

**Americans with Disabilities Act (ADA)
ADA Transition Plan for the Public Right-of-Way**



Skamania County, WA

May 2024

Prepared by



Transportation Solutions

INNOVATIVE | PRACTICAL | EQUITABLE

Acknowledgements

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

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The Americans with Disabilities Act Notice

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

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List of Abbreviations

- ADA** – American with Disabilities Act
- ADA/504** – Americans With Disabilities Act/Section 504 of the Rehabilitation Act of 1973
- APS** – Accessible Pedestrian Signal
- CFR** – Code of Federal Regulations (United States)
- DWS** – Detectable Warning System
- FHWA** – Federal Highway Administration
- GIS** – Geographic Information System
- LAG** – Local Agency Guidelines (published by Washington State Department of Transportation)
- MEF** – Maximum Extent Feasible
- NCHRP** – National Cooperative Highways Research Program
- PAR** – Pedestrian Access Route
- PROW** – Public Right-of-Way
- PROWAG** – Public Right-of-Way Accessibility Guidelines (final rule September 7, 2023)
- RRFB** – Rectangular Rapid Flashing Beacon
- SDI** – Sidewalk/Driveway Interface
- USDOJ** – United States Department of Justice
- USDOT** – United States Department of Transportation
- WSDOT** – Washington State Department of Transportation

A. Introduction & Legal Requirements

Skamania County is committed to removing barriers to accessibility in its public right-of-way facilities. To achieve this end, the County has completed an Americans with Disabilities Act (ADA) Transition Plan for the Public Right-of-Way.

This introduction summarizes the legal precedent and the required components of an ADA Self-Evaluation and Transition Plan. It also provides an overview of the County's Public Right-of-Way ADA Transition Plan with respect to these requirements.

A.1 Legal Precedent

The following federal laws and local Washington State guidelines informed the content and scope of this ADA Self-Evaluation and Access Plan. See also Washington State Department of Transportation (WSDOT) Local Agency Guidelines Chapter 29 (September 2023) in **Appendix A**.

A.1.1 Section 504 of the Rehabilitation Act (1973)

Section 504 of the Rehabilitation Act of 1973 states that “no otherwise qualified individual with a disability in the United States shall, solely by reason of his or her disability, be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity that receives Federal funding.”

Section 504 extends to the entire operations of a recipient or assignee, regardless of the specific funding source of a particular operation. Section 504 Regulations (49 CFR Part 27.5) define a recipient as “any [...] public entity [...] to whom Federal financial assistance from the Department [USDOT] is extended directly or through another recipient, including any successor, assignee, or transferee thereof.” An example of a recipient is WSDOT. An example of an assignee is Skamania County as the local agency receiving USDOT funds through WSDOT, for projects, programs, maintenance, or activities.

A.1.2 American with Disabilities Act

The *Americans with Disabilities Act* of 1990 is a civil rights statute that prohibits discrimination against people who have disabilities. There are five separate Titles, or sections, of the Act that cover different aspects of potential discrimination. These include:

- Title I – Employment
- Title II – Public Services and Transportation
- Title III – Public Accommodations
- Title IV – Telecommunications, and
- Title V – Miscellaneous

Title II of the Act specifically addresses the subject of making public services and public transportation accessible to those with disabilities. Designing and constructing facilities for public use that are not accessible by people with disabilities constitutes discrimination.

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

The ADA applies to all facilities, including both facilities built before and after 1990. State and local public entities or agencies are required to perform self-evaluations of their current facilities relative to the accessibility requirements of the current ADA accessibility standards. The requirements of the ADA apply to all public entities or agencies, no matter the size. The transition plan formal procedures as outlined in 28 C.F.R. section 35.150 only governs those public entities with more than 50 employees. For public entities with 50 or less employees, an access plan includes the same content but is not required to be posted on the agency's website.

A.2 Scope of ADA Transition Plan and Federal Accessibility Requirements

The Federal requirements for preparing and implementing an ADA Transition Plan are outlined in specific code sections of Title II of the ADA.

The 2010 ADA Standards are the current enforceable standard of accessibility requirements for existing facilities, new construction, and alterations of existing facilities. Given the 2010 ADA Standards do not cover all elements of the public right-of-way, the U.S. Access Board has been developing accessibility guidelines for the public right-of-way (PROWAG) that are not yet enforceable but are considered current best practices.

In addition, WSDOT describes ADA Transition Plan content in its Local Agency Guidelines Manual Chapter 29 (last updated September 2023). These standards and guidelines utilized in preparing the County's ADA Self-Evaluation and Transition Plan are included for reference in **Appendix A**.

The County is undertaking this Plan in phases. The initial scope of the County's ADA Transition Plan includes curb ramps, sidewalks, driveways, and transit stops within the County's public right-of-way as well as select administrative policies and procedures. Other County facilities and infrastructure in the public right-of-way, County buildings and park facilities, and County programs, services and activities will be evaluated and added in future Phases of the County's ADA Transition Plan.

A.2.1 Federal ADA Transition/Access Plan Requirements

Under Title II of the ADA, Section 28 CFR Part 35.150 (d) – Transition Plan outlines four requirements of an ADA Transition Plan. For code text, see **Appendix A**.

- Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- Describe in detail the methods that will be used to make the facilities accessible;
- 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 (1) year, identify steps that will be taken during each year of the transition period; and
- Indicate the official responsible for implementation of the plan.

A.2.2 Federal Accessibility Requirements for Existing Facilities

Until the PROWAG is adopted by the USDOJ and USDOT as mandatory, current federal accessibility requirements for existing public right-of-way facilities are based on the 2010 ADA Standards (the current enforceable standard). Section 28 § 35.150 of Title II of the ADA identifies the accessibility requirements for existing facilities. For full code text, see **Appendix A**.

A.2.3 Federal Accessibility Requirements for New Construction or Alterations

Until the PROWAG is adopted by the USDOJ and USDOT as mandatory, current federal accessibility requirements for new construction and alterations of public right-of-way facilities are based on the 2010 ADA Standards (the current enforceable standard). Section 28 § 35.151 of Title II of the ADA identifies the accessibility requirements for new construction or alterations to existing facilities. For full code text, see **Appendix A**.

A.2.4 Public Right-of-Way Guidelines (PROWAG)

The U.S. Access Board has been developing guidelines to specifically address accessibility of sidewalks, shared use paths, crosswalks, curb ramps, pedestrian signals, pedestrian activated warning devices, at-grade pedestrian rail crossings, on-street parking and other components of the public right-of-way not addressed by the 2010 ADA Standards. The U.S. Access Board has made the following progress to finalize these guidelines:

- August 8, 2023 – The Board published its final rule in the Federal Register (36 CFR Part 1190).
- As of early April 2024, the Board is waiting for the USDOJ and USDOT to adopt the PROWAG for enforcement under Title II of the ADA with or without modifications.

In this ADA Transition Plan, Skamania County opted to evaluate its public right-of-way facilities against the current (2023) PROWAG guidelines instead of the 2010 ADA Standards in anticipation of adoption of the PROWAG. This Plan also recommends barrier removal based on compliance with the current version of the PROWAG guidelines as a minimum.

For more information and access to the current version of the PROWAG, visit <https://www.access-board.gov/prowag/>.

A.2.5 Washington State Department of Transportation (WSDOT) Local Agency Guidelines

WSDOT's Local Agency Guidelines (LAG) Chapter 29 includes additional ADA Transition Plan items per Section 504 listed below. For full local agency guidelines text, see **Appendix A**.

- Designate an ADA/504 Coordinator
- Maintain Public Notice of ADA Provisions
- Adopt and publish Grievance Procedure
- Adopt an Accessible Pedestrian System (APS) Policy

A.2.6 Safe Harbor

Both the Section 504 requirements and 2010 ADA Standards contain a “safe harbor” provision. However, there is a difference in the timeline associated with the Section 504 safe harbor provision and the 2010 ADA Standards safe harbor provision. As of April 2024, the PROWAG does not reference the term “Safe Harbor.”

The WSDOT Local Agency Guidelines Chapter 29 provides the following guidance regarding “Safe Harbor for Alterations” related to the public right-of-way:

“If an agency receives Federal financial assistance from USDOT – either directly or through another USDOT recipient (such as WSDOT), the agency is subject to the 2004 ADA Accessibility Guidelines (2004 ADAAG).

This became effective in 2006 when the USDOT adopted the 2004 ADA Accessibility Guideline (2004 ADAAG) into its Section 504 regulations. This document is known as the 2004 ADA Standards. The 2004 Standards have a “safe harbor” provision for curb ramps. The provision is that if a curb ramps was constructed or altered prior to November 29, 2006, and complies with either the 1991 ADA Standards for Accessible Design (1991 ADA Accessibility Guidelines) or the Uniform Federal Accessibility Standards (UFAS), it does not need to be modified as part of a roadway resurfacing project. If this is not the case, or if the curb ramp is in disrepair then the curb ramp and its detectable warnings (truncated domes) must shall be brought into compliance with the 2004 Standards) at the time of an alternation. As mentioned above in Section 29.1, if an agency receives Federal financial assistance from USDOT – either directly or through another DOT recipient (such as WSDOT), then the agency is subject to the 2004 ADAAG as part of the USDOT Section 504 regulations.

For those agencies who are not a recipient or subrecipient of Federal financial assistance from USDOT, the safe harbor provision in the 2010 ADA Standards for Accessible Design (2010 Standards) applies. Under the 2010 Standards’ safe harbor provision, if curb ramps were built or altered (in existing facilities) prior to March 15, 2012 and if they comply with Chapter 29 Section 504 and the Americans with Disabilities Act the 1991 Standards or the UFAS, they do not need to be modified as part of a resurfacing project.

However, if an existing curb ramp does not comply with either the 1991 Standards or the UFAS (including if the curb ramp is in a state of disrepair), then the Safe Harbor provision does not apply and the curb ramp would need to be brought into compliance with the 2010 Standards at the time of roadway alteration.

When curb ramps or abutting sidewalks abutting ramps are altered, they shall be reconstructed to meet the 2010 Standards. For additional curb ramp design guidance, see LAG manual Chapter 42.”

A review of available aerial photography suggests that most of the sidewalks and curb ramps in Skamania County (Carson) were installed prior to 1991 and do not likely meet 1991 standards or the UFAS. For this reason, Safe Harbor was not assumed to apply to any currently deficient ramps. Additional research regarding the date of installation and standards met by existing facilities could be completed at the design stage of future alterations to verify this conclusion. The existing non-compliant facility could remain in place if it is determined that Safe Harbor applies.

A.2.7 Documentation for Structural Impracticability and Maximum Extent Feasible

The following guidance from the WSDOT Local Agency Guidelines Chapter 29 is useful for documenting maximum extent feasible decisions:

While ADA/Section 504 regulations do not require documentation of the application of structural impracticability nor maximum extent feasible, both FHWA and the U.S. Access Board recommend that these instances be documented so the agency can support its decisions if challenged at a later date. The documentation of these instances should reveal the standard of care that guided engineering judgments. While careful documentation will not protect an agency against complaint, evidence of the considerations that led to the specific project solution may be persuasive in discussions with stakeholders or in court.

The following guidance from WSDOT Design Manual M 22-01.22, Chapter 1510 Pedestrian Facilities, 1510.03(2) Alteration Projects (October 2023, pages 1510-8 to 1510-9) provides additional guidance for maximum extent feasible documentation:

It may not always be possible to fully meet the applicable accessibility requirements during alterations of existing facilities.

If such a situation is encountered, consult with the Regional ADA Liaison to develop a workable solution to meet the accessibility requirements to the maximum extent feasible. Cost is not to be used as a justification for not meeting the accessibility criteria. Physical terrain or site conditions that would require structural impacts, environmental impacts, or unacceptable impacts to the community in order to achieve full compliance with the accessibility criteria are some of the factors that can be used to determine that the maximum extent feasible is achieved.

If it is determined to be virtually impossible to meet the accessibility criteria for an element, document the decision in one of the following ways, as applicable:

- *Within the construction impact zone of an alteration project that does not include reconstruction, realignment, or widening of the roadway, document the following deficient elements in the DDP:*
 - *Perpendicular curb ramp or parallel curb ramp landing cross slope that is constrained by the existing roadway gutter profile and exceeds 2%, but is less than or equal to 5%, that cannot be constructed to fully meet applicable accessibility requirements.*

- *Flared side of a perpendicular curb ramp that is constrained by the existing roadway gutter profile and has a slope that exceeds 10%, but is less than or equal to 16.7%, that cannot be constructed to fully meet applicable accessibility requirements.*
- *For any deficient element that does not match the preceding description, document the decision via a stamped and signed Maximum Extent Feasible (MEF) document. The MEF document will be reviewed by the appropriate Assistant State Design Engineer (ASDE) and the Headquarters (HQ) ADA Compliance Manager. If acceptable, the MEF document will be approved and included in the DDP. See Exhibit 300-3 for the approvers of a Maximum Extent Feasible (MEF) document.*

For access to the WSDOT Design Manual, visit <https://wsdot.wa.gov/engineering-standards/all-manuals-and-standards/manuals/design-manual>.

A.3 Plan Format and Phased Approach

The National Cooperative Highway Research Program (NCHRP) No. 20-7 (232) ADA Transition Plans: *A Guide to Best Practices* (May 2009) report demonstrates how the federal ADA Transition Plan requirements give agencies flexibility on how to format their Transition Plans.

Skamania County is preparing its ADA Transition Plan in phases across multiple budget years. The Plan was formatted to accommodate additional chapters for building facilities, parks/trails, and services/programs/activities to be added in future phases. This first phase of the Transition Plan addresses components related to accessibility barriers in the County's public right-of-way and is organized as follows:

- Administrative Policies and Procedures
- Public Right-of-Way
 - Self-Evaluation and Compliance Activities to Date
 - Barrier Prioritization & Removal Recommendations
 - Barrier Removal Schedule and Costs
 - Barrier Removal Financial Plan and Schedule
- Public Engagement
- Future Actions to Maintain and Achieve Compliance
- Accessibility Guidelines, Standards, and Resources
- Appendices

B. Administrative Policies and Procedures

In 2023, Transportation Solutions, Inc., conducted a self-evaluation inventory of the County's existing ADA-related administrative policies and procedures identified in the WSDOT LAG Manual Chapter 29 Checklist. See **Appendix A**.

B.1 Official Responsible to Implement the ADA Transition Plan

The County has designed David Waymire, Public Works Director, as the official responsible to implement this ADA Transition Plan. Contact information is provided below and online [here](#).

David Waymire, Public Works Director
Skamania County Public Works
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E-mail: davidw@co.skamania.wa.us

For questions regarding the County's Public Right-Of-Way portion of the ADA Transition Plan, the County has designated Sadi' Stouder-Pettenger P.E., County Engineer. Contact information is provided below and online [here](#).

Sadi' Stouder-Pettenger P.E., County Engineer
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B.2 ADA/504 Coordinator

The County has designated Sara Slack, Human Resources Administrator, as the County's ADA/504 Coordinator. Contact information is provided below and online [here](#).

Sara Slack, ADA/504 Coordinator and Human Resources Administrator
Skamania County Courthouse
240 NW Vancouver Avenue
P.O. Box 790
Stevenson, WA 98648
Phone: 509-427-3705 (Washington Relay System: 7-1-1)
E-mail: sslack@co.skamania.wa.us

B.3 Public Notice of ADA Provisions

The notice requirement applies to all state and local government agencies covered by Title II, even localities fewer than 50 employees. The target audience for public notice includes anyone who may potentially interact with the agency and must be accessible to all. An effective notice states the basis of what the ADA requires of the public agency in clear, concise language and should include the name and contact information of the ADA Coordinator. It addresses the public agency's commitment to non-discrimination on the basis of disability and addresses the agency's associated policies regarding employment, effective communication, modifications to policies and procedures, provision of auxiliary aids, scope of the ADA, complaints, and provision of aid/services at no additional cost. The U.S. Department of Justice's ADA Best Practices Tool Kit for Local and State Governments provides a [template ADA Notice](#) for use by public agencies.

The County has publicly posted its Public Notice of ADA Provisions as part of this ADA Transition Plan; the public notice is posted on the County's webpage [here](#) and is provided in **Appendix C**.

B.4 ADA Grievance Procedure

The County has publicly posted its ADA Grievance Procedure and established an ADA Complaint Record as part of this ADA Transition Plan; the Grievance Procedure is posted on the County's webpage [here](#) and is provided in **Appendix D**.

B.5 Accessible Pedestrian Signal (APS) Policy

The County established an APS Policy as part of this ADA Transition Plan. The APS Policy is provided in **Appendix E**.

C. Public Right-of-Way

This chapter describes the County's efforts to address public right-of-way ADA barriers according to the following steps:

- Self-Evaluation and Compliance Activities to Date
- Barrier Prioritization and Removal Recommendations
- Barrier Removal Schedule and Costs
- Barrier Removal Financial Plan and Schedule

This ADA Transition Plan focuses on curb ramps, sidewalks, driveways, transit stops, and accessible pedestrian system features. Other public right-of-way facilities such as accessible parking will be covered in future updates to this ADA Transition Plan.

C.1 Public Right-of-Way Self-Evaluation and Compliance Activities to Date

In 2023, field evaluations were performed to collect current condition and ADA-compliance information for all curb ramps, sidewalks, and driveway locations under County jurisdiction and transit stops within County limits.

C.1.1 Curb Ramps

Curb Ramp ADA Inventory

In 2023, field evaluations were performed to collect data on the County's existing curb ramp assets. Individual ramps were geo-located with geographic information system (GIS) mapping software. Collected field attributes included ramp width, presence of a detectable warning surface, ramp type, running slope, cross slope, landing, a photo, and/or additional notes.

Each ramp was assigned an ADA compliance status of "Yes" (ADA-compliant) or "No" (not ADA-compliant). If one field attribute was not compliant, the curb ramp was assigned a "No" ADA compliance status and is considered an ADA barrier.

Each ramp was also assigned a condition (Fair/Better, Poor, Very Poor, or Missing) and an associated grade (A, B, C or D). The condition and grade provide a more nuanced understanding of the County's existing curb ramp inventory. A curb ramp can be functional (i.e., usable) even if it is not ADA-compliant. Collected curb ramp attribute data is documented in **Appendix B1**.

Of the County's total 58 ramp locations, 57 ramps (98%) are not ADA-compliant with current 2023 PROWAG guidelines. See **Table C-1** and **Figure C-1**.

Note: Thirteen (13) "Other" locations were identified that may be of interest to the County. See **Figure C-2**:

- Locations where private businesses have non-compliant frontage (including non-compliant or missing ramps) that are not under County jurisdiction but create barriers to accessibility.

- Marked pedestrian crossings near schools and transit stops that are on rural road segments without sidewalks and without curb ramps.

Table C-1. Curb Ramp ADA Compliance

ADA Compliance	Count	Percentage
Compliant	1	2%
Non-Compliant	57	98%
Total	58	100%
Other	13	N/A

ADA-Compliant Curb Ramps

2% of the curb ramps (1 ramp) in Skamania County are ADA-compliant with current PROWAG guidelines. This is typical for jurisdictions with residential areas built prior to federal adoption of the ADA. The compliant ramp documented in this inventory is located at:

- Salmon Falls Park & Ride transit stop

ADA Curb Ramp Barriers

98% of the curb ramps in the Skamania County are not compliant with current PROWAG Guidelines. Curb ramp barriers can vary in severity and functionality. For example, a curb ramp with a running slope of 10% (more than 8.3% as required by the current PROWAG guidelines) is less severe of a barrier than a location where a curb ramp is missing or has significant surface deterioration. A curb ramp with a 10% running slope is still functional, even though it is technically non-compliant.

Figure C-1. Curb Ramp Inventory Map By ADA Compliance (2023)

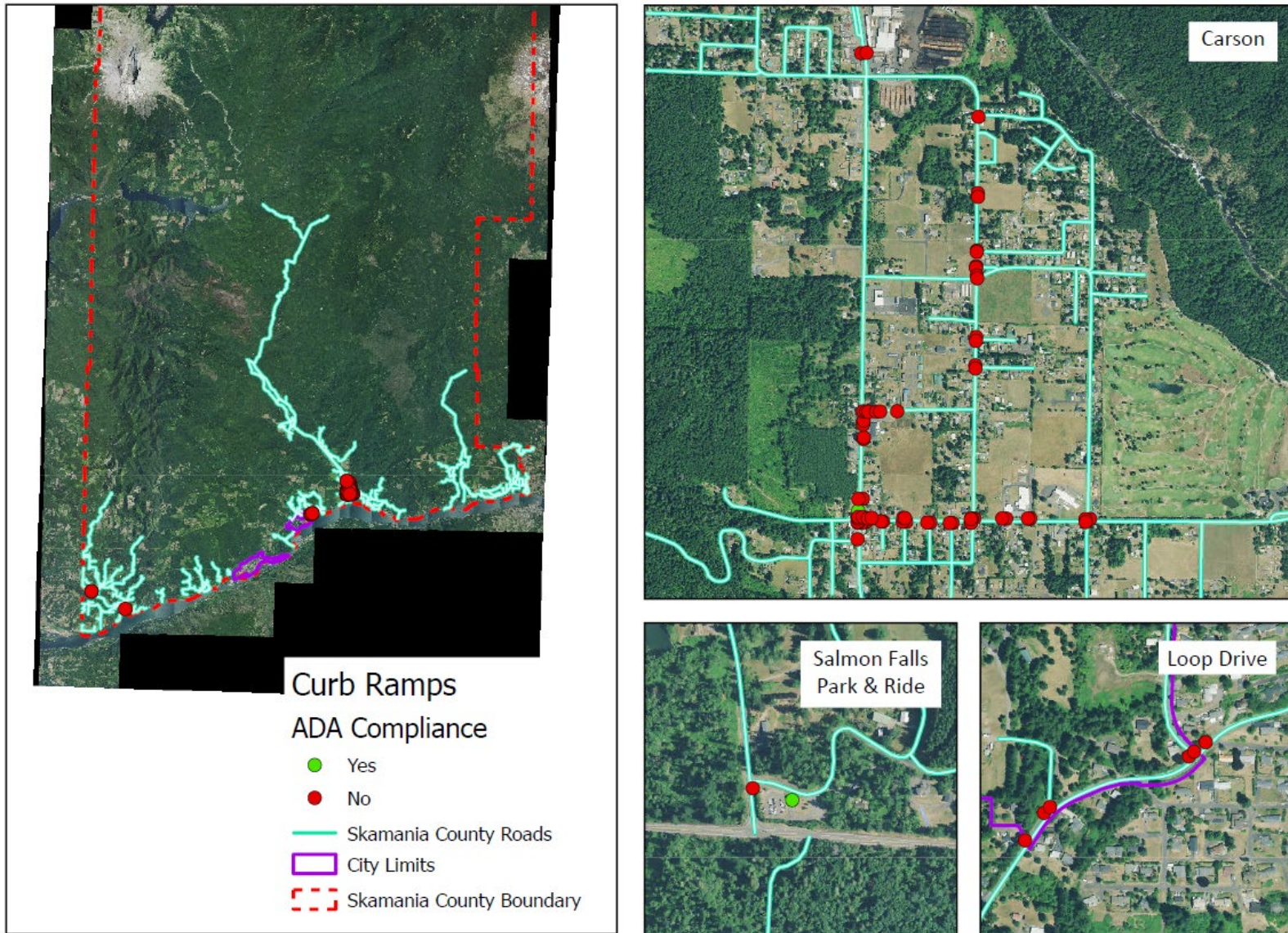
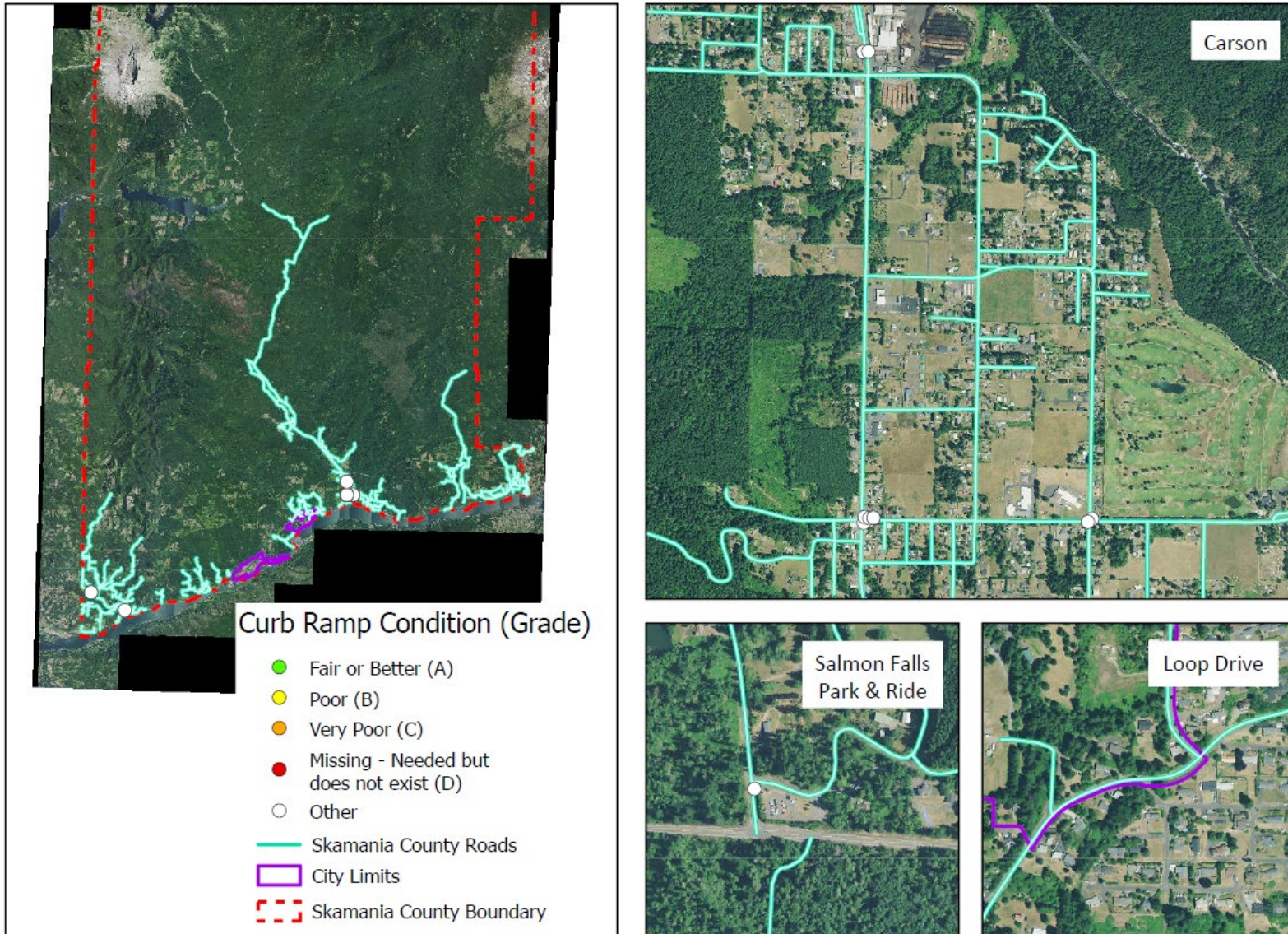


Figure C-2. Other Curb Ramp Related Locations Map (2023)



Curb Ramp Barrier Summary

The following corridors stand out for high proportions of non-compliant ramps:

- **Carson:**
 - **Wind River Highway:** Missing curb ramps, severe ramp deterioration, and ramps less than 36" wide.
 - **Metzger Road:** Existing ramps do not have landings and have running slopes greater than 10%.
 - **Hot Springs Avenue:** Missing curb ramps at marked crossings.
 - **Cloverdale Avenue:** Existing ramps with cross slopes greater than 2% and no detectable warning surfaces.
- **Loop Drive:** While the existing ramps appear to be improved, they are missing detectable warning surfaces and some curb lips are present.

Some non-compliant ramps designed to ADA standards that pre-date the current PROWAG guidelines (ramps identified as grade B/poor condition) may qualify for Safe Harbor as existing facilities. See Section A.2.6 for Safe Harbor requirements. In that is the case, the non-compliant ramp could remain in place. However, if an existing curb ramp that qualifies for Safe Harbor is altered, the curb ramp must be upgraded to meet the current WSDOT/PROWAG guidelines.

Some non-compliant ramps that do not fully meet current PROWAG guidelines may qualify for maximum extent feasible (MEF) status if site conditions make meeting the standard infeasible. See also WSDOT Design Manual Chapter 1510.030(2) Alteration Projects for guidance on MEF documentation described in Section A.2.7 above.

The inventory work completed in 2023 did not include preparation of maximum extent feasible documentation for ramps given the age of the County's curb ramp infrastructure. WSDOT LAG Manual Chapter 29 includes a section on documentation for structural impracticability and MEF. See **Appendix A**.

C.1.2 Sidewalks and Driveways

Sidewalk and Driveway ADA Inventory

In 2023, field evaluations were performed to collect data on the County's existing sidewalks and driveway assets. Individual spot and segment locations were geo-located with geographic information system (GIS) mapping software and were defined accordingly:

- **Spot:** Point on the map representing a specific location on a sidewalk or driveway
- **Segment:** Line on the map representing a section of sidewalk

Collected field attributes included sidewalk width, cross slope, running slope relative to roadway grade, obstacle type, a photo, and/or additional notes.

Each sidewalk spot and segment were assigned an ADA compliance status of "Yes" (ADA-compliant) or "No" (not ADA-compliant). If one field attribute was not compliant, the sidewalk spot or segment was assigned a "No" ADA compliance status and is considered an ADA barrier.

Each sidewalk spot and segment were also assigned a condition (Fair/Better, Poor, Very Poor, or Missing) and an associated grade (A, B, C or D). The condition and grade provide a more nuanced understanding of the County’s existing sidewalk inventory. A sidewalk or driveway can be functional (i.e., usable) even if it is not ADA-compliant. Collected sidewalk and driveway attribute data is documented in **Appendix B2**.

Of the County’s total sidewalk spot locations, 134 (97%) are not ADA-compliant with the current PROWAG guidelines. See **Table C-2** and **Figure C-3**.

Note: Eight (8) “Other” spot locations were identified where sidewalk segments do not currently exist in the vicinity of schools and recreational facilities that may be of interest to the County (they are not designated as “missing” condition because no sidewalk gap currently exists). See **Figure C-4**.

Table C-2. Sidewalk Spot ADA Compliance

ADA Compliance	Count	Percentage
Compliant	4	3%
Non-Compliant	130	97%
Total	134	100%
Other	8	N/A

Of the County’s total sidewalk segment locations, 44 (94%) are not ADA-compliant with the current PROWAG guidelines. Note: segments vary in length. See **Table C-3** and **Figure C-3**.

Table C-3. Sidewalk Segment ADA Compliance

ADA Compliance	Count	Percentage
Compliant	3	6%
Non-Compliant	44	94%
Total	47	100%

ADA-Compliant Sidewalks and Driveways

3% of the sidewalks spots and 6% of the sidewalk segments in Skamania County are ADA-compliant to current PROWAG guidelines. This is typical for jurisdictions with residential areas built prior to federal adoption of the ADA. The County’s ADA-compliant sidewalks serve the Carson Central and Salmon Falls Park & Ride transit stops. The County has one ADA-compliant driveway north of the existing Carson Central transit stop.

Sidewalk and Driveway Barriers

97% of the sidewalk spots and 94% of the sidewalk segments in Skamania County are not compliant with current PROWAG guidelines. Of the 130 non-compliant sidewalk spot locations, 28 are non-compliant driveway locations. Sidewalk barriers can vary in severity and functionality. For example, a sidewalk with a cross slope of slightly more than 2.1% (as required by the current PROWAG guidelines) is less of a barrier than a location where a sidewalk has a 1-inch vertical discontinuity that is a tripping hazard and barrier to wheelchairs.

Figure C-3. Sidewalk and Driveway Inventory Map By ADA Compliance (2023)

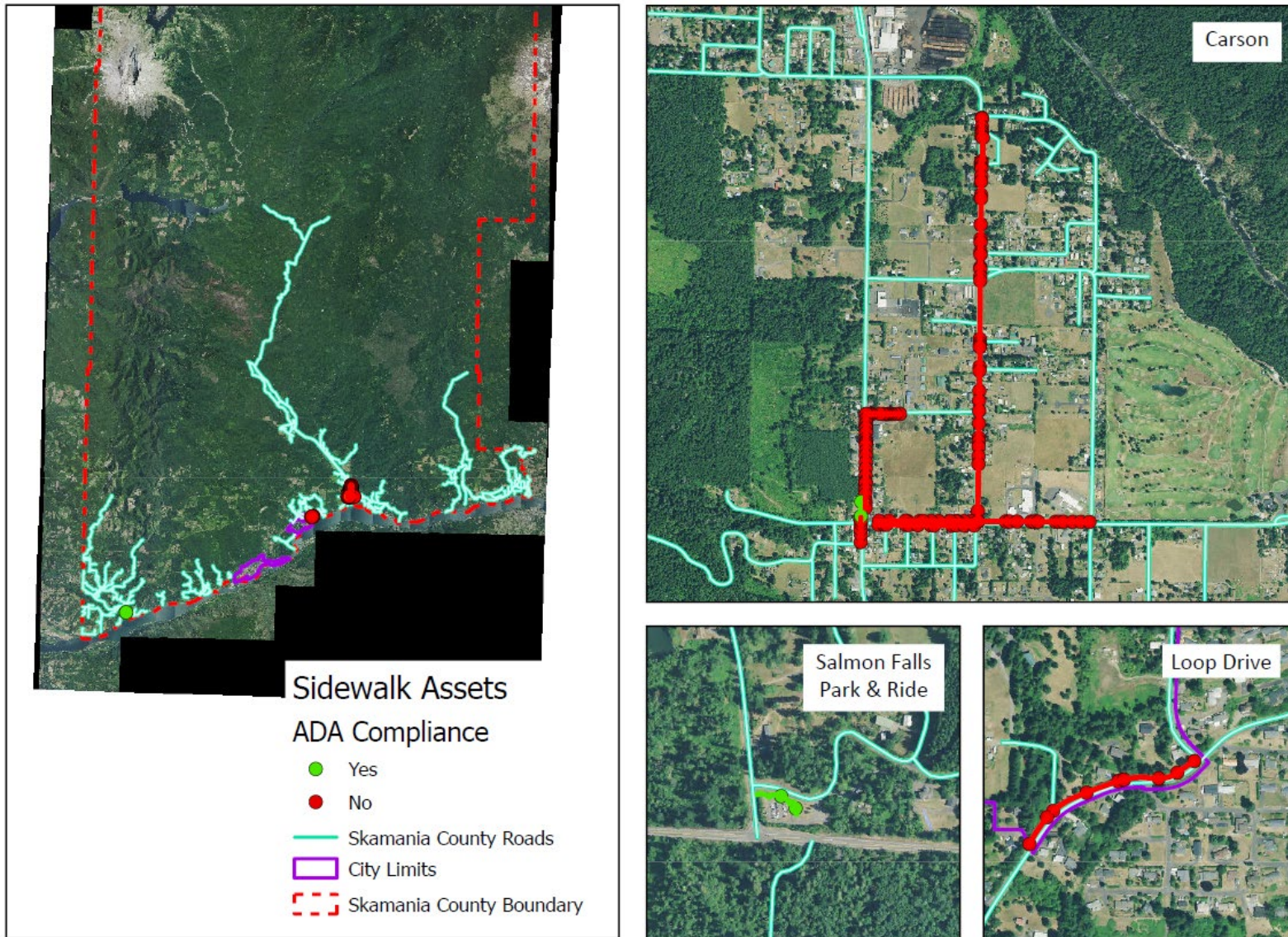
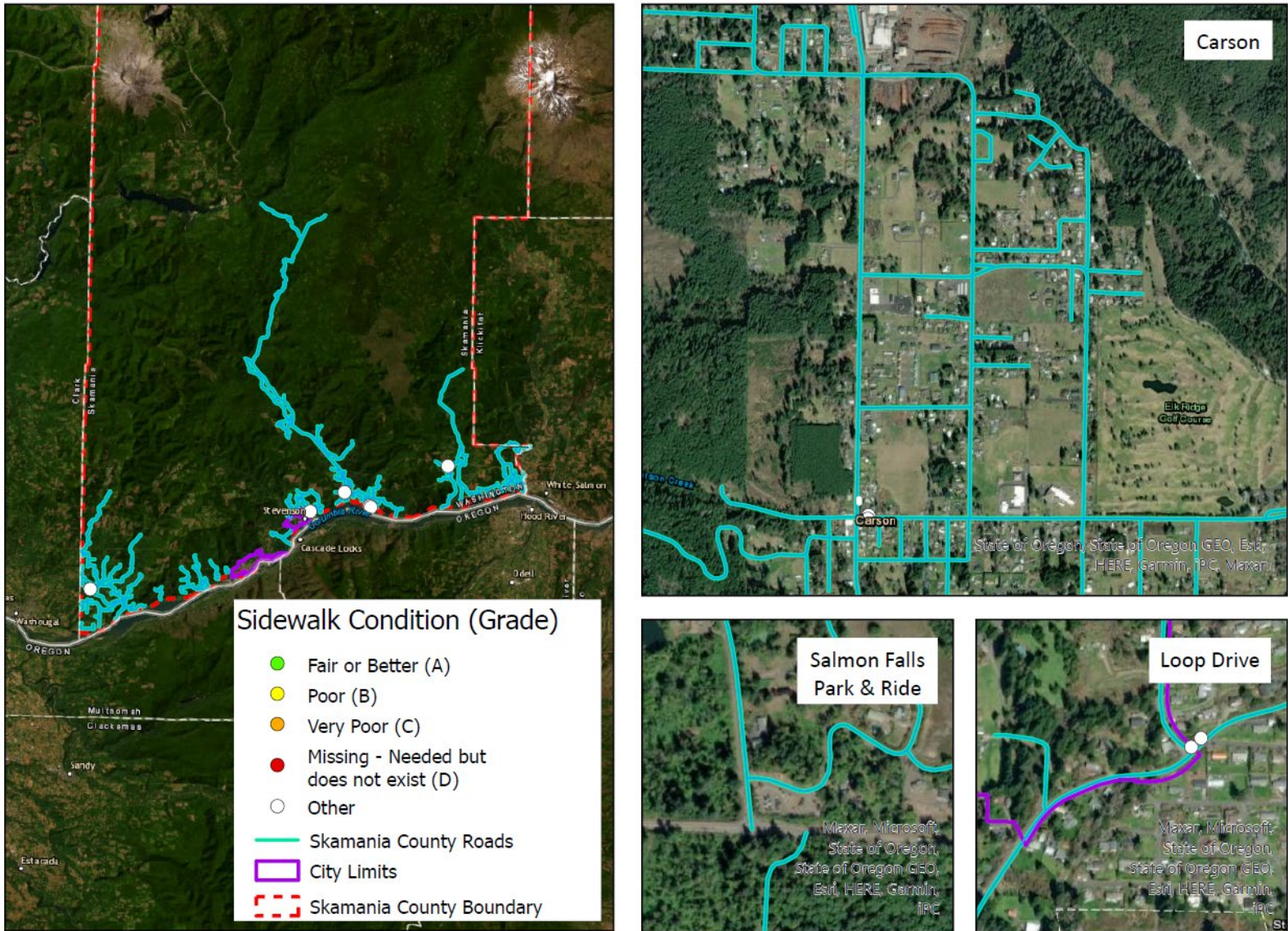


Figure C-4. Other Sidewalk Locations Map (2023)



Sidewalk and Driveway Barrier Summary

The following corridors stand out for high proportions of non-compliant sidewalks:

- **Carson:**
 - **Wind River Highway:** East side of highway between Hot Springs Avenue and Cloverdale Avenue
 - **Metzger Road:** Existing sidewalk exceeds cross slope in most segments.
 - **Hot Springs Avenue:**
 - North side between Wind River Highway and Metzger Road includes vertical discontinuities and cracks in pavement.
 - Carson Elementary School frontage sidewalk width is 42" with overgrown vegetation on north sidewalk edge (PROWAG requires 48").
 - **Cloverdale Avenue:** Existing sidewalk exceeds cross slope, includes vertical discontinuities and cracks in pavement.
- **Loop Drive:** While one segment of sidewalk appears improved, most segments include overgrown vegetation that reduces the pedestrian access route to less than 36".
- **Countywide:** Most driveways (SDIs) include steep flares that create a cross slope of more than 2% within the pedestrian access route.

Some non-compliant sidewalks designed to ADA standards that pre-date the current PROWAG guidelines may qualify for Safe Harbor as existing facilities. See Section A.2.6 for Safe Harbor requirements. If that is the case, the non-compliant sidewalk could remain in place. However, if an existing sidewalk that qualifies for Safe Harbor is altered, the pedestrian access route portion of the sidewalk must be upgraded to meet the current WSDOT/PROWAG guidelines.

Some non-compliant sidewalks that do not fully meet current PROWAG guidelines may qualify for maximum extent feasible (MEF) status if site conditions make meeting the standard infeasible. See also WSDOT Design Manual Chapter 1510.030(2) Alteration Projects for guidance on MEF documentation described in Section A.2.7 above.

The inventory work completed in 2023 did not include preparation of maximum extent feasible documentation for sidewalks given the age of the County's infrastructure and relatively flat grades. WSDOT LAG Manual Chapter 29 includes a section on documentation for structural impracticability and MEF. See **Appendix A**.

C.1.3 Transit Stops

Transit Stop ADA Inventory

The County inventoried existing ADA-compliance conditions at eight (8) transit stops in 2023. The inventory includes photos and a narrative description of the transit stop's surface condition, boarding/alighting clear space dimensions, pedestrian access route connection and slope measurements, presence of/clearance for shelter access, photo(s) and other additional notes. Additionally, the County opted to inventory transit stops within North Bonneville and City of Stevenson city limits for informational purposes. Collected transit stop attribute and asset data is documented in **Appendix B3**.

Of the transit stops within Skamania County limits north of the Columbia River, 7 (87%) are not ADA-compliant with the current PROWAG guidelines. See **Table C-4** and **Figure C-5**.

Table C-4. Transit Stop ADA Compliance

ADA Compliance	Count	Percentage
Compliant	1	13%
Non-Compliant	7	87%
Total	8	100%

ADA-Compliant Transit Stop Features

The Stevenson Central transit stop meets all current PROWAG guidelines. Note: The Stevenson Central transit stop is under City of Stevenson jurisdiction. It is included in this ADA Transition Plan for informational purposes. Additionally, transit stops with shelters other than North Bonneville meet interior shelter clearance requirements (this includes Hegewald Center, Stevenson Central, and Carson North).

Transit Stop ADA Barriers

The following transit stops do not meet current PROWAG guidelines as described in **Table C-5**.

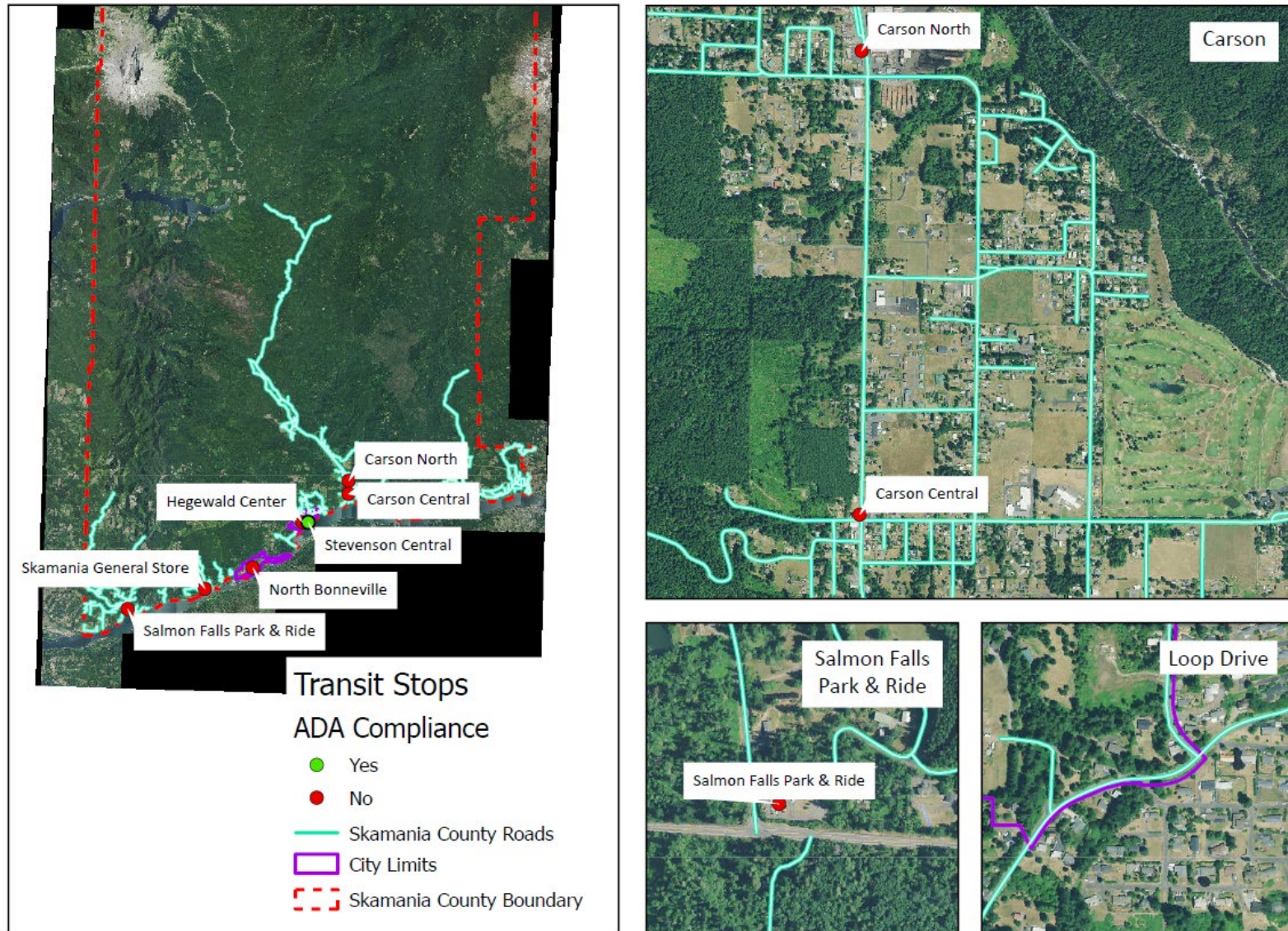
Table C-5. Transit Stop ADA Non-Compliance Features

County Transit Stop	ADA Non-Compliance Features
Salmon Park and Ride	<ul style="list-style-type: none"> Boarding/alighting area is 6’ deep within sidewalk (does not meet minimum 8’ x 5’ dimensions)
Skamania General Store	<ul style="list-style-type: none"> Very poor surface condition. Boarding/alighting area does not meet minimum 8’ x 5’ dimensions. Observed cars parked in front of the bus stop sign.
North Bonneville* (under North Bonneville jurisdiction)	<ul style="list-style-type: none"> 6% cross slope from shelter to boarding/alighting area exceeds 2% maximum.
Hegewald Center	<ul style="list-style-type: none"> Boarding/alighting area is 4’ deep within concrete panels (8’ x 5’ including shoulder).
Carson North	<ul style="list-style-type: none"> Boarding/alighting area is 4’ deep within concrete panels (8’ x 5’ including shoulder).
Carson Central	<ul style="list-style-type: none"> Boarding/alighting area is 6’ deep within sidewalk (does not meet minimum 8’ x 5’ dimensions)
Home Valley	<ul style="list-style-type: none"> Very poor surface condition with temporary sign in the grass on shoulder with potholes and puddles adjacent to paved road. Boarding/alighting area does not meet minimum dimensions.

Transit Stop Barrier Summary

7 out of 8 transit stops have at least one non-compliant feature. Multiple stops do not have compliant boarding/alighting areas (5 feet x 8 feet perpendicular to bus direction of travel) to accommodate wheelchair users who require space to embark/disembark via a bus ramp lift. Two stops with gravel alighting areas (Skamania General Store and Home Valley) are the least functional of the transit stops evaluated above.

Figure C-5. Transit Stop Inventory Map By ADA Compliance (2023)



C.1.4 Accessible Pedestrian Signals

As of publication of this Plan in 2024, the County does not have any accessible pedestrian signals.

As of April 2024, there are two intersections with flashing beacons under County jurisdiction:

- **Wind River Highway and Hot Springs Ave:** This intersection has an all-way stop, flashing red light signal control. There are marked pedestrian crossings for all crossings at this intersection.
- **Wind River Highway and Metzger Ave:** This intersection has an all-way stop, flashing yellow light signal control. There are no marked pedestrian crossings at this intersection.

These beacons are not pedestrian signals and do not require accessible pedestrian signals (APS).

As part of this ADA Transition Plan, the County is adopting a 2024 Accessible Pedestrian Signal (APS) Policy to address future accessible pedestrian signals. See **Appendix E**.

C.1.5 Rectangular Rapid Flashing Beacons

As of publication of this Plan in 2024, the County does not have any rectangular rapid flashing beacons.

C.1.6 Other Public Right-of-Way Barriers

The current PROWAG includes requirements for on-street ADA accessible parking where parking stalls are marked or metered (R310 On-Street Parking Spaces).

The County has no metered on-street parking stalls and its existing marked parking stalls are not considered on-street parking as they are located within parking lots associated with building and/or recreational park facilities. ADA accessible parking at County building and recreational park facility parking lots will be evaluated at a future phase update to the ADA Transition Plan.

C.2 Public Right-of-Way Barrier Prioritization & Removal Recommendations

C.2.1 General Barrier Prioritization Criteria

Barrier removal prioritization will be based on the ADA barrier removal criteria identified below for all barrier types. These criteria, to be used in Skamania County’s priority array, correlates to the planned capital improvement projects within the County’s Six-Year TIP.

ADA Barrier Removal Criteria	Score
Barriers identified in filed grievances/complaints*; or Barriers to accessibility serving State and Local government offices and facilities, transportation, transit stops, and places of public accommodation per section 35.150 (d) (2) of the ADA; or Barrier identified in compliance and condition as missing or very poor.	30
Barriers identified through public engagement efforts**; or Barriers identified in compliance and condition as poor.	20
Barriers to accessibility where alternative locations have accessible facilities (i.e., situations wherein accommodations can be made to provide alternative equal access); or Barriers for services not frequently used by the public; or Barriers identified in compliance and condition as fair or better.	10
Barriers to accessibility in public right-of-way or public facilities slated for demolition or pending renovations; or Barriers identified in compliance and condition as no improvements needed.	0

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

**It is recommended that prioritization decisions be guided by the overarching principle that barriers identified and/or experienced by people within the ADA community are of higher priority for removal than other barriers. Public engagement efforts are therefore a critical component of the prioritization process.

C.2.2 Curb Ramp Barriers

Curb Ramp Barrier Prioritization

The curb ramp grading system below was used to assign a grade and condition to each ramp based on the 2023 field review. The curb ramp grading system was developed by the Vermont Department of Transportation (VDOT) and amended for Skamania County use. See the grading system in **Table C-6**.

Table C-6. Skamania County Curb Ramp Grading System

Grade	Ramp Width	Detectable Warning Surface	Material Condition
A GREEN	48" or greater	Truncated Dome	<u>Fair or Better Condition</u> Limited or tight cracking, faulting (<1/4"), isolated spalling
B YELLOW	>36" to <48"	Exposed Aggregate Surface or Diamond Shape Stamp	<u>Poor Condition</u> Moderate cracking, faulting (1/4"-3/4"), moderate spalling
C ORANGE	36" or less	No detectable warning surface	<u>Very Poor Condition</u> Severe cracking, faulting (>3/4"), extensive spalling, no landing
D RED	A curb ramp is needed but does not exist at the location to access an existing sidewalk (pedestrian access route) where it crosses a curb.		

Ramps with a grade of A (Fair or Better) may or may not be fully ADA-compliant to current PROWAG guidelines but are usable in their current form. Non-compliant grade A ramps may qualify for maximum extent feasible (MEF) status if site conditions make meeting the standard infeasible. See also WSDOT Design Manual Chapter 1510.030(2) Alteration Projects for guidance on MEF documentation described in Section A.2.7 above.

Ramps with a grade of B (Poor) are usable in their current form but are not ADA-compliant with current PROWAG guidelines (they also may meet Safe Harbor for the 2010 ADA Standards). See Section A.2.6 for Safe Harbor requirements.

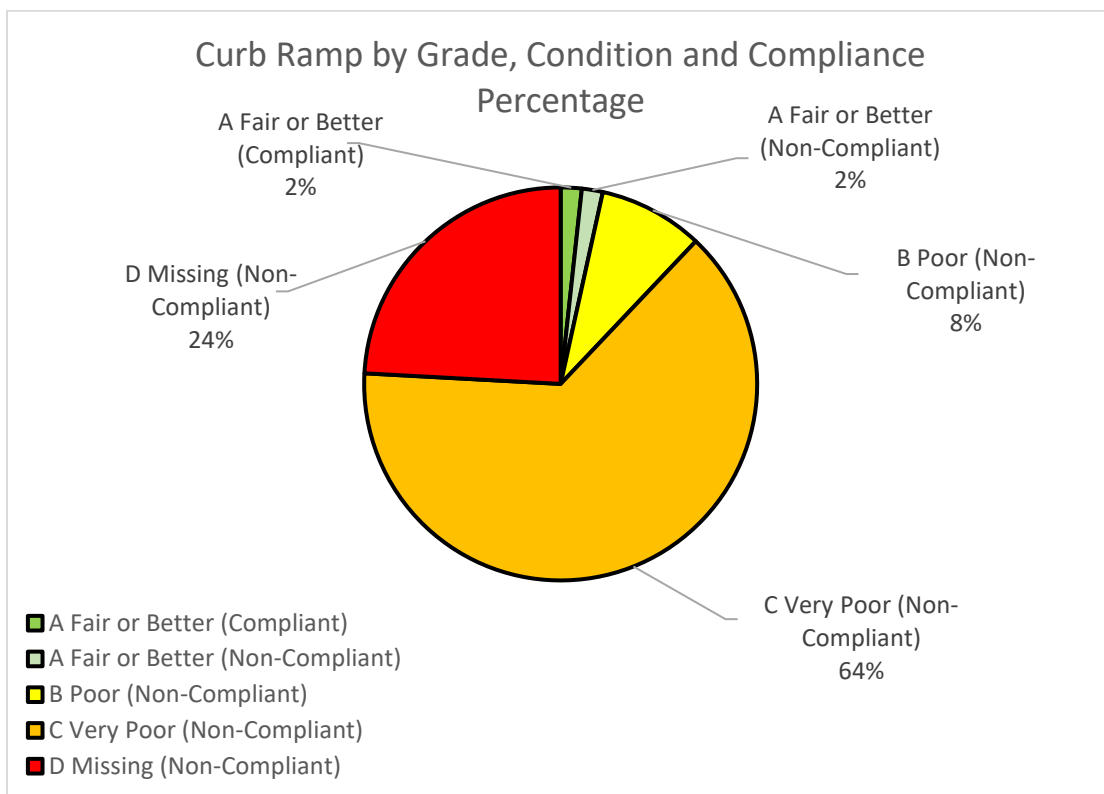
All ramps with a grade of C (Very Poor), or D (Missing) are not ADA-compliant.

Of the 58 ramps documented in this ADA Transition Plan, 98% are not ADA-compliant to current PROWAG guidelines. Non-compliant ramps with poor or no functionality (grades C or D) are considered higher priority for barrier removal than non-compliant ramps with higher functionality (grades A and B). For a table of the County’s curb ramps by grade, condition, and ADA-compliance, see **Table C-7**. For a map of the County’s curb ramps by grade and condition, see **Figure C-6**. The GIS prioritization for curb ramps is documented in **Appendix B2**.

Table C-7. Curb Ramp Grade, Condition, and ADA-Compliance Status

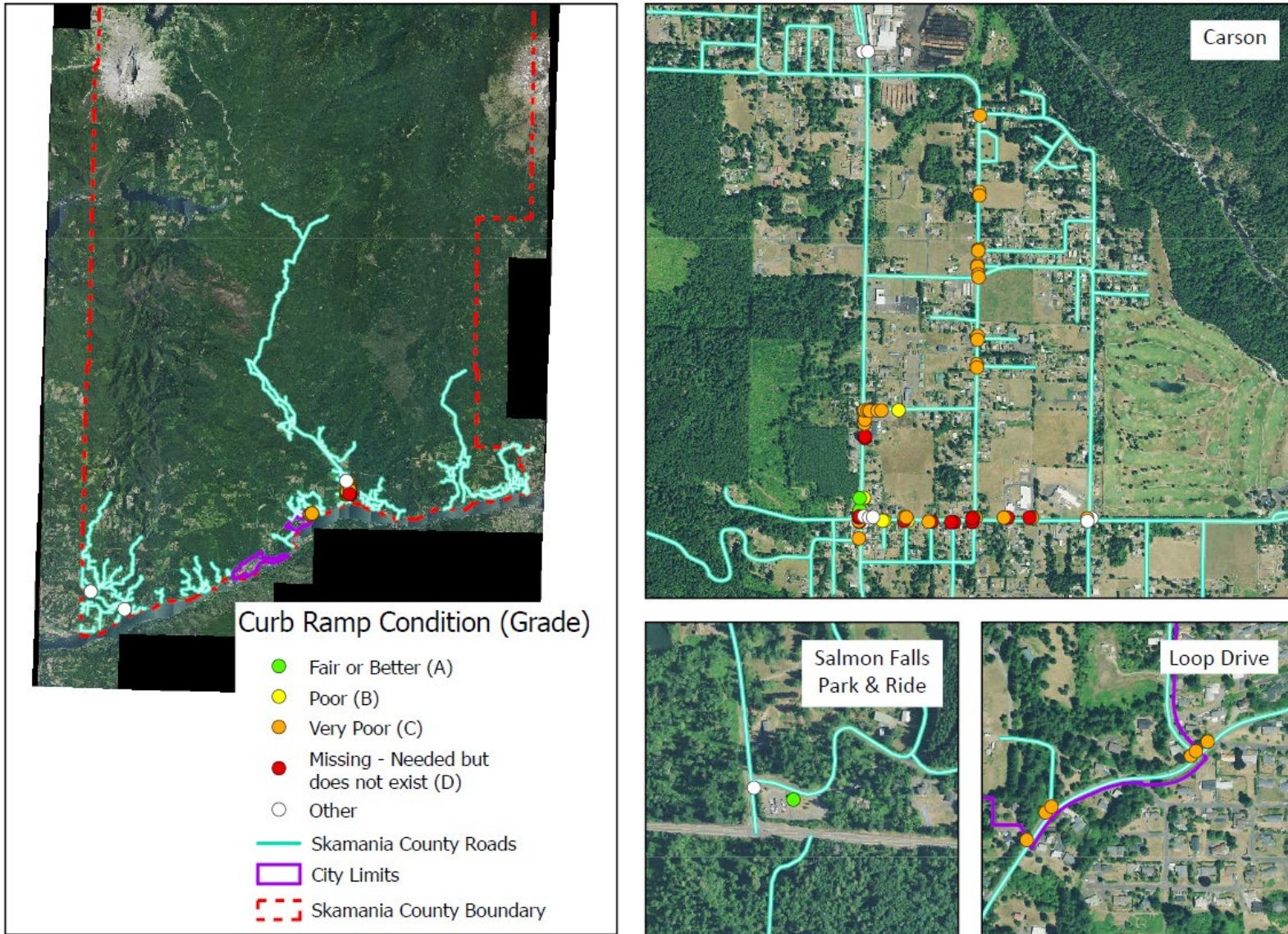
Grade	Condition	Count	Percentage Grade	ADA Compliant	Count	Compliance Percentage
A	Fair or Better	2	4%	Compliant	1	2%
				Non-Compliant	1	
B	Poor	5	8%	Non-Compliant	5	98%
C	Very Poor	37	64%		37	
D	Missing	14	24%		14	
Total	-	58	100%	-	58	100%

Figure C-6. Curb Ramps by Grade, Condition, and ADA-Compliance Percentage



Note: Thirteen (13) “Other” ramps are not included in **Table C-6**. They are shown in white on **Figure C-7** for reference purposes only.

Figure C-7. Curb Ramps by Grade and Condition Map



Curb Ramp Barrier Removal Recommendations

It is recommended curb ramp barriers be prioritized in accordance with the general prioritization criteria established in Section C.2.1. It is recommended the County:

- Consider removing curb ramp barriers identified by the public through grievances or requests during annual budgeting activities.
- Consider removing curb ramp barriers with grade of C (Very Poor) or D (Missing) before other curb ramp barriers.
- Consider grouping barriers into corridors or sub-areas to provide for cost effective barrier removal. This could be addressed in a future update of the ADA Transition Plan and is dependent upon financial resources available to the County.
- Monitor the removal of curb ramp barriers in the County’s GIS inventory.

C.2.2 Sidewalk and Driveway Barriers

Sidewalk and Driveway Barrier Prioritization

Sidewalk asset data is provided as point (sidewalk spot locations and driveways) and line segment (sidewalk segment location) data in the GIS inventory. These sidewalk assets were assigned a grade and condition to each asset based on the 2023 field review. The sidewalk and driveway grading system was developed specifically for Skamania County use. See the grading system in **Table C-8**.

Table C-8. Skamania County Sidewalk and Driveway Grading System

Grade	Condition
A	Meets all of the following: <ul style="list-style-type: none"> • Minimum 48” width • Maximum 2% cross slope • Running slope matches roadway grade • Passing zones every 200 feet (not required if 60” width) • No obstacles present
B	One or more of the following applies: <ul style="list-style-type: none"> • Does not meet minimum 4” width • Cross slope exceeds 2% • Running slope does not match roadway grade • No passing zone for 48” width • Sidewalk/Driveway Interface (SDI) has steep flares that creates cross slopes exceeding 2% • Obstacle present (vegetation, fixed object, upheaval, etc.)
C	Both of the following apply: <ul style="list-style-type: none"> • Meets one or more grade “B” criteria • Sidewalks with cracks, crumbling surface deterioration, or vertical discontinuities.
D	Sidewalk segment is missing (there is a gap in existing sidewalk that creates a barrier to the pedestrian access route)

Sidewalks and driveways with a grade of A (Fair or Better) may or may not be fully ADA-compliant to current PROWAG guidelines but are usable in their current form. Non-compliant grade A sidewalk assets may qualify for maximum extent feasible (MEF) status if site conditions make meeting the standard infeasible. See also WSDOT Design Manual Chapter 1510.030(2) Alteration Projects for guidance on MEF documentation described in Section A.2.7 above.

Sidewalks and driveways with a grade of B (Poor) are usable in their current form but are not ADA-compliant with current PROWAG guidelines (they also may meet Safe Harbor for the 2010 ADA Standards). All sidewalk assets with a grade of C (Very Poor), or D (Missing) are not ADA-compliant. See Section A.2.6 for Safe Harbor requirements.

Of the 134 sidewalk and driveway spot locations documented in this ADA Transition Plan, 97% are not ADA-compliant to current PROWAG guidelines. Non-compliant sidewalks and driveways with poor or no functionality (grades C or D) are considered higher priority for barrier removal than non-compliant sidewalk assets with higher functionality (grades A and B).

For a table of the County’s sidewalk and driveway spot locations by grade, condition, and ADA-compliance, see **Table C-9**.

Table C-9. Sidewalk and Driveway Spot Grade, Condition, and ADA-Compliance Status

Grade	Condition	Count	Percentage Grade	ADA Compliant	Count	Compliance Percentage
A	Fair or Better	8	6%	Compliant	4	3%
				Non-Compliant	4	
B	Poor	98	73%	Non-Compliant	98	97%
C	Very Poor	28	20%		28	
D	Missing	0	0%		0	
Total	-	134	100%	-	134	100%

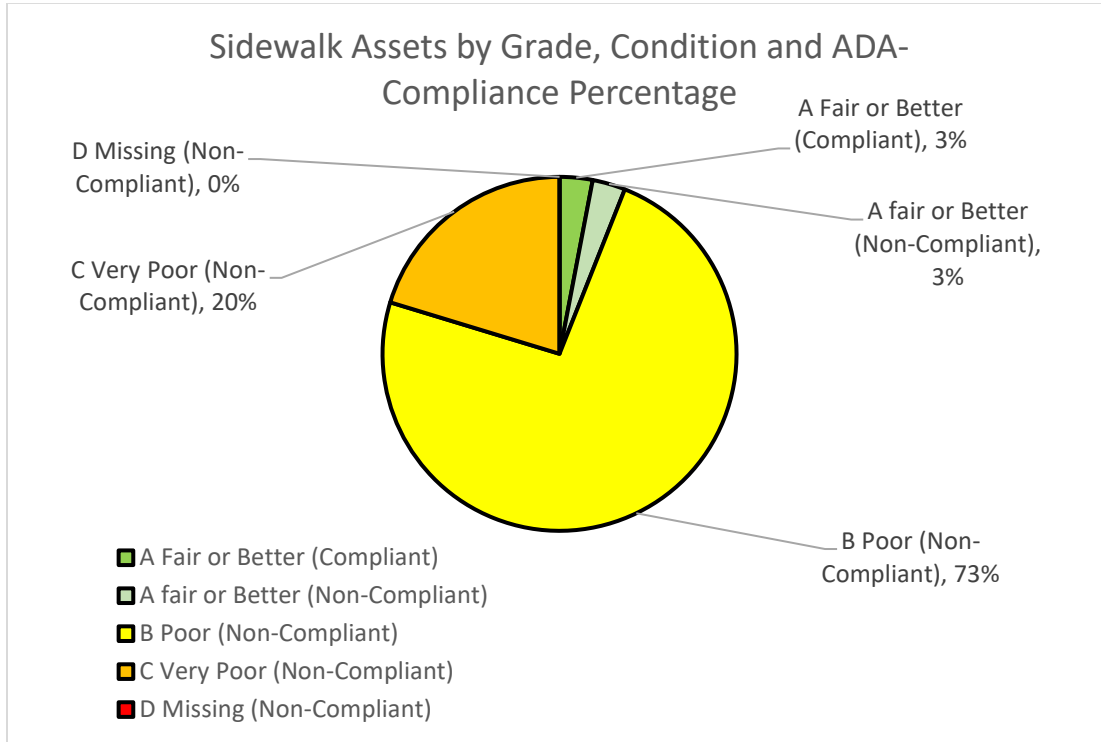
For a table of the County’s sidewalk segment locations by grade, condition, and ADA-compliance, see **Table C-10**.

Table C-10. Sidewalk Segment Grade, Condition, and ADA-Compliance Status

Grade	Condition	Count	Percentage Grade	ADA Compliant	Count	Compliance Percentage
A	Fair or Better	5	11%	Compliant	3	6%
				Non-Compliant	2	
B	Poor	31	66%	Non-Compliant	31	93%
C	Very Poor	11	23%		11	
D	Missing	0	0%		0	
Total	-	47	100%	-	47	100%

For a pie chart of the County’s sidewalk (and driveway) spot locations by grade, condition, and ADA-compliance, see **Figure C-8**. No pie chart is provided for sidewalk segment locations, as the information is nearly the same as for sidewalk spot locations.

Figure C-8. Sidewalk Locations by Grade, Condition, and ADA-Compliance Percentage



Note: Eight (8) “Other” sidewalk spot assets are not included in **Table C-10**. They are shown in white on **Figure C-9** for reference purposes only.

For a map of the County’s sidewalk and driveways by grade and condition, see **Figure C-9**.

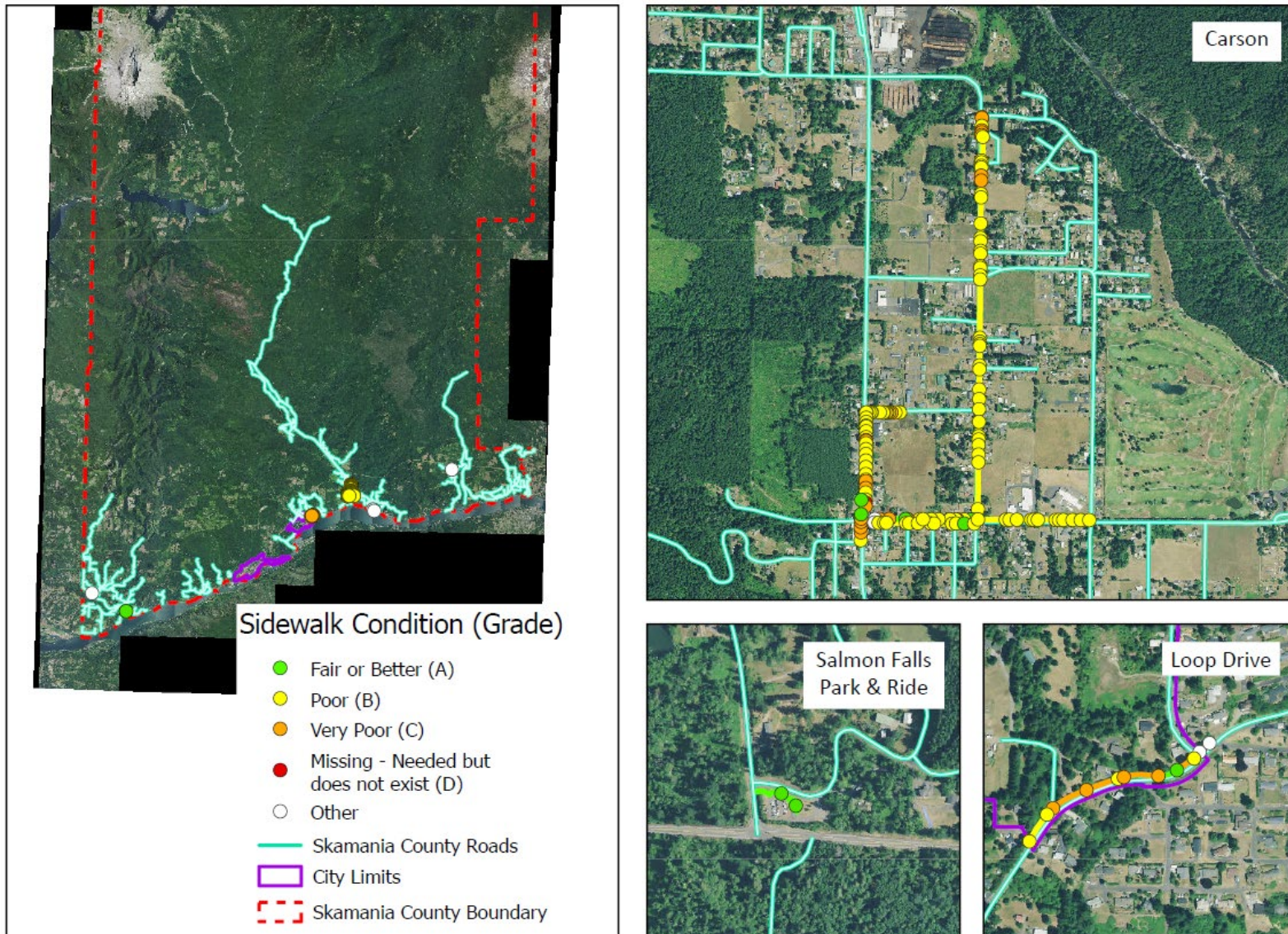
The GIS prioritization for sidewalk and driveway spot locations and sidewalk segment locations is documented in **Appendix B2**.

Sidewalk and Driveway Barrier Removal Recommendations

It is recommended sidewalk and driveway barriers be prioritized in accordance with the general prioritization criteria established in Section C.2.1. It is recommended the County:

- Consider removing sidewalk and driveway barriers identified by the public through grievances or requests during annual budgeting activities.
- Consider removing sidewalk and driveway barriers with grade of C (Very Poor) or D (Missing) before other sidewalk barriers.
- Consider grouping barriers into corridors or sub-areas to provide for cost effective barrier removal. This could be addressed in a future update of the ADA Transition Plan and is dependent upon financial resources available to the County.
- Monitor the removal of sidewalk and driveway barriers in the County’s GIS inventory.

Figure C-9. Sidewalks and Driveways by Grade and Condition Map



C.2.3 Transit Stop Barriers

Transit Stop Barrier Prioritization

Transit Stops were assigned a grade based upon the overall functionality of the transit stop. See **Table C-11**.

Table C-11. Skamania County Transit Stop Grading System

Grade	Condition
A	<ul style="list-style-type: none"> • Compliant or • Alighting area does not meet minimum 8' x 5' dimensions on transit shelter platform (must use paved shoulder)
B	<ul style="list-style-type: none"> • Alighting area does not meet minimum 8' x 5' dimensions on transit shelter platform (must use paved shoulder) • Alighting area exceed 2% slopes
C	<ul style="list-style-type: none"> • Gravel surface (not firm, stable, or slip-resistant) • Undefined alighting area

The following transit stops are locations with the highest functionality. These are considered Fair or Better (A) stops:

- Stevenson Central (fully compliant transit stop)
- Hegewald Center
- Carson North

The following transit stops are locations with functionality with more than one non-compliant feature. These are considered Poor (B) stops:

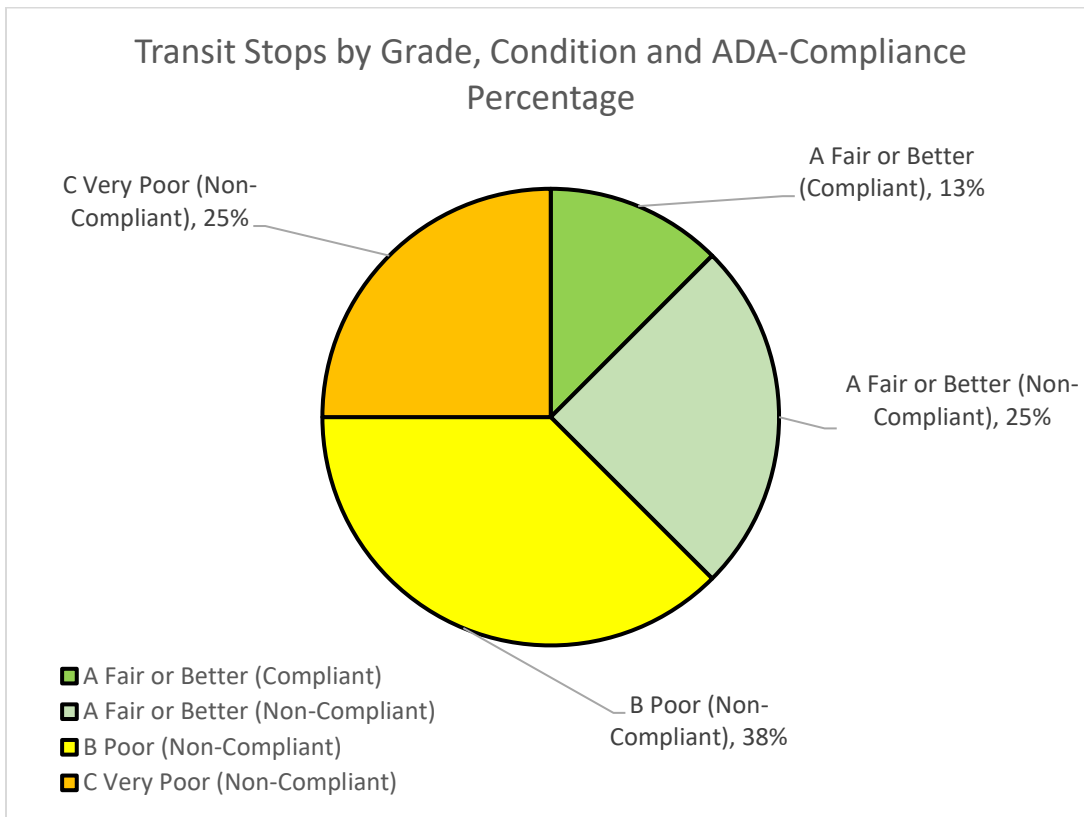
- Salmon Falls Park & Ride
- North Bonneville (under North Bonneville jurisdiction)
- Carson Central

The following transit stops are locations with the most barriers to accessibility due to poor (gravel) surface conditions. These are considered Very Poor (C) stops:

- Skamania General Store
- Home Valley Store (coordination with WSDOT recommended as passengers board from Highway 14 shoulder within WSDOT right-of-way)

For a pie chart of the County's transit stop locations by grade, condition, and ADA-compliance, see **Figure C-10**.

Figure C-10. Transit Stops by Grade, Condition, and ADA-Compliance Percentage



For a map of transit stops by grade and condition, see **Figure C-11**.

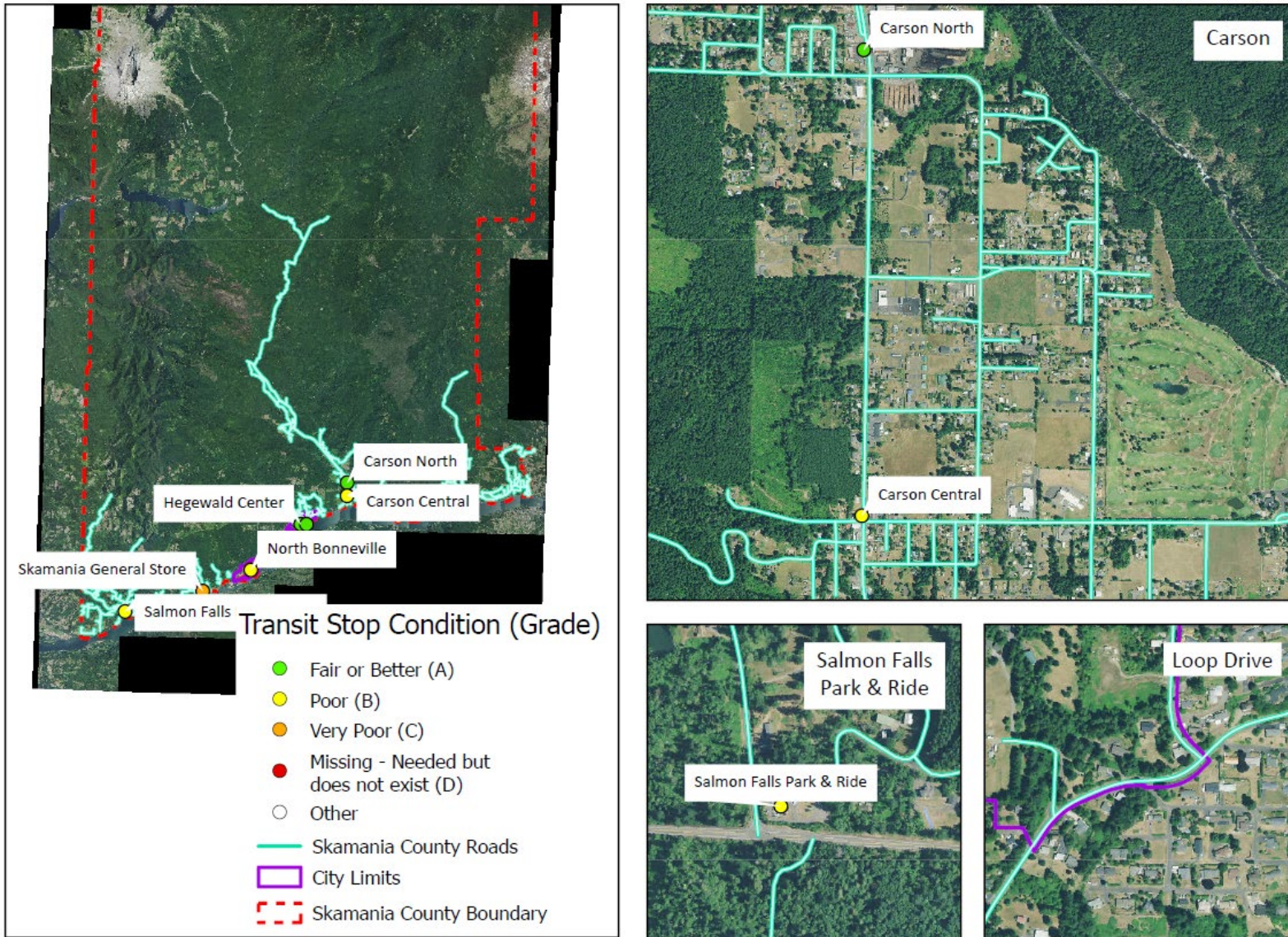
For further documentation on transit stops, see **Appendix B3**.

Transit Stop Barrier Removal Recommendations

It is recommended that the County take the following initial steps to remove ADA barriers:

- Provide paved bus boarding/alighting surfaces at the Skamania General Store and Home Valley Store transit stops.

Figure C-11. Transit Stops by Grade and Condition Map



C.2.4 Accessible Pedestrian Signal (APS) Barriers

APS Barrier Prioritization

There are no existing accessible pedestrian signals under Skamania County jurisdiction. Future APS on roadways under County jurisdiction will be built to the latest WSDOT requirements and PROWAG guidelines and will be prioritized according to the County's Accessible Pedestrian Signal Policy provided in **Appendix E**.

APS Barrier Removal Recommendations

It is recommended the County:

- Adhere to the adopted APS Policy for future APS installation within County limits under County jurisdiction. See **Appendix E**.

C.2.5 Other Public Right-of-Way Barriers

ADA barriers for ADA-accessible parking located at buildings and recreational park facilities will be addressed at a future update of this ADA Transition Plan. It is recommended these barriers be prioritized in accordance with the general prioritization criteria established in Section C.2.1.

C.3 Public Right-of-Way Barrier Removal Costs Estimates

Cost estimates are provided to understand the order of magnitude for barrier removal. The basis of cost estimates were calculated conservatively to account for Skamania County’s rural context as described in each section below. For more detailed documentation of barrier cost estimates, including 70% to 150% cost estimate ranges, see **Appendix F**.

C.3.1 Curb Ramp Barrier Removal Cost Estimate

A planning level estimated cost for replacing one (1) curb ramp is \$26,000.

In addition to design and construction of the curb ramp itself, additional costs may arise from addressing issues such as relocation of existing utilities, acquisition of new public right-of-way, and other roadway improvements such as curb bulbs and new enclosed drainage.

Correcting barriers at blended transitions (near-level transitions between a pedestrian access route and pedestrian crossing) may cost less than estimated if installation of detectable warning surfaces is sufficient to remove barriers to accessibility. See **Table C-12**.

Table C-12. Curb Ramp Barrier Removal Cost Estimate

Curb Ramp Barrier	Cost Estimate (\$2024)
Curb ramp with detectable warning surface	\$26,000

C.3.2 Sidewalk and Driveway Barrier Removal Cost Estimate

The basis of cost estimate for sidewalk and driveway barriers were calculated conservatively and includes project administration, preliminary engineering, construction management, construction cost, and a contingency.

A planning level estimated cost for replacing one linear foot of 5-foot wide sidewalk is \$500 to \$750 (WSDOT requires 5-foot wide sidewalks for new construction, which exceeds PROWAG’s 4-foot wide guideline).

A planning level estimated cost for replacing a driveway interface (SDI) with a 20-foot wide ADA-compliant driveway can range from \$25,000 to \$27,500 each depending on the chosen design. WSDOT Standard Plans for multiple types of driveways are provided in **Appendix B5** (Design Type 1 is recommended for Skamania County). See **Table C-13**.

Table C-13. Sidewalk and Driveway Barrier Removal Cost Estimate

Sidewalk and Driveway Barrier Type	Cost Estimate (\$2024)
5-foot wide sidewalk without drainage per linear foot	\$500
5-foot wide sidewalk with drainage per linear foot	\$750
Type 1 Driveway Interface per each (recommended for Skamania County)	\$26,000
Type 2 Driveway Interface per each	\$27,500
Type 3 Driveway Interface per each	\$25,000

C.3.3 Transit Stop Barrier Removal Cost Estimate

A planning level estimated cost for installing an 8 x 5-foot paved boarding/alighting area is \$11,000.

The basis of cost estimate for transit stop boarding/alighting area barriers was calculated conservatively and includes project administration, preliminary engineering, construction management, construction cost, and a contingency.

A planning level estimated cost for a prefabricated aluminum with glass metal roofing transit shelter structure and 8 x 5 foot paved boarding/alighting area pad is \$62,000.

The basis of cost estimate for the transit shelter and boarding pad includes the shelter structure and concrete boarding pad, project administration, preliminary engineering, construction management, construction cost, and a contingency. This estimate is provided for informational purposes. WSDOT Design Manual Exhibit 1730-5 showing dimensions and slope requirements for transit shelters at bus stops is included in **Appendix B5**. See **Table C-14**.

Table C-14. Transit Stop Barrier Removal Cost Estimate

Transit Stop Barrier Type	Cost Estimate (\$2024)
8 x 5 foot paved boarding/alighting area pad	\$11,000
Transit shelter structure with 8 x 5 foot paved boarding/alighting area pad	\$62,000

C.3.4 Rectangular Rapid Flashing Beacon Cost Estimate

The County is considering the installation of Rectangular Rapid Flashing Beacons (RRFBs) to improve pedestrian safety. The cost of an accessible RRFB is \$176,000.

The basis of cost estimate for an accessible RRFB crossing includes two RRFB poles, pushbuttons, two curb ramps, project administration, preliminary engineering, construction management, construction cost, and a contingency. See **Table C-15**.

Table C-15. Rapid Rectangular Flashing Beacon Cost Estimate

Rectangular Rapid Flashing Beacon Type	Cost Estimate (\$2024)
RRFB including two poles, pushbuttons, and curb ramps	\$176,000

C.3.5 Other PROW Barrier Removal Cost Estimates

The barrier removal cost estimate for accessible parking will be addressed at a future update of this PROW ADA Transition Plan.

For the basis of cost estimates for all barriers by project component, see **Table C-16**.
 For more detailed documentation of barrier cost estimates, see **Appendix F**.

Table C-16. Basis of Cost Estimates for ADA Barrier Removal

Project Component	Curb Ramp	100-Foot Sidewalk No Drainage	100-Foot Sidewalk With Drainage	ADA Compliant Type 1 Driveway	Install RRFB	Bus Pad	Bus Shelter and Pad
Construction	\$13,415	\$25,415	\$38,115	\$13,620	\$91,120	\$5,710	\$32,150
Contingency 40%	\$5,366	\$10,166	\$15,246	\$5,448	\$36,448	\$2,284	\$12,860
Construction Total	\$18,781	\$35,581	\$53,361	\$19,068	\$127,568	\$7,994	\$45,010
Design Engineering 15%	\$2,817	\$5,337	\$8,004	\$2,860	\$19,135	\$1,199	\$6,752
Construction Engineering 15%	\$2,817	\$5,337	\$8,004	\$2,860	\$19,135	\$1,199	\$6,752
Project Administration 5%	\$939	\$1,779	\$2,668	\$953	\$6,378	\$400	\$2,251
Environmental Engineering 2%	\$376	\$712	\$1,067	\$381	\$2,551	\$160	\$900
Environmental Mitigation 1%	\$188	\$356	\$534	\$191	\$1,276	\$80	\$450
ROW	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Cost	\$25,918	\$49,102	\$73,638	\$26,314	\$176,044	\$11,032	\$62,114
Rounded Cost Estimate	\$26,000	\$500 per foot	\$750 per foot	\$26,000	\$176,000	\$11,000	\$62,000

C.3.6 Sidewalk Maintenance and Snow Removal Responsibilities on County/Public Roads

According to [Skamania County Code Section 12.01.060](#), maintenance will be assumed by the county upon official acceptance of the completed roadway by the board of county commissioners. According to [Skamania County Code Section 17.64.175](#), Skamania County is in no way obligated for maintenance or snow removal until the roads meet county public road standards and are accepted by the board as a county road.

C.3.7 Sidewalk Maintenance and Snow Removal Responsibilities on Private Roads

According to [Skamania County Code Section 18.06.090](#), maintenance of private roads are the responsibility of the developer or owner, Skamania County will not be responsible to maintain these roads. According to [Skamania County Code Section 18.06.090](#), snow removal of private roads are the responsibility of the developer or owner, Skamania County will not be responsible to maintain these roads.

C.4 Public Right-of-Way Barrier Removal Financial Plan and Schedule

The County’s Six-Year Transportation Improvement Plan (TIP) will provide for incremental ADA barrier removal in the public right-of-way. The TIP for period 2024-2029 calls for approximately \$21.5 million for bridge repair, bridge inspection, road reconstruction, pavement preservations and other projects. The County funds most of its projects through federal grants and toll credits used as local match, including projects that address ADA barriers. See **Appendix F**.

The preliminary engineering for the **Wind River Road Pavement Preservation Project Phase 2** is dependent upon funding availability. The project is intended to resurface the road and improve the intersection and roadside/traffic safety elements between Frederickson Avenue and Cloverdale Avenue. This project would include ramp, sidewalk, and driveway improvements to meet current PROWAG guidelines in accordance with WSDOT standard plans. The project would be funded by federal funds using toll credits as local match. Federal funds for this project are not currently secured.

C.4.1 Curb Ramps

This curb barrier removal budget allocation may change due to the County’s ability to fund TIP projects, which is subject to annual budget review and reassessment and federal grant funding. See **Table C-17**.

Table C-17. Curb Ramp Barrier Removal Schedule and Cost

Curb Ramp Barriers	Amount (\$2024)
Total Estimated Curb Ramp Barrier Removal Costs (\$2024) (57 curb ramp barriers x \$26,000 per ramp)	\$1,482,000
Wind River Pavement Preservation Project Phase 2 (12 curb ramps x \$26,000 per ramp)	(\$312,000)
Estimated Remainder Curb Ramp Barrier Costs	\$1,170,000

C.4.2 Sidewalk and Driveways

This sidewalk barrier removal budget allocation may change due to the County’s ability to fund TIP projects, which is subject to annual budget review and reassessment and federal grant funding. See **Table C-18**.

Table C-18. Sidewalk Barrier Removal Schedule and Cost

Sidewalk Barriers	Amount (\$2024)
Total Estimated Sidewalk Barrier Removal Costs (\$2024) (10,787 ft of sidewalk barrier x \$625 per linear ft)	\$6,741,875
Wind River Pavement Preservation Project Phase 2 (1,191 feet of sidewalk x \$625 per linear foot)	(\$744,375)
Estimated Remaining Sidewalk Barrier Removal Costs	\$5,997,500

This driveway barrier budget allocation may change due to the County’s ability to fund TIP projects, which is subject to annual budget review and reassessment and federal grant funding. See **Table C-19**.

Table C-19. Driveway Barrier Removal Schedule and Cost

Driveway Barriers	Amount (\$2024)
Total Estimated Driveway Barrier Removal Costs (\$2024) (28 Driveways x \$26,000 per Type 1 WSDOT SDI)	\$728,000
Wind River Pavement Preservation Project Phase 2 (4 Driveways x \$26,000 per Type 1 WSDOT SDI)	(\$104,000)
Estimated Remaining Driveway Barrier Removal Costs	\$624,000

C.4.3 Transit Stops

The existing Carson Central transit stop may be a maximum extent feasible (MEF) candidate due to an additional curb behind the sidewalk that limits the boarding/alighting area to less than 8’ x 5’ as prescribed by PROWAG guidelines. The County is also considering relocating the Carson Central transit stop on the Wind River Highway corridor. See **Table C-20**.

Table C-20. Transit Stop Barrier Removal Schedule and Cost

Transit Stop Barriers	Amount (\$2024)
Total Estimated Transit Stop Barrier Removal Costs (\$2024) (7 x \$11,000 per paved boarding area at \$11,000 each)	\$77,000
Wind River Pavement Preservation Project Phase 2 (Relocate existing stop and install 8’ x 5’ paved boarding area)	\$11,000
Estimated Remaining Transit Stop Barrier Removal Costs	\$66,000

C.4.4 Accessible Pedestrian Signals

The County does not currently own or operate any traffic signals. USDOT requires all agencies to have an APS Policy to be eligible for federal transportation funding opportunities. As part of this ADA Transition Plan, the County has adopted an APS Policy in **Appendix E**.

The County will address requests for APS for areas within County limits under County jurisdiction according to the County’s APS Policy.

C.4.5 Other Public Right-of-Way Barriers

Overgrown vegetation and gravel debris can create temporary accessibility obstacles to the width, clear space, and surface requirements for pedestrian access routes. It is recommended County staff perform regular maintenance activities along pedestrian access routes under its jurisdiction to maintain the greatest degree of accessibility in its public right-of-way infrastructure.

The County intends to address accessible parking barriers at a future update to this ADA Transition Plan.

C.4.6 Barrier Removal Summary

The total estimated cost of known ADA barriers is approximately \$9.03 million.

Anticipated barrier removal activities total approximately \$1.17million. See **Table C-21**.

The estimated cost to remove barriers in 2030 onward is \$7.86 million. See **Table C-22**.

Table C-21. Anticipated Barrier Removal Activity (2026-2029)

Barrier Type	Barrier Removal Activity	Amount (\$2024)
Curb Ramps	12 curb ramps x \$26,000 per ramp	\$312,000
Sidewalks	1191 feet of sidewalk x \$625 per linear foot	\$744,375
Driveways	4 driveways x \$26,000 per Type 1 Driveway	\$104,000
Transit Stops	1 paved 8' x 5' boarding/alighting area x \$11,000 each	\$11,000
Total (Wind River Road Pavement Preservation Project Phase 2)		\$1,171,135

Table C-22. Future Remaining Barrier Removal Costs

Barrier Type	Total Known Barriers	2026-2029 Barrier Removal	2030-Onward Barrier Removal
Curb Ramps (57 x 26,000)	\$1,482,000	(\$312,000)	\$1,170,000
Sidewalks (10,787 feet x 625 per linear foot)	\$6,741,875	(\$744,375)	\$5,997,500
Driveways (28 x \$26,000 per driveway)	\$728,000	(\$104,000)	\$624,000
Transit Stops (7 x \$11,000 per 8'x5' paved area)	\$77,000	(\$11,000)	\$66,000
Total	\$9,028,875	(\$1,171,375)	\$7,857,500

C.4.7 Other Barrier Removal Projects

The County’s 2024-2029 TIP includes the **Wind River Road & Metzger Road Intersection Feasibility Study Project** that intends to conduct an intersection and ADA analysis and engineering feasibility study for this high traffic volume intersection. This project is dependent upon future grant funding not yet secured and is tentatively scheduled for years 2028-2029.

The County’s 2024-2029 TIP is included in **Appendix F**.

D. Future Actions to Achieve Compliance

D.1 Future Actions Needed

The County is pursuing a phased approach to its ADA Self-Evaluation and Transition Plan. This first phase focused on the public right-of-way and addresses self-evaluation, barrier prioritization, and initial barrier removal scheduling for curb ramp barriers, sidewalk assets, and transit stops. This first phase also establishes the County's accessible pedestrian signal (APS) policy. Accessible parking will be addressed at a future update of this Plan.

The County owns/maintains other facility types that will be addressed in the future:

- County buildings with publicly accessible areas
- County park facilities including building structures, restrooms, and recreational area
- County trails
- County programs, services, and activities

Notes: The County addressed the policy and procedure requirements identified in Section A.2.5 as part of this ADA Transition Plan. The County will conduct an internal self-assessment and barrier prioritization for programmatic barriers for its services, programs, and activities at a future date. Cost estimates for barrier removal for these facilities and programming will be provided at a future Plan update.

D.2 Annual Report of ADA Barriers Removed

To ensure implementation of this ADA Transition Plan, it is recommended that the County incorporate an annual review/update process to track ADA self-evaluation and barrier removal progress. It is recommended that the official responsible for implementation of the ADA Transition Plan coordinate this effort in cooperation with relevant County staff from other departments who are involved with projects that remove ADA barriers. The County updates its asset management system as projects are completed. These annual reports will inform the public every year regarding progress towards ADA barrier removal. Annual reports will be available to the public and posted on the Public Right-of-Way ADA Transition Plan webpage.

D.3 Five-Year ADA Transition Plan Update Schedule

This Plan is intended to be reviewed and updated at five-year intervals. As the Plan is updated, an updated barrier removal schedule will be identified. With each five-year Plan update, an official public comment period is recommended to continue public engagement. The inventories and cost estimates will be re-analyzed at each five-year Plan update to determine patterns of need as it relates to the complete facility inventory and barrier removal prioritization.

E. Public Engagement

E.1 Public Engagement Strategy and Findings

The County's developed the following public engagement strategy to inform interested members of the public of the undertaking of this Plan and to invite participation in the process. This strategy included digital announcements, a public online survey, a virtual public workshop, and opportunities for the general public to report ADA barriers and comment on the Plan.

The virtual platforms for the online survey, virtual ADA public workshop, Board of Commissioner workshop and public comment period provided accessible methods of public participation. The findings are helpful in guiding County staff in the selection and prioritization of barrier removal. For documentation, see **Appendix H**.

E.1.1 Project Webpage and Web-Based Publications

The project webpage content launched in February 2024 and is available at:

<https://www.skamaniacounty.org/departments-offices/public-works/ada-transition-plan>

The project webpage includes the following:

- Project description
- County Staff Contacts
- Schedule
- Take Our Survey link to map-enabled ArcGIS Survey123® public survey
- Link to March 26, 2024 ADA Virtual Public Workshop information
- Link to County Board of Commissioner Workshop meeting information for Draft Plan presentation and public comment
- Other ADA Resources section
- Documents section for posting draft version for public comment and final version
- Recent Accomplishments section for further tracking of ADA Transition Plan implementation progress

The following web-based publications promoted the project, online survey, and virtual ADA public workshop, and public comment opportunities in 2024:

- Initial News Flash posting on County's website: January 24 (added to County calendar)
- Facebook Posts
 - Skamania County Public Works & Community Development (January 25, March 11, and March 25)
 - Skamania County Chamber of Commerce (February 20 and March 14)
- Skamania County Senior Services March/April 2024 Newsletter (distribution includes approximately 500 recipients comprised of approximately 100 email recipients as well as mail recipients and social media followers).

E.1.3 Direct Engagement with Local Community Organizations

County staff contacted the Stevenson Community Library and Skamania School district staff via direct e-mail in mid-March 2024, to seek out interest in the online survey and public comment opportunities but did not receive a response.

E.1.4 Online Public ADA Survey

An online survey was created using the ArcGIS Survey123® platform which gave respondents the option to mark barrier locations on a map. The link to the online survey was active from January 24 through March 31, 2024. Sixteen responses were received. Survey documentation is included in **Appendix G**.

Some survey respondents identified locations that are under the jurisdiction of other public agencies (i.e., City of Stevenson, City of North Bonneville, etc.). These responses are noted as such and the information will be shared with the relevant jurisdictions. Two out of sixteen respondents marked barriers on the map as shown in **Figure E-3**.

- One respondent identified the roundabout at US 14 & Wind River Highway as having no room for bicycles and pedestrians and a lack of bicycle routes or side road designations for bike routes.
- One respondent identified SW Rock Creek Drive north of Rock Cove Assisted Living Community as inaccessible during snow events (this is within Stevenson city limits).

Figure E-1. Public ADA Survey Report Barrier Locations Map



The most wanted barrier types for removal are missing curb ramps, missing sidewalk segments and sidewalk/cracks/bumps. See **Figure E-1** and **Table E-2**.

Figure E-2. Most Wanted Barrier Types for Removal by Ranked Score

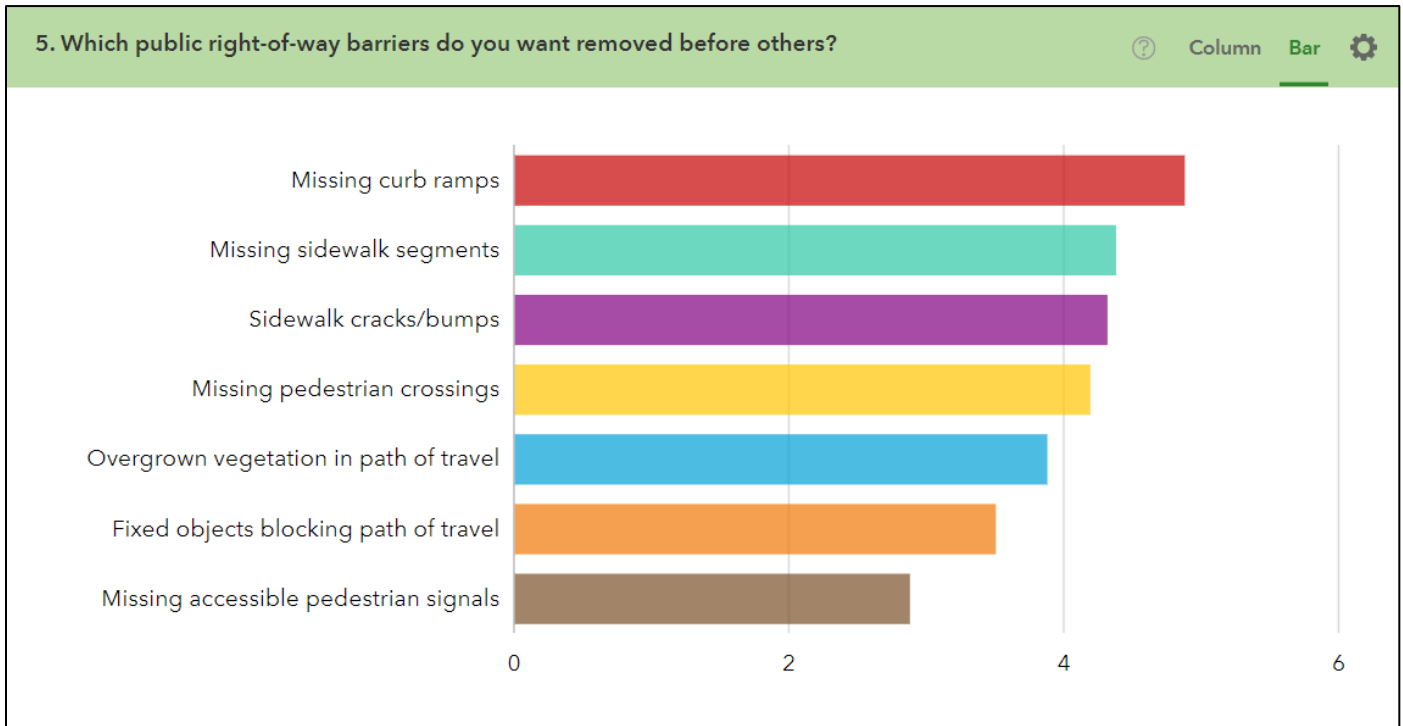


Table E-2. Most Wanted Barrier Types for Removal by Ranked Score

Barrier Type for Removal	Score
Missing curb ramps	4.88
Missing sidewalk segments	4.38
Sidewalk cracks/bumps	4.31
Missing pedestrian crossings	4.19
Overgrown vegetation in path of travel	3.88
Fixed objects in path of travel	3.50
Missing accessible pedestrian signals	2.88

The top priority locations for barrier removal are senior center/elderly care facilities, transit centers/stops/routes, and grocery stores/retail shopping. See **Figure E-2** and **Table E-3**.

Figure E-3. Most Wanted Barrier Removal Locations by Ranked Score

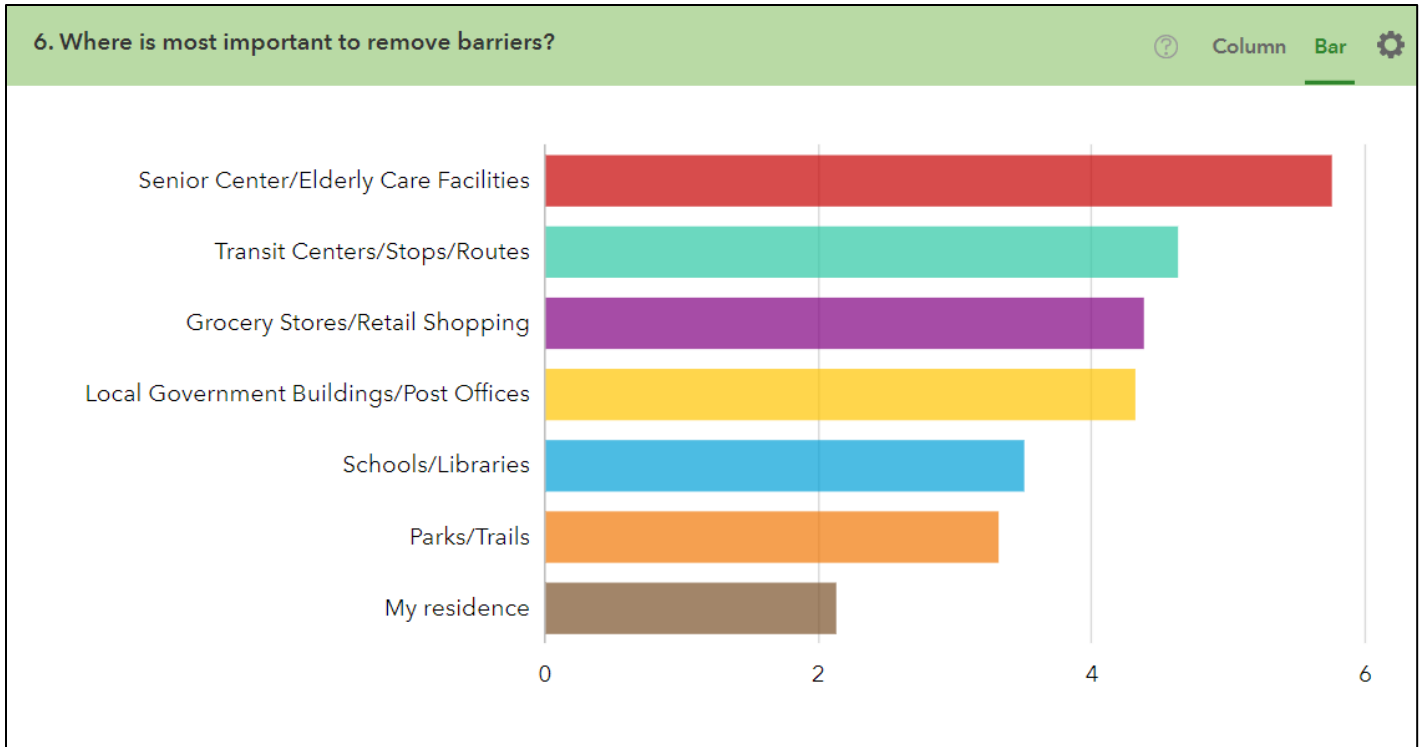


Table E-3. Most Wanted Barrier Removal Locations by Ranked Score

Barrier Removal Location	Score
Senior Center/Elderly Care Facilities	5.75
Transit Centers/Stops/Routes	4.63
Grocery Stores/Retail Shopping	4.38
Local Government Buildings/Post Offices	4.31
Schools/Libraries	3.50
Parks/Trails	3.31
My residence	2.13

Narrative data from the surveys addressed the following themes:

Sidewalk Barriers

- Debris on sidewalks around library (in Stevenson city limits).
- Debris and cracks on sidewalks west of Skamania County Fairgrounds near community gardens and Columbia Gorge Museum.
- Impact of snow events that limit access to Rock Cove assisted living facility, library, Wind River crossing, sidewalks on Second Street, and Courthouse parking lot (in Stevenson city limits).

Requests for Pedestrian Crossing Enhancements in Stevenson City Limits

- Crossing Highway 14 on Second Street.
- Rectangular Rapid Flashing Beacon (RRFB) at Highway 14 and Russell Avenue.
- RRFBs at downtown crosswalks.
- Augment current flag system with visual and audio cueing.

Requests for Expansion of Pedestrian and Bicycle Facilities

- More sidewalks in Carson including on Barnes Road.
- US 14 bicycle route and side road designations from North Bonneville to Stevenson to Home Valley.
- Route from Stevenson to Carson over ridge for bicycle, pedestrians, and off-road-vehicle with connections to Stabler area.
- Bicycle facilities in front of Court House and Rock Creek Park (in Stevenson city limits).
- New ADA ramp connecting to Island Way walking path (in North Bonneville city limits).

Other Topics

- Request for accessible parking and increased lighting at Skamania County Fairground.
- Request for accessible pathways to baseball fields at Home Valley Park (under U.S. Army Corps of Engineers jurisdiction).
- Request for elevator at library (building related; not public right of-way related).
- Request for more public social media announcements of initiatives, maps with areas of identified difficulty, points of interest or history (respondent interested in being involved in organizing or attending community celebration community celebration event where the snow removal technicians, street maintenance crews, electrical workers, paramedics, firefighters, sheriff's officers, etc. are recognized for the vital work they do especially under less than ideal circumstances to keep us warm, dry, and safe in this rural, wilderness-ringed, region).
- Request for transparency regarding how ADA improvements are funded.

E.1.5 Virtual ADA Public Workshop

A virtual ADA public workshop was held March 26, 2024, from 6:00pm to 7:00pm on the Zoom® platform and the meeting was recorded. This meeting provided an overview of the ADA

Transition Plan including barrier findings and plan components. Attendees were invited to complete the public ADA survey and were notified of the upcoming ADA Transition Plan comment period. For slide presentation and full attendee comments, see **Appendix G**.

Three members of the public provided comments at the March 26 virtual workshop:

- One attendee expressed appreciation for the number of benches and picnic tables available locally, streetside and elsewhere.
- One attendee identified issues with slope at grocery store and accessing path by fairgrounds.
- One attendee said yellow tactile pads [detectable warning surfaces] are important at ramps, shared about challenge of finding family bathrooms to accommodate an adult with disabilities of another gender, and need for person to be available by phone to accommodate elderly neighbor who does not use a computer to access/apply for helpful programs.

E.1.6 Public Comment Opportunities

The Draft ADA Transition Plan was posted online for public comment May 1, 2024, at 5pm through May 14, 2024, at 10am. No public comments were received via email or on social media platforms on the Draft ADA Transition Plan.

The Draft ADA Transition Plan was presented to the Skamania County Board of Commissioners on May 14, 2024, during their 10:30am workshop meeting on the Zoom® platform and the meeting was recorded; refer to the Skamania County Board of Commissioners workshop agenda, meeting audio recording, and minutes on Skamania County's webpage for this content. Presentation materials were provided in accessible formats with alternative text prior to the event. The presentation explained the reasons for and required content of an ADA Transition Plan and the County's phased approach to self-evaluation and barrier removal implementation focused first on curb ramps, sidewalks, driveways, and accessible pedestrian signals within the public right-of-way. An open comment opportunity followed the presentation. No public comments were received at the County Board of Commissioner workshop meeting. For meeting presentation documentation, see **Appendix G**.

E.2 Use of Public Engagement Findings and Recommendations

Skamania County's priority array for Transportation Improvement Program (TIP) project selection includes a "barriers identified through public engagement efforts" criterion to prioritize projects based on public engagement. See Section C.2.1.

It is recommended the County:

- Utilize the Skamania County ADA Transition Plan project webpage as a tool for on-going ADA Transition Plan barrier removal progress updates.

F. Accessibility Regulations, Standards & Guidelines Resources

This ADA Transition Plan is based on the most recent federal and state ADA regulations, standards, and guidelines. The resources are divided into general and barrier specific groups with links to websites. For the WSDOT Local Agency Guidelines Chapter 29 ADA Title II Checklist of requirements for ADA transition plans, see **Appendix A**.

F.1 General Resources

Federal ADA Regulations

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

U.S. Access Board

- [Public Rights-of-Way Accessibility Guidelines \(PROWAG\)](#)
- [U.S. Access Board DOJ ADA Accessibility Standards \(2010\)](#)

U.S. Department of Justice Best Practices

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

WSDOT Local Agency Guidelines

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

F.2 Barrier-Specific Resources

Curb Ramps, Accessible Pedestrian Signals and Warning Devices, Sidewalks, Shared Use Paths, Transit Stops, and Pedestrian Access Routes:

- [ADA Title II Technical Assistance Manual](#)
- [USDOT ADA Standards for Transportation Facilities \(2006\)](#)
- [Public Rights-of-Way Accessibility Guidelines \(PROWAG\)](#)
- [WSDOT Field Guide for Accessible Pedestrian Facilities \(2012\)](#)
- [WSDOT Design Manual](#)
- [FHWA's Interim Approval 21](#)

Parking:

- [Facility \(Off-Street\) Accessible Parking \(2010 ADA Standards\)](#)
- [On-Street Accessible Parking \(PROWAG\)](#)