



Acknowledgments

The City of Bellingham would like to thank the following individuals for dedicating their time, effort, and expertise to the development of this Plan.

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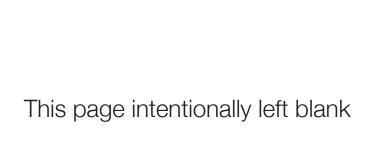
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The Americans with Disabilities Act Notice:

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

Alternative Formats:

Alternative formats of this document are available by calling 360.778.7950 or 711 (WA Relay Services) or by emailing ada@cob.org.

Additional Information:

This document and additional information relating to the accessibility of pedestrian facilities in the public right-of-way can be found on the ADA Self-Evaluation and Transition Plan Web Page (https://cob.org/about/access/mobility-for-all).

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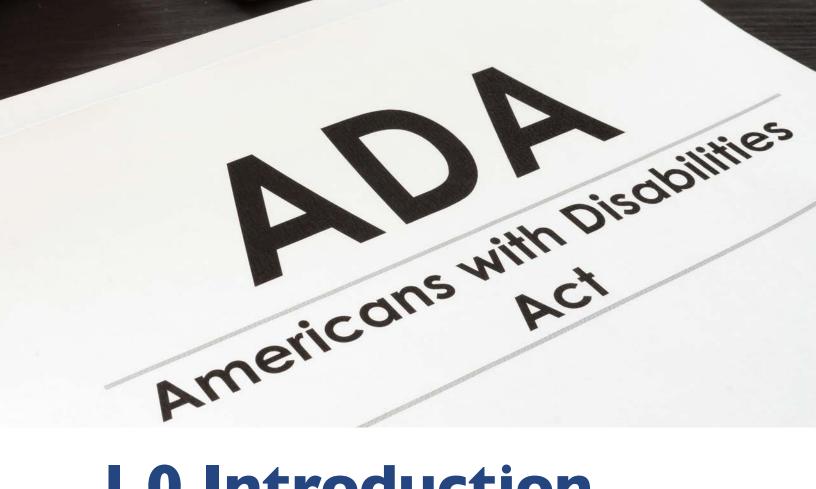
Executive Summary

This Americans with Disabilities Act (ADA) Transition Plan for Pedestrian Facilities in the Public Right-of-Way establishes the City of Bellingham's ongoing commitment to providing equal access for all. The City recognizes that access is not just a civil right, it is a social responsibility to uphold and promote diversity and inclusion. Inaccessible pedestrian facilities create barriers that limit full participation in civic life for individuals with disabilities. In developing this plan, the City collaborated with community members to identify mobility barriers, as well as the steps needed to achieve full accessibility.

The Transition Plan is a required element of the federally mandated ADA Title II, which requires that government agencies provide equal access to programs and services they offer. While the ADA applies to all aspects of government services, this document focuses exclusively on pedestrian facilities in the public right-of-way. This includes sidewalks, curb ramps, pedestrian pushbuttons, and other pedestrian-related facilities in the public right-of-way.

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This document summarizes the process of identifying barriers to accessibility and prioritizing improvements, describes the robust public engagement effort that guided plan development and lays out a long-term plan for removing barriers within the public right-of-way. It is a living document and will be updated annually. The Transition Plan provides an opportunity for Bellingham to eliminate barriers to accessibility and create mobility for all.



1.0 Introduction

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

There are five titles, or parts, to the ADA of which Title II is most pertinent to travel within the public right-of-way. Title II of the ADA requires Public Entities to make their existing "programs" accessible "except where to do so would result in a fundamental alteration in the nature of the program or an undue financial and administrative burden." The public right-of-way falls within the City's programs. Cities and other government agencies are

required to have an ADA self-assessment and transition plan once they reach a threshold of 50 employees. Accessibility is required for all public facilities. This plan focuses on accessibility within the public right-of-way.

The requirements of ADA Title II Part 35, Subpart D – Program Accessibility § 35.150 (d)(3) state:

The plan shall, at a minimum:

- Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- ii. Describe in detail the methods that will be used to make the facilities accessible;
- iii. Specify a schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year;
- iv. Indicate the official responsible for implementation of the plan;
- v. Prioritize walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas; and
- vi. Provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan.

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

Chapter 1 - Introduction

Chapter 2 – Self-Assessment Review of existing facilities, policies, procedures and design standards in compliance with the 2010 ADA Standards for Accessible Design (2010 ADA Standards).

Chapter 3 – Stakeholder Engagement Describes methods of public engagement and documents community input.

Chapter 4 – Barrier Removal Describes current barrier removal methods and lists recommendations resulting from the review of design standards, policies, procedures and public input.

Chapter 5 – Implementation Outlines a schedule for the transition plan, including prioritization of projects, planning level cost estimates and potential funding sources.

Chapter 6 – Recommended Practices Describes practices that support barrier removal efforts and provide accountability to the community.

Best practices were identified and incorporated throughout the planning process beginning with the Scope of Work.

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Several associated appendix items are included with the plan.

Appendix A – Open House Boards

Appendix B – Annotated Map Images and Identified Issues

Appendix C – Survey Questions

Appendix D – Summary of Survey Results

Appendix E – Specific Barriers Identified Through Online Survey and Mapping Tool

Appendix F – Focus Group Guide

Appendix G – Design Standards Review

Appendix H – Maximum Extent Feasible (MEF) Template

Appendix I – Accessible Pedestrian Signal (APS) Policy



Sidewalks

Pushbuttons

Curb Ramps

2.0 Self-Assessment

This section describes the data collection process and resulting inventory of pedestrian facilities within the City's public right-of-way as well as an assessment of City policies, procedures and design standards.

2.1 Physical Barrier Inventory

An inventory of existing facilitates located within the public right-of-way was conducted. This exercise utilized data already available within the City's Geographic Information System (GIS). Applicable information was extracted from the GIS and assembled to delineate the existing pedestrian network. The data included a sidewalk and curb ramp layer that is actively maintained by the City, and a pedestrian

signal layer developed as part of a previous project. Facilities within the City's public right-of-way include the following:

341.5 miles of sidewalk

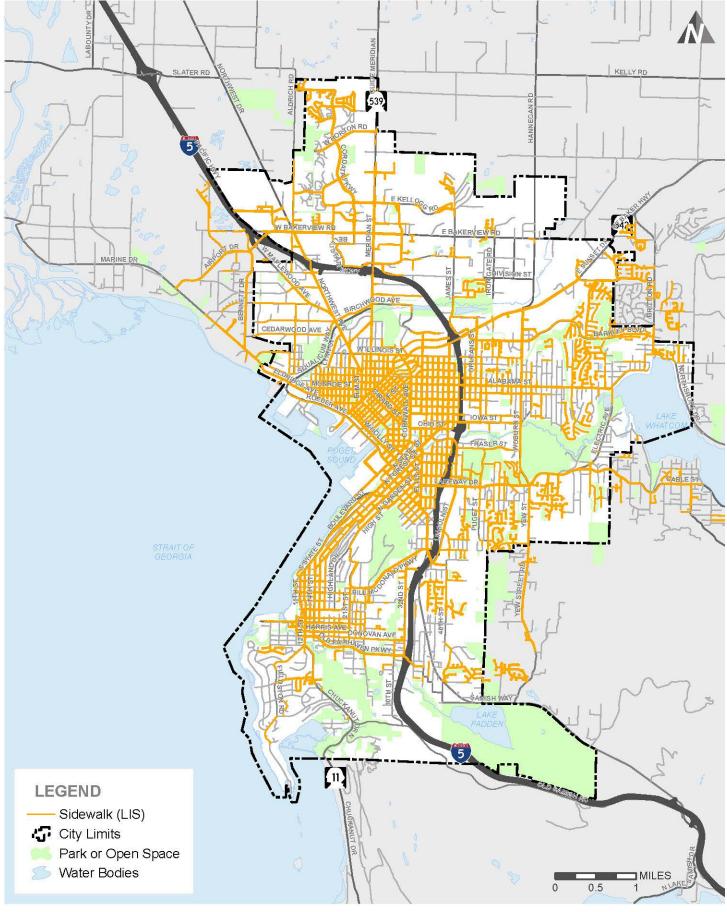
5,733 curb ramps

1,144 pedestrian signal pushbuttons

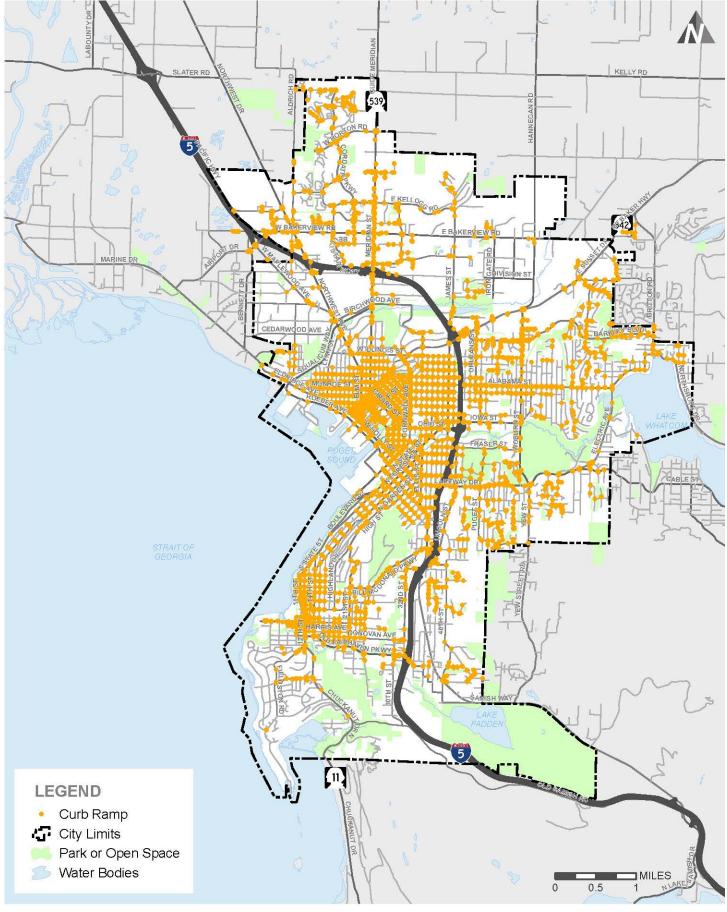
2.1.1 Assessment Data

The City has limited information on current curb ramp and sidewalk conditions, with the last data gathered in 2015. Measurements taken at that time found 62% of total curb ramps to be non-compliant. Minimal data points were assessed for curb ramps and sidewalks, lacking enough information to determine compliance with current standards. An updated inventory of curb ramps, sidewalks and pedestrian pushbuttons will be undertaken in 2021, beginning with the highest priority facilities identified in this plan.

Other pedestrian-related facilities including crosswalks, bus stops, and accessible parking were not inventoried but are included in this plan as part of the pedestrian system. Figures 2-1, 2-2, and 2-3 show the location of the City's facilities. Figure 2-4 shows the findings of the curb ramp assessment done in 2015.

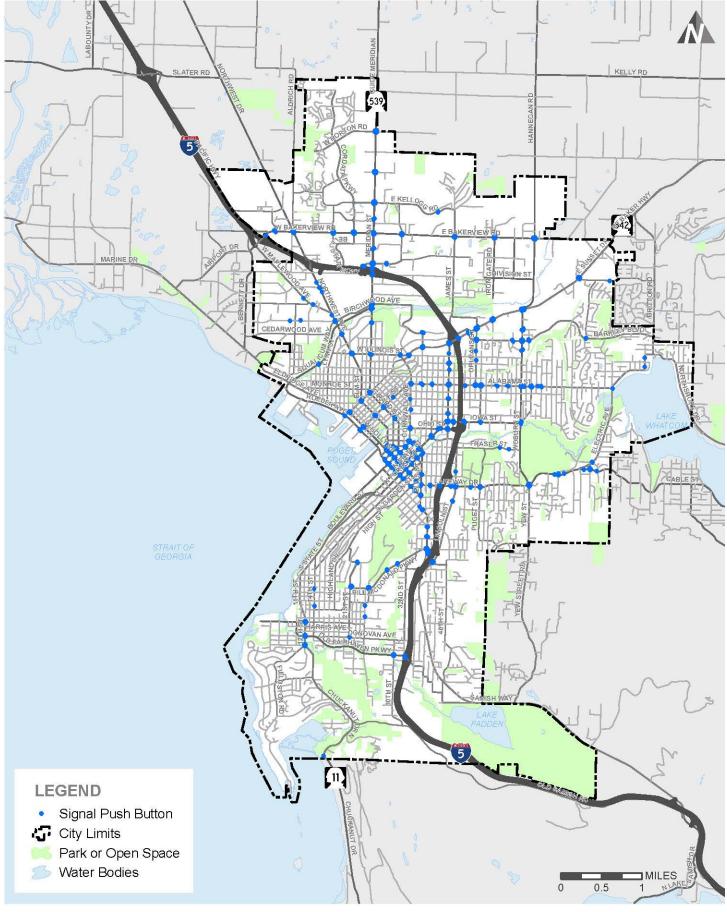






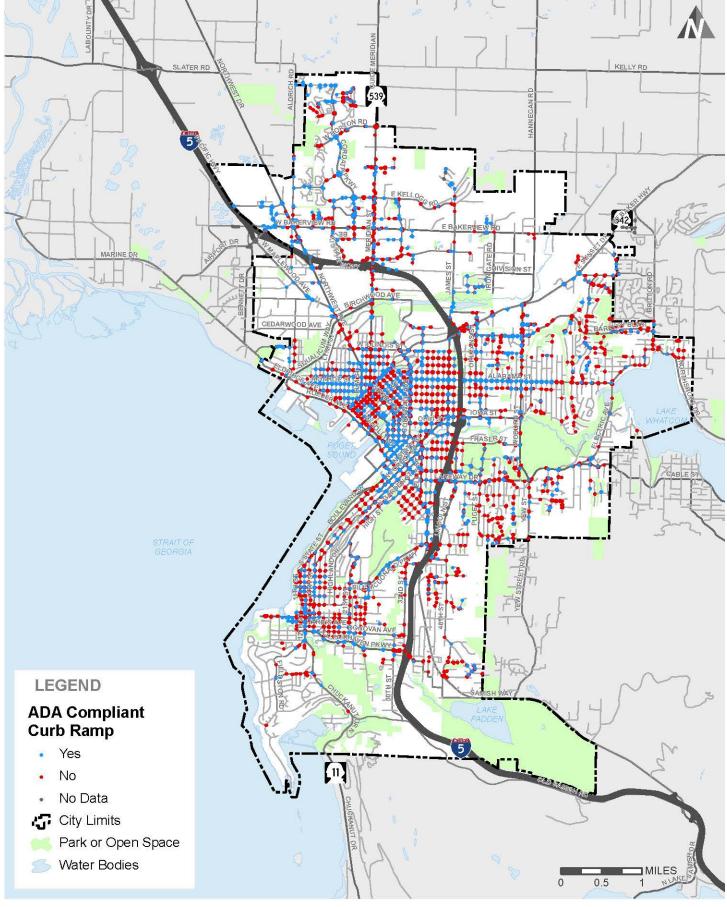


COB Pedestrian Curb Ramps





COB Pedestrian Push Buttons





Findings of 2015 Curb Ramp Assessment

2.2 Policy, Procedure, and Design Standard Audit

2.2.1 Current Design Standards

The City maintains several documents detailing design standards for various facilities in the public right-of-way. These include the City of Bellingham Standard Plans, Public Works Development Guidelines and Improvement Standards, Bellingham Pedestrian Master Plan, and Bellingham Municipal Code.

In conversations with City staff, a need was identified to review the City's current design standards for compliance with 2010 ADA Standards and Proposed Accessible Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG). A detailed assessment of these standards and policies was performed and is documented in Appendix G.

The 2010 ADA Standards are the US Department of Justice's enforceable accessibility standards. The 2010 ADA Standards set minimum requirements for newly designed and constructed or altered state and local government facilities. They are primarily focused on architectural aspects of buildings and do not address some of the unique constraints and conditions relevant to pedestrian facilities in the public right-of-way. To address this, the United States Access Board (Access Board) developed proposed guidelines for the public right-of-way

that were first released in 2002. Subsequent revisions to the draft guidelines were released in 2005 and 2011.

Neither the 2005 nor 2011 guidelines have yet been adopted as standards. Despite this delay, many public entities currently use the draft PROWAG as "best practice" for features within the public right-of-way not adequately described in the 2010 Standards and this practice has been endorsed by the Federal Highway Administration (FHA) and the US Access Board.

There are occasional instances when physical constraints make it virtually impossible to fully comply with accessibility standards when a facility is constructed. In these instances, the ADA requires entities to construct the facility to meet standards to the maximum extent feasible (MEF) and to document the reasons for not being able to achieve full ADA compliance. The City currently uses the Washington State Department of Transportation's (WSDOT) MEF template for documenting these cases. To improve consistency and streamline the documentation process, a MEF template specific to the City was developed and is included in Appendix H. This template is based on WSDOT's MEF template but was revised to include best practices from other agencies and to be more specific to the City and consistent with nearby agencies.

2.2.2 Policies and Procedures

The City identified, through the outreach process, a need for providing clarification on how the public can report ADA barriers, request accommodations and file complaints. Feedback during the public outreach process pointed to the difficulty and confusion many in the community experience when trying to reach the City to report an ADA issue. While the City currently provides the means to report ADA barriers, request accommodations and file complaints, outreach is needed to ensure the public is aware of these processes and how to access them.

Current Methods for Reporting Barriers

Members of the public can report issues such as sidewalk barriers, inaccessible curb ramps or access through work zones using the following methods:

- Call Public Works at (360) 778-7700, or 711 (WA Relay/TTY)
- Email: askpw@cob.org or ada@cob.org
- Online via "See/Click/Fix" application
 - This map-based platform allows you to click a location on a map, identify a category "ADA Accessibility", add a photo and description of the issue

Current Method for Requesting an Accommodation

The process for requesting an ADA accommodation is linked off the "ADA and Equal Opportunity" web page. The City is in the process of updating the process and creating an online fillable form so it will be more accessible and user-friendly.

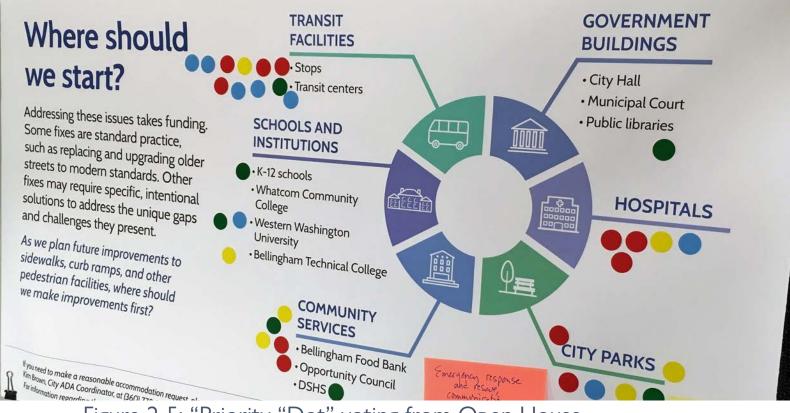


Figure 2-5: "Priority "Dot" voting from Open House

Current Grievance Policy

The City's grievance procedure is available on the City website on the "Accessibility and Equal Opportunity" page, or by request by calling (360) 778-7900 or 711 (WA Relay/TTY) or by email: ada@cob.org.

The following adjustments are recommended to improve access for citizens who wish to report an ADA barrier, request an ADA accommodation or file an ADA grievance:

Revise the City's Accessibility and Equal Opportunity web page. Create an ADA page with separate links to report barriers, request accommodations and file grievances, in addition to housing general ADA information.

Ensure that the City's website and PDF forms are accessible using common screen readers and provide alternative ways of accessing and filing forms.

Ensure all contact information is up-to-date.

Other City Policies

Through the public outreach process, several other policies/practices were identified as potential barriers to access. These include parking and sidewalk use, particularly in the downtown area. Parking and sidewalk use policies were not evaluated as part of this plan but are listed below to inform future efforts.

Parking

Several community members identified, and City staff concurred, that the availability of accessible parking stalls in the downtown area is limited. Further, of those accessible spaces that are available, many have the access aisle on the driver side which is often not accessible to people who use wheelchairs. The need to review current parking policy and design standards was identified.

Sidewalk Use

Policies addressing sidewalk use and enforcement were also identified by several outreach participants as a potential barrier to access, particularly in the downtown area. Several participants cited experiences when access to the sidewalk was inhibited by street furniture, sidewalk cafes and sandwich board signs. Participants expressed frustration when trying to resolve these issues with adjacent businesses and expressed confusion with how the City enforces existing sidewalk use policies. The need to review sidewalk use policies was identified, including the consideration of future sidewalk uses like bike-and scooter-sharing programs.



Bellingham ADA Transition Plan Open House

3.0 Stakeholder Engagement

Bellingham community members were an essential element in the development of the transition plan. They generously donated their time and expertise to ensure the needs of individuals with disabilities were acknowledged and addressed and provided guidance on best practices.

The primary goals for the public outreach activities prior to adopting the plan are:

Meet Title II requirements for public comment opportunity;

- Provide information about the ADA Transition Plan requirements and development process; Identify general types and specific locations of barriers within the public right-of-way and community priorities for improvements;
- Inform the public about the City's plan and processes regarding removal of barriers to accessibility within the public right-of-way; and
- Obtain public comment to identify any errors or gaps in the ADA Transition Plan, specifically on prioritization and processes for community input.

In developing the ADA Transition Plan for the City of Bellingham, a key initial step was outreach to people with disabilities or those who support people with disabilities. The goal of this outreach was to gain feedback on current pedestrian facilities within the public right-of-way in Bellingham, specifically those pedestrian facilities that provide access to community and government services.

3.1 Promotion and Advertising for Outreach

Outreach to solicit participants and encourage input included a news release, social media postings, flyers, radio announcements and a City web page. Specific outreach to organizations serving and advocating for individuals with disabilities included:

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- Northwest ADA Center
- United Blind of Whatcom County
- Hearing, Speech and Deaf Center
- Cascadia Deaf Nation
- Center for Independence
- Max Higbee Center (provides communitybased recreation programs for youth and adults with developmental disabilities)
- NW Regional Council Area Agency on Aging
- Opportunity Council
- The ARC of Whatcom County
- Unity Care NW Behavioral Health Services
- Vocational Rehabilitation
- WA State Department of Services for the Blind
- Whatcom Community College Access and Disability Services
- Disability Access Center at Western Washington University
- Bellingham Technical College Accessibility Team
- Pacific Northwest Autism
- Whatcom County Health Department Veteran Services
- Work Opportunities
- Whatcom Transportation Authority
- Bellingham Senior Center
- Abilitrek

The City of Bellingham maintains an ADA Transition Plan project web page which serves as the landing page for the plan development, with links to various outreach opportunities.

3.2 Methods of Engagement

To garner feedback from the community, the City hosted an in-person open house on June 26, 2019; created an online informational open-house which remained open throughout the plan's development; created an online survey that was available to the public from June 26 through July 31, 2019; and convened a focus group of interested community members held on August 21, 2019. The online open house includes a mapping tool that allows the public to identify locations of issues on a map and insert photos. This online mapping reporting tool remains open for residents in the city to report accessibility issues in pedestrian facilities.

Accessibility of online materials was tested via the Northwest ADA Center and volunteers from the community. Feedback for each element of outreach resulted in the identification of general and specific issues. Community members were also asked about priorities and which issues and areas are most important to them.

Open House: June 26, 2019

A community public meeting was held in the Bellingham Public Library lecture room on Wednesday, June 26 from 5:30 p.m. to 7:30 p.m. The room is accessible using elevators and the library is centrally located in Bellingham with good transit service. Sign language interpreters were on-site and staff engaged members of the community to provide feedback on maps and boards. Outreach boards were provided to help educate the public on the ADA at the meeting and in the online open house. Images of the open house boards are provided in Appendix A.

Over 30 people attended the public meeting. People were able to provide input to the survey on computers in the room.

During the open house, attendees noted the priorities below with sticker dots (see Figure 2-4):

- Access to transit 11
- Access to city parks 7
- Access to community services 6
- Access to hospitals and medical services 5
- Access to schools and institutions 4
- Access to government buildings 1

Using maps and through conversations with staff at the meeting, several location-based comments were provided by attendees noting barriers to access or mobility. Annotated map images from the meeting along with a list of the over 50 issues identified by participants are provided in Appendix B.

Issues for sidewalks included areas where sidewalks were uneven, missing or blocked by signboards, sidewalk

cafes or cars. Other issues included crosswalk locations where curb ramps do not align with the crosswalk, where crosswalks are rough and uneven, or where drivers are inattentive while making left or right turns. Curb ramp issues were noted where people have had challenges with their design, location, or the lack of them.

Online Survey June 26 through July 31, 2019

A 16-question survey was open from the time of the open house meeting on June 26 through July 31, 2019.

Paper surveys were also made available for those who preferred them. Four were received and were added to the online survey results. The survey was accessed 99 times and only ten percent did not complete the survey or restarted it.

The survey asked respondents how they travel, where they live, why they travel in Bellingham, whether they had a disability or support someone with a disability, and whether an accessibility issue ever prevented them from being able to participate or obtain services in Bellingham. Questions regarding demographics were optional.

Finally, the survey asked for specific feedback on the types of pedestrian facility barriers people experience, the types of public services where access is most important for them, and specific locations where there are barriers or other accessibility issues.

Differences appeared between the priorities of those with disabilities, those that support people with disabilities, and those who do not have disabilities. Specifically, the top-line survey summary suggests that those with disabilities or supporting someone with a disability clearly experience more barriers in pedestrian facilities than those without disabilities. Those with disabilities and supporting those with disabilities noted priority locations as hospitals and city parks, while those without disabilities prioritized community services and hospitals slightly higher. Access to city parks was notably a higher priority for those with disabilities as compared to those without disabilities.

The survey questions are provided in Appendix C. Top-line summaries breaking down respondent types, demographics, and transportation patterns are provided in Appendix D.

Respondents reported issues at 100 locations including sidewalks, curb ramps, crosswalks at signals, ADA parking and access to transit. Attachment E provides a list of issues collected through the surveys and online mapping tool.

Focus Group August 21, 2019

The purpose of the focus group was to review the initial comments received to date through the open house and survey and take a sharper look at different aspects of accessibility including specific locations, types of issues and priorities. Eight community members participated in the focus group on August 21 from 2 p.m. to 4 p.m. Staff attendees included Kim Brown and Amy Cloud from the City of Bellingham, Eva De Leon from the Northwest ADA Center, and Ryan Peterson and Jeanne Acutanza from the consultant team.

The focus group was facilitated by City of Bellingham staff and consultants and held at the Bellingham Public Library. A focus group guide was developed for distribution to participants and is included in Appendix F. Comments and discussion were recorded for all participants. The agenda for the focus group included:

- Welcome and acknowledge participants and provide brief purpose of meeting
- Review ground rules
- Self-Introductions
- Discussion of the survey results and review of materials
- Workshop and in-depth discussion

After the review of survey top-line results, the group discussed issues

Key Finding

Over one-third of survey respondents indicated they have not been able to participate in or obtain services in Bellingham due to an accessibility issue with a sidewalk, curb ramp, crossing, or ADA parking barrier.

Key concerns of respondents included crosswalk locations where curb ramps do not align with the crosswalk, crosswalks that are rough and uneven, and intersections where drivers are inattentive to those in the crosswalk.

and comments. These comments were noted in-person as well as transcribed from the audio recording and are summarized and categorized below in four areas:

- 1. Comments and issues on specific topics
- 2. Comments and issues at specific locations
- 3. Comments and issues that may not be addressed by this plan and
- 4. Priorities

Comments and Issues on Specific Topics

Some comments were raised related to specific issues. Where they overlapped, they were combined into the topics below.

Other data collection in addition to the survey – Is the survey response adequate to address issues? Should there be a broader inventory to identify barriers or other accessibility issues? There are more issues in the City than we identified through the survey and through the other tools. One of the processes the consultant team will follow is using GIS analysis to further identify and describe issues.

Transparency of process – What will the City do with the information gathered during the public process? Will input and issues raised be incorporated in the plan?

Transition Plan as living document – Will the plan "end up on a shelf" or truly result in accessibility improvements now and into the future?

Accessibility of private businesses – There are private businesses and organizations that are not accessible. While addressing these issues is not within the scope of this plan, it is important to identify the problem and create awareness of the need to remove barriers to improve access for all members of the community.

Medical facilities – Surprising that hospital and medical facilities were not mentioned more often in the survey. Many places, including medical offices, do not seem accessible by wheelchairs specifically from bus stops.

Lack of sidewalks – Some locations have no sidewalks, making it impossible to access buildings.

Barriers not necessarily related to physical structures

- Sometimes barriers to access are a result of attitudes or mindsets. More education might be helpful.

Sandwich boards on sidewalks – Sandwich boards not only block sidewalks but can also block access if placed adjacent to ADA parking spaces. These signs are also not very visible for those with vision limitations or for those walking side-by-side with companions (conversing with sign language, for example). Recommend review of City policy on use of sandwich board signs as well as current enforcement practices. Education for public and private businesses may help.

Crosswalk activation – Where yellow lights flash after the button is pushed on a flashing pedestrian crossing, it would be helpful to have both an audible and visual cue that the crosswalk lights are activated. People need

to know that the lights are flashing. Beyond this there is probably a need for better awareness and education. Staff mentioned devices at some crosswalks that vibrate to give a cue that the crosswalk is activated. It was noted that this might not be useful for those not physically touching the button. Side streets, more than major arterial crossings, can be most challenging. The crosswalk times should be coordinated with other nearby signals. Push buttons should only need to be pushed once.

Signal-controlled intersections – At signal-controlled intersections where left turns are permissive (drivers can turn left at the same time pedestrians have the walk light), drivers may not be paying attention and have almost struck pedestrians in the perpendicular crosswalks. Visibility and driver attention is also an issue for right-turning drivers looking left and turning but ignoring that there might be pedestrians in the crosswalk. Can signals be adjusted to allow more pedestrian crossing time, or separate the movements of pedestrians and left and right turning vehicles? Consideration of traffic engineering changes may be needed as well as education. Some people choose to wear bright clothing or are able to raise their chairs to be more visible.

Consistency in how curb ramps are designed and constructed – Where they are located, the direction of ramps, etc.

Roundabouts – In general, roundabouts are very difficult for people with disabilities of all types to navigate. Advised not to traverse roundabouts with a guide dog.

Comments and Issues at Specific Locations

Some comments were discussed, referencing specific locations described below.

Eldridge crosswalk – There is no nearby crosswalk to get across Eldridge Avenue to the bus stop. The nearest striped crosswalk is about ten blocks away. When I contacted the City, I was informed they wouldn't put in a crosswalk unless it was near a park or downtown area. They said it might create a false sense of security.

Cordata roundabout – The roundabout at Cordata by the Food Co-op is very challenging to navigate. Generally, avoid because a pathway is not clear for those with low vision. It does not feel safe to cross Cordata. People have different levels of vision, but these roundabouts are difficult for any to navigate. Part of the problem is that it is difficult to discern where vehicles are going in the roundabout (where they are exiting the roundabout). This is especially difficult if you are relying on sound. Reflective flashing beacon crosswalks are being considered at roundabouts.

Crosswalk at Haggen/Woburn – Drivers don't pay attention at the crosswalk. There have been some near misses and anecdotal reports of people being hit in crosswalks.

Garden at Maple intersection crosswalks – There are no marked crosswalks at this intersection, and it would be desirable to have them and in other residential nearby areas.

Bunker Building curb cuts – Curb cuts can be challenging to navigate. At the Bunker Building on the PeaceHealth St Joseph campus, the curb cuts may be too steep or at an angle that is hard to control and sometimes it is necessary to have people in front of them to keep from sliding sideways.

Transit access to WIC on Iowa Street – Have heard that the Women, Infants and Children (WIC) program at SeaMar Community Health Center on Iowa Street is not accessible by transit due to lack of sidewalks.

Sidewalks on James and Alabama – Up and down James Street and up and down Alabama where James ends there are uneven sidewalks because of trees. Sometimes the tree wells are on one side and sometime on the other which makes them harder to predict with low or no vision. High contrast could be used to make things like tree wells and curb cuts easier to navigate.

Sidewalks on Garden Street - Sidewalks are uneven.

Curbs on Girard Street – Girard Street near the fire station crossing Broadway has a curb where the crosswalk should be. One can end up in the street unintentionally.

Monroe curb cuts – Curb cuts used on Monroe with curbs on either side are problematic. The curb continues but the ramp comes down. The wheels of the chair may follow one elevation and tip over. Uneven crosswalks and curb ramps are also a problem at driveways. One example is by LaFiama restaurant. If they are not painted or contrasting this can be an even bigger issue. These seemed like they could be a tripping hazard, especially for those with low vision.



Bellingham ADA Transition Plan Open House

Comments and Issues that May Not Be Addressed by the Plan

Some issues identified were not related to the public right-of-way and are therefore not addressed as part of this effort. They are described here for reference.

Transit access and drivers – Some transit drivers have not accommodated those with disabilities. This should be referred to the transit agency.

Public buildings not accessible after hours – It seems some buildings are not accessible at certain times, such as for evening meetings. Doors and elevators may be turned off depending on the time of day. After-hours access should be provided to public meetings if held after hours. Alternative access pathways should also be made clear if doors to public meetings are locked after hours. Buildings

and furniture in buildings like the Council Chambers, specifically Council seats and dais are not accessible.

ADA parking at medical facilities – ADA parking spaces at medical facilities and the hospital are nearly always full. Can the number of spaces be increased? Also, there are many sidewalks on the hospital grounds without curb cuts. Some medical facilities and offices don't have ADA-compliant restrooms.

Access and steps into private businesses –

Steps into buildings from the street that are not visibly discernible are challenging. On Commercial Avenue (the street that goes by the Library) there are businesses with steps that make access impossible. Alternative access to steps is not easy to find or hard to see.

Elevators in public buildings – The elevator in the County Courthouse is small, not sized for a larger wheelchair.

Transit stop notifications – So-called "talking buses" that announce stops are great, would like to see this implemented on all routes and include all stops (don't skip announcing some stops). Drivers don't call the stops either making it hard to navigate as a rider. WTA has started implementing audible and visual stop announcements in their buses.

Need for restrooms if taking paratransit –

Paratransit service takes extra time and having a restroom nearby that is accessible would be helpful.

Priorities

As a final topic the group discussed priorities and what should be fixed first. Notes from that discussion:

Sidewalk barriers – Sidewalks and barriers in the sidewalk are priorities. If legislation governing sandwich boards is reviewed again, then navigation, especially in terms of accessibility, should be considered. Sandwich boards in the sidewalks make walking and conversing problematic for deaf people who walk side-by-side and are signing. Deaf people use vibrations to know when people are walking up on them, so it is problematic if the sidewalks are uneven. For those that are deaf-and-blind, this issue is even more intensified.

Sidewalks uneven in downtown – Sidewalks that are uneven or broken or there may be tree wells in the middle of the sidewalk that can be very challenging, especially downtown.

Crosswalks and jurisdictional coordination –

Management or maintenance of pedestrian facilities can be made more challenging if agencies have shared jurisdiction. Coordination between agencies should be addressed. If the state (WSDOT) has jurisdiction, but the City identifies a need for a change, there should be mechanisms for coordination and collaboration specifically to address ADA concerns.

Priority of ADA improvements on par with bike improvements – Accessibility and ADA improvements should be as important in the City as bicycle and trail improvements.



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Accessibility affects all – Accessibility also impacts people using strollers. Can we build alliances with parents and others to increase awareness and education?

Education and outreach – Increase outreach, education and awareness to the community at large, focus on pedestrian safety (motorists), and target businesses offering services. Have the City promote accessibility as an investment in everyone.

Maintenance of downtown streets – Maintenance of downtown streets is a priority because they are used by a lot of people and several of the curb ramps, sidewalks and street surfaces are decaying.

Advisory Committee Meetings: October 2, 2019, November 20, 2019, August 13, 2020, and September 25, 2020

An advisory committee was formed to help inform the development of the transition plan and consisted of members of the community, City staff, and consultant support. Four advisory committees were held and the purposes of each are summarized below.

Advisory Committee Meeting #I October 2, 2019

The purpose of the first Advisory Committee meeting was to facilitate introductions between members, provide background on the City's efforts, discuss current barrier removal efforts, present the results of the public outreach effort and to present and receive feedback regarding the prioritization framework and cost-estimating process.

Comments:

- Would like engineers to consider the "user experience" when there are options with ADA-compliant facility designs. Curb ramp designs were used as examples.
- Educate property owners about their responsibility to maintain clear passage on sidewalks.
- Advertise how the public can report barriers.
- Consider higher weighting for projects within locations with higher collision rates.

 Consistency in sidewalk and curb ramp design, pushbutton locations, and placement of tree wells is important for people with disabilities.

Advisory Committee Meeting #2: November 20, 2019

The second Advisory Committee meeting focused on the results of the prioritization and cost-estimating analysis. In this meeting, the prioritization framework was explained, and a summary of results was presented to committee members. Financial information was also presented including current funding available for barrier removal and the cost estimate for transitioning to ADA compliance.

Comments:

- Recommend increased funding for removal of barriers.
- Consider higher weighting for locations with high populations of people with disabilities and seniors.
- Include a process for addressing improvement requests for urgent issues.
- Consider options for clearing sidewalks of snow and ice in inclement weather. Priorities include access to businesses and services.

Advisory Committee Meeting #3: August 13, 2020

The third Advisory Committee meeting was focused on reconvening and sharing how the coronavirus pandemic



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has personally affected committee members, what coping strategies have worked, reviewing where we left off and discussing next steps in the plan review process.

Committee members identified the following challenges due to the coronavirus pandemic: feelings of isolation, anxiety being around people, missing hugs from family and friends, sadness, difficult balancing childcare and work, lay-offs, difficulty keeping programs running, missing human connection, and recognition that there is a greater impact on people with disabilities.

Members identified the following coping strategies: using delivery services, working from home, keeping connected with family and friends at a distance, having pets, communicating via internet and phone calls, being outside walking and gardening, reading, self-care, and trying to keep a positive outlook.

Comments related to pedestrian access and mobility:

- Concern about pedestrian safety in work zones. Issues include: people who are blind or low vision can't read warning signs, barriers need to be detectable and alternate routes need to be accessible.
- Some of the new sidewalk cafes create barriers for people with disabilities.
- Would like to see the City provide more accessible parking in downtown Bellingham and Fairhaven.
- Would like to see more uniformity in locating bus stop signs, and with crosswalks.

Advisory Committee Meeting #4: September 25, 2020

The purpose of the fourth Advisory Committee meeting was to ensure the "Stakeholder Engagement" chapter accurately reflects the public engagement process and input of community members. It also provided an opportunity to discuss how to encourage greater awareness among elected officials about issues facing people with disabilities.

"Stakeholder Engagement" chapter review comments to include in plan:

- ADA parking downtown is limited. In addition, angled parking with the access aisle on the driver side is not accessible to people who use wheelchairs.
- Uneven sidewalk and curb ramp surfaces are particularly challenging for people with spinal cord injuries.

- Overgrown vegetation under the I-5 bridge at Fairhaven Parkway is a frequent barrier. This is a responsibility of State DOT but City staff will contact WSDOT to see if the City can help out clearing this area.
- Combine ADA improvements with bicycle and pedestrian improvements. This will increase support for projects and help bring communities together.
- How do citizens report barriers and make service requests? Public Works main phone line: 360.778.7700.
 The City is currently investigating an online application.
 David offered to review the application for accessibility.
- Encourage private businesses to remove barriers by increasing awareness of the benefits to accommodating people with disabilities. The Disability Inclusion Advantage report talks about how companies participating in disability inclusion programs and hiring promoted a better environment, diversity and greater awareness in the disability world. In return, those companies had a greater chance of higher shareholder returns.
- Transit accommodation is critical. Ensure drivers know how to accommodate riders with disabilities by providing ADA accommodation training to drivers.
- ADA parking at medical facilities should be adequate to accommodate people with disabilities, temporarily injured people, and elderly individuals with mobility impairments.
 This applies to all public facilities, grocery stores, etc.

 Education and outreach are top priorities to move this plan forward. Ensure the public and expert groups are aware of the importance of accommodating people with disabilities and how greater accessibility benefits everyone.

Recommendations for Engaging Elected Officials

- Provide a disability simulation workshop for the Mayor and Council members. Consider holding empathy lab hours- showing people how screen reader or assistive technology users utilize the devices/ equipment for people who are blind or low vision.
- Promote the idea of an inclusive community, welcoming to all in Bellingham and Whatcom County.
- Review regulations that address sidewalk accessibility concerns such as sandwich board signs and sidewalk dining.
- Invite elected officials to meet with the Advisory Committee.
- Develop educational curriculum for community members,
 City staff, as well as for the Mayor and Council Members.
- Encourage the City to focus on enhancing -Diversity, Equity, Inclusion, and Accessibility

Americans with Disabilities Act Transition Plan for the Public Right-of-Way | April 2021

- Broaden recruiting efforts to promote employment for people with disabilities. Ensure City staff reflects diversity and includes people with disabilities.
- Establish an on-going ADA Advisory Committee.



4.0 Barrier Removal

Removal of accessibility barriers is the primary purpose of ADA transition plans. The following section documents the primary methods of barrier removal the City currently has in place. This section also provides recommended changes to city policies, practices and design standards to comply with state and federal requirements related to ADA accessibility.

4.1 Barrier Removal Methods

The City uses a number of methods to remove accessibility barriers in the public right-of-way. Some are annual programs that provide continual means of barrier removal while others vary based on outside influences such as

permitted development and available grant funding. The methods being used currently include the Capital Improvement Program, the Sidewalk Program, traffic signal upgrades and private development.

4.1.1 Capital Improvement Program

The City's Capital Improvement Program (CIP) is the most significant expenditure of funds for infrastructure projects within Bellingham. Projects completed under this program can include new facilities or upgrades to older facilities and can encompass a variety of infrastructure types including city streets and bridges as well as water, sewer and stormwater infrastructure. The following describes general subprograms in the CIP and their relation to ADA barrier removal.

While the City is currently spending \$1.3 Million per year on average for barrier removal, this funding is variable. Year-toyear expenditures largely depend on the selection of projects not necessarily related to ADA barrier removal. With the exception of the Sidewalk Program, there is very little flexibility in how monies spent on ADA barrier removal are allocated.

Pavement Resurfacing

The pavement resurfacing program is used to maintain the current roadway system by providing street overlays and other pavement related rehabilitation. While primarily focused on pavement preservation, these types of projects often include upgrades to pedestrian facilities. When pedestrian infrastructure is impacted by any type of construction, they are required to be reconstructed to current ADA standards to the maximum extent feasible. Often a pavement overlay will impact adjacent ADA features, such as pedestrian crosswalks and curb ramps. These features will be retrofitted to meet current standards if found to be non-compliant.

A recent example of a pavement resurfacing project that impacted and upgraded pedestrian features is the Roeder Avenue overlay project. This project, completed in summer of 2019, included a pavement overlay of Roeder Avenue between Squalicum Way and Central Avenue. The cost of this project was approximately \$1.8 million. About 12.5% of the overall cost was spent on upgrading existing pedestrian facilities including curb ramps and sidewalks.

Approximate annual budget: \$5,280,000

Estimated annual contribution to barrier removal: \$264,000

Transportation Fund

The Bellingham City Council formed Transportation Benefit District No. 1 (TBD) in July 2010 and in November 2010, voters approved the TBD to provide dedicated sales tax funding for priority transportation needs within Bellingham. From 2011-2015, the Council-TBD Board allocated TBD revenue in equal thirds for arterial resurfacing, non-motorized improvements and a contract with WTA to fund Sunday bus service and other supplemental transit routes in Bellingham. In 2015, the City absorbed the TBD into the

Transportation Fund and did not renew the contract with WTA for supplemental transit service. From 2016-2020, Transportation Fund revenue was equally split between arterial resurfacing and non-motorized improvements. The Transportation Fund was scheduled to expire at the end of 2020, but in November 2020, it was renewed by voters with funding priority for street resurfacing, non-motorized transportation, public transit capital improvements and transportation impact reduction for climate change.

While this program can include projects that upgrade existing facilities and remove barriers to access, the portion of TBD funds allocated to non-motorized improvements have focused primarily on constructing new infrastructure in support of the City's Pedestrian and Bicycle Master plans. It is estimated that approximately 5.8% of the Transportation Fund budget is spent on upgrading existing facilities. \$95,000 were spent upgrading ADA facilities in 2019, and \$264,000 in 2020.

One recent example of a project funded through the Transportation Fund that included removal of barriers to access was the 2020 York-Ellis Corridor Multimodal Safety Improvements, which linked to the WSDOT grant-funded Samish-Maple-Ellis Corridor Multimodal Safety Improvements. Curb ramps were reconstructed and Accessible Pedestrian Signals (APS) were installed at the Lakeway/Ellis intersection at a cost of \$130,500. Prior to these improvements people with disabilities found this intersection very challenging.

Approximate annual Transportation

Fund budget: \$3,000,000

Estimated annual contribution to barrier removal: \$150,000

Water, Sewer and Stormwater Improvements

The CIP also includes funding for improving the City's utilities including water, sewer, and storm drainage systems. Like the pavement resurfacing category, these projects often impact pedestrian facilities like crosswalks, curb ramps and sidewalks. When pedestrian infrastructure is impacted, they are required to be reconstructed to current ADA standards to the maximum extent feasible. These impacts can vary widely depending on the location of work and expenditures towards improving pedestrian facilities have historically varied from 0% to approximately 5% of the total project budget.

Approximate annual budget: \$5,000,000

Estimated annual contribution to barrier removal: \$250,000

4.1.2 Sidewalk Program

The Public Works' Maintenance and Operations Division is responsible for repairing or replacing sidewalks and curb ramps. The main funding source for these activities is the annual sidewalk program. This program repairs sidewalks and reconstructs curb ramps based on complaints from the public as well as a needs assessment. The current annual budget for the sidewalk program is \$675,000 with approximately \$150,000 to

\$200,000 spent on curb ramp reconstruction, with the remainder spent on sidewalk repair and reconstruction.

Approximate annual budget: \$675,000

Estimated annual contribution to barrier removal: \$675,000

4.1.3 Private Development

Redevelopment of properties such as construction of new housing or commercial buildings or major remodels can provide a valuable boost to barrier removal efforts. Enforcing City design standards that meet ADA requirements for frontage improvements will help ensure facilities built by private development are accessible. The amount of funds spent on upgrading existing facilities through private development has varied widely over the last several years but overall has averaged approximately \$25,000 per year. This number is expected to increase as development in Bellingham shifts to more infill and redevelopment type projects.

Approximate annual budget: N/A

Estimated annual contribution to barrier removal: \$25,000

4.1.4 Traffic Signal Upgrades

The City upgrades existing traffic signals for a variety of reasons, often with the goal of reducing vehicle congestion. When these upgrades occur, the City can ensure that push buttons and pedestrian signals meet current accessibility standards including button location and position, non-

Table 1 - Barrier Removal Method Estimated Annual Funding

Program		Annual Budget
Capital Improvement Program		\$664,000
Sidewalk Program		\$675,000
Private Development		\$25,165
Signal Upgrades		\$12,000
	Total	\$1,376,165

visual format of indicating "WALK" and "DON'T WALK" using audible tones, and vibrotactile surfaces.

The City currently spends approximately \$12,000 per year on upgrades to pedestrian signal systems.

Approximate annual budget: \$12,000

Estimated annual contribution to barrier removal: \$12,000

The average annual funding for all barrier removal programs was estimated. It is important to note that these estimates are annual averages and that for some barrier removal methods, funding levels can vary greatly from year to year. Average annual funding levels will be used to develop the ADA transition schedule and identify needs for additional funding. Estimated annual funding for each barrier removal method is shown in Table 1.

4.2 Barrier Removal Recommendations

An assessment of City policies, procedures and design standards, as documented in Chapter 2, was conducted to understand the process that results in barriers to accessibility in the public right-of-way. This assessment was informed through a review of adopted City plans and policies, discussions with City staff and advisory committee members and a detailed design audit.

The recommendations included below were developed in response to this assessment and in accordance with federal requirements and have been written in such a way that recommended actions are clearly identified and progress on each specific recommendation can be easily tracked and updated.

Recommendation I

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

Status: Complete. The City has a full-time position designated as the ADA Coordinator

This position, referred to as the "ADA Coordinator", is one of the four major federal requirements for every ADA transition plan. The ADA Coordinator is responsible for facilitating city transition planning and implementation. They also function as a central figure for monitoring programs

and departments within the City to ensure ADA compliance and in responding to public requests and grievances.

Recommendation 2

Update City design standards, procedures and policies to ensure ADA compliance

Status: To Be Completed

A detailed audit of City design standards was conducted using the 2010 ADA Standards and PROWAG. These documents included the City of Bellingham Standard Plans, Bellingham Development Guidelines and Improvement Standards, Bellingham Pedestrian Master Plan, and Municipal Code. Recommendations for revisions are included in Appendix G.

Recommendation 3

Educate City staff, consultants, and contractors on ADA compliance

Status: To Be Completed

Transition Plans are often a learning experience for City staff, consultants and contractors alike since they identify issues and barriers and the changes needed to address them. Providing training on updated standards, policies and procedures can help ensure consistency in design review, construction and inspection, resulting in ADA-compliant pedestrian facilities. Establishing clear expectations is critical. Training is also an opportunity

to teach about accessibility and the barriers that those with limited mobility, vision or hearing experience when traveling in the City's public right-of-way. Education can take many forms - from review of updated design standards with key individuals such as field inspectors and contractors, development and review of City specific design standards or checklists with City engineers, or training from groups that serve those with disabilities. It is recommended that the City identify and advertise regular and frequent opportunities for training either in-house or through other entities (agencies, vendors) to City staff, consultants and contractors doing work in the City.

Recommendation 4:

Identify opportunities to remove ADA barriers through grant programs

Status: To Be Completed

While state and federal grant funding sources vary greatly from year to year in addition to the types of projects they address, all grant programs require ADA compliance and funding for ADA barrier removal when existing infrastructure is within the project scope. When pedestrian infrastructure is impacted, it is required to be reconstructed to current ADA standards to the maximum extent feasible. Identifying potential ADA barrier removal opportunities during project scoping may strengthen a grant application and increase the likelihood of securing funding.

A project in 2020 used \$210,000 from a WSDOT Bicycle and Pedestrian Safety Program grant to fund ADA ramp, sidewalk and signal upgrades.

Recommendation 5

Incorporate accessibility into outreach to the community and elected officials

Status: To Be Completed

One of the ideas that emerged during the public outreach process was that accessibility is an issue that is relevant not only to the disabled community, but to pedestrians in general. Support for accessibility-related projects and funding could be increased through education and outreach to individuals outside the disabled community.

Recommendation 6

Develop performance measures and processes to track removal of barriers

Status: To Be Completed

The primary purpose of an ADA transition plan is to develop a plan for removal of accessibility barriers. To monitor progress, the City should develop a process for tracking barrier removal on a year-by-year basis. A GIS database that records how and when ADA barriers are removed can be used to provide annual updates in the City's Transportation Report on Annual Mobility and demonstrate to the public as well as federal regulators that the City is making progress to meet Title II requirements.



5.0 Implementation

5.1 Approach

Development of an implementation plan and transition schedule includes three steps. First, all facilities were prioritized. Next, a planning level cost estimate was developed to provide an estimate of the financial resources needed to remove all barriers. Finally, a schedule was proposed based on the annual financial resources the City currently utilizes for projects that include removal of barriers. This schedule will help inform recommendations for additional funding for barrier removal. The following chapter describes these steps in more detail.

5.2 Prioritization

To focus efforts toward facilities within the public right-of-way that serve the largest number of individuals, an analysis of the proximity to public destinations such as schools, libraries, parks, transit, and public buildings was completed. This analysis focused on locations that were identified by the public through the outreach process and is consistent with federal requirements (28 CFR § 35.150(d) (2). It also included Census data to prioritize areas with higher numbers of people with disabilities. The result of this analysis is a prioritized list based on an approximation of demand by considering a facility's proximity to high pedestrian- generating land uses and locations with high percentages of people living with disabilities.

Higher-scoring facilities are likely to be used more frequently and are expected to provide the greatest public benefit by removing barriers to access.

5.2.1 Prioritization Criteria

Several criteria were used to identify high priority pedestrian facilities within the City. For instance, identifying public destinations such as public buildings, transit and parks and identifying pedestrian facilities within close proximity of one or more of these destinations.

Pedestrian facilities within the identified proximity were assigned points based on each destination they were close to. This measure is called the Location Index Score (LIS), which identifies high pedestriangenerating overlapping areas. Ultimately the more categories of pedestrian-generating areas a facility is near, the higher the Location Index Score.

In addition, general land uses identified as high priority areas for barrier removal and specific locations of barriers identified through the public outreach process were added to the Location Index Score (LIS) as a separate category called Community-Defined Destinations. This category adds weight to those facilities that were specifically identified as barriers through the outreach process.

Community-Defined Destinations identified during the public outreach process consisted of general land uses as well as specific locations that participants identified as issues. As noted in Section 3, general land uses identified as high priority areas for barrier removal included medical facilities, government buildings, and transit facilities. Specific locations included facilities like sidewalks, curb ramps, crosswalks and signals that individuals had identified as barriers.

The following are the weighted values used for each criterion. There is a total possible score of 45 points.

Areas with high percentages of people living with disabilities

- People with a Disability per sq/mi. (1-200) =1 point
- People with a Disability per sq/mi. (200-400) =2 points
- People with a Disability per sq/mi. (400-600) =3 points
- People with a Disability per sq/mi. (600-800) =4 points

People with a Disability per sq/mi. (over 800) =5 points

Schools (including public and private elementary, middle, high schools, colleges and universities as well as preschools and childcare facilities)

Within 1/8 mile radius of school = **5 points**

Parks

Within 1/8 mile radius of a City park = **5 points**

Transit

Within 1/8 mile of high frequency "Go" line (every 15min) = **5 points**

Within 1/8 mile of any bus stop = **5 points**

Controlled crosswalks

Within 1/8 mile of signal or roundabout = **5 points**

Public buildings (includes any building open to public use, medical/health care, government, community services, recreation, etc.)

Within 1/8 mile of public building = **5 points**

Commercial buildings (commercial zoned land use, downtown, urban centers, etc.)

Within 1/8 mile radius of commercial building = 5 points

Community-defined destinations

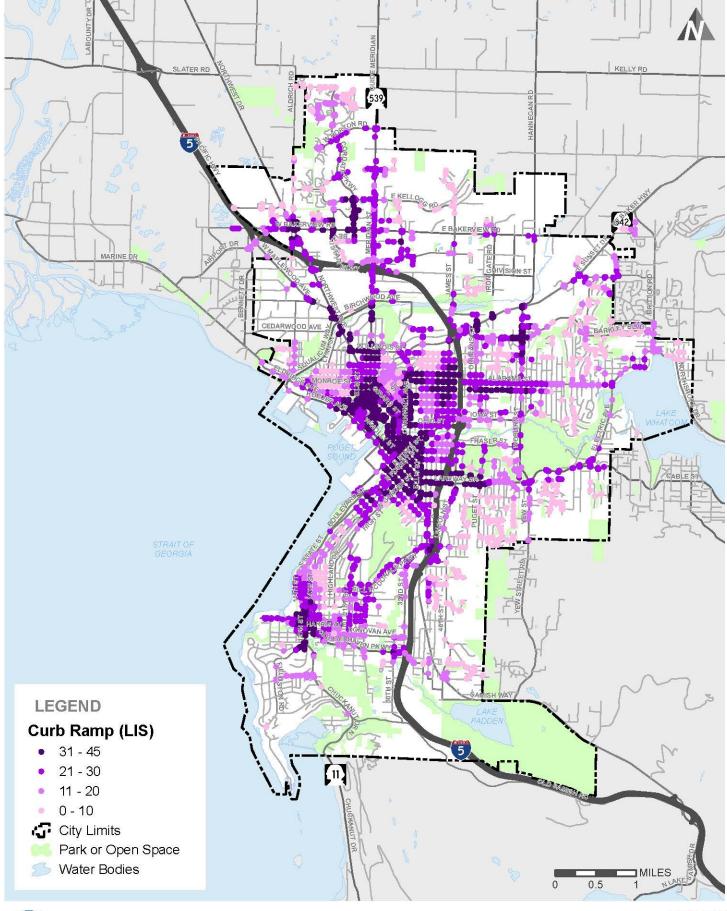
Within 1/8 mile of community defined destination = **5 points**

Facilities with the highest score should be addressed first and represent facilities that are in high-demand

areas with higher percentages of people living with disabilities. Facilities with lower scores should be addressed last and are in locations where pedestrian demand would be expected to be lower. These scores are relative, comparing one facility to the other.

5.2.2 Summary of Results

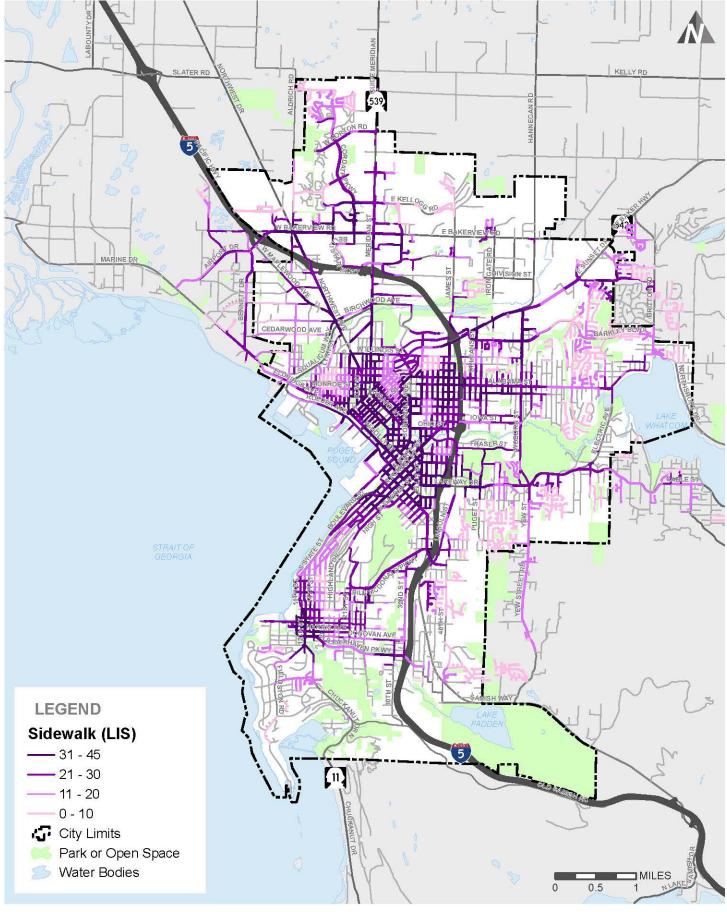
The results of the prioritization process are shown in Figures 5-1, 5-2, and 5-3 with a general summary following.





Location Index Score (Curb Ramp)

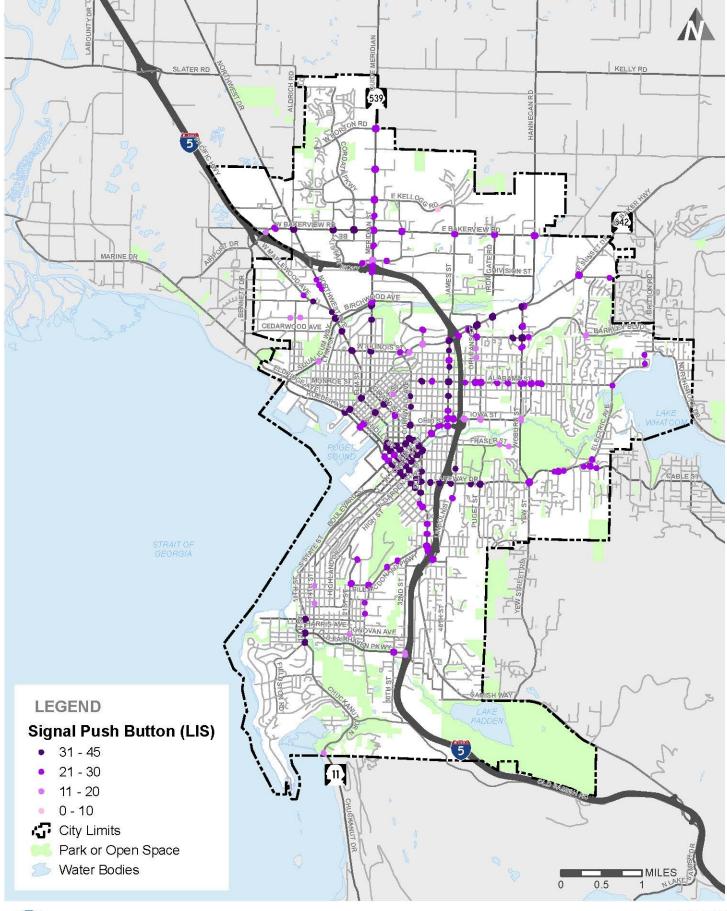
FIGURE





Location Index Score (Sidewalk)

FIGURE





Location Index Score (Signal Push Button)

FIGURE

A general summary of the prioritization is as follows:

High Priority Facilities (score of 30+) In general, high priority facilities were in the more densely urban areas of downtown, where many of the criteria discussed above are present. This included large blocks of high priority facilities including:

- An area of downtown generally bounded by E.
 Maple Street/Roeder Avenue, Ellis Street, Ohio
 Street, and Broadway. Facilities in this area scored
 high due to proximity to multiple criteria.
- An area generally centered on Cornwall Ave from E. Ohio Street to E. North Street and extending 2-3 blocks on either side. These facilities scored high for similar reasons as the area above but was influenced by the proximity to Whatcom Middle and Bellingham High Schools.
- An area centered on the Lakeway Interchange with Interstate 5 and extending several blocks in each direction. This area scored high due to proximity to public buildings, commercial areas, Carl Cozier Elementary School, transit stops, and signalized crosswalks. This area was also influenced by several parks including Harriet Spanel and Rock Hill Neighborhood parks and the Civic Athletic Complex.

- An area in the Fairhaven neighborhood generally near 12th Street from Knox Avenue to just south of Fairhaven Middle School and along Harris Avenue from 14th Street to 6th Street. Again, this block was centered on a denser urban area including commercial uses, a variety of public buildings, schools, and parks.
- An area centered on the intersection of James Street and Alabama Street and extending 3-4 blocks in every direction. These facilities scored higher due to proximity to transit and signalized crossings along Alabama, businesses and buildings providing community services, and areas with higher population of residents with disabilities.

In addition to the larger blocks described above, several isolated clusters of high priority facilities were identified. Some examples include:

- An area in the Cordata neighborhood near Whatcom Community College, WTA Transit Center and the Community Food Co-op. These facilities scored higher due to proximity to transit, public buildings, businesses and a roundabout.
- Facilities located along Meridian Street, E Victor Street, and Birchwood Avenue located near Cornwall Park.
 These facilities scored high due to the proximity to the park but also public buildings, businesses in Squalicum Corporate Park, schools including a preschool and school walk zone, and transit stops. This was also an area that was specifically identified through the outreach process.

- A small area near the intersection of E Sunset Drive and Orleans Street due to high scores associated with proximity to a commercial center, public buildings including a post office, a private school (Bellingham Christian) and bilingual preschool, a walk to school zone, signalized pedestrian crossings, and transit stops.
- A small area near the intersection of W. Maplewood Avenue with Cottonwood Avenue. Facilities in this area received scores for proximity to schools and walk to school zones (Shuksan Middle and Birchwood Elementary), Shuksan Meadows Park, a few nearby businesses, transit stops, and community defined locations.
- A small section of Old Fairhaven Parkway between 24th Street and 30th Street. This section received scores for proximity to several senior and assisted living centers classified as medical facilities, nearby businesses, a signalized pedestrian crossing, Happy Valley neighborhood park, and transit stops.

Medium Priority Facilities (Score 11-30) – In general, medium priority facilities were in similar areas as, and surrounding, high priority facilities. A few notable exceptions include:

Areas outside of downtown or other neighborhood centers but along transit routes were often rated as medium priority. Examples include Alabama, east of Interstate 5; Lakeway Drive east of Yew Street, and E Sunset Drive on the northeast side of Bellingham. Facilities near transit

stops, in general, scored high due to the added emphasis to "Go" Lines as well as being identified through the outreach process as a priority to the community and therefore, included in the Community Destinations criteria.

Low Priority Facilities (Score 0-10) – Low priority facilities were generally found in residential areas and on the outer edges of the City where the density of land uses meeting the prioritization criteria was much lower.

5.3 Transition Plan Cost and Schedule

A key requirement of an ADA Transition Plan is development of a schedule which shows how long it will take the City to remove accessibility barriers. Understanding the financial resources needed to remove accessibility barriers is essential for developing such a schedule.

5.3.1 Cost Estimate

Cost estimates for transition were developed to gauge the level of funding required for full removal of barriers over the coming years. Details regarding condition or ADA compliance on each individual facility were not collected as part of this plan. Therefore, it was not possible to calculate an actual cost of full transition based on specific defects of specific facilities. Costs of transition were estimated through a comparative analysis with other agencies who had developed detailed cost estimates based on actual defects. To do this, data available from other jurisdictions was used to calculate an average unit cost of transition for each facility type. For example, the cost of transitioning sidewalk was estimated on a per mile basis, curb ramps per each, and so on. These unit costs were then applied to the entire City of Bellingham network. The data obtained from other jurisdictions included total costs and total number of assets. These calculations were done as part of the respective agency's own ADA transition plan.

The total cost to transition the City's sidewalks, curb ramps, and pedestrian push buttons to ADA compliance based on this exercise is shown in Table 2. A more realistic total cost estimate will be developed based on an updated facility assessment to be performed starting in 2021.

While the total cost appears daunting, it is similar to what many jurisdictions in Washington state are facing. It also represents an estimated total cost based on average costs for other cities. In most cases, entities are looking at 100-to-200-year efforts to eliminate all barriers to access. At the City's current estimated annual funding level, it would take approximately 167 years to remove all barriers.

5.3.2 Transition Schedule

The ADA requires that public agencies specify a schedule for taking the steps necessary to upgrade pedestrian facilities including milestones beyond the first year. The City should develop a detailed schedule for barrier removal while completing its updated facility assessment. The assessment

Table 2 - Bellingham ADA Transition Costs

Feature	Total Qty	Unit	Average Cost Per Unit based on other agencies	Total Sidewalk Cost @ average cost per mile of other agencies
Sidewalk	341.6	MI	\$297,225	\$101,520,192
Curb Ramps	5,733	EA	\$4,810	\$27,576,841
Push- buttons	1,144	EA	\$4,617	\$5,282,557
	Tota		t @ average cost of other agencies	\$134,379,590
Contingency @ 20% \$26,876,0		\$26,876,000		
Design @ 12% \$16,126,0		\$16,126,000		
		N	Mobilization @ 8%	\$10,751,000
	TESC	+ Traff	ic Control @ 12%	\$16,126,000
Coi	nstructi	on Mai	nagement @ 20%	\$26,876,000
Grand Total Cost @ average cost of other agencies with contingencies			\$231,134,590	

Table 3 - Percentage of Facilities by LIS Score

LIS Score	Sidewalk Miles	# of Curb Ramps	# of Signal Push Buttons
31-45 (High)	~ 92.10 mi	1,534	524
21-30	~ 98.51 mi	1,887	520
11-20	~ 78.21 mi	1,245	94
0-10	~ 72.74 mi	1,067	6
Total	~ 341.56 mi	5,733	1,144

should start with the highest priority facilities identified through the community-informed prioritization process.

Due to the large investment needed in both time and money to remove accessibility barriers in the public right-of-way, it is important to identify the highest priority barriers and focus resources to remove them first. An analysis of the public right-of-way prioritization was completed to determine how many facilities are classified as "high" (scoring over 30 points) as defined in section 4.2. Table 3 shows a breakdown of the number of facilities at each priority level.

As described in Section 4.2, facilities that scored as higher priorities are in areas with high demand for accessibility. Barriers associated with the "high" priority facilities are estimated to cost a total of \$35,700,000 to remove.

The existing funding for barrier removal is estimated to be approximately \$1,300,000 annually. This funding is

variable and depends largely on the selection of projects that are not necessarily related to ADA barrier removal. In addition, with the exception of the Sidewalk Program, there is very little flexibility in how monies spent on ADA barrier removal are allocated. In order to make funding more consistent and increase the flexibility in how funds are spent, it is recommended that a specific budget line item be allocated for ADA improvements. This would provide Public Works staff with a consistent amount of ADA barrier removal funds from year to year. It would also allow the City to spend these resources in a manner that more directly impacts ADA barrier removal. Funds could be allocated as supplements to existing projects, used to address isolated barrier issues similar to the existing sidewalk program, or even used to fund a standalone barrier removal project.

The transition schedule depends largely on the amount of investment the City is willing to put towards the effort. Using estimated costs from other agencies as an example, the following shows the total years needed to address high priority barriers assuming three different funding levels:

- Annual investment of \$1,300,000 = 49.2 years
- Annual investment of \$1,500,000 = 42.6 years
- Annual investment of \$2,000,000 = 32.0 years

Several factors may contribute to differences between the estimated transition schedule and the actual rate and cost of implementation. Some of these factors include actual funding acquired, individual project cost, site specific design savings, and unanticipated capital projects. Furthermore, while many issues were raised with specific facilities through the public outreach process, not all barriers have been identified. The cost estimates presented in this plan are conceptual in nature and not based on actual conditions in the field. It is important as the City moves forward with improvements that a process is developed that identifies specific barriers in these high priority locations and develops accurate cost estimates for regular, ongoing barrier removal. This scoping exercise will provide the City with valuable information that can be compared to the estimates and assumptions in this plan and enable adjustments to the transition schedule.

After completing an updated facility assessment and determining the anticipated annual investment, the City should create a six-year barrier removal plan with a list of specific projects. The six-year plan should focus on the highest priority barriers and utilize strategies to maximize the benefit of expended funds, such as supplementing other non-related projects to include additional ADA upgrades. The City plans capital transportation projects in six-year cycles to conform to federal funding requirements. The Six-Year Transportation Improvement Program (TIP) is previewed and approved by City Council on an annual basis. The Transition Plan schedule should align with the TIP and be updated each year. Conformance with the TIP planning cycle will allow Public Works to better coordinate Transition Plan projects with other capital transportation projects.



6.0 Summary Recommendations

The following recommendations support the City's efforts to remove barriers in the public right-of-way and provide accountability to the residents of Bellingham. They include monitoring and evaluating progress, receiving input from-and providing information to-people with disabilities and other stakeholders interested in a more accessible pedestrian environment. By working collaboratively and staying engaged and informed, the City can work to achieve mobility for all.

6.1 Identify Official Responsible

- ADA Coordinator
- Mailing address: 104 W. Magnolia St. Suite 109, Bellingham, WA 98225
- Phone number: (360) 778-7900, or 711 (WA Relay/TTY)
- Email: ada@cob.org

6.2 Design Standard, Policy and Procedure Updates

Ongoing

Update City design standards and policies to comply with changes in federal and state regulations and to incorporate best practices. Review and revise procedures involving design, construction and inspection that are found to lead to non-compliant facilities.

6.3 Training City Staff, Consultants, and Contractors

Ongoing

 Provide training to City staff, consultants and contractors to ensure appropriate guidelines and standards are followed during design, construction and inspection. It is essential that consultants and contractors comply with ADA regulations and understand how the City will monitor compliance.

6.4 Public Engagement

Ongoing

- Provide public access to Bellingham's ADA Transition Plan on the City's website at https://cob.org/about/ access/mobility-for-all, by request at (360) 778-7900 or 711 (WA Relay/TTY) or email ada@cob.org.
- Post the annual summary progress report.
 Highlight projects, major accomplishments and opportunities for public involvement to keep the community informed and engaged.
- Look for opportunities to increase awareness about accessibility issues, provide information and highlight the specific concerns of people living with disabilities in Bellingham (See pages 11-19 Public Engagement).

6.5 Monitor and Evaluate Program Effectiveness

Ongoing

- Update the ADA Transition Plan on an annual basis to track progress and ensure compliance. Provide an annual summary progress report to identify barriers removed and expenditures for the prior year, list barrier removal projects and estimated costs for the upcoming year, and account for any adjustments to the prioritized project list.
- Evaluate program effectiveness to include community feedback related to overall accessibility of Bellingham's pedestrian facilities.

Appendix A: Open House Boards

ADA Self-Evaluation Transition Plan

OPEN HOUSEWednesday, June 26

OPEN HOUSE June 26-July 31

If you need to make a reasonable accommodation request, please contact:
Kim Brown, City ADA Coordinator, at (360) 778-7950 (TIY) 7-1-1, at ada@cob.org.
For information regarding the City's policies on accessibility and non-discrimination, visit: <u>cob.org/gov/access</u>



Mobility for All in Bellingham

The Americans with Disabilities Act (ADA) and Transition Plans

The Americans with Disabilities Act (ADA) requires that public entities having responsibility for, or authority over, facilities, streets, roads, sidewalks and/ or other areas meant for public use develop a Transition Plan to make their facilities meet accessibility standards.

The city of Bellingham is in the process of developing a transition plan by the end of 2019. In addition to conducting an inventory of city facilities, the development of a plan relies on feedback from members of the community.



If you need to make a reasonable accommodation request, please contact: Kim Brown, City ADA Coordinator, at (360) 778-7950 or (TTY) 7-1-1, or at ada_cob.org. For information regarding the City's policies on accessibility and non-discrimination, visit: <u>cob.org/sov/access</u>





What is Bellingham Doing?

The City of Bellingham aims to create an inclusive and welcoming environment.

We seek your help to develop a plan to ensure that curb ramps, sidewalks, pedestrian crossings and pedestrian push buttons are accessible to all. Today, we'd like you to identify the locations and deficiencies you consider most important.

If you need to make a reasonable accommodation request, please contact: Kim Brown, City ADA Coordinator, at [360] 778-7950 or (TTV) 7-1-1, or at ada@cob.org. For information regarding the City's policies on accessibility and non-discrimination, visit: <u>cob.org/gov/access</u>



Mobility for All in Bellingham

Well- developed and-maintained pedestrian and public facilities are critical for providing access to city services and resources.

Typical barriers you may encounter on pedestrian facilities include:



Cracked and uneven sidewalks

Challenging for most people, especially for those walkers, wheelchairs, canes, or pushing strollers.



Curbs at intersections without ramps

Challenging for most people and inaccessible for those using wheelchairs.



Obstructions in sidewalks

Limit a person's ability to travel, especially those who are sight-impaired or in a wheelchair.

If you need to make a reasonable accommodation request, please contact. Kim Brown, City ADA Coordinator, at (360) 778-7950 or (TTY) 7-1-1, or at ada@cob.org. For information regarding the City's policies on accessibility and non-discrimination, visit: <u>cob.org/gov/access</u>



Well- developed and-maintained pedestrian and public facilities are critical for providing access to city services and resources.

Typical barriers you may encounter on pedestrian facilities include:



Curb ramps at intersections with no detectable warning surface

Challenging and a safety concern for those with sight impairments.



Push buttons that are not accessible or don't have audible warnings

Challenging for those in wheelchairs, and those with sight impairments.



Lack of available ADA parking spaces

If not available adjacent to government services and opportunities, can prevent access to services.



If you need to make a reasonable accommodation request, please contact: Kim Brown, City ADA Coordinator, at (360) 778-7950 or (TTY) 7-1-1, or at ada@cob.org. For information regarding the City's policies on accessibility and non-discrimination, visit: col

Mobility for All in Bellingham

Where should we start?

Addressing these issues takes funding. Some things can be fixed as older streets are replaced and built to modern, standards. Some things can be fixed intentionally to specifically address these gaps.

As we plan future improvements to sidewalks, curb ramps, and other pedestrian facilities, where should we make improvements first?

Access to...



- Bellingham Food Bank
- · Opportunity Council

If you need to make a reasonable accommodation request, please contact:

Kim Brown, City ADA Coordinator, at (360) 778-7950 or (TTY) 7-1-1, or at ada@cob.org. For information regarding the City's policies on accessibility and non-discrimination, visit: cob.org/gov/access



What is the timeline for completing the plan?





June-July 2019

- Stakeholder Outreach
- Barrier Removal Evaluation

Aug-Oct 2019

- Focus Group
- · Prioritization
- · Cost Estimating
- Transition Schedule Development

Nov-Feb 2020

Draft and Final Plan

If you need to make a reasonable accommodation request, please contact:
Kim Brown, City ADA Coordinator, at (360) 778-7950 (TIY) 7-1-1, at ada@cob.org.
For information regarding the City's policies on accessibility and non-discrimination, visit: <u>cob.org/gov/access</u>



Mobility for All in Bellingham

How can you help?



Provide your input now!

There are a variety of ways to have your voice heard at tonight's Open House



Take our online survey!



Snap the QR code with your phone!

https://www.surveymonkey.com/r/BellinghamADA



Volunteer for a focus group!

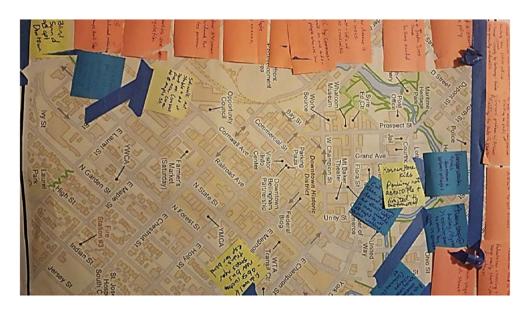
We are forming a focus group to help inform the plan in more detail.

Please let us know if you are interested in participating!

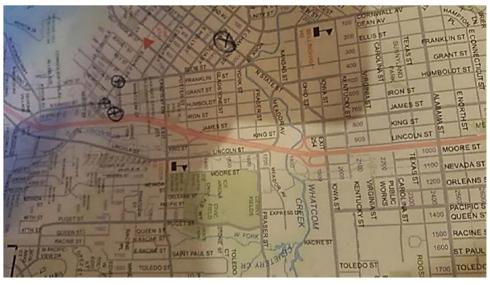
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Appendix B: Annotated Map Images and Identified Issues







ISSUES IDENTIFIED - OPEN HOUSE

Table B1 Issues Identified in the June Open House

Location	Issue	Issue Type
Citywide	Need a clearer grievance policy	Policy
Citywide	Rental Properties are not maintaining vegetation	Sidewalk
General	Restaurants expanding into sidewalk	Sidewalk
Downtown	Realtors blocking Sidewalks with their Signs in the middle of Sidewalk	Sidewalk, Policy
Downtown	Longer Walk times (downtown and urban villages)	Crosswalk, Signals
Downtown	Pedestrian crossing times too short	Crosswalk, Signals
Downtown	Drivers don't yield to peds	Conflicts with vehicles
Downtown	Street furniture and bike parking restricts on PAR	Sidewalk
Downtown	Street crews park in ADA stalls	ADA Parking
Alabama & James (Trader Joes)	Audible buttons needed	Signals
Crosswalk on James (near Avenue)	Difficult to cross	Crosswalk
York & Humbolt	Lots of traffic and no Crosswalks	Crosswalk, Conflicts with vehicles
Whatcom Community by Commons	No sidewalk on one side and lots of people who are low income need to commute	Sidewalk
Forest and Maple	Road is very uneven	Crosswalk
Chestnut & Gardner (NW Corner)	Needs to be widened for more room (too narrow)	Sidewalk
Birchwood Neighborhood	Need more sidewalks	Sidewalk
Birchwood and Northwest	Ramps don't line up with the Crosswalk	Crosswalk, Curbs
Cornwall Avenue (near E. Maple Intersection)	Sidewalk not stable and out of sort	Sidewalk
Near Transit Center	obstruction near bus stop (Especially for Blind folks)	Sidewalk, Transit
Lakeway and Lincoln + a few other places (downtown general)	Busy Urban villages	Conflicts with vehicles

May 2021 | City of Bellingham

Table B1 Issues Identified in the June Open House

Location	Issue	Issue Type
Ashley and Byron (4 way stop)	1 collision/month because of glass in Street	
Birch Street	Overgrown vegetation	Sidewalk
Fred Meyer @Lincoln	Pedestrian head too dim	Signal
Viking Plaza	Very difficult to get across street to bus stops	Crosswalk, Transit
Laurel & Jersey	Streetlight blocked by tree corner	Sidewalk, Curb ramps, Signal
Kornerstone Kids (400 Sequoia Drive)	Inaccessible/customer-only parking/	Parking
Safeway	Driveway hard to get across (drivers don't yield to peds)	Conflicts with vehicles
Safeway	Bushes overgrowing sidewalks (Sunset)	Sidewalks
Boomers (Samish)	Undefined accessibility issue	
Westerly by DHSH Office	Undefined issue	
Lakeway and Undine	Utility pole in the sidewalk	Sidewalk
Cornwall and D,E, and F Streets	Crosswalk and aprons worn out	Crosswalk, Curb ramps
Max Higbee Center (Bay Street)	Needs ADA loading Zone	ADA Parking
Division Street/Hannagan Road	(City bus stop to Whatcom Humane Society)	Transit
Division Street/Hannagan Road	No sidewalk and narrow shoulder	Sidewalk
James Street by Sunset Pond	Big hole in front of bus stop access	Sidewalk, Transit
Chestnut Avenue (Bay St. to Commercial St.)	Very bumpy road	Crosswalk
Telegraph Rd. and Meridian (by Sherry's)	Crossing has overgrown bushes and no sidewalk	Crosswalk, Sidewalk
Bellis Fair Parkway at WinCo	no crossing	Crosswalk
Bellis Fair Parkway at WinCo	No pedestrian pathway from parking lot to bus stop	Sidewalk, Transit
Bellis Fair Parkway at WinCo	Bus stop not wheelchair friendly	Transit
Fairhaven Neighborhood	Poor conditions	Sidewalk, Curbs
P/B opp side of Pole	Wheelchair positioned too high	Curb
P/B opp side of Pole	Colleges BTC	
W. Illinois and Northwest	Curb cutout not safe	Curb ramps

Americans with Disabilities Act Transition Plan for the Public Right-of-Way | April 2021

Table B1 Issues Identified in the June Open House

Location	Issue	Issue Type
N. State Street between roundabout and E. Pine (by VFW)	Sidewalk is in poor condition (huge cracks, bumps, and missing concrete slabs)	Sidewalk
Meridian Street by Meridian Village	Not enough places to cross the street on Meridian	Crosswalk
Undefined intersection problems	Howard and Ellis	
Undefined intersection problems	N. State St. (between E. Magnolia and E. Champion)	
Undefined intersection problems	Howard and Humboldt	
Undefined intersection problems	Otis and Maple	

Appendix C: Survey Questions

Bellingham Americans with Disabilit	ies Act (ADA) Transition Plan
Bellingham ADA Transition Plan	
_	n inclusive and welcoming environment, consistent with
	velop a plan to ensure that curb ramps, sidewalks, ish buttons are accessible to all. Through this brief survey,
	d deficiencies you consider most important.
his survey should take no more than 10) minutes to complete.
* 1. First, please tell us why you travel in E	Bellingham? (Choose all that apply)
Live in Bellingham	Recreation / Recreational Activities
Work in Bellingham	Medical Appointments
Attend school / college	Shopping
Other (please specify)	
* 2. Please tell us about yourself (Choose	all that apply)
I have a disability that impacts how I travel (p	please describe that disability in question 3)
I support a person with disabilities (please de	escribe that disability in question 3)
I have no disability	
I prefer not to say	
_	

that apply.	neone with a disability, please describe and choose
Physical, mental or emotional condition that limits learning, remembering or concentrating Blindness or serious difficulty seeing when wearing glasses Condition that substantially limits one or more physical activities such as walking, or climbing stairs Deafness or hearing difficulty Use a mobility devices	Use a wheelchair Use assistive software technology such as a screen-rea Use hearing aids or hearing assistive devices Use a service animal
Other (please specify)	

Belli	ingham Americans with Disabilities Act (ADA) Transition Plan
elling	ham ADA Transition Plan
4. Pl	ease provide us with your home ZIP code? (enter 5-digit ZIP code; for example, 00544 or 94305)
5. Ho	ow often do you travel in the City of Bellingham (Select one)
()	5-7 days per week
	3-4 days per week
	1-2 days per week
	less than weekly
C III	out do you trough within the City of Pollingham? (Charle all that apply)
	ow do you travel within the City of Bellingham? (Check all that apply) Drive and park
	Take transit or paratransit shuttles
	Wheel (use a wheelchair)
	Walk with assistance like a cane or walker
	Walk with a service animal
	Walk
F	Blke
	Other (please specify)
1	
1	
	you use transit, how often do you use it in a typical week? (Select one)
0 4	4 or more days per week
	2-4 days per week
	1 day or less per week
	less than weekly

ess to City of Bellingham service	ble to participate or obtain services in the City of Bellingham?
Yes	bie to participate of obtain services in the City of Definighants
No	
	you could not participate? (Check all that apply)
Sidewalk barriers	Pedestrian signal issues including access to push butto
Curb ramp barriers	ADA parking not available
Pedestrian crosswalk issues	
Other (please specify)	

Bellingham Americans with Disabilities Act (ADA) Transition Plan Priorities for pedestrian facilities We want our pedestrian facilities to be usable by all citizens. * 10. Of the six types of locations below, which one would be your HIGHEST priority? (Select one) Government buildings that provide human services (examples are City Hall, public libraries) Hospitals and other medical facilities City parks Community Services (examples are Bellingham Food Bank, Opportunity Council, DSHS) Schools and institutions (examples are Whatcom Community College, Western Washington University, Bellingham Technical College) Transit facilities (Examples are the Bellingham Station, Transit Stops) * 11. Of the six types of locations below, which one would be your SECOND highest priority? (Select one) Government buildings that provide human services (examples are City Hall, Municipal Court, public libraries) Hospitals and other medical facilities City parks Community Services (examples are Bellingham Food Bank, Opportunity Council, DSHS) Schools and institutions (examples are Whatcom Community College, Western Washington University, Bellingham Technical College) Transit facilities (Examples are the Bellingham Station, Transit Stops) * 12. Of the six types of locations below, which one would be your THIRD highest priority? (Select one) Government buildings that provide human services (examples are City Hall, Municipal Court, public libraries) Hospitals and other medical facilities City parks

Community Services (examples are Bellingham Food Bank, Opportunity Council, DSHS)

Transit facilities (Examples are the Bellingham Station, Transit Stops)

Schools and institutions (examples are Whatcom Community College, Western Washington University, Bellingham Technical

Bellingham Americans with Disabilities Act (ADA) Transition Plan

Where have you experienced challenges?

For these open-ended questions please provide locations where you have experienced challenges with pedestrian facilities including sidewalks, curb ramps, crosswalks, and buttons for activating walk signals. You may also use this <u>mapping tool here</u> to locate and describe areas of concern. The link is also provided at the end of the survey.

13. Where have you experienced challenges? Please list up to three locations and the problem. Be as specific as possible about the location and the type of barrier (sidewalk, curb ramp, pedestrian crossings, pedestrian push buttons)

•	,
Location 1 (Street address or cross street)	
Problem 1	
Location 2 (Street address or cross street)	
Problem 2	
ocation 3 (Street address or cross street)	
Problem 3	

Bellingham Americans with Disabilities Act (A	DA) Transition Plan	
Demographic questions		
We would like to better understand the audience to	aking our survey. Providing information is	
optional and your responses are confidential.		
14. What is your age? (optional)		
under 18		
18 to 24		
25 to 34		
35 to 44		
45 to 54		
55 to 64		
65 or older		
15. How do you identify yourself? (optional)		
African American/Black	Native Hawaiian/Pacific Islander	
Asian	Native American	
Caucasian/White	Some other race or combination of races	
16. Are you of Spanish, Hispanic, or Latino origin o	ur descent? (ontional)	
Yes	r descent: (optional)	
○ No		

Bellingham Americans with Disabilities Act (ADA) Transition Plan

Thank you and next steps

would like to stay in t	pating in this survey. Work on the plan will continue throughout the year. If you couch or participate in future phases, please provide your contact information provide feedback on specific locations on our mapping tool you can go to this
If you have additional	I question, please contact Kim Brown, ADA Coordinator, City of Bellingham at 7-1-1 kimbrown@cob.org.
17. Please provide y	your contact information to receive updates on the plan.
Name	
Email Address	
Phone Number	
18. Would you be w Yes No	rilling to participate in a focus group related to the plan?

Bellingham Ame	ricans with Disabilities	Act (ADA) Trans	ition Plan	

Appendix D: Summary of Survey Results

City of Bellingham ADA Transition Plan Top-Line Survey Results

Survey Results
June 26 through July 31, 2019

Transpo Group/Acutanza STS

9/2/2019

Survey Summary

- 1. Respondents and demographics
- 2. Issue areas
- 3. Priorities

9/2/2019

2

1. Respondents and demographics

9/2/2019

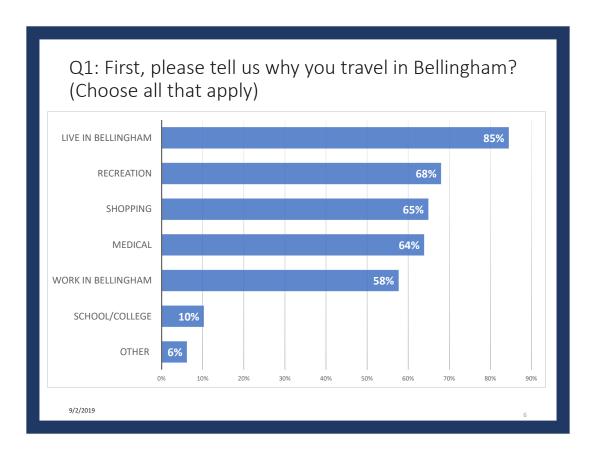
- 1. Demographics and Respondents
- •100 attempts 90% completed the survey
- Most live and conduct other activities in Bellingham
- Most are in Bellingham 5 or more days a week
- Top three modes are driving/parking, walking and taking transit

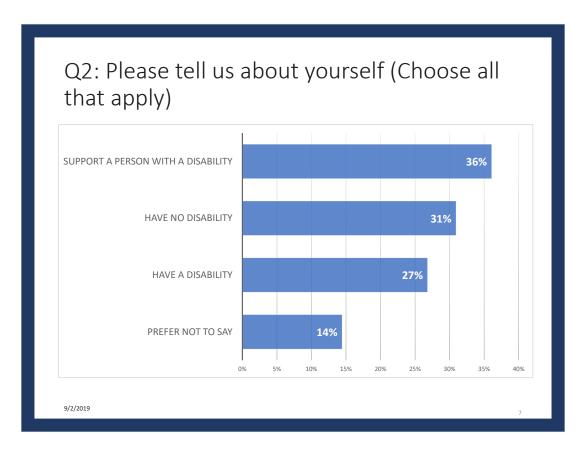
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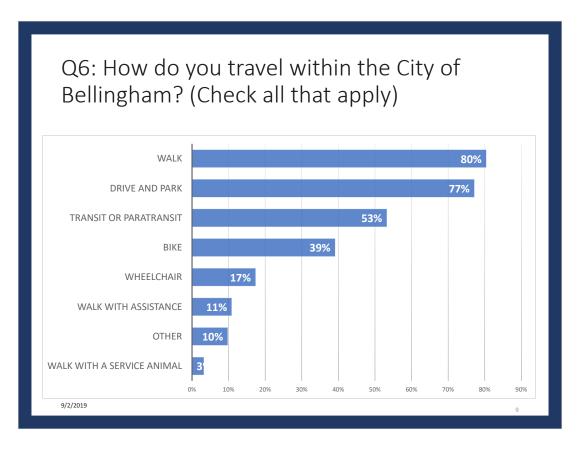
- 1. Demographics and Respondents
- Majority in two age categories 35-44 or 55-64
- Respondents
 - 25% Report they have a disability
 - 33% Report they support someone with a disability
 - 33% Report they are not disabled
- Disabilities ranged from using a wheelchair or assistive device for walking to vision, hearing and cognitive impairments

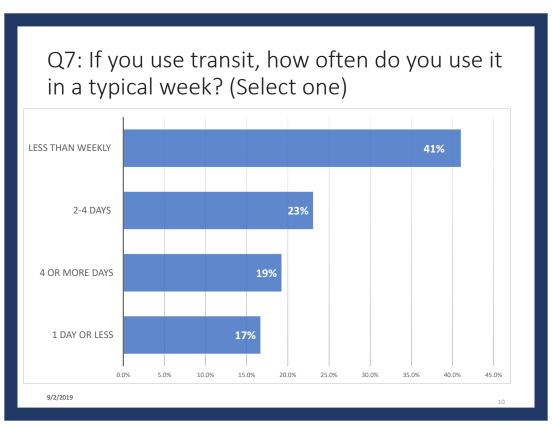
2019











2. Issues identified in the survey

9/2/2019

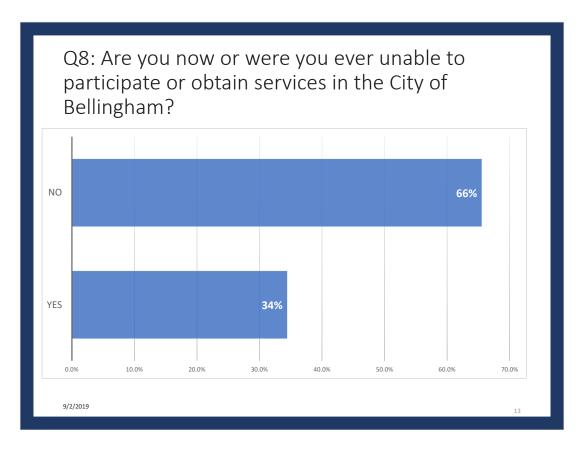
11

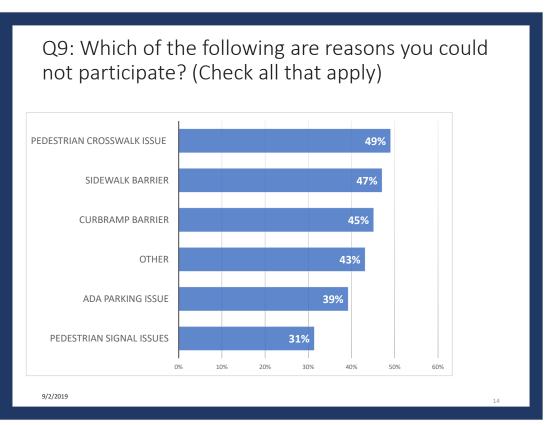
Issues

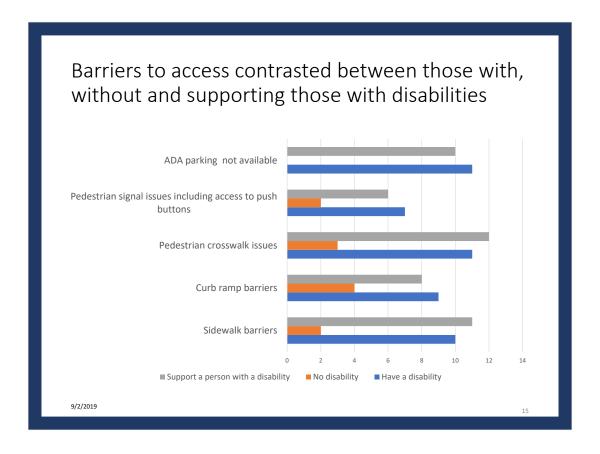
- Over one third indicate they have not been able to participate in or obtain service in Bellingham
- Issues of inadequate crosswalks, sidewalks and curb ramps were top tier with ADA parking and signals not far behind
- Access to transit, barriers in sidewalks, and conflicts with traffic were mentioned
- Other issues outside this study included building access, transit routing, and buildings with a lack of wheelchair access

9/2/2019

TZ







Questions

- Any surprises
- Concurrence or Disagreement

9/2/2019

3. Priorities

9/2/2019

17

Priority Destinations and Locations

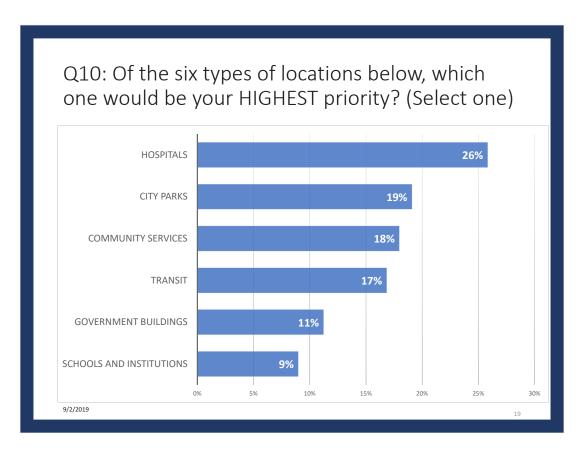
Open House

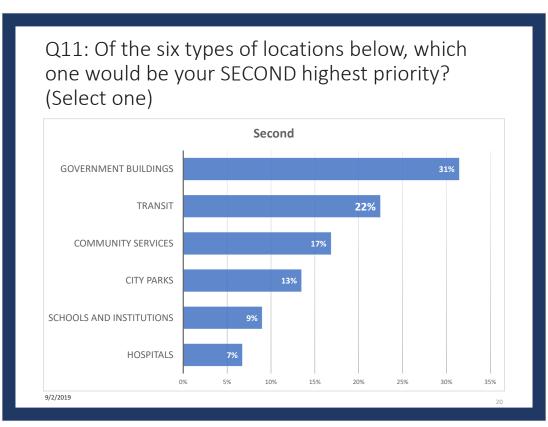
 Voting using dots indicated transit was a top priority. Other priorities "voted on" included community services next were parks, hospitals and institutions.

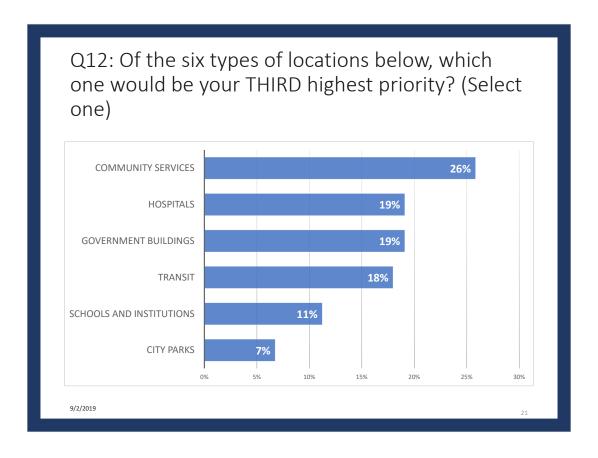
Survey

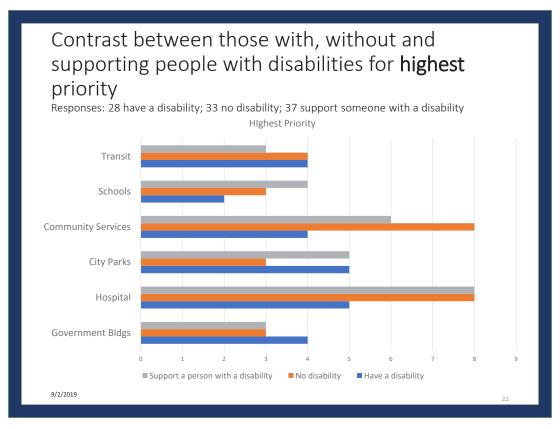
- Top destinations/locations were noted as Hospital/Medical Buildings with City Parks, Transit and Community Services next
- Access to Government Buildings and Transit were noted highest when considering weighting choices
- Access to Community Services and Hospital Medical were next highest
- Schools/Institutions were least often identified as a priority

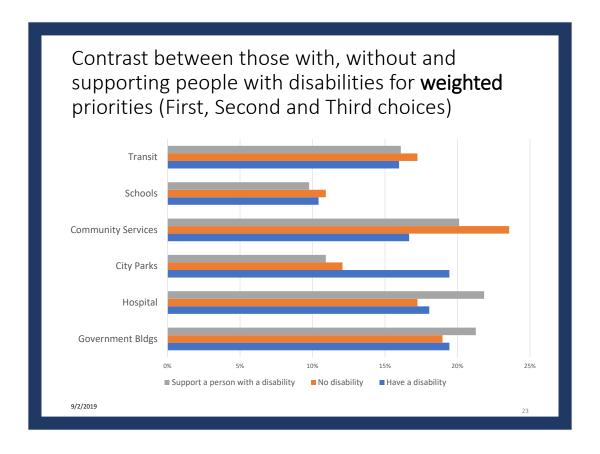
9/2/2019











Priority Destinations and Locations

- Specific issues were collected from three mechanisms:
 - Survey
 - On-line reporting tool
 - Public meeting

9/2/2019

Typical issue types

- Sidewalks Not provided, blocked with parked cars or sign boards, uneven. Sidewalks crossing commercial driveways people feel vulnerable to cars
- Crosswalks not protected or not provided, pavement is uneven in them, people feel vulnerable to cars. Lack of high contrast markings
- Curb cuts and ramps not level, not oriented in the right direction, angled or not high enough to improve visibility. Lack of tactile maps
- Pedestrian buttons and traffic signals walk times are too short.
 Needed at more locations
- ADA parking Parking not provided, or stalls don't provide access on both sides
- Transit Routes to destinations is not accessible, or stops have inadequate waiting area including no seating

9/2/2019

Workshop

- Examine specific issues or barriers that impact access to
 - Government buildings
 - Community services
 - Hospitals
 - Public transportation
- We will describe barriers (and their locations) that have been identified.

9/2/2019 26

Appedix E: Specific Barriers Identified Through Online Survey and Mapping Tool

Table E1 Issues Identified in Survey and mapping tool

LOCATION	DESCRIPTION	TYPE OF ISSUE
Bill McDonald Parkway by Buchanan Towers	Cross walk needs a push button light, cars don't stop	
Many locations	Those yellow rubber crossing pads are super slick when wet - we've had several near wipeouts on those	Curbs
The turn as Squalicum Way becomes Roeder near little Squalicum park	Cars take this corner too fast and cut into the cycling and walking lane.	Vehicle Conflicts
Birchwood at Orchard	Needs sidewalks	Sidewalk
McLeod Road between Guide Meridian and Northwest Avenue	No sidewalks at all. Cars drive over the speed limit -not safe	Sidewalk
Lakeway and Undine, north side of street	Utility and light poles in the middle of the sidewalk	Sidewalk
Holly and Railroad	Wide pedestrian crossing, not enough time to cross before light change	Crosswalk
1671 Main Street, Ferndale, WA	The paratransit bus system doesn't account for the needs when attending the food bank, esp. Thanksgiving and Christmas meals.	Transit
Downtown Ada parking space for loads on left	Fair haven parking offloads on left	Parking
Cedarwood between Laurelwood & Greenwood	No sidewalks or lighting. Dangerous walking from bus stop to home in my neighborhood	Sidewalk
Commercial and Champion(?) intersection by Mt Baker Theater		
Ellis and Sunset	Trip hazards/uneven pavement in roadways	Crosswalk
Sidewalk is nearly always either impassible or dangerous. Parking by employees and customers of the businesses in this area, particularly Hardware Sales, often block sidewalks. In addition, unloading of delivery trucks occurs on the sidewalks and forklifts drive across the street and through the intersection without obeying traffic laws. Also, employees of business on SW corner of Lincoln and Kentucky park blocking sidewalk entirely.		Sidewalk
Meridian Street	Sidewalk ends	Sidewalk
Many crosswalks downtown	Cars at busy intersections can cut me off as I cross	Vehicle conflicts
104 W. Magnolia St, Suite 109		

Table E1 Issues Identified in Survey and mapping tool

LOCATION	DESCRIPTION	TYPE OF ISSUE
Near Walgreens on Sunset	Curb cut is low, so the cars don't see you. There is a barrier that needs to be higher	
Cornwell Ave at D E and F Street	Bumpy crosswalk areas	Crosswalk
1275 E Sunset Drive	no cross walk onto Safeway parking lot on Orleans; however, the other side of the street there is a cross walk is challenging to cross because of cars going by so fast	Crosswalk
State and Holly	Cars turning onto State enter before pedestrian time is up	Crosswalk, Vehicle conflicts
Mill and 38th St	Very steep hill with no sidewalks, poor visibility, speeding traffic and gravel road. Very hard to get to the closest park especially when wet or when tree debris covers the road. Makes the neighborhood which is close to town very inaccessible to those who need a mobility device.	Sidewalk
Various (Meridian near golf course for example)	No curb ramp access to bus stops	Curb
Eldridge Lack of crosswalks		Crosswalk
Lakeway	Lakeway sidewalk under I-5 in winter. Water comes down and freezes into ice on sidewalk forcing walkers into road traffic. Please have road maintenance people throw salt so walkers can stay on sidewalk.	Sidewalk
Lorraine Ellis Park	There are no sidewalks along Illinois, despite the fact that there is play equipment that attracts children to walk to the park.	Sidewalk
Telegraph Ave. access to Home Depot area	No pedestrian access at all. One has to walk in the middle of the oncoming traffic. There is no sidewalk or pedestrian access to the Sunset Mall from Telegraph Ave.	
Lakeway at Undine: new HAWK signal		
Grant St & Lakeway	Curb ramps point into the arterial - all new curb ramps should be in line with the walking path! This one is particularly difficult since it is so narrow and has a sharp turn.	
F St and Logan Street	No crosswalk, cars not stopping, cars speeding	Crosswalk, Vehicle conflicts
N. State and Ellis St.	No curb cuts on the north side of N. State St. at this intersection!	Curbs
Chestnut and Garden	Inaccessible curb cut	Curbs
Holly Street block between Bay Incredibly rough sidewalk, wheelchair and walker navigation very challenging		Sidewalk

Table E1 Issues Identified in Survey and mapping tool

LOCATION	DESCRIPTION	TYPE OF ISSUE
Cornwall near Assumption Church/BHS	Low viability at crosswalks for pedestrians/wheelchairs. Cars don't stop	Crosswalk
Illinois and Northwest	Illinois has no sidewalks west of northwest. Getting on and off the sidewalks going east is a huge problem for my friend in a wheelchair	Sidewalk
Downtown	All round about pedestrian crossings are unsafe for the blind. All central downtown crossings need tactile markings to facilitate definition of what would be a curb.	Sidewalk, Curbs
Most parks have gravel and not paved spaces	Gravel is unstable and hard to traverse	Sidewalk
NY pizza bldg. on State Street	Uneven concrete tiles, tree roots	Sidewalk
Bakerview/ by Starbucks Fred Meyers	A raised curb, unpainted, is difficult to see in a chair. Client has hit this, flipped, chair landed on them. 500lb chair. This unpainted, readied sidewalk blocker needs to be painted or removed. I've heard of other that have hit it an been injured as well. You cannot see it.	Sidewalk, Curb
206 E. Laurel	Handicap parking	Parking
2500 Blocks of Henry and Victor Streets	Because there are no curbs on these streets, cars often park angled-in, and often block large portions of (if not the entire) sidewalk.	Curb, Parking
Every signaled intersection in town	Not my challenge, but crosswalks should have the chirping sound thing to let people with visual impairments know when it's safe to cross.	Crosswalk, Signal
Fairhaven Village Green	Level wheelchair parking turned into motorcycle parking	Parking
Boulevard Park	No handicap parking available, not enough spots	
Cornwall and Commercial streets, downtown (between Champion and Holly) Smell so much like urine from folks using the sidewalks as urinals that we avoid visiting businesses there (especially with our young daughter)		
Birchwood by hospital	Needs sidewalks	Sidewalk
Puget, St Paul, Toledo, Undine and others, primarily south of Lakeway Incomplete streets without sidewalks		Sidewalk
220 Unity Street	The building for medical care isn't set up for waiting for the paratransit. With mobility issues, I am left waiting for long periods of time because I am expected to wait where there is no seating for up to 30 minutes.	Transit
Curb cuts are old and steep on Fairhaven parkway, 34 and Connelly is horrible and sidewalks end.	4 and	

Table E1 Issues Identified in Survey and mapping tool

LOCATION	DESCRIPTION	TYPE OF ISSUE	
Birchwood, between Northwest and Greenwood	Sidewalks and streets are bad; lot of water puddles on street so it not ped friendly	Sidewalk	
Lakeway Dr (between Holly and Lincoln)	Crossing signals don't always seems to be pedestrian-activated or - friendly. Not enough time to cross, and also vehicles are turning, going straight, or trying to "beat the light" and not watching for (or stopping for!) pedestrians. Also, crossing signal doesn't always come on when activated.	Signals, Crosswalk	
Bay and Holly	Light crossing Holly too short	Signals	
Moore and Kentucky intersection (at PSE entry gate)	Should be a four-way stop with crosswalks. Pedestrians attempting to use trail connector to Nevada Street are cut off by vehicles leaving the PSE yard, delivery trucks arriving/departing Brooks Lumber (Kentucky St. Dead End).	Crosswalk	
James/State Street	No crosswalk on all legs of major intersections	Crosswalk	
same crosswalks downtown	My sister (legally blind, nearly deaf) cannot see all cars or other people turning into the crosswalk	Crosswalk	
Near Walgreens on Sunset (different angle)	Not color coded so it's hard to see it. No contrast between curb and street	Curb	
Downtown	Restaurants expansion into sidewalks	Sidewalk	
Cordata and Meridian making it challenging to go to DSHS	Pedestrian crossing and sidewalk	Sidewalk, Crosswalk	
James Avenue	Crosswalks are too high and multiple cars do not obey	Crosswalk, Vehicle conflicts	
Samish Way south of WWU.	No sidewalks for those wishing to access Padden, dangerous road	Sidewalk	
Railroad Street near Rumors, Boundary Bay	Abrupt sidewalk changes in elevation	Sidewalk	
pushbutton signals (downtown and anywhere)	- · ·		
Lakeway Grant Street Ramp	Not happy with the Lakeway-Grant street ramp to street wheelchair access. SE ramp is angled whereas SW ramp is not. Downtown ramps are not angled but old residential ramps are which makes it difficult for low vision people to find how to properly cross the street. Need to standardize with inline ramps from sidewalk and not force people out into the street with traffic	Curbs	
Columbia Neighborhood	Many streets do not have sidewalks	Sidewalk	
	Handicapped access to Hearth fire Restaurant is nonexistent. How could the COB grant a building permit to a popular restaurant that provides no handicapped access? A person with a physical disability cannot open the immense doors without help. There are no buttons to		

Table E1 Issues Identified in Survey and mapping tool

LOCATION	DESCRIPTION	TYPE OF ISSUE	
	call for help. One has to wait for another person to leave or enter to hold the door open for the disabled person.		
Many locations where there is no curb or there is a "rolled" curb (e.g. Kentucky near Hardware Sales)	o curb or there is a "rolled" urb (e.g. Kentucky near		
I-5 southbound underpass & Lakeway	Sidewalk is not wide enough for wheelchairs and all users - is not 5 feet in all locations	Sidewalk	
F St	Not enough crosswalks near the Washington Building	Crosswalk	
E. Laurel and Railroad Ave.	It's a mess of curb cuts missing here. If you go on the north sidewalk of Laurel and turn right onto Railroad, there is no curb cut. If you go on Laurel's south sidewalk, there is no curb cut at the cul-de-sac. This means that we are always pushing our daughter into the street, which is particularly dangerous with cars and bikes coming from lots of directions there!	Curbs	
Chestnut and State	Curb cut crumbling	Curbs	
Signage for cars regarding lights/stop sign needs increased to protect pedestrians, cyclists, motorists		Vehicle conflicts	
Ellis and Texas/Carolina	Curb ramp with no accessibility and no sidewalk	Curbs	
Most of the Columbia Most of the streets that do have sidewalks, have very uneven sidewalks neighborhood or complete drop offs. There're many areas with no sidewalks at all		Sidewalk	
5020 Festival Blvd			
Para transit buses	I am required to lug along my car seat. This requires a helper (which I cannot afford) or I often cannot go anywhere.	Transit	
State street	Outside dining partly blocking sidewalk	Sidewalk	
This sidewalk is broken and difficult to navigate from 7-11 to the top of zephyr place. From zephyr place to Back Iowa St there is No sidewalk a all. I've seen wheelchairs in the road to get to the nearest sidewalk. Yew St 98229 sidewalk Blind corner, unsafe.		Sidewalk	
Downtown Bellingham	Loading area in street or bike lane	Parking	
Woburn inner urban trail	Cross signal	Signal, Crosswalk	
Tree root intrusion on Fairhaven Parkway	Sandwich boards block sidewalks as do outside dining areas throughout town		
Any place on Meridian to Guide Meridian, especially near the Mall	Super wide street hard to get across at all, with vehicles trying to beat light or watch for traffic turning.	Vehicle Conflicts	

Table E1 Issues Identified in Survey and mapping tool

LOCATION	DESCRIPTION	TYPE OF ISSUE
Orchard and Meridian	No crosswalk to get from E side Meridian to bus stop; cars will not stop. Orchard Park Assisted Living is approx. 2 blocks E and residents can't safety get to southbound busses.	Crosswalk, Vehicle Conflicts
Corner of E. Connecticut at NW/Elm	Bend in road (where Elm becomes Northwest) does not allow sight distance for pedestrians crossing west to east. Once crossing begins, there's no going back. Cars coming south on NW/Elm have to slam on brakes to allow pedestrian to cross.	
Iowa Street	No sidewalks	Sidewalk
Super supplements by Fred Meyer (First)	Pole is in the way. Not safe with four lanes of traffic Chair tips in the intersection (avoids)	Sidewalk
Haggen Foods	Woburn St. coming from Evergreen Ridge apt. (enforcement issue) trying to cross into the parking lot is challenging to cross; cars refuse to yield to pedestrian	Crosswalk, Vehicle Conflicts
Boulevard park	Hard to access without the use of a car as most approaches are through gravel or down steep road	Crosswalk, Vehicle Conflicts
Ramp off of Red Square (toward South Campus)	·	
Dupont and Broadway (Fire Station Corner)	Walking up Dupont you have to turn and walk up 4-5 steps before crossing Broadway	Sidewalk
Bellweather Way or nearby.		
Commercial driveways on arterial streets	Especially problematic when: there are many close together, the ramps are outdated, sidewalks aren't highlighted or raised, driveways are wide and have L & R turns in and out	Curbs, Sidewalk
Narrow the crossing distance - there is plenty of room - to make it a narrow lane to slow down the turning cars and bulb out the sidewalk there for the many peds/wheels/strollers/shopping carts. We need Lakeway more room to be visible to drivers!		Sidewalk
E. Maple and Railroad Ave.	There's no curb cut on the east sidewalk of Railroad just south of Naan and Brew.	
Boulevard and state	Misplaced curb cut	Curbs
Downtown	Cross walk times are short, drivers just go even when you are in the walk space	
Cornwall at D, E, and F streets	Bumpy asphalt in crossing areas	Crosswalk
Woburn St (starting at cross street sunset all the way to cross street Bakerview)	by to have difficulty navigating, sometimes using the road (drivers speed	

Table E1 Issues Identified in Survey and mapping tool

LOCATION	DESCRIPTION	TYPE OF ISSUE
	The sidewalk on the south side of the turnaround does have a wheelchair curb cut but once you're on the sidewalk, overhanging brush blocks access to continuing on the sidewalk. The end of the sidewalk slopes into the underground parking exit/entrance. Dangerous.	Sidewalk access, handicap parking
	The sidewalk on the north side also has the curb cut but continuing on the sidewalk ends at a curb so it is a dead end for a wheelchair.	
	I often pick up my daughter who uses a wheelchair for appts. and there is no handicap parking for pick up. (and no parking in general in the turn-around) There are 2 handicap spaces under her bldg. but are taken 100% of the time. I am unable to push her in her wheelchair up the hill to State St. to a handicap parking space. There is a need for at least a '15-minute handicap pick-up spot in the turnaround area.	
Laurel and N State Street	Many cars park illegally in this area making access and pick up even harder.	
	Thank you for listening! This area has been very frustrating for my daughter and I.	
	There is a curb/step near the entrance which denies access to the restaurant for wheelchair users or anyone that isn't able to step up.	Other, Sidewalk
Garden Street Front door of Tokyo House Restaurant	I have written the owners a letter in the past but to no avail	
Corner as Squalicum Way becomes Roeder	Cars take this corner too quickly and enter the walking and bike lane. There is also no crosswalk or signage	Sidewalk
Many intersections throughout town have panhandlers (or folks who are living rough and may have mental or behavioral issues) make it difficult to wait	By the Lightcatcher Museum, the outdoor art that doubles as seating is	Sidewalk
- or even move around.	semi-hidden by shrubbery. Crosswalk, sidewalk, and curb ramp	Crosswalk,
South east corner of Connecticut and Park	There is a drop off that ankles can be sprained on and wheelchairs could get stuck in	Sidewalk and Curb Ramps

Appendix F: Focus Group Guide

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Facilitation Guide Bellingham ADA Transition Focus Group

Purpose and Goals

Gain deeper insight on specific issues and priorities identified in the online survey and open house.

Recruiting Members

City will recruit from survey respondents and potential other interested parties

Agenda and Welcome

- Welcome and acknowledge/thank participants and provide brief purpose of meeting- Kim and Ryan (5 Minutes)
- Ground Rules Eva (5 Minutes)
 Introductions Jeanne (10 minutes)
- (part of welcome/intro instead)
- Discussion of the survey results (via PowerPoint) and review of materials (maps) Ryan (10 Minutes)
- Workshop Jeanne and all (up to 90 minutes)
 - In depth discussion of the top three or four areas identified as priorities.

Purpose of the Focus Group

Today we are going to take a deeper dive with all of you on different aspects of accessibility including different locations and types of issues. We want to ask you more about your experiences to explore specific issues and priorities identified in the online survey and open house.

Ground Rules:

We have planned this focus group to last two hours. During this time, we have several questions that we would like to cover. We want everyone to take part in the discussion; however, you do not have to respond to every question. Also, feel free to respond to what others are saying—whether you agree or disagree. If you have been speaking a lot, wait a bit before speaking again to allow others a turn. We are genuinely interested in your experiences with barriers to pedestrian access; therefore, there are no right or wrong answers. If time begins to run short, it may be necessary to interrupt you in order to complete the questions or move to the next discussion.

We will be using some graphical material – maps of the area. We will do our best to describe them, but please feel free to ask questions.

We are using a CART provider to caption our conversation. In order to capture the details of our conversation we ask that only **one person speak at a time**. When speaking, please speak into the microphone. We will bring the microphone to you.

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We will treat your answers as confidential. We will not ask for personally identifiable information. While we may use names during this discussion, we will replace names in the transcript after our discussion. We also will not include your names or other personally identifiable information in any reports we write. We ask that each of you respect the privacy of everyone in this room and not share or repeat what is said here in any way that could identify anyone in this room.

Restrooms are down the hall on the left. Please feel free to get up from the table at any time as you need to. We will take a 10-minute break at 3:00pm.

Introductions:

Please take a few minutes to tell us about yourself and why you are here today. What is your interest in this project?

Survey Summary

PowerPoint to show the summary of the top-line survey results.

About Transition Plans

The Transition Plan addresses potential deficiencies to improve mobility in the public right of way including access issues along sidewalks, curb ramps, signals, and transit stops within and adjacent to public roadways.

A transition plan will be developed after completing the public outreach process and a review of the City's current processes for improving facilities. This plan will outline a strategy for making improvements considering several factors such as the extent of deficiencies, identified needs, proximity to certain facilities, requests and complaints by the community, available budget and a realistic schedule. For this focus group we have materials which we will rely on. Please, set up you name tent or raise your hand if you would like us to repeat anything.

Materials

- We have maps showing City Buildings and Service areas, transit stops and stations, public parks, schools and institutions and streets with transit lines. These have been overlaid with different issue areas identified in the survey and mapping tool. These maps help show clusters of issue types around different destinations.
- Power point presentation (We will read every slide)
- Priorities and sticky dots from the Open House (We will summarize the results verbally)

We will spend our time considering destinations and the types of issues that impact those destinations. We have maps that show specific types of locations like Government Buildings and transit along with mapped locations of issues identified by the community.

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Series 1 –Let's talk about access to Government Buildings and Community Services - 15-20 minutes

Facilitator Narrative:

Let's talk about one of destination areas – People felt government buildings, community services ,and transit with identified issue. Issues were identified including curb, sidewalk, crosswalks, traffic signals, ADA parking, transit and traffic conflicts. We will describe these maps and the clusters of issues for you.

The government buildings, largely in downtown Bellingham including Bellingham City Hall, Bellingham Municipal Court, Bellingham Police Department, Whatcom County Courthouse, Bellingham Public Library, Whatcom County Health Department.

Questions:

Concerns we have heard about:

- · Lack of crosswalks
- Uneven or blocked sidewalks,
- Pathway between transit stops and buildings
- Inadequate curb ramps
- · Conflicts with vehicles

What other issues and concerns do you experience when accessing these areas?

Additional probing questions for respondents.

- What other resources or community services are priorities for those with disabilities?
- Are some community services especially problematic to access due to pedestrian facilities or transit access? Which ones?
- Are there policies we could explore (signal timing) to address issues?
- Is this a high priority? Something we could partner with others?
- Are there government buildings that are a priority or have significant issues? Which are they?

Materials: Map noting buildings and issues (describe in detail for folks with low vision)

Product: Recorded comments and responses and notes as well as marked up maps

Series 2 -Let's talk about access to Transit 15-20 minutes

Facilitator Narrative:

Let's talk about access to transit. Transit is provided by Whatcom Transit. In Bellingham, Bellingham Station, Cordata Station, and Fairhaven Station are major transit hubs.

The Map shows these station locations and we will review some of the issues related to accessing Transit stops/stations

We will not be discussing transit service specifically (routes and which areas are served)

Questions:

What we have heard concerns are:

- Non ADA/wheelchair accessible stops
- Lack of sidewalks/crosswalks

What other issues and concerns do you experience?

Additional probing questions.

- How else can we improve transit, specifically pedestrian facilities used for transit?
- Is this a high priority? Something we could partner with others?
- Are there transit stops (like downtown) that are a priority or have significant issues? Which are they?

Materials: Slides and map noting transit stops and issues (describe in detail for folks with low vision)

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Series 3-Let's talk about Medical Hospital 15-20 minutes

Facilitator Narrative:

Let's talk about another issue area – Medical and Hospital Facilities.

The Map shows issues as noted previously and Medical Hospital Facilities (are these the appropriate locations)

We will **not** be discussing buildings specifically including doors and ramps.

Questions:

What we have heard concerns are:

- Non-ADA/wheelchair accessible stops
- Inadequate sidewalks/crosswalks
- Transit pathways
- Sidewalks blocked
- Any ADA parking issues identified?

What other issues and concerns do you experience?

Additional probing questions.

- Is this a high priority?

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Materials: Slides and map noting Medical Hospital areas and issues (describe in detail for folks with low vision)

Appendix G: Design Standards Review



TECHNICAL MEMORANDUM

Date:	February 17, 2021	TG:	1.18308.00
To:	Kimberly Brown, City of Bellingham		
From:	Ryan Peterson, PE, PTOE, Transpo Group		
cc:			
Subject:	Barrier Removal Audit – City of Bellingham ADA Transition Plan		

The City of Bellingham maintains approved design standards and municipal codes covering pedestrian facilities. The code and design standards are used for City funded projects as well as privately designed and constructed projects within City public right-of-way. This memorandum describes design guidelines that meet the requirements of the Americans with Disabilities Act (ADA), common accessibility design issues, and references to specific design guidelines. The audit of the City's street design standards as they relate to pedestrian features within the public right-of-way include the City of Bellingham Standard Plans (COB Std Plans) last updated September 15, 2020, Bellingham Development Guidelines & Improvement Standards (COB DG) updated June 13, 2018, Bellingham Pedestrian Master Plan (PMP) dated July 2012, and Municipal Code (COB MC) approved on October 12, 2020. The City's Comprehensive Plan was also inventoried for pedestrian and ADA related policies.

Design Guidelines

There are several key design measurements that ADA design guidelines address. These measures are used because they are important to the accessibility and safety of the facility. When pedestrian facility designs cannot be constructed to full design requirements, they should be built to conform to the maximum extent feasible. When this arises, the City should identify the location this occurs, provide justification, and document for future reference.

Several guidelines and references are available to assist the City of Bellingham in adhering to accessible design standards based on the needs for various projects. There are many opportunities to improve pedestrian conditions by identifying areas of need and establishing the appropriate accessibility design requirements.

2010 ADA Standards for Accessible Design (ADAS) (September 2010)

The Department of Justice published revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 "ADA" in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design "2010 Standards". The 2010 Standards set minimum requirements – both scoping and technical — for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities.

Proposed Guidelines for Pedestrian Facilities in the Public Right-of Way (PROWAG) (November 2011)

The United States Access Board is the rule making body that guides ADA compliance across the US. Since the late 2000's the US Access Board has been in the process of updating its Guidelines for Pedestrian Facilities in the Public Rights-of-Way. These draft guidelines focus on accessibility of sidewalks, curb ramps and in the soon to be released versions address shared-use trails. The draft guidelines cover legislative background, administration requirements, and design requirements.

Many public entities currently use the 2005 draft PROWAG as 'best practice' for features within the public right-ofways. This practice has been endorsed by the Federal Highway Administration (FHWA), the US Access Board, and is the standard the Washington Department of Transportation adheres to. The City's standards and codes were evaluated against 2011 PROWAG as this is the latest guideline developed by the Access Board. PROWAG sections referenced in this memo refer to 2011 PROWAG sections. When these standards conflicted with the 2010 ADA, the PROWAG standard is recommended.

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Design Requirements

Though the City of Bellingham has standards in place it is important for the standards to be consistent and compliant with the above standards. To that end, this memo will provide recommendations to improve and clarify the existing city documents. Recommended actions are included where necessary to meet ADA design standards and best practice. The tables below describe requirements for specific design elements, how they are addressed in City standards, and recommendations for modifications.

Sidewalks and Pathways

Sidewalks are mentioned in the standard plans. These standards cover desired dimensions and materials to be used for construction of these facilities. Sidewalks are a common element found in a pedestrian access route (PAR).

Design Element	Requirement	Review	Recommendations	
Pedestrian Access Route (PAR) and Pedestrian Circulation Path (PCP)	Various	PAR and PCP not mentioned and not defined in COB Standards or the COB MC.	Add definition of PAR and PCP to Development Guidelines & Improvement Standards section 1-3.	
		The term pedestrian access route is used in the PMP but is not defined.	This could include reference to WSDOT Design Manual sections 1510.06 and 1510.07 for PAR and PCP definitions and standards.	
			Within existing COB MC Title 8, Parks, Cemeteries, and Public Places, refer to Title 13 to ensure all pathways in public places follow ADA standards.	
Sidewalk Width	Minimum clear width of PAR is 4 ft excluding the curb; however, on PAR less than 5 ft wide, passing space of	5 ft minimum sidewalk width shown in several locations in the COB Std Plans and the PMP.	Add note to COB Std Plans CG-230, CG-232, ST-120, 124, 132, 150, and 160 to define minimum clear width	
	5 ft by 5 ft is required every 200 ft minimum (PROWAG R302.3 and R302.4)	Pedestrian Through Zone is shown in the PMP as between 4- 12ft wide depending on street	along sidewalk. Note can directly quote ADAS 403.5.1 or reference the PMP.	
	Clear width of walking surfaces shall be 36 inches minimum. The clear width shall be permitted to be reduced to 32 inches minimum for a length of 24 inches maximum provided that reduced width segments are separated by segments that are 48 inches long minimum and 36 inches wide minimum. Additional space is required at turns (ADAS 403.5.1).	classification.		
Sidewalk Running Slope	Where the PAR is contained within a street or highway right-of-way, its grade shall not exceed the general grade established for the adjacent street or highway. When the PAR is not contained within the street or highway right-of-way, the grade of shall not exceed 5 percent (PROWAG R302.5).	COB Std Plans CG-260 and CG- 265 have 1:12 running slope for driveway section.	No Change.	
	The running slope of walking surfaces shall not be steeper than 1:20 (ADAS 403.3).			
Sidewalk Cross Slope	The cross slope of a PAR shall be 2 percent maximum (PROWAG R302.6).	Sidewalk cross slopes shown as 1.5% in several locations in the COB Std Plans and PMP.	Add "Sidewalks shall be constructed to maximum cross slope of 2 percent to COB DG section 4-13.15.	

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The cross slope of walking surfaces shall not be steeper than 1:48 (ADAS 403.3).

Protruding Objects

Objects with leading edges more than 2.25 ft and not more than 6.7 ft above the finish surface shall protrude 4 in maximum horizontally into the pedestrian circulation path (PCP) (PROWAG R402.2 & ADAS 307.2).

Objects mounted on free-standing posts or pylons more than 2.25 ft and not more than 6.7 ft above the finish surface shall overhang pedestrian circulation paths 4 in maximum measured horizontally from the post or pylon base. The base dimension shall be 2.5 in thick minimum. Where objects are mounted between posts or pylons and the clear distance between the posts or pylons is greater than 1.0 ft, the lowest edge of the object shall be 2.25 ft maximum or 6.7 ft minimum above the finish surface (PROWAG R402.3).

Free-standing objects mounted on posts or pylons shall overhang circulation paths 12 inches maximum when located 27 inches minimum and 80 inches maximum above the finish floor or ground. Where a sign or other obstruction is mounted between posts or pylons and the clear distance between the posts or pylons is greater than 12 inches, the lowest edge of such sign or obstruction shall be 27 inches maximum or 80 inches minimum above the finish floor or ground (ADAS 307.3).

Section 4.3 of the PMP mentions minimizing protruding architectural elements as a best practice.

Section 20.36.100 of the COB MC allows signs on existing buildings abutting a right-of-way to protrude six feet with eight feet vertical clearance. Add protruding object leading edge requirements to COB DG Section 4-13.15

Surface Discontinuities

Vertical surface discontinuities shall not exceed 0.5 in maximum. Vertical discontinuities between 0.25 in and 0.5 in maximum shall be beveled not steeper than 50 percent (PROWAG R302.7.2)

Horizontal openings shall not permit passage of a sphere more than 0.5 in in diameter. Elongated openings in grates shall be placed so that the long dimension is perpendicular to the dominate travel direction (PROWAG R302.7.3).

Vertical. Changes in level of 1/4 inch high maximum shall be permitted to be vertical. Changes in level between 1/4 inch high minimum and 1/2 inch high maximum shall be beveled with a slope not steeper than 1:2 (ADAS 302.2 & 302.3).

Multiple COB standard plans show 3/8" x 2" min dummy joints. (COB "CG" Std Plans).

Multiple COB standard plans show 3/4" deep v grooves. (COB "CG" Std Plans).

COB standard plan CG-200 show 3/4" expansion joints.

COB standard plan CG-204 shows a 1/4" x 6 1/2" deep expansion joint material for rolled curb applications.

COB standard plan CG-260 allows for 1/4" or 3/8" expansion joints

COB DG Section 4-13.15 allows for $\frac{3}{4}$ " deep V grooves, $\frac{3}{8}$ " x 2" dummy joints, and $\frac{3}{8}$ " x4.5" expansion joints.

Update all standards to allow maximum ½" width requirement for expansion joints and all other horizontal openings.



Crossings

Crosswalks are part of the PAR at intersections, midblock crossings, and pedestrian refuge islands. These are important connections across streets to enable pedestrians travelling from one side to the other.

Design Element	Requirement	Review	Recommendations
Crosswalk Running Slope	The running slope shall be 5 percent maximum, measured parallel to the direction of pedestrian travel in the crossing (PROWAG R302.5.1).	Not mentioned.	Add 5 percent maximum running slope requirement to COB Std Plan TC-310.
Crosswalk Cross Slope	Crosswalk cross slope at crossings without yield or stop control shall be 5 percent maximum (PROWAG R302.6.1).	Not mentioned.	Add 5 percent and 2 percent maximum cross slope requirement for without and with yield or stop control, respectively, to COB Std Plan TC-
	Crosswalk cross slope at yield or stop control crossings shall be 2 percent maximum (PROWAG Advisory R302.6.1).		Add cross slope requirements to PMI Marked Crosswalks detail (4-13).
	Crosswalks cross slope at midblock crossings shall be permitted to equal the street or highway grade (PROWAG R302.6.2).		
Refuge Islands	Detectable warning surfaces at cut- through islands shall be located at placed at the edges of the pedestrian	Refuge islands are shown as acceptable treatments to reduce crossing distance in the PMP Median Refuge Island detail (4-15).	Call out detectable warning and 5.0ft clear width requirement on PMP Median Refuge Islands detail (4-15).
	island and separated by a 2.0 ft minimum length of surface between detectable warning surfaces (PROWAG R305.2.4).		Consider adding refuge island detail to section CG of the COB Std Plans.
	The clear width of a PAR with median and pedestrian refuge islands shall be 5.0 ft minimum (PROWAG R302.3.1).		

Curb Ramps

Curb ramps are the immediate junctions between the sidewalk and street crosswalk. Perpendicular and diagonal curb ramps have a running slope that cuts through the curb at right angles, while parallel curb ramps have a running slope that is in-line with the sidewalk. Combination ramps include elements of both parallel and perpendicular curb ramps.

Design Element	Requirement	Review	Recommendations
Ramp Width	The clear width of curb ramp runs and blended transitions, excluding flares, shall be 4.0 ft minimum (PROWAG R304.5.1). The clear width of a ramp run shall be 36 inches minimum (ADAS 405.5).	COB Std Plan CG-246 references WSDOT standard plans F-40.12-0x, F-40.14-0x, F-40.15-0x, and F-40.16-0x for curb ramp installation details.	No Change.

7/

Design Element	Requirement	Review	Recommendations
Running Slope	The running slope shall be 5 percent minimum and 8.3 percent maximum but shall not require the ramp length to exceed 15.0 ft (PROWAG R304.2.2).	COB Std Plan CG-246 references WSDOT standard plans F-40.12-0x, F-40.14-0x, F-40.15-0x, and F-40.16-0x for curb ramp installation details.	No Change.
	The running slope of blended transitions shall be 5 percent maximum (PROWAG R304.4.1).		
	Ramp runs shall have a running slope not steeper than 1:12. In existing sites, buildings, and facilities, ramps shall be permitted to have running slopes steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to space limitations (ADAS 405.2).		
Cross Slope	The cross slope shall be 2 percent maximum. At pedestrian street crossing without yield or stop control and at midblock pedestrian street crossings, the cross slope shall be permitted to equal the street or highway grade (PROWAG R304.5.3).	COB Std Plan CG-246 references WSDOT standard plans F-40.12-0x, F-40.14-0x, F- 40.15-0x, and F-40.16-0x for curb ramp installation details. PMP ADA Compliant Curb	No Change.
	Cross slope of ramp runs shall not be steeper than 1:48 (ADAS 405.3).	Ramps detail (4-20) includes maximum 2.0% slope in any direction.	
Flared Sides	Flared sides with a slope of 10 percent maximum, measured parallel to the curb line, shall be provided where a pedestrian circulation path crosses the curb ramp (PROWAG R304.2.3).	COB Std Plan CG-246 references WSDOT standard plans F-40.12-0x, F-40.14-0x, F-40.15-0x, and F-40.16-0x for curb ramp installation details.	No Change.
	Curb ramp flares shall not be steeper than 10 percent (ADAS 406.3).		
Direction	Perpendicular curb ramps shall have a running slope that cuts through or is built up to the curb at right angles or meets the gutter grade break at right angles.	COB Std Plan CG-246 references WSDOT standard plans F-40.12-0x, F-40.14-0x, F-40.15-0x, and F-40.16-0x for curb ramp installation details.	No Change.
	Parallel curb ramps shall have a running slope that is in-line with the direction of sidewalk travel (PROWAG Advisory R304.1).		
Counter Slope	The counter slope of the gutter or street at the foot of curb ramp run, blended transitions, and turning space shall be 5 percent maximum (PROWAG R304.5.4).	COB Std Plan CG-246 references WSDOT standard plans F-40.12-0x, F-40.14-0x, F-40.15-0x, and F-40.16-0x for curb ramp installation details.	No Change.
	Counter slopes of adjoining gutters and road surfaces immediately adjacent to the curb ramp shall not be steeper than 5%. The adjacent surfaces at transitions at curb ramps to walks, gutters, and streets shall be at the same level (ADAS 406.2).		

Design Element	Requirement	Review	Recommendations
Grade Breaks	Grade breaks at the top and bottom of curb ramps shall be perpendicular to the direction of ramp run. Grade breaks shall not be permitted on the surface of ramp runs and turning spaces. Surface slopes that meet at grade breaks shall be flush (PROWAG R304.5.2).	COB Std Plan CG-246 references WSDOT standard plans F-40.12-0x, F-40.14-0x, F-40.15-0x, and F-40.16-0x for curb ramp installation details.	No Change.
	Changes in level other than the running slope and cross slope are not permitted on ramp runs (ADAS 405.4).		
Turning Space/Landing Size	For perpendicular curb ramps, a turning space 4.0ft by 4.0ft minimum shall be provided at the top of the curb ramp. If the turning space is constrained at the back of sidewalk, the turning space shall be 4.0ft by	COB Std Plan CG-246 references WSDOT standard plans F-40.12-0x, F-40.14-0x, F-40.15-0x, and F-40.16-0x for curb ramp installation details.	No Change.
	5.0ft minimum. The 5.0ft dimension shall be provided in the direction of the ramp run. (PROWAG R304.2.1).	PMP ADA Compliant Curb Ramps detail (4-20) includes 5ft by 5ft landing preference.	
	For parallel curb ramps, a turning space 4.0ft by 4.0ft minimum shall be provided at the bottom of the curb ramp. If the turning space is constrained on 2 or more sides, the turning space shall be 4.0ft by 5.0ft minimum. The 5.0ft dimension shall be provided in the direction of the pedestrian crossings. (PROWAG R304.3.1).		
	The landing clear length shall be 36 inches minimum. The landing clear width shall be at least as wide as the curb ramp, excluding flared sides, leading to the landing (ADAS 406.4).		
Turning Space/Landing Slope	The running slope of turning spaces shall be 2 percent maximum (PROWAG R402.2 & PROWAG R304.3.2).	COB Std Plan CG-246 references WSDOT standard plans F-40.12-0x, F-40.14-0x, F- 40.15-0x, and F-40.16-0x for	No Change.
	The cross slopes of turning spaces shall be 2 percent maximum (PROWAG R304.5.3).	curb ramp installation details.	

Design Element	Requirement	Review	Recommendations
Clear Space	Beyond the bottom grade break, a clear space 4.0ft by 4.0ft minimum shall be provided within the width of the pedestrian crossing and wholly outside the parallel vehicle travel lane (R304.5.5).	COB Std Plan CG-246 references WSDOT standard plans F-40.12-0x, F-40.14-0x, F-40.15-0x, and F-40.16-0x for curb ramp installation details.	No Change.
	Diagonal or corner type curb ramps with returned curbs or other well-defined edges shall have the edges parallel to the direction of pedestrian flow. The bottom of diagonal curb ramps shall have a clear space 48 inches minimum outside active traffic lanes of the roadway. Diagonal curb ramps provided at marked crossings shall provide the 48 inches minimum clear space within the markings. Diagonal curb ramps with flared sides shall have a segment of curb 24 inches long minimum located on each side of the curb ramp and within the marked crossing (ADAS 406.6).		
Detectable Warning Surfaces	Detectable warning surfaces shall extend 2.0 ft minimum in the direction of pedestrian travel and the full width of the curb ramp (exclusive of flares), the turning space, or the blended transition. (PROWAG R305.1.4).	COB Std Plan CG-246 references WSDOT standard plan F-45.10-0x for detectable warning surface details. PMP ADA Compliant Curb Ramps detail (4-20) includes requirement for tactile warning device at edge of curb ramp.	No Change.
	The truncated domes in a detectable warning surface shall have a base diameter of 0.9 in minimum and 1.4 in maximum, a top diameter of 50 percent of the base diameter minimum and 65 percent of the base diameter maximum, and a height of 0.2 in (PROWAG R305.1.1 & ADAS 705.1.1).		
	The truncated domes shall have a center-to-center spacing of 1.6 in minimum and 2.4 in maximum, and a base-to-base spacing of 0.65 in minimum, measured between the most adjacent domes (PROWAG R305.1.2 & ADAS 705.1.2)		
	Detectable warning surfaces shall contrast visually with adjacent gutter, street or highway, or walkway surfaces, either light-on-dark or dark-on-light (PROWAG R305.1.3).		
	Detectable warning surfaces shall contrast visually with adjacent walking surfaces either light-on-dark, or dark-on-light (ADAS 705.1.3).		

Detectable Warning Surface Placement	On perpendicular curb ramps, detectable warning surfaces shall be	COB Std Plan CG-246 references WSDOT standard	No Change.
	 Where the ends of the bottom grade break are in front of the back of curb, detectable warning surfaces shall be placed at the back of curb. Where the ends of the bottom grade break are behind the back of curb and the distance from either end of the bottom grade brake to the back of curb is 5.0 ft or less, detectable warning surfaces shall be placed on the ramp run within one dome spacing of the bottom grade break. Where the ends of the bottom grade break are behind the back of curb and the distance from either end of the bottom grade break are behind the back of curb and the distance from either end of the bottom grade brake to the back of curb is more than 5.0 ft, detectable warning surfaces shall be placed on the lower landing at the back of curb. (PROWAG R305.2.1). On parallel curb ramps, detectable warning surfaces shall be placed on the turning space at the flush transition between the street and sidewalk at the back of curb. (PROWAG R305.2.2). On blended transitions, detectable warning surfaces shall be placed at the back of curb. Where raised pedestrian street crossings, depressed corners, or other level pedestrian street crossings are provided, detectable warning surfaces shall be placed at the sidewalk (PROWAG R305.2.3). 	plan F-45.10-0x for detectable warning surface details.	
Receiving Ramp	A crosswalk served by a curb ramp must also have an existing curb ramp in place on the receiving end unless there is no curb or sidewalk on that end of the crosswalk Revised Code of Washington (RCW) 35.68.075.	Handicapped ramps and vertical curb drainage grates will be utilized on corners where applicable (COB DG 4-13.13.01.4). Depressed curb driveway and wheelchair ramp openings shall	No Change.

Signals

Signals are important connections in the pedestrian network that provide crossings at intersections for all roadway users. Where pedestrian signals are provided at pedestrian street crossings, they shall include accessible pedestrian signals and pedestrian pushbuttons complying with sections 4E.08 through 4E.13 of the MUTCD (PROWAG R209.1).

Design Element	Requirement	Review	Recommendations
Accessible Pedestrian Signals and Pedestrian Pushbuttons	Where pedestrian signals are provided at pedestrian street crossings, they shall include accessible pedestrian signals and pedestrian pushbuttons complying with sections 4E.08 through 4E.13 of the MUTCD. An accessible pedestrian signal and pedestrian	The COB APS policy states that all APS equipment shall be installed in compliance with sections 4E.08 – 4E.13 of the MUTCD and section R403 of PROWAG draft 2011.	Update COB DG 4-13.23.09 to reference WSDOT Standard Plan J-20.26-0x.
	pushbutton is an integrated device that communicates information about the WALK and DON'T WALK intervals at signalized intersections in non-visual formats (i.e., audible tones and vibrotactile surfaces) to pedestrians who are blind or have low vision. (PROWAG R209.1).	COB DG section 4-13.23.08 Pedestrian Signal Heads and 4- 13.23.09 Pedestrian Push Buttons requires clamshell type housing attached to the signal pole. Pedestrian push button assemblies shall be in accordance with Standard Plan	
	Existing pedestrian signals shall comply with R209.1 when the signal controller and software are altered, or the signal head is replaced (PROWAG R209.2).	J-5.	
Accessible Pedestrian Pushbuttons Clear Space	Clear spaces shall be 2.5 ft minimum by 4.0 ft minimum with additional space needed if it is confined on all or part of three sides (PROWAG R404.3). One full unobstructed side of a clear space shall adjoin a pedestrian access route or adjoin another clear	The COB APS policy states that all APS equipment shall be installed in compliance with sections 4E.08 – 4E.13 of the MUTCD and section R403 of PROWAG draft 2011.	No Change.
Accessible Pedestrian Pushbutton Reach Ranges	space (PROWAG R404.6). Where a forward reach is unobstructed, the high forward reach shall be 1220 mm (4.0 ft) maximum and the low forward reach shall be 380 mm (1.25 ft) minimum above the finish surface. Forward reach over an obstruction is not permitted (PROWAG R406.2). Where a clear space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 4.0 ft maximum and the low side reach shall be 1.25 ft minimum above the finish surface. An obstruction shall be permitted between the clear space and the element where the depth of the obstruction is 10 in maximum (PROWAG R406.3).	The COB APS policy states that all APS equipment shall be installed in compliance with sections 4E.08 – 4E.13 of the MUTCD and section R403 of PROWAG draft 2011. PMP Accommodating Pedestrians at Signalized Crossings detail (4-23) places push buttons where someone in a wheelchair can reach the bottom from a level area of the sidewalk.	No Change.
Pedestrian Crossing Times	All pedestrian signal phase timing shall comply with section 4E.06 of the MUTCD, shall be based on a pedestrian clearance time that is	The COB APS policy states that all APS equipment shall be installed in compliance with sections 4E.08 – 4E.13 of the	Update PMP Accommodating Pedestrians at Signalized Crossings

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Design Element	Requirement	Review	Recommendations
	calculated using a pedestrian walking speed of 3.5 ft/s or less	MUTCD and section R403 of PROWAG draft 2011.	detail (4-23) pedestrian walking speed to 3.5 ft/s.
	(PROWAG R306.2).	PMP Accommodating Pedestrians at Signalized Crossings detail (4-23) recommends pedestrian walking speed of 4 ft/s.	
At Roundabouts	At roundabouts with multi-lane pedestrian street crossings, a pedestrian activated signal shall be provided for each multi-lane segment of each pedestrian street crossing, including the splitter island (PROWAG R306.3.2).	The COB APS policy states that all APS equipment shall be installed in compliance with sections 4E.08 – 4E.13 of the MUTCD and section R403 of PROWAG draft 2011.	No Change.
At multi-lane channelized turn lanes	At signalized intersections and roundabouts with multi-lane channelized turn lane crossings, pedestrian activated signals shall be provided (PROWAG R306.4 & PROWAG R306.5).	The COB APS policy states that all APS equipment shall be installed in compliance with sections 4E.08 – 4E.13 of the MUTCD and section R403 of PROWAG draft 2011.	No Change.

Other Pedestrian Areas

Other pedestrian areas include transit stops and work zones. Transit provides a critical lifeline of access and independence for those with limited mobility or vision. Transit stops have additional width requirements for boarding and alighting passengers, and work zones should provide the same level of accessibility as permanent pedestrian facilities.

Requirement	Review	Recommendations
-	Transit Stops	
ng and great areas shall provide a clear length of sions 8.0 ft minimum, measured perpendicular to the curb or vehicle street or highway (PROWAG R308.1.1.1 & ADAS 810.2.2).	sidewalk adjacent to a bus	Add transit subsection to Section 4 of COB DM. Reference WSDOT Design Manual Chapter 1510.15 for transit stop requirements.
		Add boarding and alighting minimum 8.0ft by 5.0ft area to COB Std Plan ST-155.
Parallel to the street or highway, the grade of the bus stop boarding and alighting areas shall be the same as the street or highway, to the extent	Not mentioned.	Add transit subsection to Section 4 of COB DM. Reference WSDOT Design Manual Chapter 1510.15 for transit stop requirements.
practicable. Perpendicular to the street or highway, the grade of the bus stop boarding and alighting areas shall not be steeper than 2 percent (PROWAG R308.1.1.2 & ADAS 810.2.4).		Add boarding and alighting maximum 2 percent slope to COB Std Plan ST-155.
Transit shelters shall be connected by PARs to boarding and alighting areas. Transit shelters shall provide a minimum clear space complying with R404 entirely within the shelter. Where seating is provided within transit shelters, the clear space shall be located either at one end of a seat or shall not overlap the area	Not mentioned.	Add transit subsection to Section 4 of COB DM. This should include a reference to follow WSDOT Design Manual Chapter 1510.15 for transit stop requirements.
	Bus stop boarding and alighting areas shall provide a clear length of 8.0 ft minimum, measured perpendicular to the curb or vehicle street or highway edge, and a clear width of 5.0 ft minimum, measured parallel to the vehicle street or highway (PROWAG R308.1.1.1 & ADAS 810.2.2). Parallel to the street or highway, the grade of the bus stop boarding and alighting areas shall be the same as the street or highway, to the extent practicable. Perpendicular to the street or highway, the grade of the bus stop boarding and alighting areas shall not be steeper than 2 percent (PROWAG R308.1.1.2 & ADAS 810.2.4). Transit shelters shall be connected by PARs to boarding and alighting areas. Transit shelters shall provide a minimum clear space complying with R404 entirely within the shelter. Where seating is provided within transit shelters, the clear space shall	Bus stop boarding and alighting areas shall provide a clear length of 8.0 ft minimum, measured perpendicular to the curb or vehicle street or highway edge, and a clear width of 5.0 ft minimum, measured parallel to the vehicle street or highway (PROWAG R308.1.1.1 & ADAS 810.2.2). Parallel to the street or highway, the grade of the bus stop boarding and alighting areas shall be the same as the street or highway, to the extent practicable. Perpendicular to the street or highway, the grade of the bus stop boarding and alighting areas shall not be steeper than 2 percent (PROWAG R308.1.1.2 & ADAS 810.2.4). Transit shelters shall be connected by PARs to boarding and alighting areas. Transit shelters shall provide a minimum clear space complying with R404 entirely within the shelter. Where seating is provided within transit shelters, the clear space shall be located either at one end of a

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Design Element	Requirement	Review	Recommendations
	within 1.5 ft from the front edge of the seat (PROWAG R308.2).		
	Bus shelters shall provide a minimum clear floor or ground space complying with 305 entirely within the shelter. Bus shelters shall be connected by an accessible route complying with 402 to a boarding and alighting area complying with 810.2 (ADAS 810.3).		
		Parking	
Parking Spaces	Where parking spaces are marked with lines, width measurements of parking spaces and access aisles shall be made from the centerline of the markings (ADAS 502.1). Car parking spaces shall be 96 inches wide minimum and van parking spaces shall be 132 inches wide minimum, shall be marked to define the width, and shall have an adjacent access aisle (ADAS 502.2).	COB Std Plan ST-150 shows the parking width as 8ft (96in). Off-street parking aisle and stall requirements are listed in COB MC 20.08.020 Figures 10 and 11. Stall widths range from 8ft to 8.5ft.	Add standard plan to section ST of the COB Std Plans, similar to CG-24 that references WSDOT Standard Plan M-17.10-02 for accessible parking dimensions and placement.
	Van parking spaces shall be permitted to be 96 inches wide minimum where the access aisle is 96 inches wide minimum (ADAS 502.2 Exception).		
Parking Access Aisles	Access aisles shall adjoin an accessible route. Two parking spaces shall be permitted to share a common access aisle (ADAS 502.3).	Not mentioned.	Add standard plan to section ST of the COB Std Plans, similar to CG-24 that references WSDOT Standard Plan M-17.10-02 for accessible parking dimensions and placement
	Access aisles serving car and van parking spaces shall be 60 inches wide minimum (ADAS 502.3.1).		and requires access aisles be locate on the passenger side of the vehicle for van parking spaces.
	Access aisles shall extend the full length of the parking spaces they serve (ADAS 502.3.2).		
	Access aisles shall be marked so as to discourage parking in them (ADAS 502.3.3).		
	Access aisles shall not overlap the vehicular way. Access aisles shall be permitted to be placed on either side of the parking space except for angled van parking spaces which shall have access aisles located on the passenger side of the parking spaces (ADAS 502.3.4).		
Parking identification.	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign (ADAS 502.6).	Not mentioned.	Add standard plan to section ST of the COB Std Plans, similar to CG-24 that references WSDOT Standard Plan M-17.10-02 for accessible parking dimensions and placement.

Design Element	Requirement	Review	Recommendations
Parallel Parking Spaces	Where the width of the adjacent sidewalk or available right-of-way exceeds 14.0 ft, an access aisle 5.0 ft wide minimum shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall not encroach on the vehicular travel lane (PROWAG R309.2.1).	COB standard plan ST-150 shows the parking width as 8ft (96in).	Revise COB standard plan ST-150 to include requirement "For parking spaces designated as accessible, provide 5.0 ft wide access aisle at street level the full length of the parking space and connected to a pedestrian access route if the adjacent sidewalk is greater than 14.0 ft. If the adjacent sidewalk is not greater than 14.0 ft., spaces designated as accessible shall be
	In alterations where the street or sidewalk adjacent to the parking spaces is not altered, an access aisle shall not be required provided the parking spaces are located at the end of the block face (PROWAG R309.2.1.1).		located at the end of the block with no access aisle required."
	An access aisle is not required where the width of the adjacent sidewalk or the available right-of-way is less than or equal to 14.0 ft. When an access aisle is not provided, the parking spaces shall be located at the end of the block face (PROWAG R309.2.2).		
Perpendicular or Angled Parking Spaces	Where perpendicular or angled parking is provided, an access aisle 8.0 ft wide minimum shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with R302.7 and shall be marked so as to discourage parking in the access aisle. Two parking spaces are permitted to share a common access aisle (PROWAG R309.3).	Not mentioned.	Add standard plan to section ST of the COB Std Plans, similar to CG-246 that references WSDOT Standard Plan M-17.10-02 for accessible parking dimensions and placement.
	Alternative P	edestrian Access Routes	
Alternate Pedestrian Access Route	When a pedestrian circulation path is temporarily closed by construction, alterations, maintenance operations, or other conditions, an alternate pedestrian access route complying with sections 6D.01, 6D.02, and 6G.05 of the MUTCD shall be provided. Where provided, pedestrian barricades and channelizing devices shall comply with sections 6F.63, 6F.68, and 6F.71 of the MUTCD (PROWAG R205).	PMP Pedestrian Access Through Construction Areas detail (4-11) provides guidance for pedestrian access through construction areas.	Add statement to COB DM section 4-13.31.01 Traffic Control Within City of Right-0f-Way that states "If traffic control impacts a pedestrian route, an alternative pedestrian access route shall be provided through the temporary closure routes per the WSDOT Design Manual, Chapter 1510.17, and sections 6D.01, 6D.02, and 6G.05 of the MUTCD."
		Driveways	

Design Element	Requirement	Review	Recommendations
Driveways	The cross slope shall be 2 percent maximum (PROWAG R304.5.3). Cross slope of ramp runs shall not be steeper than 1:48. (ADAS 405.3) The running slope shall be 5 percent minimum and 8.3 percent maximum but shall not require the ramp length to exceed 15.0 ft (PROWAG R304.2.2).	COB Std Plans CG-260, CG-265, and CG-275 show sidewalk cross slope crossing driveways as 1.5% maximum. COB Std Plan CG-260 shows ramp running slope in driveway sections as 1:12 (8.3%). COB Std Plan CG-270 shows driveway restoration sawcut requirements.	Add note to COB Std Plan CG-260 that states "Ramp running slope shall not require the ramp length to exceed 15 feet. When applying the 15-foot maximum length, the running slope of the curb ramps is allowed to exceed 8.3%. Use a single constant slope from the bottom of ramp to top of ramp. Documentation of the use of 15-foot max length as means for meeting standards to the Maximum Extent Feasible is required." Add 1.5% maximum cross slope requirement to COB Std Plan CG-270.
		Ramps	
Ramp Width	The clear width of a ramp run and, where handrails are provided, the clear width between handrails shall be 3.0 ft minimum (PROWAG R407.4 & ADAS 405.5).	Not mentioned.	Within COB DG section 4-13 include a reference to WSDOT Design Manual Chapter 1510.15(2) for access ramp requirements.
Running Slope	Ramp runs shall have a running slope between 5 percent minimum and 8.3 percent maximum (PROWAG R407.2)	Not mentioned.	Within COB DG section 4-13 include a reference to WSDOT Design Manual Chapter 1510.15(2) for access ramp requirements.
	Ramp runs shall have a running slope not steeper than 1:12. In existing sites, buildings, and facilities, ramps shall be permitted to have running slopes steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to space limitations (ADAS 405.2).		
Cross Slope	The cross slope of ramp runs shall be 2 percent maximum (PROWAG R407.3).	Not mentioned.	Within COB DG section 4-13 include a reference to WSDOT Design Manual Chapter 1510.15(2) for
	Cross slope of ramp runs shall not be steeper than 1:48. (ADAS 405.3)		access ramp requirements.
Rise	The rise for any ramp run shall be 2.5 ft maximum (PROWAG R407.4 & ADAS 405.6).	Not mentioned.	Within COB DG section 4-13 include a reference to WSDOT Design Manual Chapter 1510.15(2) for access ramp requirements.

Design Element	Requirement	Review	Recommendations
Landing Size	Ramps shall have landings at the top and the bottom of each ramp run (PROWAG R407.6 & ADAS 405.7).	Not mentioned.	Within COB DG section 4-13 include a reference to WSDOT Design Manual Chapter 1510.15(2) for
	The landing clear width shall be at least as wide as the widest ramp run leading to the landing (PRWOAG R407.6.2 & ADAS 405.7.2)		access ramp requirements.
	The landing clear length shall be 5.0 ft long minimum (PROWAG R407.6.3 & ADAS 405.7.3)		
	Ramps that change direction between runs at landings shall have a clear landing 5.0 ft by 5.0 ft minimum (PROWAG R407.6.4 & ADAS 405.7.4).		
Landing Slope	Landing slopes shall be 2 percent maximum in any direction (PROWAG R407.6.1 & ADAS 405.7.1).	Not mentioned.	Within COB DG section 4-13 include a reference to WSDOT Design Manual Chapter 1510.15(2) for access ramp requirements.
		Stairways	
Stairway Treads and Risers	All steps on a flight of stairs shall have uniform riser heights and uniform tread depths. Risers shall be 4 in high minimum and 7 in high maximum. Treads shall be 11 in deep minimum (PROWAG R408.2 & ADAS 504.2).	Not mentioned.	Within COB DG section 4-13 include requirements for riser and tread dimensions for stairways.
	Open risers are not permitted (PROWAG R408.3 & ADAS 504.3).		
	The radius of curvature at the leading edge of the tread shall be 0.5 in maximum. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. The permitted projection of the nosing shall extend 1.5 in maximum over the tread below (PROWAG R408.5 & ADAS 504.5).		
		Handrails	
Handrails	Stairways shall have handrails (PROWAG R408.6). Handrails are required on ramp runs	COB Std Plans MS-1010 – MS- 1025 show 3'-6" pedestrian handrail height to top of gripping surface. COB DG section 4-13.12 Pedestrian Handrail requires a steel handrail on top of rock retaining walls.	Within COB DG section 4-13.12 reference WSDOT Design Manual Chapter 1510.15(3) for handrail
	with a rise greater than 6 in and on certain stairways (PROWAG R407.8 & ADAS 405.8).		requirements. Revise COB Std Plans MS-1010 – MS-1025 to show 2.8' minimum and
	Edge protection complying shall be provided on each side of ramp runs and landings (PROWAG R407.9 & ADAS 405.9).		3.2' maximum pedestrian handrail height to top of gripping surface.
	Where required handrail shall be provided on both sides of ramps and		

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Design Element	Requirement	Review	Recommendations
	stairways (PRWOAG R409.2 & ADAS 505.2).		
	Top of gripping surfaces of handrails shall be 2.8 ft minimum and 3.2 ft maximum vertically above walking surfaces, ramp surfaces, and stair nosings. Handrails shall be at a consistent height above walking surfaces, ramp surfaces, and stair nosings (PROWAG R409.4 & ADAS 505.4).		
	Clearance between handrail gripping surfaces and adjacent surfaces shall be 1.5 in minimum (PROWAG R409.5 & ADAS 505.5).		
	Handrail gripping surfaces shall be continuous along their length and shall not be obstructed along their tops or sides. The bottoms of handrail gripping surfaces shall not be obstructed for more than 20 percent of their length. Where provided, horizontal projections shall occur 1.5 in minimum below the bottom of the handrail gripping surface (PROWAG R409.6 & ADAS 505.6).		
Handrail Extension on Ramps	Ramp handrails shall extend horizontally above the landing for 1.0 ft minimum beyond the top and bottom of ramp runs. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent ramp run. (PROWAG R409.10.1 & ADAS 505.10.1).	Not mentioned.	Within COB DG section 4-13.12 reference WSDOT Design Manual Chapter 1510.15(3) for handrail requirements.
Handrail Extension on Stairways	At the top of a stair flight, handrails shall extend horizontally above the landing for 1.0 ft minimum beginning directly above the first riser nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight (PROWAG R409.10.2 & ADAS 505.10.2).	Not mentioned.	Within COB DG section 4-13.12 reference WSDOT Design Manual Chapter 1510.15(3) for handrail requirements.
	At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance at least equal to one tread depth beyond the last riser nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight. (PROWAG R409.10.3 & ADAS 505.10.3).		
Handrail Cross Section	Handrail gripping surfaces with a circular cross section shall have an outside diameter of 1.25 in minimum and 2 in maximum (PROWAG R409.7.1 & ADAS 505.7).	COB Std Plan MS-1012 and MS- 1014 includes TS4x2x3/16" handrail dimensions.	Revise COB Std Plan MS-1012 and MS-1014 handrail cross sections to meet 4in-6.25in perimeter cross-section.

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Design Element	Requirement	Review	Recommendations
	Handrail gripping surfaces with a non-circular cross section shall have a perimeter dimension of 4 in minimum and 6.25 in maximum, and a cross-section dimension of 2.25 in maximum (PROWAG R409.7.2 & ADAS 505.7).	COB Std Plan MS-1020 includes 2" diameter schedule 40 pipe handrail dimensions.	Add a reference to follow WSDOT Design Manual Chapter 1510.15(3) for handrail requirements.
		Railways	
Railroad Flangeway Gaps	Flangeway gaps at pedestrian atgrade rail crossings shall be 2.5 in maximum or non-freight rail track and 3 in maximum on freight rail track (PROWAG R302.7.4).	COB DG 4-13.30.3.C requires crossing to be a right angle with roadway approach at same elevation as top of rails.	Add reference to follow WSDOT Design Manual Chapter 1510.13 for at-grade railroad crossing requirements in COB Section 4- 13.15.
	Where a circulation path serving boarding platforms crosses tracks, it shall comply with 402. Openings for wheel flanges shall be permitted to be 2 1/2 inches maximum (ADAS 810.10).		
Detectable Warning Surfaces at Rail Crossings	At pedestrian at-grade rail crossings not located within a street or highway, detectable warning surfaces shall be placed on each side of the rail crossing. The edge of the detectable warning surface nearest the rail crossing shall be 6.0 ft minimum and 15.0 ft maximum from the centerline of the nearest rail. Where pedestrian gates are provided, detectable warning surfaces shall be placed on the side of the gates opposite the rail. (PROWAG R305.2.5).	Not mentioned.	Add reference to follow WSDOT Design Manual Chapter 1510.13 for at-grade railroad crossing requirements in COB Section 4- 13.15.
Detectable Warning Surfaces at Rail Boarding Areas	At boarding platforms for rail vehicles, detectable warning surfaces shall be placed at the boarding edge of the platform (PROWAG R305.2.6). At boarding and alighting areas at sidewalk or street level transit stops for rail vehicles, detectable warning surfaces shall be placed at the side of the boarding and alighting area facing the rail vehicles (PROWAG R305.2.7).	Not mentioned.	Add reference to follow WSDOT Design Manual Chapter 1510.13 for at-grade railroad crossing requirements in COB Section 4- 13.15.

Design Element	Requirement	Review	Recommendations
	stairways (PRWOAG R409.2 & ADAS 505.2).		
	Top of gripping surfaces of handrails shall be 2.8 ft minimum and 3.2 ft maximum vertically above walking surfaces, ramp surfaces, and stair nosings. Handrails shall be at a consistent height above walking surfaces, ramp surfaces, and stair nosings (PROWAG R409.4 & ADAS 505.4).		
	Clearance between handrail gripping surfaces and adjacent surfaces shall be 1.5 in minimum (PROWAG R409.5 & ADAS 505.5).		
	Handrail gripping surfaces shall be continuous along their length and shall not be obstructed along their tops or sides. The bottoms of handrail gripping surfaces shall not be obstructed for more than 20 percent of their length. Where provided, horizontal projections shall occur 1.5 in minimum below the bottom of the handrail gripping surface (PROWAG R409.6 & ADAS 505.6).		
Handrail Extension on Ramps	Ramp handrails shall extend horizontally above the landing for 1.0 ft minimum beyond the top and bottom of ramp runs. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent ramp run. (PROWAG R409.10.1 & ADAS 505.10.1).	Not mentioned.	Within COB DG section 4-13.12 reference WSDOT Design Manual Chapter 1510.15(3) for handrail requirements.
Handrail Extension on Stairways	At the top of a stair flight, handrails shall extend horizontally above the landing for 1.0 ft minimum beginning directly above the first riser nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight (PROWAG R409.10.2 & ADAS 505.10.2).	Not mentioned.	Within COB DG section 4-13.12 reference WSDOT Design Manual Chapter 1510.15(3) for handrail requirements.
	At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance at least equal to one tread depth beyond the last riser nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight. (PROWAG R409.10.3 & ADAS 505.10.3).		
Handrail Cross Section	Handrail gripping surfaces with a circular cross section shall have an outside diameter of 1.25 in minimum and 2 in maximum (PROWAG R409.7.1 & ADAS 505.7).	COB Std Plan MS-1012 and MS- 1014 includes TS4x2x3/16" handrail dimensions.	Revise COB Std Plan MS-1012 and MS-1014 handrail cross sections to meet 4in-6.25in perimeter cross-section.

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Design Element	Requirement	Review	Recommendations
	Handrail gripping surfaces with a non-circular cross section shall have a perimeter dimension of 4 in minimum and 6.25 in maximum, and a cross-section dimension of 2.25 in maximum (PROWAG R409.7.2 & ADAS 505.7).	COB Std Plan MS-1020 includes 2" diameter schedule 40 pipe handrail dimensions.	Add a reference to follow WSDOT Design Manual Chapter 1510.15(3) for handrail requirements.
		Railways	
Railroad Flangeway Gaps	Flangeway gaps at pedestrian atgrade rail crossings shall be 2.5 in maximum or non-freight rail track and 3 in maximum on freight rail track (PROWAG R302.7.4).	COB DG 4-13.30.3.C requires crossing to be a right angle with roadway approach at same elevation as top of rails.	Add reference to follow WSDOT Design Manual Chapter 1510.13 for at-grade railroad crossing requirements in COB Section 4- 13.15.
	Where a circulation path serving boarding platforms crosses tracks, it shall comply with 402. Openings for wheel flanges shall be permitted to be 2 1/2 inches maximum (ADAS 810.10).		
Detectable Warning Surfaces at Rail Crossings	At pedestrian at-grade rail crossings not located within a street or highway, detectable warning surfaces shall be placed on each side of the rail crossing. The edge of the detectable warning surface nearest the rail crossing shall be 6.0 ft minimum and 15.0 ft maximum from the centerline of the nearest rail. Where pedestrian gates are provided, detectable warning surfaces shall be placed on the side of the gates opposite the rail. (PROWAG R305.2.5).	Not mentioned.	Add reference to follow WSDOT Design Manual Chapter 1510.13 for at-grade railroad crossing requirements in COB Section 4- 13.15.
Detectable Warning Surfaces at Rail Boarding Areas	At boarding platforms for rail vehicles, detectable warning surfaces shall be placed at the boarding edge of the platform (PROWAG R305.2.6). At boarding and alighting areas at sidewalk or street level transit stops for rail vehicles, detectable warning surfaces shall be placed at the side of the boarding and alighting area facing the rail vehicles (PROWAG R305.2.7).	Not mentioned.	Add reference to follow WSDOT Design Manual Chapter 1510.13 for at-grade railroad crossing requirements in COB Section 4- 13.15.

Appendix H: MEF Template

Maximum Extent Feasible (MEF) Template – Public Right-of-Way Facilities

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Barrier Type fo	r MEF Evaluation
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□ New Construction Project - with proposed accessible route features requiring MEF evaluation
 □ Reconstruction Project - with existing accessible route barriers for MEF evaluation
 □ Isolated Accessible Route Barrier identified by Maintenance & Operations or public

Roadway/Accessible Route Parameters

- Roadway Classification:
- Design Speed/Posted Speed:
- Design Year ADT:
- Truck Percentage:
- Pedestrian related crash history:
- Facilities verified to be within right of way?:

Existing Pedestrian Facilities – general description (include a summary of the proposed pedestrian features throughout project, i.e. types of facilities, connections to existing facilities, etc.)

Pedestrian Design Standards – cover the following subjects:

- Discuss the criteria that apply to the pedestrian elements on the project that will be built to the Maximum Extent Feasible
- Include reference(s) to the appropriate PROWAG/ADA section(s) and Bellingham Public Works Standards [including revision date]

Alternative(s) analysis – were there alternatives considered and why were they not selected?

Proposal - cover the following subjects

- What features will remain that meet guidelines (Only applicable to features associated with barriers that are being evaluated for feasibility of removal, or justification being provided per the MEF process. For example, if an intersection has four corners and only one is altered to the MEF, only include information about that one corner)
- · What features are being built to guidelines
- What is being built to the maximum extent feasible

May 2021 | City of Bellingham

Justification

• Discussion of what constraints/challenges there are to meet full design level

Additional Benefits – examples include improving pedestrian connections, improved safety, better traffic operations, etc.

Attachments included:	
☐ Vic Map	
Plan Sheet(s), description:	
Feasibility /Justification Cost Estimate	
☐ Other:	

Additional Information:

New and reconstructed facilities should be constructed to ADA compliance to the Maximum Extent Feasible (MEF). When the facility can not be constructed to full compliance, it should be constructed in a way that provides the best user experience possible. The end user and the variety of mobility challenges users may face should be considered in each case.

The following is a list of attributes that have accessibility requirements for each facility type. Requirements for each attribute can be found in the City of Bellingham Public Works Development Guidelines and Improvement Standards. The attributes are listed in increasing order of importance in terms of constructing the facility to the maximum extent feasible. This list is meant to provide guidance into which order attributes should be altered to maintain maximum usability.

Sidewalks:

- Running slope
 - o Running slope compared to roadway slope
- Driveway running slopes
- Driveway cross-slopes
- Fixed and/or protruding obstacles
- Cross-slope
- Width

Curb Ramps:

- Roadway clear space
- Running slope
- Flare slope
- Presence, location, and dimensions of detectable warning surface
- Gutter Lip
- Presence and dimensions of turning space/landing
- Concurrent grade breaks
- Cross-slope
- Width

Crosswalk:

- Running slope
- Width
- Cross-slope

Railroad crossing:

- Presence, location, and dimensions of detectable warning surface
- Flangeway gap

Signal Push-buttons

- Location and placement per MUTCD?
- APS? See APS policy

Bus Stop

- Boarding area dimensions
- Bus shelter turning slope (if shelter is present)
- Boarding area cross-slope
- Boarding area running slope

Parking

- Signs and markings placement and color
- Vertical Clearance
- Parking space width
- Parking access aisle width and turning slope

Appendix I: APS Policy



City of Bellingham Public Works Department 104 W. Magnolia Street Bellingham, WA 98225

MEMORANDUM

TO: BRENT BALDWIN, PAUL REED, FREEMAN ANTHONY, JESSICA BENNETT, STEVE DAY,

CRAIG MUELLER, LARRY SCHOLTEN, SAM SHIPP

FROM: KIM BROWN

CC: CHAD SCHULHAUSER, ERIC JOHNSTON, MIKE OLINGER

SUBJECT: ACCESSIBLE PEDESTRIAN SIGNALS AND PUSHBUTTONS (APS) INSTALLATION

DATE: 10 NOVEMBER 2019

Intent:

Title II of the Americans with Disabilities Act (ADA) requires state and local governments to provide "effective communication" for those using or accessing public programs, services, and activities. For pedestrians living with visual and/or hearing impairments, audible and vibrotactile communication may be provided by means of Accessible Pedestrian Signals and Pushbuttons (APS) at signalized intersections. These signals can provide information in an "effective" or accessible format to assist in making signalized street crossings easier to use for all pedestrians.

Purpose:

The purpose of this policy is to establish reasonable and consistent policy for installing APS.

Policy:

The City of Bellingham will install APS under the following conditions:

- New construction: All new construction of traffic signal projects, including HAWK signals, requires installation of APS when pedestrian signals are installed.
- Alteration: Existing pedestrian signals shall be upgraded to APS when the signal controller and software are altered or any individual signal or pedestrian head is replaced.
- Citizen requests: Individuals living with disabilities or those who directly care for
 individuals living with disabilities can request installation of APS at signalized
 intersections, including HAWK signals. Requests will be logged and considered for
 improvement outside of a new construction or alteration project.
- In addition to the above conditions, signalized intersections will be retrofitted with APS according to the City's ADA Transition Plan prioritization process.

Technical Requirements:

APS shall be installed in compliance with technical requirements specified in Section 4E.08 through 4E.13 of the 2009 Manual on Uniform Traffic Control Devices (MUTCD) and Section R403 of the Proposed Guidelines for Pedestrians Facilities in the Public Right of Way (PROWAG DRAFT 2011).

