor improvements such as a retrofit warning pattern or grinding the curb to eliminate too high of lip.

### **Low need for replacement:**

- Ramps with detectable warning patterns;
- Level landing behind ramp;
- No obstructions such as utility poles or tripping hazards (one half of an inch high uplifted sidewalk panel);
- Less than a one quarter of an inch lip at curb; and
- The ramp throat is less than three feet wide.

### **Findings**

The Department of Justice (DOJ) provides precedence with the “Safe Harbor” (§ 35.150(b)(2)(i)) provision that does not require upgrade of substandard ramps built before 2012 and meet the 1991 standards unless they are part of a planned alteration. Any street pavement restoration project or other physical alteration that affects a pedestrian crossing after 2012 are required to be upgraded by the US Department of Justice.

### **Recommendation 9:**

Review pavement management program for streets altered after 2012. Program ADA improvements at these pedestrian crossings in the next phase of the ADA Transition Plan.

### **Findings**

Fixed route transit provides persons with disabilities an important option for mobility; C-TRAN Route 92, though limited in service hours, proves riders with an important transportation option, and one that does not require making an advance reservation.

### **Recommendation 10:**

Check that sidewalk work planned and standard details affecting arterials with fixed route transit service accommodate the eight-foot deep transit loading pads and bus shelter pads as needed. Coordinate with C-TRAN staff during the review process. Use C-TRAN’s 2007 bus stop design guidelines when appropriate.

### **Citizen Request and Grievance Procedure**

The City of Camas is required to adopt and publish procedures for resolving requests and/or grievances arising under Title II of the ADA. The procedure is intended to set out a formalized system for resolving complaints of disability discrimination within the time periods set forth. It is important that complaints are resolved in a timely manner and at the local agency before they

are directed to the US Department of Justice. See Appendix A for more information on the content of the checklist.

### **Findings**

The City of Camas currently reacts to citizen requests concerning ADA barriers on existing public transportation facilities through a three-step approach:

1. All publicly reported comments are logged by the Senior Administrative Support Assistant;
2. The requests are then prescreened for responsibility by the Senior Engineering Technician; and
3. The Engineering Manager undertakes the resolution of the complaint.

### **Recommendation 11:**

The City of Camas should adopt a formal Citizen Request and Grievance Procedure as outlined in Appendix F, and have this document prepared in alternative formats. The City of Camas should give priority to requests for ADA upgrades, but if a request is reviewed and found that it is not appropriate to fulfill then a meeting should be set up to discuss such a response should occur within the fifteen day time period set forth by the US Department of Justice. Additional information about the appeal process to the City Administrator and its deadlines must be included in the follow up notification if no resolution is reached.

### **ADA Facilitator/Point of Contact Person for the Public Right of Way**

The selection of the City's ADA Facilitator/Point of Contact Person for the Public Right of Way was one of the first actions undertaken by this process. The City of Camas has designated James Carothers, Engineering Manager, as its first ADA Facilitator/Point of Contact Person for the Public Right of Way. This action formalizes his current role in processing citizen requests at the City for ADA barriers in the public right of way.

The City Administrator will continue with their existing responsibilities for Civil Rights under the Title VI Program.

### **Recommendation:**

The City of Camas shall make available to all interested people the name, office address, and telephone number of the ADA Facilitator/Point of Contact Person for the Public Right of Way. Additionally, the city should post on its website if individuals needing a (TTY) teletypewriter / text emulator to communicate should dial direct a city phone number or dial 711 at the state.

## **Public Involvement Process**

### **Public Notice:**

Public notice of the Self-Evaluation and the ADA Transition Plan is required throughout the process. It should include at a minimum:

- Providing opportunity to comment on the development of the Self- evaluation Report and ADA Transition Plan through the citizen committee and press releases for each committee meeting.
- Keeping record of comments received for 3 years.
- Keeping the Self-Evaluation Report and ADA Transition Plan available to the public.

### Public Outreach

The participation element for this report was conducted through repeated public advertisement of this planning activity in newspapers of public record, public bulletins, and word of mouth spread through local service providers. The message included the opportunity to serve on the future advisory committee when formed and that the City meetings were open to attendance for all. There was some initial difficulty at identifying potential local committee members, as Camas is a small city with many specialized resources located in the larger adjoining communities. But this was overcome through the dedicated assistance of the C-TRAN staff that was well acquainted with potential candidates.

### Agencies & Service Providers:

- C-TRAN;
- Clark County Community Services;
- Northwest ADA Center;
- People First of Clark County/ ARC of SW Washington;
- Prestige Care and Rehabilitation of Camas;
- Vancouver Housing Authority;
- Washington State Division of Vocational Rehabilitation;
- Washington State School for the Blind; and
- Washington School for the Deaf

These entities when approached were very interested in making their community a better place and eagerly supported the process. This committee once formed was composed of persons with disabilities, formal service providers, and informal caregivers. Additionally, an attempt was made to select participants with direct experience travelling independently through most districts of Camas and with a range of physical mobility such as: low vision, ambulatory with aid of a cane or walker, power wheel chair, etc. so that any feedback from the committee on barriers in the public right of way would be both comprehensive (as to aid) and broad (type or location of barrier).

The City Hall was chosen as the meeting location because of its central location and being fully accessible. Meeting dates were established to avoid summer and winter holidays. The meeting times and room access were organized, so as to allow paratransit service drop off and pick up before the 7:15 PM service end for the Camas area. Additionally, for our visually impaired committee member the prepared meeting agendas and other materials were provided in text format via email for their conversion into Braille, as requested. Other documents, such as maps were verbally described in detail.

### **Process Kick-Off Meeting with City of Camas Staff**

On August 28, the project self-evaluation process started off with a meeting with City staff from the public works department to discuss how ADA requests are managed within the City for the public right of way. There are three primary sources to fund the reconstruction of sidewalk and curb ramps to remove ADA barriers: annual CDBG grant awards for ramps, the City reconstruction activities when ad hoc requests/ complaints are made by citizens, and by property owners when properties are developed or complaints arise. The meeting also included discussion of which City staff position would be best to be the future ADA Facilitator/Point of Contact Person for the Public Right of Way.

### **ADA Community Advisory Committee for the Public Right of Way**

The Community Advisory Committee (CAC) assisted the Public Works Department and consultant staff in the preparation of the City-wide Self-evaluation and ADA Transition Plan for the public right of way during three meetings held during the fall and winter of 2014.

### **Objectives**

1. Establish criteria to prioritize locations;
2. Prioritize the streets for high, medium and low need to remove barriers to the disabled;
3. Establish a list of projects that will eliminate barriers in the public right of way at high priority locations;
4. Establish a schedule for completing the high priority projects;
5. The ADA plan will provide City staff with policy and procedure recommendations to deal with ADA upgrades in the future as opportunities presents themselves; and
6. Complete the plan with three CAC meetings, as a minimum.

The committee assistance focused on setting criteria for prioritizing locations, providing feedback on the locations for ADA upgrades, on the scope of work for high ranked projects and the schedule for completion.

### **CAC Meeting One Findings – September 30**

The first CAC committee meeting established the project outcomes and meeting processes for the CAC members. The CAC members discussed their broad interests and motivations for assisting the City of Camas with reducing barriers in the public right of way. They also discussed what geographic areas of the city and destinations they frequently used and which ones the CAC may want to be included in the high and medium priority list.



**Figure 5: CAC members at work, in meeting and in field accessibility tour**

### **Project Workshop with the Mayor and City Council – November 3**

The project added a workshop with City Council on November 3 to the public process scope of work. This change was an opportunity to raise their awareness of the public comments generated by the Self-evaluation process in regards to common barriers experienced by our CAC representatives and geographic areas that would likely be targeted in the upcoming ADA Transition Plan project list.

### **CAC Meeting Two Findings – November 4**

The second CAC meeting focused on the CAC members and staff review of the emerging high and medium priority locations generated out of the initial project screening process. The CAC members reiterated that the zone around the Crown Point Park should be a high priority area due to the importance of the City recreational facilities there for persons with disabilities and the proximity to the Vancouver Housing Authority’s affordable housing units. Additional locations and corridors were added to the review process at the request of the CAC, such as private medical offices. A few proposed locations were removed due to recent or pending capital contraction work. This discussion often led to secondary but important issues of the range of design enhancements that each location could see in the future, such as the role of pedestrian refuges, signal timing, and traffic speeds play in accessibility; especially for the elderly in crossing accessible streets. The CAC discussed and accepted the consultant’s recommendation to classify intersections among the “highest” priority locations due to a barrier there affecting access to two or more arterials. These locations also often provided access to fixed route transit stops.

### **CAC Meeting Three Findings – December 9**

The third CAC committee meeting finalized the Self-evaluation report findings and focused on the ADA Transition Planning. There was much discussion in the CAC of the role of the ADA and a clarification that it does not directly fund projects even though the ADA is a federal legal mandate. This then led to defining what the CAC’s vision of ADA was for Camas and how this would be reflected in the projects ranked highest versus lower priority locations. The cost of project treatments were reviewed individually and as a whole in light of what local and grant funding exists in the region on any given year.

## CAC Field Workshop on Physical Barriers in the Right of Way

The Community Advisory Committee members and City staff also participated in a field tour of common accessibility barriers affecting urban transportation facilities over their lifespan. The following design issues were identified and discussed during September 30:

- Marked crosswalks with missing sidewalk ramps;
- Ramp directionality (oblique versus parallel to a crosswalk);
- Out of compliance sidewalk ramps (slope and missing landing);
- Sidewalk problems (panel lift, gaps and curb lips);
- Traffic signal accessibility (walk cycle lengths, APS, push button locations); and
- Other barriers (vegetation, trash cans, street furniture, etc.).



**Figure 6: Examples of levels of accessibility experienced during the CAC field tour, such as a missing ramp and a ramp with an outdated design**

See Appendix C for more information on the CAC and materials from meetings.

## Inventory

### Public Facilities in the Right of Way Ranking Criteria Methodology

The outcome of ranking projects is to facilitate the management of the “need” with the resources available to complete the objective of making all public pedestrian facilities accessible.



The action of ranking projects is a function of the following criteria:

- **Collision History** for pedestrians and bicyclists (vulnerable roadway users) is used to quantify risk exposure for persons with disabilities;
- **Government Buildings** that are important destinations for all citizens.
- **Roadway Classification** for arterials, not local streets; is a measure of greater exposure (higher risk) to traffic injuries;
- **Land-use Zoning** of commercial, not residential land, is used to measure likelihood of pedestrian traffic generation;
- **Medical Services** and other facilities important to persons who are disabled;
- **Fixed Route Transit Service** is used to measure likelihood of pedestrian traffic; and
- **Committee Identified Priority Sites** these locations have been identified through the CAC public process and added to the priority list based on local knowledge for as facilities important to persons who are disabled.

Pedestrian safety is an important consideration in ranking potential sites and can be done based on exposure to high volume and high-speed motor vehicle traffic. Typically the arterial roadway classification is a good starting point for judging the likely exposure levels, as higher order arterials have more than collector or local streets. Thus high priority locations have most if not all criteria present while medium have fewer. And any public streets not listed below are considered low priority, as they generally have low traffic volumes in residential areas and often are without reported crash history. These street facilities also generally do not have transit service or public facilities serving persons with disabilities thus reducing their importance for this community wide planning process.

The priority locations are also organized by type (intersection, corridor, and area) for purposes of easier discussion in identification and treatment types. All facilities types are collectively equal within each priority tier. The type of location becomes important later when mitigations or treatments are proposed.

See Appendix D for high and medium priority location memo and maps.

### Summary of inventory:

Based on field observations of the public right of way, the City of Camas provides reasonable access throughout the community. Most intersections with sidewalks have curb ramps. The older ramps are not compliant by today's standards but most provide reasonable access. The downtown intersection and sidewalk are good examples of sidewalks that do not meet all standards but are very accommodating. The sidewalks on newer streets, especially the newer arterials, where constructed under the ADA standards of the day. These ramps provide reasonable access and should be a low priority to be replaced due to their functionality for the interim period.

The two areas where curb ramps are frequently substandard are the lip where the sidewalk ramp meets the gutter at street level and the lack of the detectable warning pattern for the

sight impaired. The lip at the gutter should be flush or no greater than one quarter of an inch in height. Older ramps do not have the warning pattern to provide a notice to the sight impaired they are about to enter a vehicle travel way. With modern concrete grinding equipment and after-market detectable warning panel, it is assumed these ramps can be quickly improved and at a reasonable cost overall.

The field inspection of existing sidewalks noted many locations with damage that exceeded ADA standards. These were listed in the inventory of the sidewalks. Most of these are along private property frontages and were considered to be the responsibility of the butting property to address, per city code. In some cases, sidewalk was missing but ADA does not require sidewalk construction just that new and existing sidewalk do not pose a barrier. In some case with short sections of missing sidewalk, installation was recommended.

Driveway approaches are a challenging consideration. Most sidewalks attached to the curb have driveways too steep to meet ADA standards. The field inventory considered that a driveway approach less than eight feet in sidewalk width was so steep in cross slope, so as to be a physical barrier and need to be replaced. And a driveway approach wider than eight feet provided reasonable access even though they may not meet ADA standards for cross slope.

As discussed in the City of Camas Public Right of Way Policy and Practice Review section, staff were supplied with inventory criteria to prioritize work at each location based on reasonable access at existing curb ramps, sidewalks and traffic signals. Each high priority location was further ranked for the need to replace the existing facility based on the level of barrier to the disabled. See Appendix E for details on the ranking of criteria for barriers.

To facilitate planning level estimates of ADA upgrades, the City of Camas' standard plan detail(s) was listed, when applicable, as a recommendation for the scope of the work for the upgrade. Each upgrade was assigned a planning level cost estimate that includes most construction cost such as construction cost, construction administration, traffic control and mobilization but does not include design engineering and right of way.

At traffic signals with one pedestrian push button substantially out of compliance (high priority for replacement), all APS upgrades were assumed at the intersection. See Appendix E for the inventory of high-ranking locations.

## **The Self-evaluation Report Conclusions:**

- The City of Camas has reasonably good ADA access to transportation facilities in the public right of way;
- The City of Camas' policy and practices should be modified per the recommendations of the Self-evaluation Report;



- Modifications are necessary to achieve ADA compliance and an ADA Transition Plan is required;
- The inventory of high priority locations should be included in the ADA Transition Plan and ADA improvement scheduled at locations that are a barrier to persons with disabilities;
- Locations with a full height curb should be addressed first, as they are major barriers to the disabled community;
- Sidewalks and pedestrian crossings in need of substantial repair should be addressed, as a second priority;
- Traffic signals with pedestrian push buttons beyond the reach standards for ADA should be the highest priority for Accessible Pedestrian Signal upgrades;
- Curb ramps without detectable warning patterns or a lip of over a half of an inch at the center, should be third priority for minor upgrades; and
- Adopt the US Department of Justice ADA Grievance Procedure Under the Americans with Disabilities Act.

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## ADA TRANSITION PLAN FOR THE PUBLIC RIGHT OF WAY

May 7, 2015



Prepared for:  
**The City of Camas Public Works Department**

Prepared by:  
**HDJ Design Group PLLC**  
in conjunction with:  
**Urbane Streets**





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## Overview

The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 requires cities with more than fifty employees to prepare a Self-evaluation Report and ADA Transition Plan. The ADA Transition Plan is intended to build on the self-evaluation and provide a plan to eliminate barriers to the disabled.

The City of Camas has an existing ADA Transition Plan for its public buildings, hiring practices, and meeting procedures. The current effort is intended to address the built environment in the public right of way. The ADA and Section 504 emphasize that cities engage members of the disabled community in preparing their Self-evaluation Report and ADA Transition Plan.

The guidance in this document is based on the Washington State Department of Transportation Local Agencies Guide (LAG) manual. Using the results of the self-evaluation, the ADA Transition Plan shall include, as a minimum:

- Identify the physical obstacles that limit accessibility;
- Describe in detail what will done to make the facilities accessible;
- Specify the schedule for each facility and or obstacle to be retrofitted; and
- Identify the individual responsible for the implementation of the plan.

Many agencies throughout the US are behind in implementing all current ADA and Section 504 regulations. With the tremendous cost of ADA improvements, this is not surprising, but it is important to remember that ADA improvements benefit many users of the public right of way. Pedestrians are less like to trip on up-lifted sidewalk sections, children can easily access the sidewalk using ramps while they learn to ride a bike, and most all, as the citizens of Camas age, accessibility will be critical to maintaining quality of life, as they seek to age in place.

## Executive Summary

This ADA Transition Plan focuses on the transportation facilities in the public right of way. The City's Self-evaluation Report identified high priority locations and high priority improvements within those locations. It also provides recommendations on policy and procedures related to accessibility. The ADA Transition Plan will recommend a list of high priority projects to bring the City into compliance with the Americans with Disabilities Act.



## The City of Camas Self-evaluation Report Conclusions:

Based on the findings of the Self-Evaluation Report concluded that:

- Modifications are necessary to achieve ADA compliance and an ADA Transition Plan is required;
- The City of Camas's policy and practices should be modified per the recommendations of the self-evaluation. Appendix A includes the recommendations from the initial Self-evaluation Report related to Public Works Policies and Procedures;
- A public process was conducted to elicit comments from the disabled community on locations that are a concern and on proposed improvements;
- Locations with a full height curb should be addressed first, as they are major barriers to the disabled community;
- Sidewalks and pedestrian crossings in need of substantial repair should be addressed, as a second priority;
- Curb ramps without detectable warning patterns or a lip of over a half of an inch at the center, should be third priority for minor upgrades; and
- Traffic signals with pedestrian push buttons beyond the reach standards for ADA should be the highest priority for Accessible Pedestrian Signal upgrades.

Appendix C provides a list of high priority projects and a proposed schedule based on assumed funding sources.

## Vision, Goals and Objectives:

Good planning efforts rely on vision, goals, and objectives statements to assure successful outcomes. The following proposed statements are intended to provide the citizens, City Council, and the staff of Camas a clear direction that the plan will lead them forward.

### Vision:

Camas is renowned as a healthy, vibrant community with high pedestrian activity. Citizens of all ability feel comfortable traveling within the community. The streets have sidewalks that are wide and smooth and have curb ramps at all the intersections. The Camas traffic signals are user friendly for pedestrians. It is acknowledged as a walk friendly community by the Federal Highway Administration based on the progress made to make it's streets accessible to all users. The Camas ADA Transition Plan has proven useful to assist staff to eliminate barriers to the disabled community.

### Goals:

The following goals will help Camas achieve this vision.

1. Important locations, such as the downtown, are free of tripping hazards;
2. All arterial intersections have curb ramps that meet current standards;
3. All bus stops are accessible and connected to the sidewalk network; and
4. All traffic signals are upgraded with accessible pedestrian signal (APS) hardware.

### Objectives:

The following objectives will meet the goals and the vision of the ADA Transition Plan.

1. Complete ADA upgrades at all high priority location within 5 to 10 years;
2. Complete ADA upgrades at traffic signal within 10 years;
3. Complete ADA upgrades at all medium priority locations within 30 years; and
4. The ADA Facilitator/Point of Contact Person for the Public Right of Way actively pursues ADA upgrades.

## Location Prioritization

Location prioritization is based on criteria identified in the Self-Evaluation Report. The following ranking criteria data were mapped for evaluation. It was then reviewed and discussed by the Citizen Advisory Committee (CAC) for use in the final location prioritization. See Appendix B for the maps of high priority criteria.

- **Collision History** for pedestrians and bicyclists, as a measure for risk exposure for persons with disabilities in the public right of way;
- **Roadway Classification** of arterials and not local streets, as a measure for more exposure to higher speed and volume roadways;
- **Government Buildings** that are important destinations for all citizens, as a measure for higher levels of pedestrian traffic generated when seeking public services, access to job sites or elected officials;
- **Land-use Zoning** of commercial property, a measure for higher levels of pedestrian traffic generated to travel along the public right of way;
- **Medical Facilities** important to persons who are disabled, as measure for higher frequency of such traffic demand;
- **Fixed Route Transit Service** as a measure of pedestrian traffic and also of desirable routes to bus stops for a barrier free pedestrian network; and
- **Committee Identified Priority Sites** these locations have been identified through the CAC public process and added to the priority list based on local knowledge of conditions and desirable destinations for persons with disabilities.

The high priority locations were inventoried for need for ADA upgrades that include partial retrofit or full replacement of curb ramps, with each upgrade ranked in the inventory. See Appendix B for maps and memo describing upgrades to the high and medium priority locations.

The inventory included an estimate of the scope of work to upgrade high priority locations to current ADA standards. The inventory was reviewed and a planning level construction cost estimated was prepared for each upgrade.

## Funding

The final project list and schedule are based on the funding available for ADA upgrades. Funding for ADA upgrades fall under the following categories:

- Local funding;
- The Community Development Block Grant (CDBG);
- State and Federal transportation grants; and
- The C-TRAN Streamline Program for improving access to bus stops.

### Local Funding Focus

- Respond to complaints within annual budget;
- Minor upgrades to existing curb ramps;
- Condition upgrades as part of the development review process;
- Upgrade sidewalk ramps as part of pavement preservation projects; and
- Notify property owner(s) to repair of sidewalk as required by the Camas Municipal Code (CMC Chapter 12.04.020).

It is important for the City to allocate an annual budget to effectively respond in a timely manner to a citizen request (aka the “Grievance Process”), so as to minimize any future risk of the US Department of Justice involvement in a complaint. A program that only responds to citizen requests and requires development to install ADA upgrades, as a condition of their approval, is important work, but will typically be focused at spot locations and thus the outcome may not address high priority locations during the initial years.

Assuming that during some years, if no citizen requests are submitted, the available budget could be used for minor upgrades to substantially compliant ADA curb ramps. This might include adding post-construction detectable warning panels and grinding down the lip of gutter at the base of the ramp to older facilities.



**Figure 1: Example of ramp lip of gutter that is a barrier to the disabled**

As property is redeveloped, the City will have the opportunity to require ADA upgrades to the sidewalk system. This provides another local funding source to reach the vision set forth in this plan.

The upgrade of pedestrian crossings and curb ramps altered by pavement preservation projects will have a higher correlation with high priority locations than projects only initiated only under the local funding focus, as mentioned previously. Often transit routes need higher frequency of pavement maintenance due to the heavy load associated with buses along higher frequency routes.

Requiring repair of uplifted sidewalk panels by the adjacent property owner is typically made based on citizen complaints. The City could focus on high priority corridors and work in partnership with adjacent property owner to facilitate repairs that will both address ADA compliance but also minimize risk of tripping hazards or other property maintenance for the affected owner.





**Figure 2: Example of damaged sidewalk that is a barrier to the disabled**

### Community Development Block Grant Focus

The Community Development Block Grant (aka CDBG) program can provide funding at prioritized locations but will be limited to funding upgrades to new curb ramps at intersections without existing ramps. This is important because full height curbs are true barriers in the public right of way. The inventory of high priority locations found that most Camas intersections have ramps but a few projects as proposed are expected to be stand-alone CDBG projects due to the current funding guidance restrictions.



**Figure 3: Example of full height curb that is a barrier to the disabled**

### Federal and State Transportation Grant Focus

Transportation grants are competitive and on an annual or every other year schedule. These grants are intended to address safety, capacity or missing links in the transportation system. Technically all ADA upgrades qualify for use of these grants but typically they do not rank well as a stand-alone ADA project. The following grant programs should be combined with other transportation improvements to upgrade high priority locations.

- The Surface Transportation Program (STP);
- The State City Safety Program;



- The Transportation Alternatives Program (TAP);
- State Pedestrian & Bicycle Safety Grants;
- The Safe Routes to School (SRTS) Program; and
- The Transportation Improvement Board Sidewalk Program.

The Washington State City Safety Program has been used effectively in Pasco (Court Street) and in Vancouver (Fourth Plain Boulevard) to make ADA upgrades at high priority locations within larger corridor “safety” projects. Signal upgrades often rank among the highest of any improvement for safety grants. This is an excellent opportunity to make intersections built before 2010 ADA compliant by upgrading the same traffic signals with Accessible Pedestrian Signal (APS) hardware. The key strategy is to propose ADA enhancements on locations with serious or fatal injury traffic collisions.



**Figure 4: Examples of pedestrian push buttons, existing (left) and APS (right)**

The Safe Routes to School Program or the TAP Program are great funding sources for upgrades to high priority locations that include sidewalk in-fill in the vicinity of schools or other pedestrian destinations. Safety and accessibility improvements made to pedestrian facilities closest to schools can allow more students to walk to school and assist school districts in providing transportation to more distant students, as these state funds become more limited each year.



**Figure 5: Example of children walking to school on funded sidewalk**

The same criteria used for ranking locations as high priority for ADA upgrades will tend to rank well for TAP funds too. The key is to extend the scope beyond just the facility expansion to include other ADA upgrades. The NE 3<sup>rd</sup> Ave corridor in Camas has transit service and some missing sections of sidewalk. A pedestrian improvement grant along this corridor to infill the missing sidewalk, add count down signal heads should rank very well for funding during any given grant year.





**Figure 6: Examples of existing missing sidewalk section**

### C-TRAN Streamline Program

C-TRAN has a Streamlining Project program that systematically retrofits existing fixed route transit stops with ADA accessible concrete pads and other enhancements. This grant program has not been used for any bus stop enhancement work in Camas yet. Although no funding appears available until the 2016 grant cycle, this source looks like a very good opportunity to fund bus stop upgrades along the Route 92 corridor.



**Figure 6: Example of an improved bus stop**

### ADA Upgrade Schedule

The key element of an ADA Transition Plan is the schedule of improvements that will bring the community into compliance. The schedule is the culmination of the following tasks:

1. Provide a public process to identify high priority locations;
2. Inventory the locations;

3. Develop a scope of work for the improvements;
4. Estimate the construction cost for the improvements; and
5. Identify funding programs for implementing the improvements.

The preparation of the Self-evaluation Report included providing a public process that engaged members of the disabled community as well as provided public notice to the community at large. An inventory of high priority locations with a scope of work to upgrade them and construction cost estimate are included in the Self-evaluation Report. This ADA Transition Plan builds upon the initial self-evaluation to include proposed funding sources for the upgrades.

The schedule is based on local funding for minor upgrades or repairs, CDBG funding for replacing full height curb with new curb ramps, and State and Federal grants for larger corridor projects. See Appendix C for project schedules for the each funding source.